

**Title VI Compliance Requirements
for
Local Public Agencies (LPA's)**

- 1) As subrecipients, LPA's 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 Program
 - Nondiscrimination Statement of Policy
 - Designate Title VI Coordinator
 - Procedures for assuring compliance and enforcement
 - Annual Work Plan/Accomplishment Report
 - Required Title VI Contract Provisions
 - Opportunity for DBE's
 - Participation by small business enterprises

Additional Considerations:

- State Transportation Agency (STA) may delegate Federal-aid project administration and management to subrecipients like LPA's- cities, towns, townships or other local municipal entities
- Although a subrecipient, LPA's are required to carry out their Federal-aid project actions in accordance with all applicable Federal requirements
- Nondiscrimination denotes 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))