



City of Alexandria, Virginia

MEMORANDUM

DATE: MAY 30, 2023

TO: JAMES PARAJON, CITY MANAGER

THROUGH: ROBERT SNYDER, CHIEF INTERNAL AUDITOR 

FROM: KUSH PATEL, INTERNAL AUDITOR II 

SUBJECT: T&ES VDOT TITLE VI COMPLIANCE REVIEW (FS23-11)

Background Title VI requirements prohibit agencies receiving Federal assistance from discriminating against anyone or any group in the United States on the grounds of race, color, national origin, sex, age, disability, or low income. On May 2, 2022, the Virginia Department of Transportation (VDOT) contacted the City's Transportation and Environmental Services (T&ES) department and informed them that they would be conducting a Title VI Compliance Review of the organization pursuant to 23 CFR 200.9 (b)(7).

The Title VI Compliance Review would capture information related to the City's compliance with Title VI laws and regulations and the extent to which the City has met its Title VI Program Requirements. The City must be in compliance with VDOT and Federal Highway Administration (FHWA) regulations to avoid funding being canceled, terminated, or suspended. **Per the FY 2022 Annual Consolidated Financial Statement, VDOT pass-through expenditures from the U.S. Department of Transportation amounted to \$13,000,783.**

Findings The review found that the City needed to take the following actions:

- The City must update their Title VI plan documents to comply with federal requirements
- The Title VI Coordinator and personnel who implement the program must take ethical training

Conclusion On September 28, 2022, the City Council adopted a FHWA Title VI Plan that was the result of collaboration with VDOT. On December 28, 2022, VDOT completed their formal review of the FHWA Title VI Plan and identified that the City was required to include Title VI assurances with appendices. The assurance currently consists of a nine (9) page document which places the City on notice to the requirements of the program. The appendices are part of the Title VI program document. On February 7, 2023, the City Manager signed the assurances. On April 12th, 2023, the City Grants Coordinator attended the Title VI Coordinator training which completes the VDOT findings. **We would like to note that the approval of the Title VI program will be an annual requirement and any failure to reauthorize or update the program documents will result in new compliance review findings.**

cc. Kendel Taylor, Acting Deputy City Manager
 Tarrence Moorer, Acting Director T&ES
 Jacqueline Tucker, Race and Social Equity Officer