

**FFY 2023**

WISCONSIN DEPARTMENT OF TRANSPORTATION

TITLE VI

GOALS AND ACCOMPLISHMENTS REPORT



Office of Business Opportunity & Equity Compliance  
December 1, 2023

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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**

Tondra Davis 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>	
Tondra Davis, Chair	Office of Business Opportunity & Equity Compliance
Carolyn Amegashie	Division of Transportation System Development
Mary Forlenza	Federal Highway Administration
Julie Goldsmith	Division of Motor Vehicles
Dan Graff	Office of General Counsel
Justin Kiekhaefer	Division of Business Management
Major Cedric Rembert	Division of State Patrol
Rodney Saunders, Jr.	Division of Budget and Strategic Initiatives
Becky Soderholm	Division of Transportation Investment Management - Transit
Charles Wade	Division of Transportation Investment Management - Planning
<b><i>Committee Staff</i></b>	
Taqwanya Smith	Title VI Program Coordinator

**C. FFY 2023 Accomplishments**

- New committee member orientation conducted for the DBM representative.
- Updated the Title VI online training module for WisDOT employees and contractors & consultants with a WisDOT LearnCenter account. The module was updated in August 2023 and required to be completed by December 31, 2023.

**D. FFY 2024 Goals**

- Develop the 2024-25 Committee Work-plan.

**IV. PROGRAM AREA REVIEWS**

WisDOT reviewed the Right-of-Way program area in FFY 2023. The results of the review are listed below. WisDOT will review 1 program area in FFY 2024.

**A. Purpose of the review**

To determine how well the Right-of-Way Program’s policies and procedures follow Title VI/Nondiscrimination requirements under Title VI of the Civil Rights Act of 1964 (Title VI) and the Uniform Relocation Assistance and Real Property Acquisition Policies Act of 1970 (Uniform Act).

**B. Scope of review**

The review will examine policies, procedures, manuals, forms, brochures, contracts, etc. from FFY 18 to FFY 21.

**C. Expected Results**

Completed report with recommendations and best practices as warranted. The report and its recommendations will be shared with the Right-of-Way Program that will lead to ongoing improvements in the overall program.

**D. Team Members**

<b>Team Members</b>	<b>Agency</b>	<b>Title</b>
Tondra Davis	WisDOT/OBOEC	Director
Taqwanya Smith	WisDOT/OBOEC	Title VI Program Coordinator
Barry Paye	WisDOT/BTS	Director
Greg Gasper	WisDOT/BTS	Appraisal/Relocation/Property Management Section Chief
Norman Pawelczyk	WisDOT/BTS	Acquisition and Services Section Chief
Nathan Walters	WisDOT/BTS	Real Estate Specialist

**E. Background**

The Right-of-Way Program resides in the Bureau of Technical Services in the Division of Transportation System Development (DTSD). The role of the Right-of-Way Program is to acquire real property as necessary for the construction of transportation facilities. The Right-of-Way Program provides relocation assistance to people and businesses displaced by highway improvement projects; and works to sell or lease any property deemed as surplus to the department’s needs. These activities are carried out as a decentralized (regional) organization, with Real Estate staff and consultants located in each of DTSD’s regional offices.

**F. Review Areas**

**1. Title VI**

**a. Regulation**

- 1. 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 including by WisDOT Secretary	The WisDOT Office of Business Opportunity and Equity Compliance (OBOEC) is responsible for the Title VI Assurances covering pertinent Nondiscrimination authorities including the Uniform Act.	Title VI Plan/OBOEC files	Commendable.
Title VI Implementation Plan	OBOEC is responsible for the Department's Title VI Implementation Plan.	WisDOT website/OBOEC files	Commendable.
Notice of Nondiscrimination to the public	OBOEC 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	OBOEC is responsible for the Title VI complaint form, policy, and procedure. The complaint form is on the WisDOT website. The Title VI/Nondiscrimination Complaint Intake Procedure is provided in the Department's Transportation Administrative Manual (TAM).	WisDOT website and intranet	Commendable.
Title VI complaint log	The Right-of-Way Program did not receive any complaints during the review period.	BTS/Real Estate files and OBOEC files	Recommendation.
Title VI contract provisions Appendix A and E included in Real Estate Services contracts	Using the Raosoft sample size calculator with a 90% confidence level and 10% margin of error, 44 out of 140 contracts were examined for the required Title VI provisions. 82% of contracts included the provisions.	BTS/Real Estate files	Recommendation.

The Right-of-Way Program did not receive any Title VI complaints, investigations or lawsuits during the review period. The Right-of-Way Program did not have any compliance reviews during the review period.

**Recommendations:**

- The Right-of-Way Program will provide a link to the Title VI complaints page (<https://wisconsindot.gov/Pages/doing-bus/civil-rights/titlevi-ada/filingcomplaint.aspx>) or the DOA Relocation complaint form on the "Highway projects and your property" webpage (<https://wisconsindot.gov/Pages/doing-bus/real-estate/hghwys-yourland/default.aspx>) to inform the public of the department's complaint procedures.

- The Right-of-Way Program will provide instruction or training that all Real Estate contracts include the required Title VI/Nondiscrimination provisions.

2. **Limited English Proficiency (LEP)**

a. Regulation

1. 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
Language Access Plan	The WisDOT Office of Business Opportunity and Equity Compliance (OBOEC) is responsible for the Department’s Title VI/Language Access Plan.	Recommendation.
Information disseminated in languages other than English	“Rights of Landowners in Wisconsin Eminent Domain Law” brochure in English, Spanish, and Hmong. “Wisconsin Relocation Rights – Business” brochure in English, Spanish, and Hmong. “Your rights and benefits as a displaced person under the federal relocation assistance program” brochure in English and Spanish. Google Translator on the WisDOT website.	Commendable.
Method(s) used to provide language translation	The Right-of-Way Program employed two bilingual staff during the review period.	Commendable.
Method(s) used to provide language interpretation	The Right-of-Way Program employed two bilingual staff during the review period.	Commendable.

During the review period, bilingual staff provided language services for a Spanish-speaking property owner during a personal property realignment and for a Spanish-speaking Church during relocation. In addition to bilingual staff, it is recommended that the Right-of-Way Program also use the Title VI/ Language Access Plan to provide interpretation and translation services when necessary to effectively communicate with landowners and displaced persons with limited English proficiency.

**Recommendations:**

- The Right-of-Way Program will notify staff of the Title VI/Language Access Plan and the requirement to use certified interpreters/translators to provide language access services.
- The Right-of-Way Program will provide the “Wisconsin Relocation Rights - Residential” Spanish and Hmong brochures in addition to the English brochure on the Real Estate Program Manual/Forms webpage.



**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>
Collection of demographic data of relocatees	“Residential Questionnaire – Individual Needs Inventory” form collects race and ethnicity. “Individual Relocation Case Report” form collects white/non-white.	Commendable.
Information disseminated to the public	“Rights of landowners in Wisconsin eminent domain law” brochure. “Wisconsin Relocation Rights – Residential” brochure. “Wisconsin Relocation Rights – Businesses” brochure. “Your rights and benefits as a displaced person under the federal relocation assistance program” brochure. “Highway projects and your property” webpage.	Commendable.
Outreach to Title VI and LEP populations	Specific outreach activities targeted to Title VI/LEP populations are conducted by Environmental staff.	Not applicable.
Public Involvement or Participation Plan	The Right-of-Way Program does not hold public involvement meetings. ROW staff attend public involvement meetings as a resource.	Not applicable.

The Right-of-Way Program collects demographic data of relocatees through the WisDOT “Residential Questionnaire – Individual Needs Inventory” and the WI Department of Administration “Individual Relocation Case Report” forms. The new Real Estate Automated Data System (READS) version will be mobile which will allow for field data collection.

**Recommendations:**

The Right-of-Way Program will develop a form that includes the purpose for the collection of demographic data that accompanies the “Residential Questionnaire – Individual Needs Inventory” form and the “Individual Relocation Case Report” form.

4. **Uniform Act**

a. Regulation

1. 49 CFR 24.4(a)(1)

Before a Federal Agency may approve any grant to, or contract, or agreement with, a State Agency under which Federal financial assistance will be made available for a project which results in real property acquisition or displacement that is subject to the Uniform Act, the State Agency must provide appropriate *assurances* that it will comply with the Uniform Act and this part.

2. 49 CFR 24.5

Each notice shall be written in plain, understandable language. Persons who are unable to read and understand the notice must be provided with *appropriate translation and counseling*.

3. 49 CFR 24.8(b)

The implementation of this part must be in compliance with other applicable Federal laws and implementing regulations, including, but not limited to, the following: *Title VI of the Civil Rights Act of 1964* (42 U.S.C. 2000d et seq.).

4. 49 CFR 24.205(c)(1)

The Agency shall carry out a *relocation assistance advisory program* which satisfies the requirements of *Title VI of the Civil Rights Act of 1964* (42 U.S.C. 2000d et. seq.) ... and offer the services described in paragraph (c)(2) of this section.

b. Data collection and analysis

Requirement	Action	Commendation/ Recommendation
Assurances	The WisDOT Office of Business Opportunity and Equity Compliance (OBOEC) is responsible for the Title VI Assurances covering pertinent Nondiscrimination authorities including the Uniform Act. The WisDOT Real Estate Program Manual also provides an Assurance in Chapter 5 Relocation, section 5.0.5 "WisDOT Assurance."	Commendable.
Language translation and counseling	"Rights of landowners in Wisconsin eminent domain law brochure in English, Spanish, and Hmong. "Wisconsin Relocation Rights - Businesses" brochure in English, Spanish, and Hmong. "Your rights and benefits as a displaced person under the federal relocation assistance program" brochure in English and Spanish. Google Translator on WisDOT website.	Recommendation.
Compliance with other laws and regulations including Title VI	The WisDOT Real Estate Program Manual is certified by FHWA.	Commendable.

Relocation Advisory Services – Title VI	The WisDOT Real Estate Program Manual is certified by FHWA.	Commendable.
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The WisDOT Real Estate Program Manual (REPM) was certified by FHWA on December 18, 2018, and February 15, 2022.

**Recommendations:**

The Right-of-Way Program will provide notice of the ability to request free translation and interpretation in the notice letter to landowners and on the “Highway projects and your property” webpage.

**G. Summary**

The desk audit of the Right-of-Way Program found many commendable practices and procedures. Commendable practices and procedures under Title VI include: Title VI/Nondiscrimination Assurances signed by the WisDOT Secretary; Notice of Nondiscrimination; and Title VI complaint form, policy, and procedures. Commendable practices and procedures under LEP include: “Rights of landowners” brochures translated into different languages; “Relocation Rights for Businesses” brochures translated into different languages; “Rights and Benefits as a Displaced Person” brochure translated into Spanish. Commendable practices and procedures under Public Involvement and Outreach include: “Residential Questionnaire-Individual Needs Inventory” which collects race and ethnicity; “Individual Relocation Case Report” which collects race; brochures disseminated to the public; and the “Highway projects and your property” webpage for the public. Commendable practices and procedures under the Uniform Act include: WisDOT Real Estate Program Manual certified by FHWA in 2018 and 2022. The onsite visit reviewed the desk audit findings, asked follow-up on questions, and made recommendations for improvement.

**V. SUBRECIPIENT REVIEWS**

WisDOT reviewed the Greater Madison Metropolitan Planning Organization in FFY 2023. The results of the review are listed below. WisDOT will review 1 Metropolitan Planning Organization (MPO) and 1 Local Public Agency (LPA) in FFY 2024.

**A. Purpose of the review**

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

**B. Scope of review**

The review will examine public involvement/outreach policies and procedures, language needs assessments, demographics of advisory committees, public meeting attendance, demographic maps, and dissemination of information procedures from FFY 19 to FFY 22.

**C. Expected Results**

Completed report with recommendations and best practices included as warranted. The report and its recommendations will be shared with Greater Madison MPO 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>
Tondra Davis	WisDOT/OBOEC	Director
Taqwanya Smith	WisDOT/OBOEC	Title VI Program Coordinator
Alexandra Andros	Greater Madison MPO	MPO Director
Benjamin Lyman	Greater Madison MPO	Title VI Coordinator

**E. Background**

Greater Madison MPO is the federally designated Metropolitan Planning Organization for the Madison Urban Area. As the MPO, it is the policy body responsible for cooperative, comprehensive regional transportation planning and decision-making for the Madison Metropolitan Planning Area. The Madison Metropolitan Planning Area consists of the City of Madison and the Madison Urbanized Area, including all or portions of the 34 contiguous villages, cities, and towns that are or are likely to become urbanized within a 20-year planning period. Greater Madison MPO is also responsible for comprehensive planning and decision-making to build agreement on transportation investments that balance roadway, public transit, bicycle, pedestrian, and other transportation needs to achieve an exceptional quality of life for all within the region. Greater Madison MPO staff are housed within the Planning Division of the City of Madison’s Planning, Community, and Economic Development Department.

**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

<b>Requirement</b>	<b>Action</b>	<b>Where</b>	<b>Commendation/ Recommendation</b>
Signed Standard DOT Title VI Assurances by MPO Director	Assurances were signed by the MPO Director for FFYs 2022 and 2023.	WisDOT/OBOEC files	Commendable.
Signed Title VI Subrecipient Implementation Plan Agreement by MPO Director	The WisDOT/FHWA Subrecipient Title VI Implementation Plan Agreement was signed by the MPO Director for FFY 2023.	WisDOT/OBOEC files	Commendable.
Notice of Nondiscrimination to the public	Greater Madison MPO provides a Nondiscrimination Statement and Notice of Nondiscrimination on its website and in its Title VI Program/Language Access Plan.	MPO website	Commendable.
Title VI complaint form, policy, and procedure	Greater Madison MPO provides a complaint form and procedure on its website, in its Title VI Program/Language Access Plan, and on a bulletin board in the agency office.	MPO website and office	Commendable.
Title VI complaint log	Greater Madison MPO maintains a Title VI complaint log.	MPO files	Commendable.

No Title VI complaints were received by Greater Madison MPO within the past 5 years. Greater Madison MPO underwent a U.S. DOT FHWA and FTA Greater Madison Transportation Management Area (TMA) Planning Certification Review of the Madison Urbanized Area in 2022. The review included a civil rights section (Title VI, LEP, EJ, and ADA) and recommendations. The review found that the metropolitan transportation planning process conducted in the Madison TMA substantially meets or exceeds federal planning requirements. There were no findings requiring corrective actions. Greater Madison MPO was commended for its effective use of focus groups during the Regional Transportation Plan Update to engage Environmental Justice communities.

The City of Madison provides Racial Equity and Social Justice Initiative (RESJI) trainings that are required for all employees. RESJI trainings I and II are required for all employees. RESJI III is encouraged for all employees, especially supervisors. Employees are encouraged to retake these trainings every few years.

**Recommendations:** None.

2. **Limited English Proficiency (LEP)**

a. Regulation

1. 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. Four-factor analysis re-done in 2023.	Commendable.
Language Access Plan	Developed a Title VI Program/Language Access Plan in 2020.	Commendable.
Method(s) used to provide language translation	MPO staff offered to provide translation services for Environmental Justice focus groups held for the Long-Range Plan update in 2021. However, the organizations hosting the focus groups indicated that no translation services would be required.	Commendable.
Method(s) used to provide language interpretation	The City of Madison/Department of Civil Rights has developed a training for front-line staff regarding language access services, including interpretation procedures. Training is provided for all new city staff at orientation.	Commendable.
Use or planned use of bilingual employees	The City of Madison has a contract with Language Line. The City of Madison employs bilingual staff. Bilingual staff must be certified by Human Resources.	Commendable.
Information disseminated in languages other than English	Nondiscrimination Statement on website can be translated into Spanish, Hmong, and Traditional Chinese. Title VI Notice in Spanish, Hmong, and Traditional Chinese. Vital documents as identified in the Title VI Program/Language Access Plan are published in Spanish, Hmong, and Traditional Chinese. Taglines in notice, complaint procedure, and complaint form.	Commendable.

Notice on all Greater Madison MPO Policy Board agendas and public meeting notices in English, Spanish, Hmong, and Traditional Chinese providing information on how individuals can request interpretation

services or materials in alternative formats for the meeting. A Spanish webpage provides links to Spanish versions of the MPO Profile and the Executive Summary of the Regional Transportation Plan. Greater Madison MPO maintains “I Speak” language chart cards in the office and brings them to all in-person meetings. Greater Madison MPO does not have a translator tool on the website because the City of Madison does not allow Google Translate. Greater Madison MPO does not normally encounter stakeholders requesting language access services. Language access is addressed during outreach.

Greater Madison MPO offered to provide translation services for Environmental Justice focus groups held for the Long-Range Plan update in 2021; however, the organizations hosting the focus groups indicated that no translation services would be required. Bayview Foundation staff offered to provide translation as needed to LEP individuals, although no translation was needed. The two Latino Academy of Workforce Development focus groups were held entirely in Spanish, and Academy staff provided translated feedback to Greater Madison MPO. Greater Madison MPO is also working with Jewish Social Services for Afghanistan and Ukrainian refugees.

**Recommendations:** None.

**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	Public Participation Plan updated in 2021.	Commendable.
Identify population eligible to be served	Greater Madison MPO identified population eligible to be served by race and ethnicity using the 2020 Census for the Greater Madison MPO planning area, City of Madison, and Dane County. Greater Madison MPO identified LEP-speaking households in the planning area using the 2021 American Community Survey.	Commendable.
Collection of demographic data of public meeting participants	Public involvement meeting sign-in sheets collect the name and email addresses of participants.	Recommendation.

Demographic maps used in decision-making	Greater Madison MPO has an identified Environmental Justice (EJ) areas map, conducted an EJ analysis for the Transportation Improvement Plan (2022-26), and identified EJ areas in the Madison urban area and Dane County in 2021.	Commendable.
Information disseminated to the public.	Interactive website, public involvement meetings, interactive comment maps, press releases, local news agencies, Facebook posts, and public hearings.	Commendable.
Outreach to Title VI and LEP populations	Information, including meeting notices and press releases, will be provided to minority news media. For the Regional Transportation Plan and other selected meetings, digital format announcement flyers in English and Spanish are distributed via email to the MPO's email list and to special interest groups representing minority and low-income populations.	Commendable.
Advisory Committee membership lists	Greater Madison MPO has two planning/advisory committees – MPO Policy Board and MPO Technical Coordinating Committee.	Commendable.

For the Regional Transportation Plan (RTP) update, Greater Madison MPO worked with a consultant to create an interactive website for the RTP in an effort to increase public participation and interest in the planning process. The website, [greatermadisonmpo.konveio.com](http://greatermadisonmpo.konveio.com), provided project news, descriptions of the plan development process, a listing of RTP-related boards and committees and corresponding membership, a timeline of public engagement activities and meetings, links to related plans and studies, information about Greater Madison MPO, and interactive tools at specific points in the planning process. The website also included Spanish translation of key plan information.

Through every public involvement phase of the RTP update, outreach was done to engage the public and stakeholders and bring awareness to public involvement meetings, interactive comment maps, and other opportunities to provide public feedback. Press releases were distributed prior to each phase of public involvement, some of which were advertised through local news agencies. Opportunities for comment and public involvement meetings were regularly communicated through Facebook posts. A public hearing for the draft plan was also conducted.

Greater Madison MPO wants to do more. During the pandemic, Greater Madison MPO did not hold in-person meetings. The City of Madison/Planning Division used a survey/demographics/registration confirmation email intermittently. Greater Madison MPO could require stakeholders to register to attend a public involvement meeting and provide demographic information. Greater Madison MPO has a new marketing and communication specialist to work with diverse communities and reach disenfranchised populations.



Greater Madison MPO sent out self-identification forms to its two planning/advisory committees. Minorities are represented on both committees. The committees are also geographically diverse.

**Recommendations:**

Greater Madison MPO should use the survey/demographics/registration confirmation email to provide the opportunity for stakeholders who attend a public involvement meeting to provide demographic information.

**G. Summary**

The desk audit of Greater Madison MPO found many commendable practices and procedures. Commendable practices and procedures under Title VI include: Title VI/Nondiscrimination Assurances signed by the MPO Director; Title VI Program/Language Access Plan; Notice of Nondiscrimination to the public; and a Title VI complaint form, policy, and procedure. Commendable practices and procedures under LEP include: a four-factor analysis; LEP training for front-line staff; translation of the Nondiscrimination statement and vital documents; and taglines in different languages. Commendable practices and procedures under Public Involvement and Outreach include: a Public Participation Plan, using the U.S. Census to identify the population eligible to be served, and identifying Environmental Justice areas for the Transportation Improvement Plan. The onsite visit reviewed the desk audit findings, asked follow-up questions, and made recommendations for improvement.

## **VI. TRAINING**

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

The Title VI Program Coordinator completed the following trainings in FFY 2023.

- WisDOT Affirmative Action Advisory Committee "Unconscious Bias" Presentation with Judge Mosley on January 18, 2023.
- TRB Webinar: Advancing Transportation Equity—Key Insights from 2021 and Looking to 2024 on March 9, 2023.
- TRB Webinar: Career Series #3 – Transportation Equity: Community-Building in Action on March 22, 2023.
- FHWA Equity in Roadway Safety Leadership Panel on April 17, 2023.
- FHWA Equity in Roadway Safety Webinar Series: Tools to Conduct Equitable Safety Data Analysis on June 14, 2023.
- FHWA Equity in Roadway Safety Workshop: Strategies for Meaningful Public Involvement in Roadway Safety Planning on September 20, 2023.

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

- One new committee member completed the FHWA “Federal-aid Essentials for Local Public Agencies - Title VI/Nondiscrimination” training modules.
- New committee members completed the updated “Title VI: Knowing Your Role” online module.

### **C. Department Non-Supervisory Employees**

- 1398 non-supervisory employees completed the updated “Title VI: Knowing Your Role” training from in FFY 2023.

This introductory online module explains the parameters of Title VI and the employee role in ensuring nondiscrimination in WisDOT programs and activities. All WisDOT employees including staff, supervisors, and managers complete the module as part of the New Employee Orientation Program. The module was updated in August 2023 and completion by all WisDOT employees is required by December 31, 2023.

- 105 employees attended the “Right-of-Way Acquisition and Title VI/Nondiscrimination Requirements” presentation during the WisDOT 2023 Real Estate Conference on October 3, 2023.

This presentation was designed for WisDOT staff and consultants to ensure nondiscrimination in all Department programs, services, and activities including ROW Acquisition. The presentation also defined Title VI/Nondiscrimination responsibilities for ROW Acquisition and the Right-of-Way Program.

- 2 Planning employees and 13 Transit employees attended the “Title VI/ADA/Nondiscrimination LEP Program Plan Requirements for MPO/RPC Recipients of Federal Transit Administrations (FTA) Funding” presentation by the Transit Title VI Program Manager during the quarterly MPO/RPC Directors’ meeting on July 25, 2023.

The purpose of the training was to provide an overview of the MPO/RPC Title VI Nondiscrimination Plan requirements, discuss the 2023 submission process and deadline, and provide technical resources and guidance materials. Attendees learned about the key requirements: Notice of Nondiscrimination, Complaint Procedure, Complaint Form, Complaint Log, Public Involvement Plan, Limited English Proficiency Plan (LEP), Demographic Profile, Program Administration, and Staff Training.

**D. Department Supervisory Employees**

- 224 supervisory employees completed the updated “Title VI: Knowing Your Role” training in FFY 2023 (*see Training Description in section C*).

**E. Subrecipients**

- 23 Metropolitan Planning Organizations and Regional Planning Commissions (MPO/RPC) employees attended the “Title VI/ADA/Nondiscrimination LEP Program Plan Requirements for MPO/RPC Recipients of Federal Transit Administrations (FTA) Funding” presentation by the Transit Title VI Program Manager during the quarterly MPO/RPC Directors’ meeting on July 25, 2023 (*see Training Description in section C*).
- An email blast was sent to Local Public Agencies (LPA) on June 5, 2023, recommending that LPAs view the FHWA training, “Federal-aid Essentials for Local Public Agencies: Title VI/Nondiscrimination modules” in preparation for Title VI reviews.

**F. Contractors and Consultants**

- 693 Contractors and Consultants with a WisDOT LearnCenter account completed the “Title VI: Knowing Your Role training in FFY 2023. The requirement for contractors and consultants to complete the training began on August 22, 2023 (*see Training Description in section C*).
- 70 Consultants attended the “Right-of-Way Acquisition and Title VI/Nondiscrimination Requirements” presentation during the WisDOT 2023 Real Estate Conference on October 3, 2023 (*see Training Description in section C*).

## **VII. TITLE VI COMPLAINTS**

### **A. Complaints**

The Title VI Program received 2 Title VI complaints in FFY 2023. The basis for the complaints is shown below. Some complaints contained more than one basis.

- Race - 1
- Color - 1
- National Origin - 0
- Age - 1
- Retaliation - 1

### **B. Status of complaints**

The status of the complaints received in FFY 2023 is listed below. One complaint was forwarded to the National Highway Traffic Safety Administration (NHTSA) Office of Civil Rights for processing. One complaint was forwarded to the FHWA Headquarters Office of Civil Rights for processing.

- Referred to NHTSA – 1
- Referred to FHWA - 1
- Closed – 1
- Open - 1

The complaints log is available any time for inspection.

### **C. Technical Assistance**

The Title VI Program received 12 requests for technical assistance in FFY 2023.

## **VIII. LIMITED ENGLISH PROFICIENCY**

### **A. Information in Other Languages**

The top four languages spoken by LEP persons in Wisconsin are: Spanish, Hmong, German, and Chinese. WisDOT provides the following information regarding language access services:

- Nondiscrimination Notice in Spanish and Hmong.
- “Individual Foreign Language Interpreter and Translator Request” form for the public to request interpretation or translation services free of charge.
- WisDOT website, including forms and Word documents, are available for translation through Google Translate.
- Language Access Plan (LAP) for WisDOT staff to provide in-person interpretation, telephonic interpretation, and written translation services.
- Interactive map of “Commonly Spoken Foreign Languages in Wisconsin” for WisDOT staff that estimates the percentage of the population in each Wisconsin county that speaks a foreign language and can be used for statewide and regional analysis.

### **B. FFY 2023 Accomplishments**

- In August 2023, the Division of Motor Vehicles (DMV), Bureau of Field Services, rolled out *Pocketalk* to all 80 permanent Customer Service Centers.

*Pocketalk* is a handheld device that provides two-way translation and interpretation in real-time providing DMV the ability to communicate with non-English speaking customers. *Pocketalk* provides talk-to-text translation in 82+ languages and visual translation for 55 languages via a built-in camera. The camera can instantly recognize and translate text, the written word, and signs. The device runs on data (included for 2 years) or a Wi-Fi connection.

*Pocketalk* has improved employee safety and operational efficiency by offering a quick and basic translation solution. It eliminates wait times or dependency on other multilingual staff and/or third-party interpretive services. An increase in customer satisfaction, staff productivity, and reduction in return visits has also been recognized, now being able to provide better instruction and information on the customer’s initial visit.

### **C. FFY 2024 Goals**

- Develop a report form for divisions, bureaus, and programs to track the number of language interpretations/translations provided during an FFY.

## **IX. 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.

For the last 23 years, WisDOT has worked in partnership with the College of the Menominee Nation and the Lac Courte Oreilles Ojibwa University 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 only one of two other states in the country that offers this program with the two tribal colleges within the state.

In 2023, 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 2023 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. Lac Courte Oreilles Ojibwa University had 18 student participants. The College of the Menominee Nation had 24 student participants.

**X. 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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