



# **TITLE VI COMPLIANCE REVIEW OF THE** **Hampton Roads Planning District Commission**

## **FINAL REPORT**

7/26/2021

(Updated 2/8/23)

Prepared By

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**I. GENERAL INFORMATION**

SUB-RECIPIENT: Hampton Roads Planning District Commission

EXECUTIVE OFFICIAL: Robert A. Crum, Jr  
Executive Director  
HRPDC  
723 Woodlake Road, Chesapeake, VA 23320

COMPLIANCE REVIEW FORM PREPARED BY: Kendall Miller, HRPDC Title VI/Civil Rights

DATE OF COMPLIANCE REVIEW FORM SUBMITTAL: 10/30/2020

DATE OF SITE VISIT: 2/9/2021

REPORT PREPARED BY: Queen T. Crittendon, VDOT Civil Rights

## **II. JURISDICTION AND AUTHORITIES**

The Virginia Department of Transportation's (VDOT) Civil Rights Division is authorized by the Department of Transportation (DOT) and the Federal Highway Administration to conduct civil rights compliance reviews. Reviews are undertaken to ensure compliance of applicants, recipients, and sub-recipients with Title VI of the Civil Rights Act of 1964, as amended (42 U.S.C.2000d); 23 CFR 200: The Title VI Program and Related Statutes-Implementation and Review Procedures; and 49 CFR 21: Nondiscrimination in Federally Assisted Programs of the Department of Transportation.

The Hampton Roads Planning District Commission is a sub-recipient of federal assistance and is therefore subject to the Title VI compliance conditions associated with the use of these funds. As a sub-recipient, the Hampton Roads Planning District Commission is required to establish and maintain effective internal control that provides reasonable assurance that the entity is managing the federal funds in compliance with Federal Statutes, regulations, terms and conditions of the Federal funding.

### **III. PURPOSE and RESPONSIBILITIES**

#### **Purpose**

In accordance with 23 CFR 200.9 (b)(7), the Virginia Department of Transportation is required to conduct mandatory reviews of sub-recipients receiving federal funds to determine whether they are implementing their responsibilities under the Title VI Program.

The primary purpose of this Compliance Review was to determine the extent to which the Hampton Roads PDC has met its Title VI Program Requirements. The Compliance Review also provided the opportunity to offer technical assistance and make recommendations for corrective actions related to deficiency findings of the Hampton Roads PDC 's Title VI Program.

FHWA expects that VDOT will, at a minimum, review sub-recipients to ensure that they have annually:

- A signed Title VI Program Assurance
- Identified a Title VI Program Coordinator
- Submitted a Title VI Program Plan; and
- Submitted a Title VI Program Report

#### **Responsibilities**

The State DOTs are able to require of PDCs any number of the same requirements that apply to the State DOTs to determine if the PDC is implementing a compliant Title VI Program.

As a sub-recipient, PDCs are responsible for meeting the Title VI Program requirements as defined by the State DOT. VDOT's Title VI requirement is to ensure that the PDC:

- Designates a Title VI Coordinator that has access to the head of the organization
- Develops a Title VI Program Implementation Plan
- Implements Title VI Program directives
- Develops procedures for investigations and disposition of Title VI complaints that conform to the FHWA complaints procedures found in the FHWA Title VI Complaints Q and A ([https://www.fhwa.dot.gov/civilrights/programs/title\\_vi/titleviga.cfm](https://www.fhwa.dot.gov/civilrights/programs/title_vi/titleviga.cfm)).
- Develops procedures for the collection of statistical data (race, color, national origin, sex, age, disability, and persons of limited English proficiency)
- Receives and provides training on Title VI
- Develops information for dissemination to the general public in languages other than English, where appropriate
- Establishes procedures to identify and eliminate discrimination when found to exist
- Ensures that federally assisted transportation benefits and related to services are made available and are equitable distributed without regard to race, color, or national origin
- Ensures that the level and quality of federally assisted transportation services are sufficient to provide equal access and mobility for any person without regard to race, color, or national origin.

- Ensures that opportunities to participate in the transportation planning and decision-making process are provided to persons without regard to race, color, national origin, sex, age, or disability
- Ensures that decisions on the location of transportation services and facilities are made without regard to race, color or national origin.
- Takes affirmative action to correct any deficiencies found within a reasonable time period not to exceed 90 days.

#### **IV. BACKGROUND INFORMATION**

The purpose of planning district commissions, as set out in the Code of Virginia, Section 15.2-4207 is ...to *encourage and facilitate local government cooperation and state-local cooperation in addressing on a regional basis problems of greater than local significance.*

The HRPDC mission is to:

- Serve as a forum for local elected officials and chief administrators to deliberate and decide issues of regional importance;
- Provide the local governments and citizens of Hampton Roads credible and timely planning, research and analysis on matters of mutual concern; and
- Provide leadership and offer strategies and support services to other public and private, local and regional agencies, in their efforts to improve the region's quality of life.

The HRPDC serves as a resource of technical expertise to its member local governments. It provides assistance on local and regional issues pertaining to Economics, Emergency Management, Environmental Education, Housing, Planning, and Water Resources, and provides a robust education and outreach program through its Office of Community Affairs & Civil Rights.

The HRPDC staff also serves as the support staff for the Hampton Roads Transportation Planning Organization (HRTPO), which is responsible for transportation planning and decision-making in the region. As a Virginia Planning District, the HRPDC is also the Affiliate Data Center for our region, providing economic, environmental, transportation, census, and other relevant information to businesses, organizations and citizens.

#### **COMMITTEES**

##### **Hampton Roads Planning Directors**

The HRPDC facilitates a regular meeting of local government planning directors. The goals of the meeting are to develop and improve working relationships, share best practices, and collaborate to address regulatory and technical matters related to community development. The meeting is also used as a forum to communicate with and receive input from local planners regarding the work of regional organizations and provide input to the Chief Administrative Officers (CAO) as requested. The group meets on the last Thursday of the month. Agendas indicating the meeting location and time are distributed approximately one week prior to the meeting dates.

##### **Regional Environmental Committee**

The Regional Environmental Committee addresses technical and administrative issues associated with environmental planning, land use, water quality, stormwater, environmental education, as well as a broad range of other coastal and planning issues. The committee meets on the first Thursday of the month. Agendas indicating the meeting location and time are distributed approximately one week prior to the meeting date.

### Current program areas include:

- Conservation Planning
- Water Access Planning
- Federal Planning
- Solid Waste Planning
- Offshore Wind
- Mapping & Data

### PDC Board Structure:

- Chair
- Vice-Chair
- Treasurer
- Localities represented include:
  - *Chesapeake*
  - *Franklin*
  - *Portsmouth*
  - *Gloucester*
  - *Smithfield*
  - *Newport News*
  - *Southampton*
  - *Suffolk*
  - *Isle of Wight*
  - *Surry*
  - *James City*
  - *Virginia Beach*
  - *Norfolk*
  - *York*
  - *Hampton*
  - *Poquoson*

### HAMPTON ROADS DEMOGRAPHICS

Table 5: Population by Race

Geography	Total population	White	Black/African American	American Indian and Alaska Native	Native Hawaiian and Other Pacific Islander	Asian
Chesapeake	222,209	139,012	66,237	871	6,383	169
Gloucester County	36,858	32,149	3,197	139	286	15
Hampton	137,436	58,642	68,104	594	2,992	154
Isle of Wight County	35,270	25,318	8,712	126	281	15
James City County	67,009	53,792	8,805	197	1,506	55
Newport News	180,719	88,518	73,514	851	4,956	315
Norfolk	242,803	114,304	104,672	1,200	7,999	396
Poquoson	12,150	11,557	78	38	260	3
Portsmouth	95,535	39,701	50,878	421	1,019	112
Suffolk	84,585	44,197	36,120	268	1,350	54
Virginia Beach	437,994	296,670	85,935	1,685	26,769	657
Williamsburg	14,068	10,407	1,968	38	808	5
York County	65,464	50,031	8,751	251	3,205	99

Per US Census data conducted in 2010, the total population for the 13 HRTPO localities was at 1,632,100, which excludes portions of Southampton and Franklin counties. The following chart represents the population demographics by race as presented in the Title VI/LEP Plan (2019 Update, Table 5). However, based on current 2019 US Census data, the Hampton Roads MPA represents 1,684,277 estimate population (July 1, 2019), which shows a continuous growth in the region's overall population.



## V. SCOPE AND METHODOLOGY

### Scope

The following form was used to conduct the Title VI Compliance Review of the Hampton Roads PDC .



## Planning District Commission Title VI Program Review Form (Self-Assessment)

This questionnaire is used to assess your organization's compliance with Title VI regulations. State Highway Agencies (SHAs) are required to review those entities to which the SHA distributes federal funds (subrecipients) (23 C.F.R. §200.9(b)(7)). VDOT is required to conduct Title VI reviews of Metropolitan Planning Organizations (MPOs) to monitor and ensure Title VI compliance. The review form assists VDOT in determining whether the MPO operates in a nondiscriminatory manner and is managing the federal-aid in compliance with Title VI Regulations.

Reporting Period (VDOT reviewer enter applicable reporting period here)

<b>Name of PDC</b>	
<b>Address of PDC</b>	
<b>Date of Review</b>	

<b>Title VI Administration</b>
<p>1. Identify the person responsible for the administration of the Title VI policies and procedures at your Agency (Title VI Coordinator)</p> <p>Name: _____ Position Title: _____</p>
<p>2. Has the Title VI Coordinator participated in any form of training with specific reference to Title VI? Yes <input type="checkbox"/> No <input type="checkbox"/> If YES, what type of Training? Describe and provide date</p>
<p>3. Does the Title VI Coordinator have access to the top official at the PDC? Yes <input type="checkbox"/> No <input type="checkbox"/> Please list names of the official(s)</p>
<p>4. Does the agency have an approved Title VI Implementation Plan that documents the Agency's methods of administration of its Title VI Program? Yes <input type="checkbox"/> No <input type="checkbox"/> If YES, please enter the name of the Agency that approved the Plan, provide the date of approval and attach a copy of the Plan.</p>

. Has the agency signed the Title VI Assurances (USDOT 1050.2A)?

Yes ☐ No ☐

If YES, has the agency included the Title VI Assurances in the Title VI Implementation Plan?

Yes ☐ No ☐

## Staffing

1. Identify the following for each individual who has responsibilities in the transportation component of the organization. Name, position title, and race. Please attach an organizational chart.

NAME	POSITION TITLE	RACE

2. Of the positions above, identify those that are elected by citizens and those positions that are appointed by some governing authority. Identify the said governing authority.

## Public Involvement

1. What efforts are made to notify the public of meetings, workshops, special sessions, etc.?

2. What efforts are made to ensure minorities, disabled, and persons with Limited English Proficiency (LEP) are aware of PDC meetings?

3. Are accommodations for translation services or special needs included in notices to the public?

Yes ☐ No ☐

If YES, please attach a sample of the most recent notice.

4. Does the PDC include minority or non-English (other languages) media in all notification processes for public meetings or public review of agency documents?

Yes ☐ No ☐

If YES, identify the media resources used by name

5. Where are PDC meetings held? \_\_\_\_\_

Please describe the meeting locations, time, days of week. Is the atmosphere conducive for public involvement?

6. Are the meetings held where bus or rail service is provided?

Yes ☐ No ☐

If NO, please explain.

<p>7. Has your organization received any request for information in an alternative format such as Braille, Audio, or non-English?</p> <p>Yes <input type="checkbox"/> No <input type="checkbox"/></p> <p>If YES, please discuss.</p>
<p>8. What is your process for providing access to persons whose primary language is not English?</p>
<p>9. Has the PDC established any advisory or citizen's group?</p> <p>Yes <input type="checkbox"/> No <input type="checkbox"/></p> <p>If YES, describe any efforts or methods used to focus on increasing the participation of minority and non-English speaking population, in the transportation planning processes.</p>
<p>10. Are persons traditionally underrepresented by transportation systems, such as minority or LEP population, actively sought out for involvement in PDC processes?</p> <p>Yes <input type="checkbox"/> No <input type="checkbox"/></p> <p>If YES, what methods are used?</p>
<p>11. Are contacts with minority groups or leaders used to identify information needs and planning/programming issues or concerns?</p> <p>Yes <input type="checkbox"/> No <input type="checkbox"/></p> <p>If YES, identify those individuals contacted during the reporting period</p>
<p>12. How does the PDC gather data when assessing transportation needs, projects, and impacts?</p> <p>How is the data utilized to examine and evaluate the equitable distribution of benefits and burdens of transportation investments?</p> <p>Note: The emphasis here is on collecting and utilizing data that reflects community boundaries, racial and ethnic makeup, community services, etc.</p>
<p>13. Are limited English proficient persons made aware that they can receive translation services at no cost to them?</p> <p>Yes <input type="checkbox"/> No <input type="checkbox"/></p> <p>If YES, identify how</p>

## Contracting – consultants

1. Did your organization award any consultant contracts during the reporting period?

Yes ☐ No ☐

If YES, identify the following.

Total dollar amount of contracts awarded: \_\_\_\_\_

Total dollar amount awarded to DBE\* firms: \_\_\_\_\_

\*DBE = Disadvantaged Business Enterprises

2. Please provide list of companies, the type of service and the award amount.

3. How does your organization solicit and award consultant contracts?

4. Does your organization insert the Title VI/Nondiscrimination paragraph from the U.S. DOT Standard Title VI Assurances into all solicitations for bids and requests for proposals (RFPs)?

Yes ☐ No ☐

If YES, describe how this verified.

Provide an example of a document including the paragraph.

5. Do contracts with consulting firms include contract provisions for Title VI? (Appendix A and Appendix E of the US Order DOT 1050.2A)

Yes ☐ No ☐

Provide an example.

## Other

1. Has the PDC been reviewed recently by any governmental agencies (such as the Federal Transit Administration [FTA], Department of Labor, Department of Justice, or the Federal Highway Administration [FHWA]), for compliance with Title VI or other Equal Opportunity programs?

Yes ☐ No ☐

<p>If YES, please indicate the agency/agencies and provide a copy of the letter identifying the review finding(s). If the review was conducted by FTA, please attach a copy of the final report.</p>
<p>2. Have any formal or informal complaints alleging violations of the Title VI of the Civil Rights of 1964 been lodged against the PDC during the previous three years?</p> <p>Yes <input type="checkbox"/> No <input type="checkbox"/></p> <p>If yes, please provide a statement on the nature of the complaint and status of the complaint.</p>
<p>3. Does the PDC have Complaint Procedures which describe the process for investigations and disposition of Title VI complaints and conform to the FHWA complaints procedures?</p> <p>If YES, what is the PDC's process for complaints alleging violations of Title VI? Please describe the process for receiving, investigating, and resolving those complaints?</p>
<p>5. Identify any significant Title VI related issues and/or changes that have occurred during the reporting period.</p>
<p>6. Identify all individuals by name and title that are anticipated to attend an on-site Title VI compliance review if one is needed.</p>
<p><b>Catalog of Title VI related data to be submitted for this assessment</b></p> <ul style="list-style-type: none"> <li>• Professional Services Contracts - Bidding: Submit an advertisement/RFP applicable to the reporting period</li> <li>• Professional Services Contracts - Provisions: Submit a contract agreement applicable to the reporting period</li> <li>• Public Involvement – Submit public meetings records to include number of meetings, ads, meeting attendees' demographic data (collected at the meeting, comments collected both formally and informally) applicable to the reporting period.</li> </ul>

***For Office Use Only:***

**Findings / Conclusions**

Compliance: \_\_\_\_\_ Non-compliance: \_\_\_\_\_

**Review conducted by:** \_\_\_\_\_

**Approved by:** \_\_\_\_\_ **Date:** \_\_\_\_ / \_\_\_\_ / \_\_\_\_

## Methodology

Prior to conducting the Compliance Review, a letter was sent out to the PDC notifying them of an upcoming Title VI Compliance Review. Following the letter, the PDC received its Title VI Compliance Review Form accompanied by a cover letter providing instructions about completion and submittal of the form.

The compliance review form was sent to the PDC on 9/29/2020

The PDC submitted the completed form to VDOT's District Civil Rights Office on 10/30/2020

## VI. FINDINGS AND RECOMMENDATIONS

### 1. Title VI Administration

Requirements: Designation of a person responsible for the administration of the Title VI policies and procedures and easy access to the top official at the PDC. Development and implementation of Methods of Administration of the Title VI Program (policies and procedures) documented in a Title VI Implementation Plan that contains the required elements.

Finding: At the time of the report, the HRPDC was staffed with the support of the HRTPO Civil Rights and Community Affairs Administrator who possessed the required knowledge, skills, and authority to administer the Title VI Program for the HRPDC. The position reports directly to the HRTPO/PDC Executive Director. VDOT is aware that the formal assignment of the Civil Rights Administrator to the PDC was fair new at the time. While the staff person has the commitment to meet the requirements of the project, it appears from the Self-Assessment that it remained reliant on the HRTPO's process rather than assess and apply the unique characteristics of the PDC. The Self-Assessment indicated that the PDC did not have an approved Title VI Implementation Plan that documented the Commission's methods of administration of its Title VI Program. It was noted during a virtual meeting that the Plan was in the process of being developed by the Civil Rights Administrator. In reviewing the documents on the PDC's website there was no draft plan, only a brief narrative about Title VI and Environmental Justice. VDOT requested signed Assurances, which were submitted for the PDC. The Civil Rights Administrator identified various training received but was unable to show recent Title VI or related-training received by other PDC decision-makers; nor had the Administrator conducted training for the PDC staff.

As an update to the report, it is noted that the Civil Rights Administrator and Deputy Director of the PDC are no longer employed with the HRTPO/HRPDC. Title VI activities are being lead by the Executive Director, who possess less comprehensive knowledge of the fundamentals and requirements of Title VI.

Corrective Action: Based on feedback provided in the Self-Assessment and the approval status of the Title VI Implementation Plan, this item is deficient and requires corrective action.

## 2. Staffing

**Requirement:** Nondiscrimination in the selection and retention in employment practices in connection with the staff that has responsibilities in the transportation component of the organization.

**Finding:** The staff of the PDC is comprised of highly skilled technical professionals in various disciplines. It was stated that the PDC serves as a resource of technical expertise to its member local governments. It provides assistance on local and regional issues pertaining to economics, emergency management, housing, planning, environmental education, and water resources. The PDC staff serves as the support staff for the HRTPO.

**Advisory Comment:** The HRPC is advised to continue to expand its recruitment and hiring strategies for those individuals with direct leadership responsibilities in the various disciplines when vacancies occur to reflect the region's Census data representation.

## 3. Public Involvement

**Requirement:** Executive Order 12898 is a directive to provide minority and low-income populations access to information and opportunities for public participation in the decision-making process that may impact human health and the environment. Sub-recipients are required to ensure meaningful access to the information and opportunities for inclusive public participation of minority and low-income population.

**Finding:** It was reported on the Self-Assessment that the PDC enlists a number of methods to notify the public of upcoming meetings, workshops, or special sessions through its website, social media, physical meeting notices posted at the Regional Building, public notices for hearings, electronic newsletters, and press releases. However, the Self-Assessment reported that while the HRPDC Board and Committee shared meeting information via e-blasts, the Title VI Administrator did not have purview over the majority of public meetings for PDC programs to ensure minorities or persons with disabilities were informed about PDC meetings or if accommodations were needed. It was indicated that the PDC did not engage paid media in its public notification process, which would include minority or non-English (other languages) media in all notifications for public meetings or public review of agency documents. On a positive note, HRTPO and the PDC Boards revised their bylaws to expand the Community Advisory Committee (CAC) to include both activities, which input was received from its members. And, while some metropolitan planning organizations have lost CAC's due to lack of community participation, the Hampton Roads CAC has continued to engage and expand its portfolio to include HRPDC actions.

**Corrective Action:** This requirement is deficient and requires corrective action. While the PDC has developed and posted its Public Participation Plan, it appears that crucial elements of the Plan have not been executed to ensure a wider-spread of information to the public, particularly with minorities, disabled groups, and low income populations within the region for increased engagement. The Title VI Coordinator must be engaged in the activity of the PDC and maintain records to document its level of public involvement. For this reason, it is required that the PDC re-evaluate the current Participation Plan for effective strategies for minority and low-income populations engagement.



**Requirement:** Executive Order 13166 ensures access to programs, services and activities for persons whose primary language is not English that may have difficulty reading, writing, speaking or understanding English. Sub-recipients are required to ensure meaningful access to the information and opportunities for inclusive public participation of individuals who are Limited in English proficiency.

**Finding:** The Self-Assessment indicated that while the HRPDC Board and Committees meetings were shared via e-blasts, the Title VI Administrator did not have purview over the majority of public meetings for PDC programs to ensure Limited English Proficient (LEP) individuals were also made aware of PDC meetings or if accommodations were requested. The Self-Assessment questionnaire asks if any efforts or methods were used to focus on increasing the participation of minority and non-English speaking populations in the regional planning process; and the response given indicated that this requirement has not been completed by the PDC.

**Corrective Action:** This requirement is deficient and requires corrective action. Based on the Self-Assessment, the Civil Rights Administrator reported that her position was not involved in the PDC's public meetings to ensure LEP individuals were made aware of public meetings. The PDC is also advised that its first resources used for interpreting and translations should be a professional language services provider. The last types of resources to be used should be the free websites and Google Translate due to liability and non-trusted services. The staff may assist in impromptu or emergency situations but not constantly relying on its staff unless staff members are specifically hired to do so.

#### 4. Contracting - Consultants

**Requirement:** Requires nondiscrimination notifications in all solicitations for bids of work or materials and in agreements; nondiscrimination in the selection and retention of contractors; and nondiscrimination in employment practices for contractors and subcontractors.

**Finding:** The signed Title VI Assurances were verified and have been physically inserted all contracts and agreements. VDOT also received a copy of the signed document as requested. HRTPO/PDC Procurement Manual serves as the guiding document for all purchasing and procurement activities.

**Advisory Comment:**

As a reminder, only Appendices A and E of the USDOT 1050.2 need to be incorporated in contracts or agreements. The Title VI nondiscrimination paragraph needs to be included in solicitation documents. It is a specific paragraph that says: "The (Name of MPO/TPO), in accordance with the provisions of Title VI of the Civil Rights Act of 1964 (78 Stat. 252, 42 U.S.C. §§ 2000d to 2000d-4) and the Regulations, hereby notifies all bidders that it will affirmatively ensure that any contract entered into pursuant to this advertisement, disadvantaged business enterprises will be afforded full and fair opportunity to submit bids in response to this invitation and will not be discriminated against on the grounds of race, color, or national origin in consideration for an award."

5. Other

**Requirement:** Recipients and sub-recipients shall have a procedure in place for the filing of Title VI discrimination complaints. The process conforms to the FHWA complaints procedures found in the FHWA Title VI Complaints Q and A? The procedure shall be made available to participants, beneficiaries, and other interested parties.

**Finding:** Per the response noted in the Self-Assessment, the HRPDC did not have discrimination complaint procedures established, which are typically included in the approved Title VI Plan and posted on the website, conforming to FHWA's guidance. The PDC's website was reviewed, and there was no evidence of the complaint procedure on its website.

**Corrective Action:** This requirement is deficient and requires corrective action. HRPDC is required to post discrimination complaint procedures and update those procedures in the Title VI Plan and update the website. PDC is also required to submit an annual Title Accomplishment Report to VDOT CRD.

## VII. SUMMARY OF FINDINGS AND CORRECTIVE ACTIONS

### TITLE VI COMPLIANCE REVIEW OF Hampton Roads PDC

Title VI Requirements	Desk Review Finding	Description of Deficiencies	Site Visit Finding	Response Date	Response Due Date
1. Title VI Administration	<b>D</b>	Update Title VI Plan for submission to VDOT Civil Rights Division for approval.  Conduct on-going training for staff and Board/ Advisory members.			March 15, 2023  Title VI Training must be on-going.
2. Staffing	<b>ND/AC</b>	Advised to enhance recruitment efforts and hiring strategies to reflect Hampton Roads demographics.			On-going

3. Public Involvement	<b>D</b>	<p>The Title VI Coordinator must be engaged in the activity of the PDC and maintain records to document its level of public involvement.</p> <p>Re-evaluate current the Participation Plan for effective strategies for LEP engagement and monitor and report efforts.</p>			March 15, 2023
4. Contracting - consultants	<b>ND/AC</b>	<p>Ensure the Appendices A and E are included in contracts and agreements.</p> <p>Ensure the Title nondiscrimination paragraph is included in solicitations.</p>	Recommended that the Executive Director sign the updated Assurance and post it on the website and provide a copy to VDOT-CRD.		March 15, 2023
5. Other	<b>D</b>	<p>HRPDC is required to develop and post discrimination complaint procedures and update those procedures in the Title VI Plan.</p> <p>PDC is also required to submit an annual Title Accomplishment Report to VDOT CRD.</p>			<p>March 15, 2023</p> <p>November 15, 2023</p>

**Findings: ND= No Deficiency; D= Deficiency; NA= Not Applicable; NR= Not Reviewed;  
AC= Advisory Comment**

## **VIII. APPENDIXES**

**N/A**