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## **I. WISDOT STATEMENT OF NONDISCRIMINATION**

### **A. WisDOT Title VI Commitment**

The Wisconsin Department of Transportation (WisDOT) is committed to providing compliance with Title VI of the Civil Rights Act of 1964 so that, no person in the United States shall, on the grounds of race, color or national origin be excluded from participation in, be denied the benefits of, or be otherwise subjected to discrimination under any program or activity for which WisDOT receives federal financial assistance from the U.S. Department of Transportation, including the Federal Highway Administration.

### **B. WisDOT Title VI Policy**

Title VI of the Civil Rights Act of 1964 prohibits discrimination on the basis of race, color, and national origin in all federally-assisted programs. The Federal-aid Highway Act of 1973 added sex as a protected status in all Federal Highway Administration activities. The scope of Title VI was clarified by the Civil Rights Restoration Act of 1987, effective March 22, 1988, which added Section 606, expanding the definition of the terms "programs or activities" to include all of the operations of an educational institution, government entity, or private employer that receives federal funds if any one operation receives federal funds.

WisDOT is a state governmental entity. It is the policy of WisDOT to ensure compliance with Title VI of the Civil Rights Act of 1964 and related statutes and regulations in all programs and activities. WisDOT will take all steps to ensure that no person or groups of persons shall, on the grounds of race, color or national origin be excluded from participation in, be denied the benefits of, or be otherwise subjected to discrimination under any program or activity administered by WisDOT, its subrecipients, and contractors.

All administrators, bureau directors, section chiefs, supervisors, and other WisDOT employees are hereby delegated the responsibility to implement the WisDOT Title VI Policy and Title VI Implementation Plan in their work areas, to include the responsibility to develop and implement procedures and guidelines which would adequately help execute and monitor their programs.

WisDOT recognizes the need for continuous Title VI Training for WisDOT personnel in order to promote and achieve successful implementation of the WisDOT Title VI Policy and Title VI Implementation Plan.

The WisDOT Title VI Program Coordinator is granted the authority to monitor, promote, and direct the implementation of the WisDOT Title VI Program, Policy, and Implementation Plan.

Any individual who believes that he or she has been discriminated against, in violation of Title VI or related statutes, under any WisDOT program or activity should contact the Title VI Program Coordinator at (608) 266-8129 or <http://wisconsindot.gov/Pages/doing-bus/civil-rights/titlevi-ada/default.aspx>.

## **II. TITLE VI OFFICE STAFFING AND ORGANIZATION**

### **A. OBOEC Director**

Lea Collins-Worachek is the Director of the Office of Business Opportunity and Equity Compliance (OBOEC) and oversees the Title VI Program. The OBOEC Director is also the chair of the Title VI Managing Committee.

### **B. Title VI Program Coordinator**

Taqwanya Smith is the Title VI Program Coordinator and is responsible for monitoring program areas and subrecipients, processing complaints, providing technical assistance, and staffing the Title VI Managing Committee.

### **C. Title VI Staff General Duties**

Title VI Program Coordinator meets regularly with the OBOEC Director to administer the Title VI Program. Issues covered in these meetings are the Title VI Implementation Plan, Title VI Goals and Accomplishments Report, Title VI training, complaint processing, FHWA Subrecipient Title VI Assurances and Implementation Plan Agreement, and the Title VI Managing Committee. The OBOEC Director shares these issues with the DTSD Deputy Administrator for the Bureaus and brings them to the WisDOT Board of Directors, as necessary.

Annually, the Title VI Program is responsible for submitting the Title VI Implementation Plan and Title VI Goals and Accomplishments Report to the FHWA Wisconsin-Division Office.

**III. TITLE VI MANAGING COMMITTEE**

**A. Purpose**

The purpose of the Title VI Managing Committee is to provide an interdisciplinary approach to fulfilling Title VI requirements for the overall agency. The Managing Committee is currently made up of the following members:

**B. Membership**

<b><i>Voting Members</i></b>	
Lea Collins-Worachek, Chair	Office of Business Opportunity & Equity Compliance
Carolyn Amegashie	Division of Transportation System Development
Jada Bigham	Federal Highway Administration
Julie Goldsmith	Division of Motor Vehicles
Dan Graff	Office of General Counsel
Major Cedric Rembert	Division of State Patrol
Rodney Saunders, Jr.	Division of Budget and Strategic Initiatives
Becky Soderholm	Division of Transportation Investment Management
Charles Wade	Division of Transportation Investment Management
Vacant	Division of Business Management
<b><i>Committee Staff</i></b>	
Taqwanya Smith	Title VI Program Coordinator

**C. FFY 2022 Accomplishments**

- New committee member orientation conducted for the DMV and DSP representatives.
- Received a presentation on the WisDOT Equity and Inclusion Plan from the Equity, Inclusion, and Workforce Program Manager.
- Received a presentation on the WisDOT Language Access Plan and “Commonly Spoken Foreign Languages in Wisconsin” interactive map.

**D. FFY 2023 Goals**

- Update the Title VI online training module.

#### IV. PROGRAM AREA REVIEWS

WisDOT reviewed the Planning program area in FFY 2022. The results of the review are listed below. WisDOT will review 1 program area in FFY 2023.

##### A. Purpose of the review

To determine how well WisDOT's Planning Program's policies and procedures follow Title VI requirements to involve Title VI and LEP populations in decision-making processes.

##### B. Scope of review

The review will examine Title VI, LEP, and Public Involvement/Outreach manuals, standard operating procedures, policies, plans, procedures; demographic data; and information disseminated to the public from FFY 2018 to FFY 2021.

##### C. Expected Results

Completed report with recommendations and best practices as warranted. The report and its recommendations will be shared with the Planning Program that will lead to ongoing improvements in the program's decision-making processes.

##### D. Team Members

Team Members	Agency	Title
Taqwanya Smith	WisDOT/OBOEC	Title VI Program Coordinator
Lea Collins-Worachek	WisDOT/OBOEC	Director
Charles Wade	WisDOT/BPED	Bureau Director
Alex Gramavot	WisDOT/BPED	Planning Section Chief

##### E. Background

The Planning Program resides in the Planning Section of the Bureau of Planning and Economic Development in the Division of Transportation Investment Management. Planning Section staff include 1 section chief/manager and 7 planners. The Planning Program is responsible for statewide planning, and metro and regional planning assistance. The Planning Program is responsible for the department's statewide, long-range transportation plan and statewide modal plans (State Freight Plan, Rail Plan, and Active Transportation Plan) with one exception. The State Airport System Plan is produced by the Bureau of Aeronautics, Airport Program Section which also resides in the Division of Transportation Investment Management. In addition to the modal plans, the Planning Program also coordinates the development of the Strategic Highway Safety Plan, Transportation Asset Management Plan, and assists in the development of the ADA Transition Plan, all of which are statewide plans.

##### F. Review Areas

1. Title VI
  - a. Regulation - 23 CFR 200.9(b)(5).

Develop a program to conduct Title VI reviews of *program areas*.

b. Data Collection and Analysis

Requirement	Action	Where	Commendation/ Recommendation
Signed Standard DOT Title VI Assurances by WisDOT Secretary	The WisDOT Office of Business Opportunity and Equity Compliance is responsible for the Title VI Implementation Plan and signed assurances.	WisDOT website	Commendable
Title VI Implementation Plan	The WisDOT Office of Business Opportunity and Equity Compliance is responsible for the Department's Title VI Implementation Plan.	WisDOT website	Commendable
Notice of Nondiscrimination to the public	The WisDOT Office of Business Opportunity and Equity Compliance is responsible for the Notice of Nondiscrimination. The Notice is provided in English, Spanish, and Hmong.	WisDOT website	Commendable
Title VI complaint form, policy, and procedure	The WisDOT Office of Business Opportunity and Equity Compliance is responsible for the Title VI complaint form, policy, and procedure. The complaint form is on the WisDOT website. The complaint policy and procedure are provided in the Department's Transportation Administrative Manual (TAM DIV 102).	WisDOT website and intranet	Commendable
Title VI complaint log	The WisDOT Office of Business Opportunity and Equity Compliance is responsible for the Department's Title VI complaints log.	OBOEC files	Recommendation

The Planning Program did not receive any complaints, investigations or lawsuits within the past 5 years. The Planning Program did not have any compliance reviews within the past 5 years.

If the Planning Program receives a Title VI complaint, the program will follow the procedures in TAM DIV 102 – Title VI/Nondiscrimination Complaint Intake Procedure.

Metropolitan Planning Organizations (MPOs) provide annual certifications and assurances in their work program (Unified Planning Work Program) which includes Title VI. MPOs also include a link or copy of their Title VI Plan in their Transportation Improvement Program, Appendix A, Certifications.

Recommendation: The Planning Program will inform its staff members of the Title VI complaint procedure in TAM DIV 102 in the event that they receive a Title VI complaint.

- 2. Limited English Proficiency (LEP)
  - a. Regulation - 23 CFR 200.9(b)(12)

Develop Title VI information for dissemination to the general public and, where appropriate, in languages other than English.

- b. Data Collection and Analysis

<b>Requirement</b>	<b>Action</b>	<b>Commendation/ Recommendation</b>
Four-factor analysis	The Planning Program did not perform any language needs assessments.	Recommendation
Language Access Plan	The Planning Program does not have a language access plan.	Recommendation
Method(s) used to provide language translation	The Planning Program provided translators through a consultant contract with HNTB for the statewide, long-range plan. The Planning Program also provided translation services through the statewide DOA contract for the statewide, long-range plan.	Commendable
Method(s) used to provide language interpretation	The Planning Program provided ASL interpretation for an individual to attend a webinar.	Commendable
Information disseminated in languages other than English	Transportation trends factsheets in Spanish and Hmong. Plan overview factsheet in English and Spanish. Equity factsheet in English and Spanish. Plan summary brochure in English and Spanish. Printable comment form in English and Spanish. Social media audio clips explaining the goals and objectives in English and Spanish. Website included an accessibility widget and users could select their preferred language. Downloadable materials in English, Spanish, and Hmong. LEP notice in Spanish and Hmong. Email notification of toolkit in English and Spanish. Email notification of plan summary materials in English and Spanish. Provision of translations and translated materials into other languages available upon request to the public.	Commendable

The statewide, long-range transportation plan was designed so that it could be read entirely online with a reader including Google Translate. The online format was designed to be translatable by Google.

The Planning Program conducted outreach to disability advocacy organizations and incorporated their feedback into the planning process. The Planning Program provided American Sign Language (ASL) interpretation upon request for an individual to attend a webinar.



Recommendations:

- The Planning Program will use the four-factor analysis in the OBOEC/Title VI Language Access Plan to determine its vital documents that should be provided in other languages.
- The Planning Program will utilize its bilingual staff to determine whether Google Translate is translating its products accurately.

3. Public Involvement and Outreach

a. Regulation

1. 49 CFR 21.9(b)

In general recipients should have available for the Secretary *racial and ethnic data* showing the extent to which members of minority groups are beneficiaries of programs receiving Federal financial assistance.

2. 23 CFR 200.9(b)(4)

Develop procedures for the collection of statistical data (*race, color, religion, sex, and national origin*) of participants in, and beneficiaries of State highway programs, i.e., *relocatees, impacted citizens and affected communities*.

b. Data Collection and Analysis

<b>Requirement</b>	<b>Action</b>	<b>Commendation/ Recommendation</b>
Public Involvement or Participation Plan	The Planning Coordination Document describes and identifies strategies the Planning Program uses during the development of the statewide, long-range transportation plan to engage members of the public, stakeholders, and EJ populations. The Planning Coordination Document also includes public involvement plans for multiple planning efforts.	Commendable
Collection of demographic data of public meeting participants	Collected demographic data from online survey respondents. Respondents: 4.2% - Hispanic/Latino, Asian, Black or African-American, American Indian or Alaska Native and 76.6% - White. Demographic maps used in Freight Plan, Rail Plan, and Long-Range Plan. EJ analysis performed in Freight and Rail Plans.	Commendable
Information disseminated to the public	Surveys, factsheets, website, online survey, online public comment form, virtual open house, social media platforms, stakeholder webinars, public comment dashboard, stakeholder toolkit for stakeholder groups, email notifications, and press release. Educational and informational videos, outreach communications infographics, videos, maps, and charts. Encouraged stakeholders to use their contact lists to disseminate information and surveys, and leverage stakeholders' local contacts.	Commendable

Outreach to Title VI and LEP populations	Specific organizations that advocate for minority, low-income, senior, disabled, and non/limited English populations were identified and added to the stakeholder database to receive plan-related notifications. Targeted social media ads for low-income, racial minority, rural, and Spanish-speaking populations. Equity factsheet. Email notifications sent to stakeholder database of 577 contacts throughout the state with special attention paid to groups advocating for/or representing EJ populations.	Commendable
Advisory Committee membership lists	Freight Advisory Committee membership list is available on the WisDOT website.	N/A

The Planning Program Coordination Document outlines the process by which the Planning Program will coordinate with various parties during the development of required planning products and other select programs. Modal plans and other statewide plans follow the statewide, long-range transportation plan public involvement process, where appropriate. If requirements are in place for a modal plan that guide the public involvement process, those requirements are followed. The Public Involvement Plan provides outreach to the public and stakeholders including advocacy groups, major businesses within the state, public ports, freight shippers, private providers of transportation (including intercity bus operators), and others.

The Planning Coordination Document/Public Involvement Plan (PIP) provides outreach to Environmental Justice (EJ) populations by identifying EJ populations and stakeholders; conducting an EJ analysis; identifying EJ stakeholder groups or stakeholder groups who can help access EJ populations; leveraging stakeholders' capabilities to reach and engage low-income populations in their areas; holding meetings at transit-accessible locations, when available; targeted communications; providing translators upon request; and translating materials into other languages upon request.

For the statewide, long-range transportation plan, the Planning Program used the stakeholder database to target stakeholders by different types, such as local grassroots organizations. Stakeholders then forwarded the information to their constituents. The Planning Program also worked with the Office of Public Affairs to target social media ads on Facebook.

The Planning Program is responsible for the Freight Advisory Committee. The Committee is comprised of representatives from industry, agriculture, logistics, warehousing, economic development, and transportation sectors.

Recommendation: OBOEC will provide recommendations to the Planning Program on demographic data collection at public involvement meetings.

**V. SUBRECIPIENT REVIEWS**

WisDOT reviewed the Southeastern Wisconsin Regional Planning Commission in FFY 2022. The results of the review are listed below. WisDOT will review 1 subrecipient in FFY 2023.

**A. Purpose of the review**

To determine how well SEWRPC’s policies and procedures follow the Title VI requirements to involve Title VI and LEP populations in decision-making processes.

**B. Scope of review**

The review will examine Title VI, LEP, and Public Involvement/Outreach manuals, standard operating procedures, policies, plans, procedures; demographic data; and information disseminated to the public from FFY 2018 to FFY 2021.

**C. Expected Results**

Completed report with recommendations and best practices. The report and its recommendations will be shared with SEWRPC that will lead to ongoing improvements in the agency’s decision-making processes.

**D. Team Members**

<b>Team Members</b>	<b>Agency</b>	<b>Title</b>
Taqwanya Smith	WisDOT/OBOEC	Title VI Program Coordinator
Lea Collins-Worachek	WisDOT/OBOEC	Director
Benjamin McKay	SEWRPC	Interim Executive Director
Elizabeth Larsen	SEWRPC	Title VI Coordinator
Jennifer Sarnecki for Nakeshia Payne	SEWRPC	Principal Transportation Planner; Public Involvement and Outreach Manager unable to attend onsite review.

**E. Background**

The Southeastern Wisconsin Regional Planning Commission (SEWRPC) is the metropolitan planning organization for the SE Region. The SE Region is comprised of 7 counties: Kenosha, Milwaukee, Ozaukee, Racine, Walworth, Washington, and Waukesha. It is the official area-wide planning agency for land use and infrastructure in the SE Region. It is the largest of the 9 regional planning commissions in Wisconsin. SEWRPC covers a population of 2.05 million (35% of Wisconsin’s population).

**F. Review Areas**

- 1. Title VI
  - A. Regulation
    - 1. 49 CFR 21.7(a)(1)

Every application for Federal financial assistance to which this part applies, except an application to which paragraph (b) of this section applies, and every application for Federal financial assistance to

provide a facility shall, as a condition to its approval and the extension of any Federal financial assistance pursuant to the application, contain or be accompanied by, an assurance that the program will be conducted or the facility operated in compliance with all requirements imposed by or pursuant to this part. Every award of Federal financial assistance shall require the submission of such an assurance.

2. 23 CFR 200.9(b)(7)

Conduct Title VI reviews of cities, counties, consultant contractors, suppliers, universities, colleges, planning agencies, and other recipients of Federal-aid highway funds.

B. Data Collection and Analysis

Requirement	Action	Where	Commendation/ Recommendation
Signed Standard DOT Title VI Assurances by Executive Director	Assurances were signed by the Executive Director for FFYs 2020 and 2021.	WisDOT/OBOEC files	Commendable
Signed Title VI Subrecipient Implementation Plan Agreement by Executive Director	The WisDOT/FHWA Subrecipient Title VI Program Agreement was signed by the Executive Director for FFY 2021.	WisDOT/OBOEC files	Commendable
Notice of Nondiscrimination to the public	SEWRPC provides a Notice of Nondiscrimination with Spanish and Hmong taglines.	SEWRPC website	Commendable. Notice moved from "About Us" page to home page.
Title VI complaint form, policy, and procedure	SEWRPC has a Title VI complaint form and procedure.	SEWRPC website	Commendable
Title VI complaint log	SEWRPC maintains a Title VI complaint log.	SEWRPC Title VI Coordinator	Commendable

No complaints were received by SEWRPC within the past 5 years. SEWRPC underwent a federal certification review by FHWA and FTA on August 25-26, 2020. The Transportation Management Area Planning Certification Review included a civil rights section (Title VI, LEP, EJ, and ADA) and recommendations. The review examined SEWRPC's website, Title VI Plan, Public Participation Plan, Environmental Justice Task Force charter, public involvement/outreach accomplishments, public involvement quantitative evaluation, and agency organizational structure. The review found that SEWRPC meets and exceeds federal planning requirements.

Recommendation: None.

2. Limited English Proficiency (LEP)

A. Regulation - 23 CFR 200.9(b)(12)

Develop Title VI information for dissemination to the general public and, where appropriate, in languages other than English.

B. Data Collection and Analysis

Requirement	Action	Commendation/ Recommendation
Four-factor analysis	Conducted a four-factor analysis in 2020.	Commendable
Language Access Plan	Developed a Language Access Plan in 2020.	Commendable
Method(s) used to provide language translation	SEWRPC worked with community partners, hired consultants, and has a bilingual staff member.	Commendable
Method(s) used to provide language interpretation	SEWRPC worked with community partners, hired consultants, provided ASL interpretation, and has a bilingual staff member.	Commendable
Information disseminated in languages other than English	Presentations in Spanish, surveys in Spanish, factsheets in Spanish, social media posts in Spanish, business letters in Spanish, meeting flyers in Spanish, and newspaper notices in Spanish. A virtual public involvement meeting in Spanish only.	Recommendation

SEWRPC worked with community partners to provide language services at community meetings, i.e., the Hmong American Friendship Association. SEWRPC hired an agency to provide American Sign Language interpretation on 12 occasions. SEWRPC hired consultants and used in-house staff to provide language services. SEWRPC has replaced the consultant with a bilingual staff member. SEWRPC held a virtual public involvement meeting in Spanish and had an interpreter available by phone. SEWRPC provided examples of translated materials. SEWRPC provided a notice of the availability of sign language interpreters with 72 hours advance notice in newspaper advertisements.

SEWRPC provided an example of how the agency works with one of its community partners, the Hmong American Friendship Association. SEWRPC received feedback from the Association that documents for LEP populations should be less detailed and more public-friendly in nature. The Association also stated translating documents is not necessarily the best way to provide information to its members. The Association recommended that SEWRPC work with its members at in-person meetings and leave information with them at large meetings. SEWRPC has had good success working with the Association.

Recommendation: SEWRPC will provide in its meeting notices that both sign language interpreters and foreign language interpreters can be requested for its community meetings.

3. Public Involvement and Outreach

A. Regulation

1. 49 CFR 21.9(b)

In general recipients should have available for the Secretary *racial and ethnic data* showing the extent to which members of minority groups are beneficiaries of programs receiving Federal financial assistance.

2. 23 CFR 200.9(b)(4)

Develop procedures for the collection of statistical data (*race, color, religion, sex, and national origin*) of participants in, and beneficiaries of State highway programs, i.e., *relocatees, impacted citizens and affected communities*.

B. Data Collection and Analysis

Requirement	Action	Commendation/ Recommendation
Public Involvement or Participation Plan	Developed a Public Participation Plan in 2020.	Commendable
Collection of demographic data of public meeting participants	SEWRPC uses community meeting sign-in sheets and surveys to collect demographic data of participants.	Recommendation
Information disseminated to the public	Brochures, flyers, QR code postcards, comment cards, newsletters, direct mailings, email notices, news releases, paid advertisements, and SEWRPC website postings.	Commendable
Outreach to Title VI and LEP populations	Identified 9 community partners to work with that represent or work closely with low-income communities, minority communities, or people with disabilities. Newspaper notices in the Milwaukee Community Journal, an African-American newspaper.	Commendable
Advisory Committee membership lists	SEWRPC has 23 advisory committees. SEWRPC maintains a membership list for each committee. SEWRPC has an Environmental Justice Task Force.	Recommendation

SEWRPC has a Public Involvement and Outreach Division. The division is responsible for public participation plans and environmental justice plans.

SEWRPC collected demographic data of community meeting participants through meeting sign-in sheets. Different sign-in sheets were used at different meetings. A virtual meeting sign-in sheet collected name, email address, and city. A project contact list collected name, email address, zip code, and organization/affiliation. A meeting registrants list collected name, email address, zip code, organization/affiliation, ASL, and LEP. SEWRPC did not collect mailing or physical addresses of community meeting participants.

SEWRPC has identified 9 community partners to work with that represent or work closely with low-income communities, minority communities, or people with disabilities. Currently, these partners include Common Ground of Southeastern Wisconsin, Ethically Diverse Business Coalition, Hmong American Friendship Association, Independence *First*, Milwaukee Urban League, Renew Environmental Public Health Advocates Inc., Southside Organizing Committee, Urban Economic Development Association of Wisconsin, and Urban League of Racine and Kenosha.

SEWRPC has a formal distribution list of approximately 100 organizations. Approximately 53 of the organizations have been identified as primary organizations and a focus of targeted outreach efforts. The list of primary organizations is reviewed annually by the Environmental Justice Task Force.

SEWRPC has 23 advisory committees. The advisory committees have been around for a long time. Most committees include city and county officials, and agencies that are direct service providers or have technical expertise i.e., Regional Housing Plan Advisory Committee and Regional Food System Plan Advisory Committee. A few committees are extremely technically oriented. SEWRPC makes a conscious effort to include more individuals as committees are updated. The Advisory Committee on Regional Transportation Planning has the highest minority participation outside of the Environmental Justice Task Force.

The Public Involvement and Outreach Division is also responsible for the Environmental Justice Task Force (EJ Task Force). The EJ Task Force was established in 2007 and continues to meet quarterly, or as needed based on regional planning schedules. The primary role of the 15-member task force is to enhance the consideration and integration of environmental justice throughout the regional planning process. The EJ Task Force reviews all regional plans developed by advisory committees and provides feedback on regional planning documents. The EJ Task Force has a liaison to the other advisory committees. The EJ Task Force held a retreat in 2018, provided a report to community partners and primary organizations in 2019, and held meetings in 2021 and 2022. At the 2021 meeting, the EJ Task Force received a presentation on “Title VI and EJ in Transportation.” The EJ Task Force also produced a flyer for community partners, co-sponsored events and meetings, and conducted public outreach meetings.

SEWRPC annually evaluates the effectiveness of its outreach efforts and documents the outcome on its website.

Recommendations:

- SEWRPC will develop a standardized sign-sheet for community meetings that collect demographic data from participants.
- SEWRPC will send to WisDOT the demographic makeup of its advisory committees.
- WisDOT will provide recommendations to SEWRPC on demographic data collection at community meetings.

## **VI. TRAINING**

### **A. Title VI Staff**

The Title VI Program Coordinator completed the following trainings in FFY 2022.

- Minnesota DOT Peer Exchange “Public Engagement” session on October 27, 2021.
- Minnesota DOT Peer Exchange “Technology in Civil Rights” session on October 27, 2021.
- WisDOT/FHWA “Right-of-Way/Acquisition Training” course on June 13-14, 2022.

### **B. Title VI Liaisons**

2 new Title VI Managing Committee members completed the FHWA “Federal-aid Essentials for Local Public Agencies - Title VI/Nondiscrimination” training modules in FFY 2022.

### **C. Department Employees**

477 new WisDOT non-supervisory employees completed the “Title VI: Knowing Your Role” training in FFY 2022.

5 employees attended the “New FHWA Title VI Reviews for Subrecipients” presentation to the WisDOT/Bureau of Transit, Local Roads, Railroads, and Harbors/Local Roads Programs & Finance Section on January 26, 2022.

### **D. Department Supervisors and Managers**

13 new WisDOT supervisory employees completed the “Title VI: Knowing Your Role” training in FFY 2022.

### **E. Subrecipients**

40 MPO/RPC employees attended the “New FHWA Title VI Reviews for Subrecipients” presentation by the Title VI Program Coordinator during the quarterly MPO/RPC Directors’ meeting on October 26, 2021.



## **VII. TITLE VI COMPLAINTS**

### **A. Complaints**

The Title VI Program did not receive any Title VI complaints in FFY 2022. The Title VI Program received 4 ADA complaints in FFY 2022.

### **B. Technical Assistance**

The Title VI Program received 14 requests for technical assistance in FFY 2022. The basis for the requests are shown below.

- Title VI - 6
- ADA - 8

### **C. Status of complaints**

The status of the complaints received in FFY 2022 is listed below. Three complaints were forwarded to the National Highway Traffic Safety Administration (NHTSA) Office of Civil Rights for processing. One complaint was investigated by the Title VI Program.

- Referred to NHTSA – 3
- Investigated – 1
- Closed – 2
- Open - 2

The complaints log is available any time for inspection.

## **VIII. NATIVE AMERICAN INITIATIVES**

The WisDOT Office of Tribal Affairs works with Wisconsin's eleven federally recognized tribes to provide training, funding opportunities, and resources to the tribes on transportation and transportation-related issues.

WisDOT works in partnership with the College of the Menominee Nation and the Lac Courte Oreilles Ojibwa Community College to offer the National Summer Transportation Institute (NSTI). NSTI is a summer youth enrichment program designed to introduce middle and high school students to careers in the transportation industry with an emphasis on science, technology, engineering, and math. The Federal Highway Administration (FHWA) places special emphasis on offering this program in partnership with Historically Black Colleges and Universities, Hispanic-Serving Institutions, and Tribal Colleges. Wisconsin is one of two states in the country that offer this program with the tribal colleges within the state.

In 2022, WisDOT received \$90,000 in grant funding from FHWA to provide the NSTI program to both tribal colleges. Those funds were evenly distributed to both colleges at \$45,000 each, with WisDOT supplementing those funds with an additional \$30,000 for a total of \$75,000 per project. The accomplishments of the 2022 programs include the delivery of in-person and outdoor classroom and hands-on activities, presentations by transportation professionals, and field trips that focused on all modes of transportation including land, air, and water. The programs also produced driver safety and awareness public service announcements that were conceptualized, written, directed, and edited by student participants.

**IX. CORRECTIVE ACTION PLANS**

**A. Program Area Reviews**

- Work with selected program areas in collecting and analyzing data to identify and address any trends/patterns of discrimination in their respective bureaus.
- Explore training opportunities for WisDOT program areas to ensure compliance with Title VI, specifically in collecting Title VI data and analyzing the data to identify and address any trends/patterns of discrimination.
- Ensure operating or informational manuals include the required Title VI information and procedures to implement these requirements.

**B. Reviews Conducted**

Action Step	Timeline	Participants	Results
Review preceding FFY results	Q1 (Oct 1 – Dec 31)	Title VI Section	
Prepare corrective action plans if necessary	Q1 (Oct 1 – Dec 31)	Title VI Section	
Provide corrective action plans to program areas/subrecipients	Q2 (Jan 1 – Mar 31)	Title VI Section	
Identify program areas and subrecipients for reviews	Q2 (Jan 1 – Mar 31)	Title VI Section & OBOEC Director	

**C. Upcoming Reviews**

Action Step	Timeline	Participants	Results
Request and review documents	Q3 (Apr 1 – Jun 30)	Title VI Section	
Conduct desk audits	Q3 (Apr 1 – Jun 30)	Title VI Section & Program Areas/ Subrecipients	
Conduct onsite reviews	Q4 (Jul 1 – Sep 30)	Title VI Section & Program Areas/ Subrecipients	
Write results of reviews	Q4 (Jul 1 – Sep 30)	Title VI Section	

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