

# Title VI Implementation Plans

## What is a Title VI Implementation Plan?

A Title VI Plan is the standard operating procedure for how Title VI of the 1964 Civil Rights Act is implemented and overseen by a State Highway Administration. The plan should detail the who, what, how, when, and the why for each of the State Highway Administration's programs and activities in relation to Title VI.

## Who is required to have a Title VI Plan?

State Highway Administrations are required to annually submit Title VI Plans to FHWA. This requirement comes from, 23 C.F.R. § 200.9(b)(11), which states: State Highway Administrations (SHAs) "shall annually submit an updated Title VI implementing plan to the Regional Federal Highway Administrator for approval or disapproval."

## What does a Title VI Plan contain?

Title VI Plans are intended to be public documents which convey the day to day operations of the Title VI Program within a State Highway Administration. The plan should be user friendly and accessible to members of the public. The plan needs to be updated annually.

## What are the Essential Elements of a Title VI Plan?

The Title VI Plan is required by 23 C.F.R. § 200.9 to contain the following 11 elements. These elements may be stand alone, however it is often more useful to address elements together such as combining data collection and analysis with program area procedures, sub-recipient review procedures, and LEP procedures rather than as a separate and independent element.

1. Standard USDOT Title VI Assurances.
2. Organization & Staffing
3. Program Area Review Procedures
4. Subrecipient Review Procedures
5. Data Collection and Analysis Methods
6. Training Procedures
7. Complaint Procedures
8. Dissemination of Title VI Information
9. Limited English Proficiency
10. Review of STA Directives
11. Compliance & Enforcement Procedures

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## What is the process for Plan submittal and review?

SHAs must submit their plans to FHWA division offices for review and approval by October 1st each year. FHWA division offices then electronically submit the plan and approval documents to the FHWA Office of Civil Rights for reporting purposes by December 1st of the same year.

## What does FHWA review in a Title VI Plan?

1. Are both internal and external review processes discussed in detail?
2. Do Program area sections describe actions that are related to Title VI?
3. Are data sources and collection procedures described in detail?
5. Is all of the information up to date?
6. Was the plan submitted by October 1st?
7. Is the plan easily accessible to the public?
8. Are vital portions of the plan translated to languages other than English following the LEP plan?

## What is a Title VI Plan used for?

A Title VI plan may be used by the State DOT to inform the public and their recipients of the standard process for reviewing programs, projects and recipients to ensure compliance with Title VI of the Civil Rights Act. The plan may also be used by members of the state DOT to inform internal state DOT employees on the processes to follow in their respective program areas. The Title VI Plan should also aid in informing recipients on their obligations under Title VI.

## What about elements not listed in the Regulation?

While not required by regulation, a state DOT may have other elements that make the plan more user friendly. For example, plans may contain a policy statement, glossary of terms, an introduction, or a definition of acronyms used in the document. However, FHWA discourages including elements that are not specifically covered under Title VI bases of race, color or national origin. Plans should not include state specific bases of discrimination, other federal regulations outside of Title VI, or programs and activities enforced by other federal agencies.



## **Where do I go for more information?**

Please visit the [FHWA Title VI website](#) for more information on Title VI Plan requirements.