

Title VI Compliance Requirements for Subrecipients

What is Title VI?

“No person in the United States shall, on the grounds of race, color, or national origin, be excluded from participation in, be denied the benefit of, or be subjected to discrimination under any program or activity receiving federal financial assistance.”

- 1) As subrecipients, your organization must have signed assurances as a condition of Federal award and approval and to ensure the program is conducted and operated with all requirements imposed (49 CFR 21.7)
- 2) Develop a system of procedures and mechanisms to assure nondiscrimination in all its programs, activities and services, whether Federally-funded or not (49 CFR 21.7 & 23 CFR 200.5(p))
- 3) Develop Title VI Implementation Plan/Program
 - Nondiscrimination Statement of Policy
 - Designate Title VI Coordinator/Unit
 - Procedures for assuring compliance and enforcement
 - Annual Work Plan
 - Required Title VI Contract Provisions
 - Opportunity for DBE's
 - Participation by small business enterprises
- 4) Submit an Annual Title VI Accomplishment/Goals report to VTrans

Additional Considerations:

- Vermont Agency of Transportation (VTrans) may delegate Federal-aid project administration and management to subrecipients like cities, towns, townships or other local municipal entities
- Although a subrecipient, your organization is required to carry out their Federal-aid project actions in accordance with all applicable Federal requirements

- Nondiscrimination refers to the absence of disparate treatment or impact in Federally-assisted programs and activities
- Failure or refusal to furnish required assurance is grounds for termination and/or refusal to grant or continue Federal financial assistance (49 CFR 21.13(b)&(c))

Helpful Title VI and Civil Rights Links:

<http://vtrans.vermont.gov/civil-rights/compliance/titlevi>

<http://www.fhwa.dot.gov/resourcecenter/teams/civilrights/>

<http://www.fhwa.dot.gov/civilrights/programs/tvi>

<http://www.fta.dot.gov/civilrights/12328.html>

http://www.fhwa.dot.gov/environment/environmental_justice/overview/

<http://www.lep.gov/>

<https://www.civilrights.dot.gov/>