

FY2014 Title VI Accomplishments/FY2015 Work Plan

As part of the process for updating the West Virginia Department of Transportation/Division of Highways Title VI Plan, and in response to the Title VI Compliance review performed by the Federal Highway Administration; the following work plan has been established.

ACCOMPLISHMENTS – FY14

The Standard Title VI/Non Discrimination Assurances have been updated in accordance with the April 2013 guidance from USDOT.

The Title VI Coordinator conducted Title VI Training in each of the 10 Districts between January and March, 2014.

ANNUAL WORK PLAN – FY15

Monitoring Sub-Recipients

The process for monitoring sub-recipients will be revised according to feedback received as part of the 2014 FHWA Compliance Review. There are currently eight Metropolitan Planning Organizations within the State of West Virginia all of which receive limited funding for transportation planning or construction projects at the metropolitan and/or local level. Local Public Agencies have historically received funding, along with all other sub-recipients, through the WVDOT grant programs such as Transportation Enhancement, Safe Routes to School, Recreational Trails, National Scenic Byways, and Transportation, Community, and Systems Preservation Programs. Consistent with other WVDOT policies and procedures concerning funding, non-discrimination clauses are required in each signed agreement. The clause includes implementation procedures, reporting requirements, a complaint process and a description of potential sanctions for non-compliance. Additionally, the grantee/sub-recipient may be required to submit an annual report or undergo an on-site review. Utilizing a risk based approach; WVDOT will implement a sub-recipient monitoring program for funding in excess of \$250,000 to be used for transportation planning and construction projects. An on-site review conducted at least once during the life of project(s) meeting the \$250,000 threshold.

Training

WVDOT Planning Division hosts annual planning conferences that include representatives from each of the eight MPO's. Beginning with the October

2014 conference, Title VI Program Training and ADA Training will be a static component of the conference.

Human Resources, Legal and Civil Rights coordinate and provide annual Equal Opportunity Training to all employees. The 2014 training will introduce a Title VI component. By October 2015 in depth Title VI Program Training will be developed and will become an integral in the annual EO Training.

Data Collection

The process for monitoring major program areas will be revised according to feedback received as part of the 2014 FHWA Compliance Review. For the coming year, WVDOT will start to transition from a survey-based approach to an analytical-based approach in monitoring Program Areas. In support of fostering this transition, WVDOT will analyze the current data collection methodology to determine if elements within the existing modules can be modified and structured to accommodate the analytical model. WVDOT will also work with the different program areas to develop new questions to incorporate them into the analytical model. It is our hope that by engaging and soliciting feedback from the program areas, they will have a greater sense of ownership in the monitoring process. It will also allow WVDOT to develop a more focused approach in data collection and analysis.