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# Title VI Goals and Accomplishments Report

Federal Fiscal Year 2019  
October 1, 2018  
FHWA

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# Table of Contents

<b>TITLE VI PROGRAM POLICY STATEMENT</b> .....	<b>1</b>
<b>INTRODUCTION AND ASSURANCES</b> .....	<b>1</b>
<b>ORGANIZATION AND STRUCTURE</b> .....	<b>1</b>
FFY 2018 Accomplishments .....	1
Staffing.....	1
FFY 2019 Goals.....	2
<b>PROGRAM AREA REVIEWS AND SUB-RECIPIENT REVIEWS</b> .....	<b>2</b>
FFY 2018 Accomplishments.....	2
Title VI Program Area Review Survey .....	2
Areas of Strength.....	2
Identified Improvement Areas .....	3
MnDOT Districts Highlighted .....	3
Title VI Program Scorecards .....	4
FFY 2019 Goals.....	4
<b>TITLE VI TRAINING</b> .....	<b>5</b>
FFY 2018 Accomplishments.....	5
MnDOT’s Wildly Important Goal (WIG) 2.0.....	5
The Office of Civil Rights (OCR) and WIG 2.0 Activities .....	5
Figure 1. Graphic of the WIG, WIG Priorities, WIG Focus Areas, and Goals. ....	7
OCR Outreach and Education .....	8
Annual Compliance Reviews.....	8
Spot Checks .....	8
Pre-Bid & Pre-Construction Meetings.....	8
Tribal Employment Rights Ordinance Meetings.....	8
Commercially Useful Function Reviews .....	8
MnDOT DBE/Workforce Collaborative.....	9
Small Business Development and Workforce Supportive Services.....	9
Activities of the Title VI Specialist and Coordinator .....	10
Publications and Emails.....	10
FFY 2019 Goals.....	11
<b>COMPLAINT IDENTIFICATION AND INVESTIGATION</b> .....	<b>11</b>
FFY 2018 Accomplishments.....	11
FFY 2019 Goals.....	12

<b>DISSEMINATION OF INFORMATION .....</b>	<b>12</b>
FFY 2018 Accomplishments.....	12
Public Notice of Rights Under Title VI.....	12
Title VI Program Frequently Asked Question Documents.....	12
Public Involvement: Planning and Programming at MnDOT.....	12
State Aviation System Plan.....	13
Advancing Transportation Equity Initiative.....	13
MnDOT’s Public Engagement Policy.....	13
Metropolitan Planning Organizations (MPOs).....	13
Figure 2: Metropolitan Planning Organizations in Minnesota.....	14
FFY 2019 Goals.....	15
<b>LIMITED ENGLISH PROFICIENCY (LEP).....</b>	<b>15</b>
FFY 2018 Accomplishments.....	15
FFY 2019 Goals.....	15
<b>ENVIRONMENTAL JUSTICE.....</b>	<b>15</b>
FFY 2018 Accomplishments.....	15
FFY 2019 Goals.....	15
<b>STATE TRANSPORTATION AGENCY DIRECTIVES .....</b>	<b>15</b>
FFY 2018 Accomplishments.....	15
FFY 2019 Goals.....	16

## List of Appendices

- A: MnDOT’s signed USDOT Standard Title VI/Non-Discrimination Assurances (DOT Order 1050.2A)
- B: MnDOT Title VI Liaison List (FFY 2019)
- C: MnDOT Title VI Program Scorecard (MnDOT District 4)
- D: MnDOT Small Business Development and Workforce Supportive Services: Accomplishments and Goals (FFY 2018/19)
- E: MnDOT Articles with Themes of Title VI (Newslines)
- F: MnDOT Public Notice of Rights Under Title VI
- G: MnDOT Title VI Program Frequently Asked Question Documents (3)
- H: Characteristics and Details of Each MPO

## TITLE VI PROGRAM POLICY STATEMENT

The Title VI Program Policy Statement for Federal Fiscal Year (FFY) 2019 was signed by the Minnesota Department of Transportation (MnDOT) Commissioner and is located in the Title VI and Nondiscrimination Implementation Plan that was submitted to FHWA. The plan is available on [MnDOT's Title VI Website](#).

## INTRODUCTION AND ASSURANCES

MnDOT is a recipient of federal financial assistance. All recipients are required to comply with nondiscrimination laws and regulations, including Title VI of the Civil Rights Act of 1964, which forbids discrimination against any person in the United States because of race, color or national origin by any agency receiving federal funds.

The Federal Highway Administration (FHWA) requires recipients of federal financial assistance to prepare an annual implementation plan to clarify roles, responsibilities and procedures established to ensure compliance with Title VI of the Civil Rights Act of 1964. MnDOT's Title VI and Nondiscrimination Implementation Plan for FFY 2019 was submitted to FHWA in October 2018 and is available on [MnDOT's Title VI Website](#).

The Federal Transit Authority (FTA) also requires recipients of federal financial assistance to prepare a Title VI implementation plan. FTA requires submittal of the plan triennially. The MnDOT FTA Title VI Program Plan was submitted to FTA in April 2018 and is available on [MnDOT's Title VI Website](#).

This Goals and Accomplishments Report is prepared to satisfy the requirements under 23 CFR Part 200.9(b)(10). The report is organized in accordance with the elements of the annual Title VI implementation plan. Information on each element consists of a description of the accomplishments in FFY 2018 toward fulfilling such responsibilities and a list of goals or priorities for FFY 2019.

The United States Department of Transportation (USDOT) Standard Title VI/Non-Discrimination Assurances for FFY 2019 were signed by MnDOT's Commissioner and are attached as Appendix A.

## ORGANIZATION AND STRUCTURE

### FFY 2018 Accomplishments

#### *Staffing*

Title VI requirements necessarily touch and extend into every MnDOT district and office. Therefore, MnDOT's Title VI Program requires the appointment of a Title VI Liaison for each district and office. The Title VI Liaison is responsible for understanding and identifying Title VI issues, requirements, policies, and procedures; supplying Title VI guidance to internal and external stakeholders (or connecting to resources that can supply guidance); collecting data and reporting on Title VI activities and implementation; assisting with Title VI monitoring and compliance activities; and acting as a liaison to the Office of Civil Rights. The list of Title VI Liaisons is attached as Appendix B.

During FFY 2018, 2 new offices were added to the Title VI Liaison List. There are currently 54 Title VI Liaisons representing 37 districts and offices throughout the state.

## FFY 2019 Goals

- Continue to emphasize the importance of the involvement of MnDOT management in the Title VI Liaison role to ensure Title VI-related oversight is at the appropriate level.

## PROGRAM AREA REVIEWS AND SUB-RECIPIENT REVIEWS

### FFY 2018 Accomplishments

#### *Title VI Program Area Review Survey*

MnDOT monitors internal Title VI compliance by conducting annual reviews of program areas through the use of a Title VI Program Area Review Survey and Title VI Program Scorecards. If trends or patterns of discrimination are identified, MnDOT will take action to correct any violation. Trends may be identified through reoccurring activities, practices, or complaints.

The Title VI Specialist gathers information from Title VI Liaisons utilizing a Title VI Program Area Review Survey. The survey questions are grouped into major themes of MnDOT's Title VI Program, which include: general administrative information, environmental justice and continuous public engagement, limited English proficiency, accessibility, and internal education. Some specific questions within the major themes relate to complaints received, required postings, Title VI-related goals, the collection of demographic data, public outreach and involvement to historically underserved groups, document translation and the use of interpreters, contracts and agreements, employee Title VI awareness and training, and other related information.

In 2018, the survey questions and format were updated. For example, this year the survey was also used as a training tool. Prior to each set of questions were an introduction explaining the major themes within the Title VI Program followed by questions that contained more explanations and examples. In addition to educating the Title VI Liaisons who are responsible for completing the survey, this also allowed for improved and more accurate responses. The delivery method of the survey was updated from completing a fillable PDF to utilizing electronic survey software. This made the survey more user-friendly and allowed for more accurate response consolidation.

The survey was sent to 52 Title VI Liaisons representing 34 districts and offices throughout MnDOT. The survey was completed by 31 out of 34 districts and offices for FFY 2018.

#### **Areas of Strength**

100% of applicable districts and offices who responded conduct non-traditional methods of outreach to underserved persons and groups for their particular programs, projects, activities, services, or continuous and ongoing public engagement activities. Examples of non-traditional methods of outreach include: involving local community leaders, attending meetings for community groups and faith-based organizations, researching minority group cultures to be able to inform public engagement strategies, tailoring outreach to a group's preferred style of communication, developing partnerships on a one-on-one basis to ensure representation, contact with local community representatives to assist in engagement, etc.

Over 90% of applicable districts and offices who responded either translate vital documents or inform the public that the document is available in alternative languages upon request.

Almost 100% of districts and offices who responded format their public activities to encourage participation from individuals with disabilities. Examples include: holding less formal meetings; circulating at events to allow for informal and one-on-one discussions; utilizing technology to provide information, such as using videos to reach audiences who have difficulty reading or who have other accessibility concerns; etc.

Almost 100% of districts and offices attended trainings with themes relating to Title VI, such as public engagement, accessibility, environmental justice, the Disadvantaged Business Enterprise program, and recruiting diverse candidates to the highway heavy industry.

### **Identified Improvement Areas**

Conducting public engagement activities on an ongoing and continuous basis with the communities that our projects and activities serve. In doing this, relationships with underserved communities impacted by our projects and activities will improve.

Identifying and documenting primary language data of the individuals in the service area of the project or activity to ensure that the most common languages spoken are captured and recorded.

Ensuring that a record is maintained related to public engagement activities with underserved communities.

### **MnDOT Districts Highlighted**

#### **MnDOT District 7 Goals and Priorities**

MnDOT District 7 includes 13 Minnesota counties. District 7 adopted goals and priorities for FFY 2019 with themes of Title VI, which are outlined below.

- Establish a district-wide demographic report that includes racial/ethnic, primary language, and income data to be used as an internal educational tool to prepare staff to interact with citizens of various backgrounds and as a starting point for project-based community profiles. Included in the report will be a process for regular updating.
- Prepare a Community Profile for each programmed project added to the STIP during FFY 2019. This document will be similar to the district-wide demographic report but will be specific to the project area and will identify local resources that could be engaged on the project.
- Obtain signs explaining rights under Title VI that include the complete information in English and basic information in the most common languages spoken in the district. The sign will be posted in public spaces within the headquarter buildings, and additional laminated copies will be available to post at public meetings held offsite. Further, additional copies with complete information in the most common languages spoken will be available in the office upon request.
- Establish procedures to respond to requests for accommodation based on ADA or alternate language needs. This includes exploring translator apps for cell phones so that initial contacts can be made and other innovative approaches.

#### **MnDOT Metro District Engagement Plans**

MnDOT Metro District includes 8 Minnesota counties. Both Hennepin and Ramsey County within the Metro District are inclusive of the two most populous cities in the state of Minnesota, Minneapolis and St. Paul. Every project occurring with the Metro District has an Engagement Plan. The Engagement Plan includes information

about the project area such as demographics, languages spoken within schools, places of worship, businesses, and community groups. This information assists in gaining invaluable knowledge, insight, and assistance to be able to expand into the local communities. This also allows for local points of contact to pass along construction updates for the traveling public. [Click here for an infographic of the Rethinking I-94 Study Area.](#)

The Metro District also utilizes a [Public Engagement Toolkit](#) on all projects in the Metro District, which was initially developed for the Rethinking I-94 project. This Toolkit outlines an adaptable process that MnDOT project teams can use to develop project-specific plans for public engagement. It features a variety of engagement tools these teams can use as they build their engagement plans.

Engagement efforts within the Metro District to better reach underserved populations include: meeting with community leaders and members in their communities even when there is not an active project; partnering with local community groups to assist with MnDOT open houses, hiring events, and other outreach activities; serving on various committees led by community groups; participating in annual community events like Rondo Days, Pride Days, Dragon Race and Cinco de Mayo; and creating several tools to assist in identifying ways communities want to be engaged, such as the Public Engagement Toolkit, interactive maps, and zone profiles. [Click here for more.](#)

### *Title VI Program Scorecards*

In 2018, the MnDOT Office of Civil Rights created a Title VI Program Scorecard for district offices. The scorecards were developed from the responses received within the Title VI Program Area Review Surveys. The scorecards provide the opportunity for the Office of Civil Rights to report back to the districts on their performance within the major themes of the Title VI Program, and also allows the Title VI Specialist to share best practices across the organization and identify areas that need improvement. Finally, the scorecards establish a baseline for measuring the adequacy of the Title VI Program and capture historical data on MnDOT's compliance as an agency. A copy of a Title VI Program Scorecard is attached as Appendix C.

Following the dissemination of the scorecards, the Title VI Specialist held meetings with the district Title VI Liaisons to review their scorecards. This allowed the liaisons to provide feedback on the scorecards as well as an opportunity to ask any questions related to the Title VI Program. Feedback received by the liaisons will be incorporated into the next round of scorecards.

### **FFY 2019 Goals**

- Develop the second round of Title VI Program Scorecards for district offices based on the responses received in the surveys sent out in 2018.
- Develop Title VI Program Scorecards for other impacted offices within the agency such as Land Management, Maintenance, Communications, etc.
- Provide the MnDOT Title VI Public Notice of Rights in Spanish, Somali, and Hmong to Title VI Liaisons for posting.
- Conduct 1-2 sub-recipient desk audits of counties and/or cities.

## TITLE VI TRAINING

### FFY 2018 Accomplishments

#### *MnDOT's Wildly Important Goal (WIG) 2.0*

In August 2016, MnDOT kicked-off an agency-wide effort to accomplish WIG 2.0, Earning Customer Trust. The desired outcome is to improve trust and increase transparency through a customer-centered organization in which MnDOT engages customers, listens to, understands, and balances the diverse needs of all to achieve the best possible outcomes. WIG 2.0 efforts enhance MnDOT's Title VI Program.

WIG 2.0 Earning Customer Trust is scheduled to conclude in September 2018. MnDOT employees statewide are operating within workgroups to advance these important objectives. One priority area is Advancing Equity, with focus areas on workforce and small business contracting. The second priority area is Improving Intentional Customer Engagement, with focus areas on internal and external customer engagement. See Figure 1 for a graphic of the WIG, WIG Priorities, WIG Focus Areas, and Goals.

Measurements of success on WIG 2.0 will have a positive impact to the broader objectives and help MnDOT make progress on the overarching goal of Earning Customer Trust.

#### *The Office of Civil Rights (OCR) and WIG 2.0 Activities*

Throughout WIG 2.0, OCR has been active in an office-wide effort to respond to 100% of requests for advice, assistance, and participation on WIG 2.0 activities throughout the agency. Lead measures involve getting requests for information to the right individuals so they can be promptly and properly addressed. OCR participated on teams for several offices to help inform internal stakeholders about MnDOT's workforce and small business contracting programs.

Some achievements under this initiative during FFY 2018 are outlined below.

#### **Negotiated contracts with MnDOT Districts**

MnDOT exercised its statutory authority to create Negotiated Maintenance Contracts (NMCs). Using this method, MnDOT districts are able to break out scopes of work and solicit competitive quotes to award to the low bidder.

OCR also partnered with the Maintenance Office and Tribal Affairs to solicit Indian-owned NMCs. Under this effort, the first NMC was awarded to Red Lake Nation.

#### **ArcGIS**

The ArcGIS project identifies and maps certified DBE, TGB, and Veteran-owned businesses. OCR and other areas of MnDOT have assisted with identifying small businesses who may be eligible for certification to increase participation in bidding on smaller MnDOT projects. This activity will be incorporated into the day-to-day work of OCR's Business and Program Development team moving forward.

### **Quicker processing of DBE applications**

The goal for OCR's Small Business Contracting team was to process 85% of DBE applications within 60 days of receipt by the end of 2017. This goal allows eligible DBE firms to have their DBE certification prior to the beginning of the construction season and will improve internal and external customer service.

At the start of the effort, 65% of DBE applications were being processed within 60 days. To reach the goal, onsite visits of applicant firms were scheduled sooner which allowed more time to request and receive any required follow-up documentation. At the end of the effort, the goal was almost reached with 80% of DBE applications being processed within 60 days.

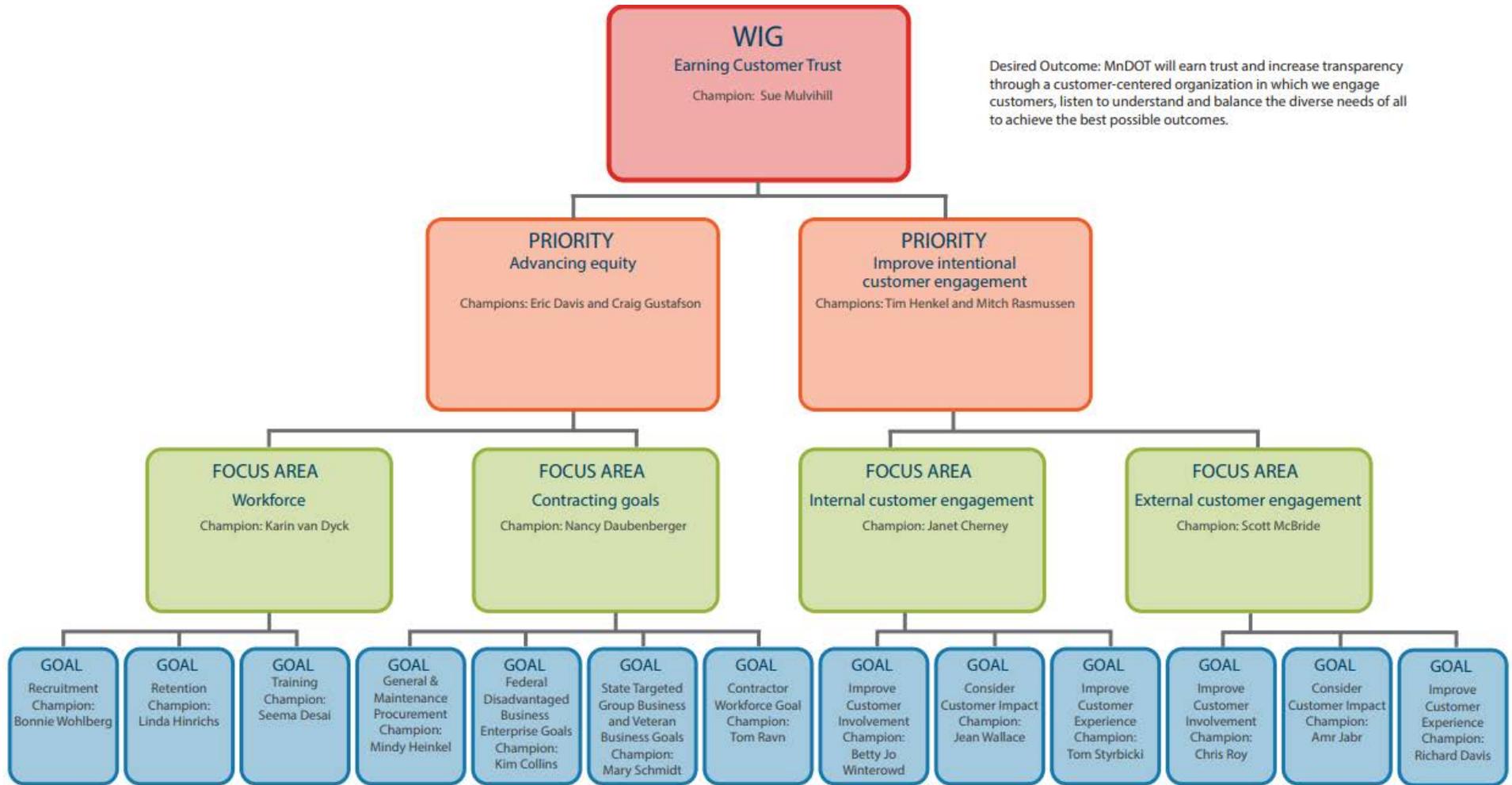
### **Forming better relationships with internal and external customers associated with the DBE Uniform Report**

A process was created and implemented to allow for real time tracking and accurate reporting of DBE data. As a part of this effort, individual spreadsheets for each DBE Specialist were developed to track projects, including due dates for documents and required payments. This allows for compliance activities to be streamlined and conducted more proactively, including the ability to reach out to prime contractors and project engineers if additional participation is found, missing payments are discovered, etc. This proactive approach aims to eliminate any chance of surprise at the time of final clearance for projects and helps to ensure that all participation by DBE firms is captured and reported accurately in the DBE Uniform Report.

### **Advancing the OCR Technology Plan**

In an effort to advance equity and track Small Business Contracting Program participation, the OCR Technology Team worked with the Contracts Agreements Audit Tracking System (CAATS) Project Team to track and manage small business participation by certification program (DBE, TGB or VET) on select contracts. This year the team concentrated on incorporating automation into the process using workflow. This will allow for a smoother transition of data between offices while also removing the need for paper documentation. Additional reports are also under development that will better serve internal and external customers by automating some of OCR's reporting.

Figure 1. Graphic of the WIG, WIG Priorities, WIG Focus Areas, and Goals.



2/7/2018

## *OCR Outreach and Education*

### **Annual Compliance Reviews**

An Annual Compliance Review is the means for determining whether a contractor performing on Federal-Aid Highway contracts is in compliance with its Equal Employment Opportunity (EEO) program requirements.

A compliance review consists of two parts, a desk audit and an on-site visit. A desk audit is a review of the contractor's policies, practices and procedures related to EEO compliance and workforce information. An on-site visit will take place at the field office to interview the contractor's EEO Officer, review documentation submitted, ask additional questions, and discuss any areas of improvement. OCR also interviews prime and subcontractor employees on the job-site. After the on-site visit, a report is completed and submitted to FHWA. If deficiencies were identified, the contractor will be placed on a voluntary corrective action plan until the deficiencies are corrected.

In FFY 2018, OCR conducted 13 Annual Compliance Reviews.

### **Spot Checks**

A spot check is less formal than an Annual Compliance Review and is conducted on randomly chosen projects by OCR. The team interviews employees of the prime and subcontractor on the job-site.

In FFY 2018, OCR performed spot checks on 2 contractors and performed 5 informal drop-ins with DBE firms.

### **Pre-Bid & Pre-Construction Meetings**

OCR meets with contractors to discuss female and minority goals on projects, EEO Special Provisions, required EEO posters, CRL reporting, OJT information, FHWA 1273 document, etc.

OCR attends meetings that have significant opportunities for employment. In FFY 2018, OCR attended 6 pre-bid or pre-construction meetings.

### **Tribal Employment Rights Ordinance Meetings**

The American Indian Tribal Employment Rights Ordinance (TERO) is a tribally based employment rights initiative. The program seeks to maximize American Indian employment opportunities by establishing an employment preference for contractors who have construction projects on or near a reservation.

In FFY 2018, OCR held or attended 11 meetings with TERO officers present, including a District 1-3 TERO meeting, a TERO training in Hinckley, the National Transportation in Indian Country Conference in Duluth, and Monthly Results & Transparency Meetings.

[See MnDOT's Office of Civil Rights TERO Program website for more information.](#)

### **Commercially Useful Function Reviews**

A DBE performs a commercially useful function when it is responsible for execution of the work of the contract and is carrying out its responsibilities by actually performing, managing, and supervising the work involved. To

determine whether a DBE is performing a commercially useful function, MnDOT evaluates the amount of work subcontracted, industry practices, whether the amount the firm is to be paid under the contract is commensurate with the work it is actually performing and DBE credit claimed for its performance of the work, and other factors.

In FFY 2018, OCR conducted 24 Commercially Useful Function reviews including 14 desk audits.

### **MnDOT DBE/Workforce Collaborative**

OCR works with stakeholders in the MnDOT DBE/Workforce Collaborative to review the performance of contractors in the employment of women and minorities. The group identifies key projects of interest and meets monthly to review reports prepared by OCR.

Each year OCR selects a range of projects for inclusion on a Priority Project List. In FFY 2018, there was a total of 67 projects statewide included on this list. This means that workforce diversity and inclusion goals, current participation percentages on the project, and on-the-job training (“OJT”) goals and participation percentages were monitored on a monthly basis and reported publicly to the community at scheduled monthly meetings. General project information is also included within the reports, such as project location, prime contractor, percent complete, contract amount, etc.

### **Small Business Development and Workforce Supportive Services**

OCR works to connect certified small businesses and women and minorities to opportunities in highway heavy construction. OCR partners with the business community to build the capacity of DBE firms to expand their work on MnDOT projects. OCR provides outreach and support activities to increase the number of certified DBE firms and grow Minnesota’s skilled construction workforce. Below is an overview of activities conducted in FFY 2018.

- **Building DBE capacity and increasing the number of certified DBEs:**
  - 14 representatives of newly certified DBE firms learned about the benefits of certification and how to access information about contracting opportunities through New DBE Orientation.
  - 10 businesses received comprehensive business assessments and development plans.
  - 8 DBE firms attended a training on how to improve or repair their credit scores.
  - 10 DBE firms partnered with prime contractors to improve capabilities and expand scopes of work through the Mentor-Protégé Program.
  - 23 DBE firms, 1 TGB firm, and 8 non-certified small businesses connected with prime contractors and explored business opportunities for growth at a Mentor-Protégé Matchmaking event.
  - 135 small businesses and 3 prime contractors have utilized the services offered at the DBE Small Business Resource Center.
- **Job Training Programs: Growing Minnesota’s highway heavy construction workforce:**
  - 7 people graduated from CDL training offered to women, minorities, and disadvantaged businesses.
  - 12 people graduated from the Cement Masons pre-apprenticeship training program developed for members of federally recognized tribes, and 9 people were placed in jobs.
  - 19 people graduated from a labor training offered by Minnesota Department of Employment and Economic Development, which was developed to train minority and women to work on highway heavy construction projects, and 16 people were placed in jobs.

A full list of the Small Business Development and Workforce Supportive Services accomplishments during FFY 2018 and goals for FFY 2019 is attached as Appendix D.

## Activities of the Title VI Specialist and Coordinator

- Attended **Systematic Development of Informed Consent Training** (October 25-26, 2017).
- Attended **Continuing Legal Education class on persuasive writing** (November 3, 2017).
- Attended the annual **Minnesota Department of Human Rights Symposium**, which brings together presenters and participants to explore ideas and best practices to reduce discrimination within the state of Minnesota (December 12-13, 2017).
- Presented at the **Metropolitan Planning Organization Directors Meeting in St. Cloud** (February 6, 2018).
- Panelist at MnDOT's **Public Engagement Workshop**, which is a workshop to share information across all levels of MnDOT and make participants more aware of available resources, current successful public engagement strategies and the overall importance of working with external stakeholders (March 2018).
- Attended **USDOT's Virtual Civil Rights Symposium** (March 2018).
- Attended **FHWA/MnDOT Public Engagement Peer Exchange** (June 12-13, 2018).
- Attended **USDOT's Community Impact Assessment – A Quick Reference for Transportation 2018 Update Webinar** (June 19, 2018).
- Attended **USDOT's Community Impact Assessment – Example Best Practices Webinar** (June 26, 2018).
- Presented at **Office of Civil Rights All Staff Meeting** (July 18, 2018).
- Held **Skype Meetings with District Title VI Liaisons (totaling 8 meetings)** to ensure they are up to date on Title VI-related topics, information, and trends, and to review and receive feedback on their Title VI Program Scorecards (throughout the month of July 2018).
- Presented via Skype to attendees at **MnDOT Operations Division Meeting** to provide a reminder about the Title VI Program Area Review Survey and to be available for questions (August 22, 2018).
- Attended **meetings with the Public Engagement and Constituent Services Office** to discuss updating the Public Engagement Policy to include MnDOT's commitment to continuous public engagement (throughout FFY 2018).
- Attended monthly **Commissioner's Staff Diversity and Inclusion Committee Meetings** (throughout FFY 2018).
- Attend **MnDOT Monthly Public Engagement Meetings** (throughout FFY 2018).

## Publications and Emails

During FFY 2018, MnDOT published various resources to promote Title VI to both internal and external audiences related to MnDOT activities. Below is an outline of the internal news articles and links to the GovDelivery emails sent out to both internal and external audiences.

### Newsline Articles

Newsline is MnDOT's online employee newsletter published biweekly to highlight key agency and transportation news. The full Newsline articles are attached as Appendix E. Below is a brief description of the articles.

- Article about Tribal State Relations Training (November 2017).
- Article about 2<sup>nd</sup> Annual Mentor-Protégé Networking Event hosted by the Office of Civil Rights (November 2017).
- Article about WIG 2.0 and advancing equity progress (December 2017).
- Article about ArcGIS map which connects contractors with small businesses (December 2017).
- Article about Small Business Resource Center (January 2018).
- Article about WIG efforts helping MnDOT to advance equity (January 2018).
- Article about Tribal State Relations Program Day (January 2018).

- Article about ADA Small Business Opportunity Pilot Program (February 2018).
- Article about Metro District WIG of increasing contracting with certified small businesses (March 2018).
- Article about Public Engagement Workshop (March 2018).
- Article about Diversity and Inclusion Committee outreach event with students (May 2018).
- Article about Rethinking I-94 community engagement findings (August 2018).
- Article about Tribal Cement Masons graduation (August 2018).

### GovDelivery Emails

GovDelivery is an email platform used by MnDOT and other government agencies to send subject-specific updates to subscribing audiences. OCR sends GovDelivery emails about OCR programs, activities, events, and various other updates. [Click here to view.](#)

### FFY 2019 Goals

- Integrate Title VI into conferences, trainings, meetings, reviews, and educational activities.
- Conduct Commercially Useful Function Reviews on all PODI projects.
- Conduct Annual Compliance Reviews on all PODI projects.
- Offer a Business Skills Training Course to provide business-related technical training to help small businesses successfully participate on MnDOT contracts.
- Manage a Working Capital Loan Fund program which will provide access to capital for DBE's working as prime contractors or subcontractors on MnDOT-eligible projects.
- Provide highway heavy transportation training to Bois Forte tribal members to work on future highway heavy construction projects.
- Create an OJT recruiting and screening strategy for a highway heavy training program for minorities, women and other disadvantaged individuals.
- Provide a comprehensive set of sessions designed to address what a business needs to do to become bond-ready, including a one-on-one session with surety bonding professionals.
- Host Meet and Greet events for large MnDOT projects to provide opportunities for small businesses to meet and network with prime contractors and to learn more about the particular project.

## COMPLAINT IDENTIFICATION AND INVESTIGATION

### FFY 2018 Accomplishments

During FFY 2018, the MnDOT Office of Civil Rights did not receive nor investigate any complaints of discrimination that are covered under the Title VI Program.

Any person who believes that he or she, individually, or as a member of any specific class of persons, has been subjected to discrimination on the basis of race, color, national origin (including limited English proficiency), sex, age, disability or income status may file a Title VI complaint with MnDOT using the "MnDOT Title VI and Other Discrimination Complaint Form" which is available on MnDOT's website (in web form and printed hard copy). The complaint form is available in English, Spanish, Somali, Hmong, and additional languages upon request. MnDOT will accept complaints in alternative formats from persons with disabilities upon request. A complainant also has the option to call MnDOT and provide complaint allegations over the telephone. More information on complaint

format and complaint submission is available in the MnDOT Title VI and Nondiscrimination Implementation Plan for FFY 2019 submitted to FHWA.

## **FFY 2019 Goals**

- Forms and processes related to Title VI complaint investigations will continue to be updated and made available online.
- The Office of Civil Rights, the Office of Equity and Diversity, and the Ombudsman's Office will continue to meet throughout the year to review complaints received by the agency and work to resolve them appropriately.

## **DISSEMINATION OF INFORMATION**

### **FFY 2018 Accomplishments**

#### *Public Notice of Rights Under Title VI*

MnDOT's Public Notice of Rights Under Title VI document is signed annually by the Commissioner. This year, the notice is available in English, Spanish, Somali, and Hmong. All versions are attached as Appendix F. At a minimum, the notice is posted within public entrances at the information centers in the MnDOT Central Office and district office locations throughout the state. [The notice can also be found on MnDOT's public website linked here.](#)

#### *Title VI Program Frequently Asked Question Documents*

In 2018, Title VI Program Frequently Asked Questions (FAQs) were created and posted on the MnDOT Office of Civil Rights external website and sent to MnDOT's Title VI Liaisons. There are 3 FAQ documents: Title VI Program: Complaint Process; Title VI Program: Environmental Justice; and Title VI Program: Limited English Proficiency.

The FAQ documents were created to assist both internal and external audiences in understanding the MnDOT Title VI Program and various processes and procedures that are in place. The FAQs on Environmental Justice and Limited English Proficiency also include one-page overviews to explain their applicability to the Title VI Program. Further, a Title VI Program Umbrella was created to provide a visual representation of MnDOT's Title VI Program. The 3 FAQ documents are attached as Appendix G and can also be [accessed on the MnDOT Title VI Webpage.](#)

#### *Public Involvement: Planning and Programming at MnDOT*

MnDOT's Planning and Programming responsibilities consist of a range of activities. These include writing plans, conducting data analysis, reviewing performance outcomes, and managing the capital program. MnDOT begins planning construction projects as far as twenty years in advance. Title VI factors into the planning phase and is addressed by ensuring effective public involvement processes are in place.

[Click here to visit MnDOT's Family of Plans](#) which are a part of Minnesota GO, MnDOT's 50-year statewide vision for all the ways people and goods move throughout Minnesota — individually for each mode and together as a multimodal system.

## **State Aviation System Plan**

MnDOT is currently updating Minnesota's State Aviation System Plan (SASP). The SASP is part of MnDOT's Family of Plans and is Minnesota's 20-year direction and plan for aviation.

The Public Involvement Plan (PIP) for the SASP aims to provide a framework for how public involvement activities will be conducted during the plan update process. The overall PIP is intended to be a dynamic document which will be updated periodically throughout both phases of the plan based on input from partners, stakeholders and the public, as well as results from previous engagement activities. The current PIP covers Phase 1. [Click here to review the PIP for the SASP.](#)

Phase 2 of the SASP will involve a more robust environmental justice analysis contingent upon the types of projects, strategies and goals identified by the plan.

There is a website dedicated to SASP outreach activities, where audiences can view upcoming events and review previous events. [Click here to view the Public Involvement Calendar.](#)

## **Advancing Transportation Equity Initiative**

MnDOT is undertaking the Advancing Transportation Equity initiative to better understand how the transportation system, services and decisions-making processes impact the lives of people in underserved and underrepresented communities in Minnesota. Specifically, MnDOT wants to identify key actions that transportation agencies can take to make meaningful change.

The overarching objectives for the Advancing Transportation Equity initiative are (1) to learn about the transportation experiences of underserved and underserved communities in Minnesota; (2) identify possible solutions to address challenges faced by these communities; and (3) initiate partnerships with others working to advance equity in the state. [Click here for more on this initiative.](#)

## **MnDOT's Public Engagement Policy**

MnDOT adopted a Public Engagement Policy in September 2016. MnDOT is committed to increasing transparency and collaboration and ensuring everyone has the opportunity to participate in public engagement. The Public Engagement Policy focuses on internal duties and responsibilities related to plans, projects, programs, services and activities. The policy also serves as a foundation for MnDOT's commitment to public engagement by its employees.

In FFY 2019, MnDOT will update the current Public Engagement Policy to include a pledge of ongoing and continuous engagement and relationship building with the public to earn trust and mutual understanding.

[Click here to view MnDOT's Public Engagement Policy.](#)

## ***Metropolitan Planning Organizations (MPOs)***

MPOs are entities designated by law with the lead responsibility for the development of a metropolitan area's transportation plans and coordination of the transportation planning process. All urbanized areas with a population of more than 50,000 individuals are required to have an MPO if the agency spends federal funds on transportation improvements.

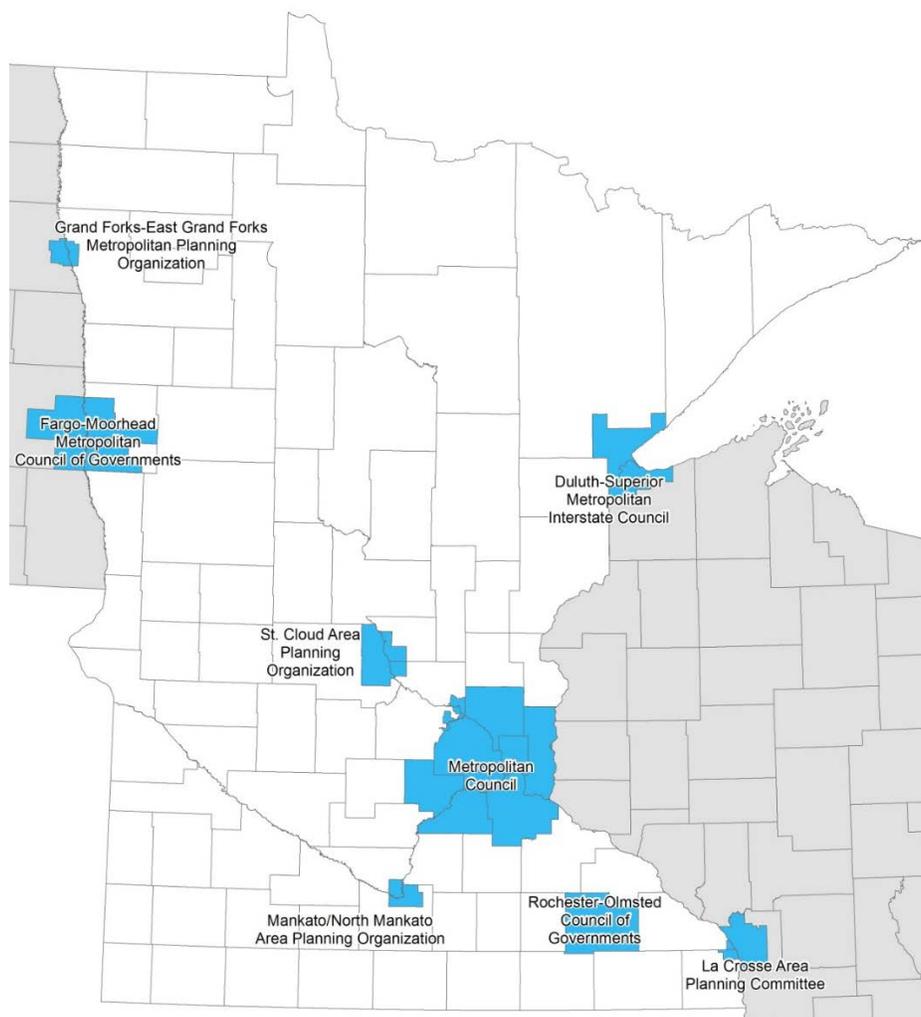
Minnesota has eight urbanized areas and designated MPOs as shown in Figure 2. Of the eight MPOs, five are bi-state MPOs. MnDOT administers grants with federal funds for six of the MPOs. The federal funds for the North Dakota MPOs are transferred to the North Dakota Department of Transportation for administration. Minnesota is identified as the lead oversight state for five of the MPOs. North Dakota is the lead state for the Fargo-Moorhead and Grand Forks/East Grand Forks MPO. Wisconsin is lead state for the La Crosse/La Crescent MPO.

As a recipient of federal funds, each MPO is required to certify at least every 4 years that the metropolitan transportation planning process is being carried out in accordance with all applicable requirements, including Title VI and other statutes and regulations that prohibit discrimination in federally-funded programs and activities.

Attached as Appendix H is a list of characteristics and details of each of the 8 MPOs, including the status of their Title VI Program Plan submittals and links to each Title VI Program page.

[Click here for more information about MPOs and MnDOT's other transportation planning partners.](#)

*Figure 2: Metropolitan Planning Organizations in Minnesota*



## FFY 2019 Goals

- Title VI Specialist to attend trainings and meetings with MPOs.

## LIMITED ENGLISH PROFICIENCY (LEP)

### FFY 2018 Accomplishments

MnDOT completed a statewide LEP four factor analysis which can be found in the Title VI and Nondiscrimination Implementation Plan for FFY 2019 submitted to FHWA and available on [MnDOT's Title VI Website](#).

### FFY 2019 Goals

- Develop a comprehensive Language Access Plan for MnDOT that establishes guidelines consistent with USDOT's Policy Guidance Concerning Recipients' Responsibilities to Limited English Proficient (LEP) Persons. The Language Access Plan will meet the requirements of Executive Order 13166, Improving Access to Services for Persons with Limited English Proficiency. The Language Access Plan will be incorporated into MnDOT's Title VI Program.

## ENVIRONMENTAL JUSTICE

### FFY 2018 Accomplishments

MnDOT supports environmental justice through every stage of its planning, construction and maintenance processes. This ensures MnDOT gains input from the community that will help shape how the agency builds and maintains roads, bridges, regional airports, rail lines, ports and trails. MnDOT pursues this goal by working to:

- Avoid, minimize or mitigate disproportionately high and adverse human health and environmental effects, including social and economic effects, on minority populations and low-income populations;
- Ensure the full and fair participation by all potentially affected communities in the transportation decision-making process; and
- Prevent the denial of, reduction in, or significant delay in the receipt of benefits by minority and low-income populations.

### FFY 2019 Goals

- Title VI Specialist to attend environmental justice trainings.
- Title VI Liaisons to be trained in environmental justice issues.

## STATE TRANSPORTATION AGENCY DIRECTIVES

### FFY 2018 Accomplishments

State Transportation Agencies are required to periodically review directives to determine if a given directive has Title VI implications. If it is determined to have Title VI implications, then the State Transportation Agency needs to interpret how the directive impacts each program area from a Title VI perspective.

MnDOT's comprehensive review process for all new and updated departmental policies includes a review by a designated staff member within the Office of Chief Counsel who identifies legal risks and concerns, including any potential Title VI issues.

Beginning in FFY 2018 and continuing through FFY 2019, the current Public Engagement Policy will be updated to include a pledge of continuous and ongoing engagement and relationship building with the public to earn trust and mutual understanding. The Public Engagement Policy is discussed further under the *Dissemination of Information* section of this report.

### **FFY 2019 Goals**

- Continue to staff and train designated staff in the Office of Chief Counsel.