FDOT Title VI Nondiscrimination CBT
Module 3 - Title VI Nondiscrimination Responsibilities for District Title VI Staff

Welcome to the FDOT Title VI Nondiscrimination CBT. This is Module 3 - Title VI Nondiscrimination Responsibilities for District Title VI Staff.

FDOT has worked hard to make Title VI and Nondiscrimination duties consistent, efficient and easy. With the exception of discrimination complaints or issues that could expose FDOT to liability or public scrutiny, both of which should be immediately reported to the District Coordinator, Program Area Officers, or PAOs, need only report once per quarter, populating the complaint log and the appropriate sections of the report matrix.

Annually, the State Title VI Coordinator reviews the District report matrix submissions to identify any anomalies that require further action, if appropriate.

Timely quarterly reporting is also important, since the report matrix data is the foundation of risk-based Quality Assurance Review, or QAR, and program area interview selections, and is also rolled into statewide reports that go to FHWA, FTA, US DOT and even the Department of Justice. These agencies have strict due dates often set by regulation. Flexibility in reporting dates is not generally a possibility.

The District Title VI and Nondiscrimination Program Coordinator has further responsibilities, including familiarizing new PAOs with the Title VI programming, ensuring adequate staff training is available, conducting investigations as directed by Central Office, facilitating QARs or FHWA process reviews, compiling the district quarterly report and matrix, and submitting data to Central Office upon request or by schedule.

District Title VI Quarterly Report Matrix submissions are due 30 calendar days after each quarter. The Coordinator also updates the District's Title VI organizational chart, making sure it is current and that Title VI is given direct, easy access to the District Secretary.

The District Coordinator reviews PAO submissions for completion and accuracy and, if deemed necessary, inquiries into any matter or program area to ensure nondiscrimination. The Coordinator further has the authority to recommend initiation of program area or special emphasis reviews by Central Office.

FDOT understands that the District Coordinators and PAOs may have other lines of supervision, including team leaders, managers, directors, etc. Whether supervisory or leadership staff are also PAOs is immaterial. All members of management are responsible for Title VI Program compliance in their respective offices and disciplines.

While management may always report areas or issues of concern directly to Central Office, FDOT recommends that District Coordinators are always included. Further and most importantly, District management staff must never impede the Coordinator's easy, direct access in reporting matters of possible discrimination. To do so is a violation of both FHWA regulations and FTA circulars, as well as the FDOT Title VI Nondiscrimination Implementation Plan.

At Central Office, the Statewide Title VI and Nondiscrimination Program Coordinator is the liaison between FDOT and the federal DOT modes. The Statewide Coordinator compiles FDOT reports, conducts discrimination investigations, facilitates staff training and serves as a watchdog, ensuring open, direct communication between the EOO Nondiscrimination Officer and the FDOT Secretary.

The Coordinator must also conduct annual effectiveness reviews of every federal program area to ensure compliance and nondiscrimination.

Title VI and Nondiscrimination is a fun and rewarding program and Title VI staff is encouraged to enjoy it, especially the special outreach to our customers and partners. Note, however, that no matter how great your Title VI assignments, they are part of the FDOT job description and a foundation for evaluation, reward or discipline, the same as any other work responsibility.

This concludes Module 3 - Title VI Nondiscrimination Responsibilities for District Title VI Staff. Please continue to Module 4 – Summary of all Modules.