

New Jersey Department of Transportation  
Bureau of Research

## Technical Brief



### Title VI Agency Policy Examination and Best Practices Review

*This study developed recommendations for updating NJDOT's existing Title VI policies and procedures. By reviewing the Title VI policies and procedures of other transportation agencies as well as NJDOT's existing policies and procedures, the research team developed a proposed structure and suggested content for updating NJDOT's existing Title VI Plan.*

### Background

In order to meet MAP-21 guidelines and remain in compliance with FHWA's Title VI requirements, the NJDOT Division of Civil Rights and Affirmative Action was instructed to re-examine their existing Title VI policies and procedures. Through this process they were charged with identifying the strengths and weaknesses of the Department's existing Title VI practices, in addition to the strengths and weakness of Title VI practices when coordinating with sub-recipients. Each Federal recipient is charged with developing their own plans, policies, and requirements that assist in achieving Title VI compliance. Guidance is varied and there is no one approach that is consistent for achieving Title VI compliance.

### Research Objectives and Approach

This objective of the research was to ensure NJDOT and sub-recipients remain in compliance with federal Title VI regulations. The research approach consisted of the following steps:

- Examining existing Title VI regulations and best practices for achieving compliance based upon the body of transportation planning literature, policies, and procedures of other states and federal agencies;
- Reviewing NJDOT's current Title VI practices;
- Gathering information on how other State Department of Transportations and sub-recipients are achieving Title VI compliance; and
- Summarizing recommendations for Title VI compliance.

### Findings

The research team found that in order to develop a comprehensive Title VI Plan, NJDOT's Title VI Plan should include the following elements: Introduction/Overview, Organization and Staff Responsibilities, Procedures for Ensuring Compliance, Program for Conducting Title VI Reviews, Compliance Monitoring, and Glossary of Terms/Definitions.

The research team has the following recommendations for NJDOT:

- NJDOT should update the content of its existing Title VI Plan with recommendations identified in NJDOT's Title VI Practices Review. The fact sheets in NJDOT's Title VI Practices Review can be used to guide the update of the existing Title VI.
- NJDOT should strengthen internal partnerships, particularly with programmatic areas and upper-level management. NJDOT should strengthen external partnerships with MPO's, sub-recipients, municipalities/localities, engineers at job sites, other Departments of Transportation, and the Federal Highway Administration.
- NJDOT should formulate training programs and modules aimed at a variety of audiences. Internal audiences to target include program area staff and upper-level management. External audiences to target include sub-recipients (county engineers, consultants/contractors, and DBEs).
- To achieve Title VI compliance in contracts or with DBEs, NJDOT should create and maintain detailed workflows for contractors and track DBE goals on a monthly basis.
- NJDOT should update its existing Title VI data collection methods and sources, which may include formulating an electronic database that can be populated by data obtained by MPOs and municipalities.
- NJDOT should notify sub-recipients of their Title VI roles and responsibilities as well as NJDOT's responsibilities as it relates to Title VI compliance for sub-recipients. NJDOT should also provide sub-recipients with guidance on policies and procedures for addressing DBEs/Contract Compliance.
- NJDOT should evaluate the existing staff size and responsibilities of those responsible for Title VI Compliance (by examining the staff size and responsibilities of peer agencies interviewed).

### **For More Information Contact:**

NJDOT Project Manager:	Paul Thomas
	(609) 530-8039
	paul.thomas@dot.nj.gov
Principal Investigator:	Christopher Titze, Whitney Faron
	Cambridge Systematics
	(646) 364-5479
	ctitze@camsys.com

A final report is available online at: <http://www.state.nj.us/transportation/refdata/research/>.  
If you would like a copy of the full report, send an e-mail to: [Research.Bureau@dot.state.nj.us](mailto:Research.Bureau@dot.state.nj.us).

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