

2023

EEO/AFFIRMATIVE ACTION UPDATE

Prepared by

NORTH DAKOTA

DEPARTMENT OF TRANSPORTATION

Bismarck, North Dakota

www.dot.nd.gov

Ronald J. Henke, Director

CIVIL RIGHTS DIVISION

Ramona Bernard, Director

September 29, 2023

Table of Contents

INTRODUCTION	3
Civil Rights Division.....	3
NDDOT Organizational Chart (04/03/2023)	4
Civil Rights Division Chart (05/16/2023)	5
Updated Policies.....	6
Policy II 5-1 Title VI/Nondiscrimination and Americans with Disabilities Act (10/18/2022).....	6
Policy 2.1 - Title VII/EEO and Workplace Harassment Policy Statement (01/25/2023).....	8
Policy 3-1 - Disadvantage Business Enterprise Policy Statement (10/25/2019)	9
Updated Forms.....	11
PART 1- CONTRACTOR COMPLIANCE	14
I. Organization and structure	14
A. NDDOT EEO Coordinator (External) and staff support	14
B. District or Division Personnel	14
II. Compliance procedures.....	22
III. Accomplishments.....	22
A. Regular project compliance review program	22
VI. Complaints	23
VII. External training programs, including supportive services.....	23
A. Participation by women and minorities in construction training programs.	23
VIII. Disadvantaged Business Enterprise Program (DBE).....	26
XI. Liaison.....	26

INTRODUCTION

This document will serve as the 2023 Annual Update to the North Dakota Department of Transportation (NDDOT) five-year EEO/Affirmative Action Plan. The current plan is effective from 2020 through 2024. The entire five-year plan can be found at:

<https://www.dot.nd.gov/divisions/civilrights/docs/titlevii/AffirmativeActionPlan.pdf>

This annual update includes data and narratives with regard to the 2023 Workforce Analysis, applicant flow, and a variety of updated statistics.

Civil Rights Division

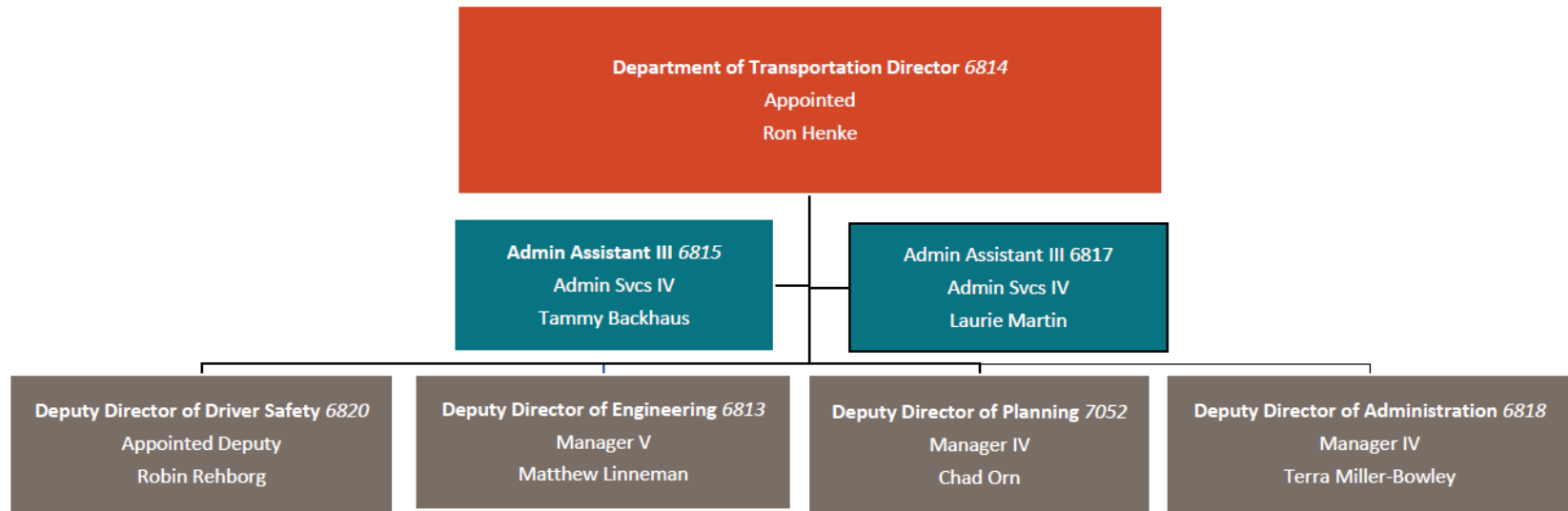
The NDDOT Civil Rights Division (CRD) is responsible for the following programs:

- Title VI/Nondiscrimination and ADA Program
- Internal EEO/Title VII Program, including AAR Program
- Workplace Investigations Program
- Disadvantaged Business Enterprise (DBE) Program,
Including Supportive Services
- Contractor Compliance Program
- OJT Program, including Supportive Services
- Labor Compliance Program, including LCPtracker

NDDOT Organizational Chart (04/03/2023)

Executive Office

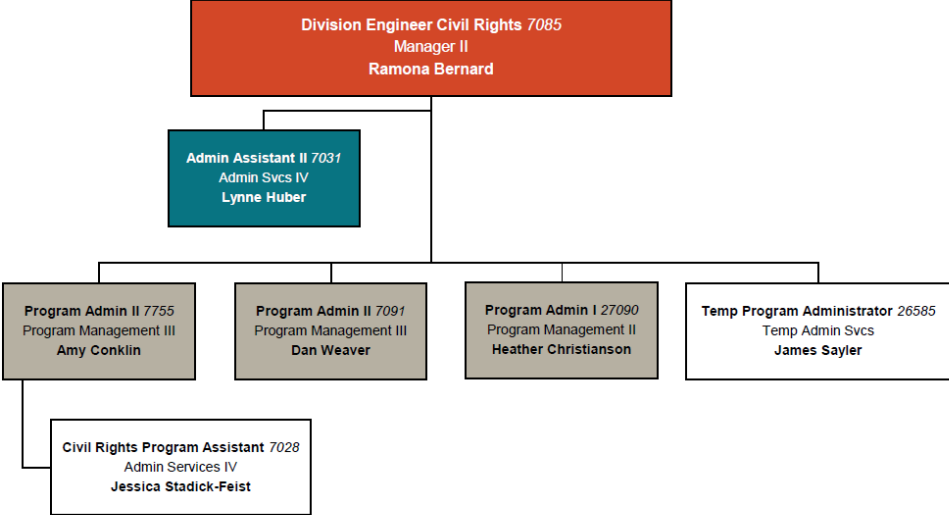
4-3-2023



Civil Rights Division Chart (05/16/2023)

Last updated 05/16/2023

Civil Rights



Updated Policies

Policy II 5-1 Title VI/Nondiscrimination and Americans with Disabilities Act (10/18/2022)



Agency:	North Dakota Department of Transportation (NDDOT)
Division:	Civil Rights
Group:	Executive Policy Manual
Category:	II-Management, Project, and Program Development
Policy Number:	II 5-1
Title:	Title VI/Nondiscrimination and Americans with Disabilities Act (ADA)
Original Date:	02/26/2010
Revised Date:	10/18/2022
Review by Date:	10/18/2023

PURPOSE: To set forth, as a fundamental agency policy, the department's commitment to ensure compliance with Title VI of the Civil Rights Act of 1964, related nondiscrimination statutes and regulations, and Americans with Disabilities Act (ADA) in all programs and activities.

POLICY: Title VI of the Civil Rights Act of 1964 (42 U.S.C. § 2000d *et seq.*, 78 Stat. 252), prohibits discrimination in federally assisted programs on the basis of race, color, or national origin; and 49 C.F.R. Part 21, entitled "Nondiscrimination In Federally Assisted Programs Of The Department of Transportation – Effectuation Of Title VI of the Civil Rights Act of 1964."

Since 1964, additional related statutes and regulations that have prohibited discrimination include the Federal-Aid Highway Act of 1973 (23 U.S.C. § 324 *et seq.*) on the basis of sex; Age Discrimination Act of 1975, as amended, (42 U.S.C. § 6101 *et seq.*) on the basis of age; Section 504 of the Rehabilitation Act of 1973 (29 U.S.C. § 794 *et seq.*) and Americans with Disabilities Act of 1990, as amended, (42 U.S.C. § 12101 *et seq.*) on the basis of disability.

The Civil Rights Restoration Act of 1987 (P.L. 100-259), amended the Civil Rights Act of 1964, and each of the affected statutes; the Age Discrimination Acts of 1967 and 1975, Section 504 of the Rehabilitation Act of 1973, the Americans with Disabilities Act of 1990, Title IX of the Education Amendments of 1972, and Federal-Aid Highway Act of 1973 by adding a section defining the word "program" to make clear that discrimination is prohibited in all areas, not just the particular program or activity that received the federal funding.

Additionally, Executive Order 12898 addresses Environmental Justice in minority and low-income populations and Executive Order 13166 on Limited English Proficiency are not statutes, but nondiscriminatory in their intent and included in this policy (70 Federal Regulations at 74087-74100.)

Title VI/Nondiscrimination and Americans with Disabilities Act (ADA)

II 5-1

Page 2

The NDDOT is a recipient of Federal financial assistance. It is the policy of NDDOT to ensure compliance with Title VI of the Civil Rights Act of 1964 and related nondiscrimination statutes or regulations in all programs and activities, whether those programs and activities are federally funded or not.

NDDOT will take all steps to ensure that no person shall, on the ground of race, color, national origin; sex, age, or disability, be excluded from participation in, be denied the benefits of, or be otherwise subjected to discrimination under any program or activity administered by NDDOT, its recipients, sub recipients, and contractors.

The NDDOT Director sub-delegates and charges the Division Directors and District Engineers with the responsibilities to assure that practices and procedures involving all programs and activities within their area of responsibility are applied uniformly and equitably and to ensure compliance with Title VI/Nondiscrimination and ADA Programs. The Title VI Liaison Officer and ADA Coordinator will provide assistance as necessary and appropriate.

NDDOT recognizes the need for continuous Title VI training for division and district Title VI Specialists and NDDOT personnel.

Anyone who believes that he or she has been subjected to discrimination under any program or activity of a recipient, sub recipient, or contractor should contact the NDDOT Title VI Liaison Officer and ADA Coordinator at 701-328-2576 or civilrights@nd.gov. TTY users may use Relay North Dakota at 711 or 1800-366-6888.

Ronald J. Henke, PE
Director

Policy 2.1 - Title VII/EEO and Workplace Harassment Policy Statement (01/25/2023)

NORTH DAKOTA DEPARTMENT OF TRANSPORTATION CIVIL RIGHTS DIVISION

Policy 2-1 Title VII

Original Date: July 7, 2011
Revised Date: January 25, 2023

TITLE VII/EEO AND WORKPLACE HARASSMENT POLICY STATEMENT

North Dakota Department of Transportation (NDDOT), is committed to and will ensure Equal Employment Opportunity (EEO) for all regardless of race, color, religion, sex, national origin, age, physical or mental disability or genetic information. NDDOT will ensure equal opportunity to all applicants, employees and contractors in all employment practices.

NDDOT will not tolerate discrimination or harassment or retaliation in the workplace. Harassment is defined as conduct that is so offensive as to create a work environment that a reasonable person would consider intimidating, hostile, or offensive. Violations of the law prohibiting unlawful discrimination practices will result in appropriate disciplinary actions against offenders, up to and including dismissal.

As Director of NDDOT, I am personally committed to maintain a model work environment, free of discrimination, harassment and retaliation and fully support the NDDOT's affirmative action program.

The responsibility for implementing NDDOT's affirmative action program is assigned to the Civil Rights Division Director. However, all employees and contractors share in this responsibility and will be assigned specific tasks to assure that compliance is achieved.

Applicants, employees and contractors who believe they have been victims of harassment or unlawful discrimination may, without fear of retaliation, seek the immediate assistance of a management official, any NDDOT Affirmative Action Representative, the Civil Rights Division Director at 701-328-2576 or the Human Resources Division Director at 701-328-4365. TTY users may call Relay North Dakota at 711 or 1-800-366-6888 (toll free).



Ronald J. Henke, Director
North Dakota Department of Transportation

1/31/2023

Date

Policy 3-1 - Disadvantage Business Enterprise Policy Statement (10/25/2019)

NORTH DAKOTA DEPARTMENT OF TRANSPORTATION CIVIL RIGHTS DIVISION

Policy 3-1 DBE

Original Date: August 1, 2014
Revision Date: October 25, 2019

DISADVANTAGED BUSINESS ENTERPRISE POLICY STATEMENT (49 CFR §26.23)

The North Dakota Department of Transportation (Department) has established a Disadvantaged Business Enterprise (DBE) program in accordance with regulations of the U.S. Department of Transportation (USDOT), 49 CFR Parts 23 and 26. The Department receives federal financial assistance from USDOT. As a condition of receiving this assistance, the Department has signed an assurance that it complies with 49 CFR Parts 23 and 26.

The DBE requirements of 49 CFR Parts 23 and 26 and the Department's DBE program apply to all federally-aided highway construction contracts and to any assignments made to subcontractors, subconsultants or sub recipients.

Title VI of the Civil Rights Act of 1964 prohibits discrimination on the basis of race, color, and national origin. Specifically, 42 USD 2000d states that "No person in the United States shall, on the ground of race, color or national origin, be excluded from participation in, be denied the benefits of, or be subjected to discrimination under any program or activity receiving Federal financial assistance." In addition to Title VI, there are other Nondiscrimination statutes which include: Section 162(a) of the Federal-Aid Highway Act of 1973 (23 USC 324) (sex), Age Discrimination Act of 1975 (age), and Section 504 of the Rehabilitation Act of 1973/ADA of 1990 (disability). Taken together, these requirements define an over-arching Title VI/Nondiscrimination and ADA Program. Title VI and the additional Nondiscrimination requirements are applicable to programs receiving federal financial assistance due to the Civil Rights Restoration Act of 1987.

In regard to the DBE Program, the Department, its sub recipients, contractors, subcontractors, consultants, and subconsultants shall not discriminate on the basis of race, color, national origin, or sex. It is Department policy to ensure that DBEs, as defined in 49 CFR Parts 23 and 26, have an equal opportunity to receive and participate in USDOT-assisted contracts. It is also Department policy:

- To ensure nondiscrimination in the award and administration of DOT-assisted contracts in the Department's highway, transit, and airport financial assistance programs;
- To create a level playing field on which DBEs can compete fairly for DOT-assisted contracts;
- To ensure that the Department's DBE program is narrowly tailored in accordance with applicable law;
- To ensure that only firms that fully meet this part's eligibility standards are permitted to participate as DBEs;
- To help remove barriers to the participation of DBEs in DOT-assisted contracts;
- To promote the use of DBEs in all types of federally-assisted contracts and procurement activities conducted by recipients.

- To assist the development of firms that can compete successfully in the marketplace outside the DBE program; and
- To provide appropriate flexibility to recipients of Federal financial assistance in establishing and providing opportunities for DBEs.

The Department will disseminate the policy when any updates are made to all Department staff as well as DBEs and non-DBEs. The policy will be disseminated to the broadest possible audience. We will:

- Broadcast the updated statement to all DBE and non-DBE firms through the Department's electronic notification email system (Listserv)
- Publish the updated policy in the next upcoming DBE newsletter
- Publish the updated policy on the Department DBE bid information web site at <http://www.dot.nd.gov/divisions/civilrights/docs/dbe/dbepolicystmt.pdf>

Each sub recipient, contractor, subcontractor, consultant, or subconsultant that fails to carry out the requirements set forth in 49 CFR Parts 23 and 26 may constitute a breach of contract, and after notification by the Department, may result in termination of the agreement or contract, or such remedy as the Department deems appropriate.

As the Department Director, I am charged with the overall responsibility for assuring compliance with 49 CFR Parts 23 and 26, including DBE programs delegated to sub recipients such as Metropolitan Planning Organizations and other political subdivisions. I have appointed the Civil Rights Division Director as the Department's DBE Liaison Officer. The DBE Liaison Officer is responsible for developing, coordinating, and monitoring the implementation of the Department's DBE program on a day-to-day basis. Division Directors and District Engineers are responsible for carrying out applicable facets of the DBE program within their areas.

Ramona Bernard is the Department's DBE Liaison Officer. She is responsible for implementing all aspects of the DBE program. Implementation of the DBE program has the same priority as compliance with all other legal obligations incurred by the Department in its financial assistance agreements with USDOT.



NDDOT Director

10-25-19

Date

Updated Forms

SFN 51795 – External Complaints of Discrimination (1-2022)

EXTERNAL COMPLAINTS OF DISCRIMINATION

North Dakota Department of Transportation, Civil Rights
SFN 51795 (1-2022)

COMPLAINANT INFORMATION (Complete all items below.)

Name		Telephone Number	
Address		City	State ZIP Code
Email Address			

CAUSE OF DISCRIMINATION (Check all that apply.)

Title VI of the Civil Rights Act of 1964 <input type="checkbox"/> Race <input type="checkbox"/> National Origin <input type="checkbox"/> Color	Other Nondiscrimination Statutes/Executive Orders <input type="checkbox"/> Sex <input type="checkbox"/> Disability <input type="checkbox"/> Age <input type="checkbox"/> Limited English Proficiency
---	---

Name of public entity complaint is against.
Provide an explanation of what happened and date(s) of the alleged discriminatory act and location.

WE CANNOT ACCEPT YOUR COMPLAINT WITHOUT A SIGNATURE AND DATE.

Complainant's Signature	Date
-------------------------	------

Any person or specific class of persons, who believes they were subjected to discrimination on the basis of race, color, national origin; or sex, age, disability, or limited English proficiency in the programs and activities of NDDOT or its sub-recipients (e.g., a city, county, Metropolitan Planning Organization, Transit Agency, etc.) may by himself/herself or through his/her legally authorized representative, make, sign and date a written complaint and file such complaint with the Department within 180 calendar days following the date of the last instance of the alleged discriminatory action. Complainants must complete in its entirety, sign, and date NDDOT's External Complaints of Discrimination form (SFN 51795) and file by mail, in person, or e-mail. However, the complainant may call NDDOT and provide the allegations by telephone. NDDOT will transcribe the complainant's allegations into the complaint form and send the written complaint to the complainant for corrections, signature, and date.

To request accommodations, complainants may contact the Civil Rights Division, NDDOT at (701) 328-2978 or civilrights@nd.gov. TTY users may use Relay North Dakota at 711 or 1-800-366-6888.

The NDDOT Civil Rights Division Program Administrator will review the complaint, gather additional information from the complainant if necessary, and refer the complaint to the appropriate federal agency, which in most cases will be the Federal Highway Administration. It is also within your rights to file directly with the appropriate Federal agency that oversees the transportation activities, services or facilities.

FHWA JURISDICTION (Roads and Bridges)

Title VI Complaints will be forwarded to the Division Office.

For Title VI complaints against sub recipients, NDDOT is required to follow the timeframes in 23 CFR 200.9(b)(3) as follows: A copy of the complaint, together with a copy of the NDDOT's report of investigation shall be forwarded to the FHWA Division Office within 60 days of receipt of the delegated complaint from FHWA.

ADA Complaints will be forwarded to the FHWA Division Office.

For a Section 504/ADA complaint against subrecipients, NDDOT shall forward a copy of the complaint, together with a copy of the report of investigation within 90 days of receipt of the delegated complaint to the FHWA Division Office.

The FHWA HCR has delegated authority for dismissing and issuing letters of findings (LOFs) for Title VI, and Section 504/ADA complaints processed by FHWA. LOFs issued by the FHWA HCR are administratively final.

FTA JURISDICTION (Public Transit)

Complaints filed under Title VI, related statutes, and Section 504/ADA in which NDDOT is named as the respondent will be handled informally if possible. If the complaint cannot be resolved by informal means, the NDDOT may investigate the complaint as follows:

1. The complaint will be reviewed within 10 business days to determine whether it contains all necessary information required for acceptance.
2. If the complaint is complete and no additional information is needed, the complainant will be sent a letter of acceptance along with the Complainant Consent/Release form (SFN 60741) and the notice about Investigatory Uses of Personal Information fact sheet.

Title VI, related statutes, and Section 504/ADA complaints filed directly with NDDOT against NDDOT, its sub recipients, or contractors will be processed by NDDOT in accordance with the FTA approved complaint procedures under FTA C 4710.1, FTA C 4702.1B, 49 CFR 27.13(b).

For Title VI or related statutes Complaints, NDDOT is required to follow the FTA C 4702.1B to comply with reporting requirements of 49 CFR 21.9(b). The investigation information is recorded on the Transit Title VI - List of Investigations, Lawsuits, and Complaints (SFN 60805) and included in the Title VI/Nondiscrimination and ADA Program submitted to FTA every three years. Although, FTA regulations do not specify a time frame for the investigation of Title VI complaints, the NDDOT attempts to complete investigations within 90 days of receipt of the complaint.

For a Section 504/ADA complaint, NDDOT shall forward a copy of the complaint, together with a copy of the report of investigation within 90 days of receipt of the complaint to the FTA Office of Civil Rights.

The FTA has delegated authority for issuing LOFs for Title VI, related statutes, and Section 504/ADA complaints processed by NDDOT. Closure letters or LOFs issued by NDDOT under FTA jurisdiction on Title VI, related statutes, and Section 504/ADA complaints are administratively final. Individuals or a specific class of individuals, personally or through a representative, may submit a complaint to FTA within 180 days from the date of the alleged discrimination.

If NDDOT receives a complaint against its sub recipients, the sub recipient will be contacted to handle the complaint informally at the local level if possible. If the complaint cannot be resolved informally at the local level, NDDOT will use the same process above to resolve the complaint.

Agencies Authorized to Receive and Process Complaints

North Dakota Department of Transportation

Civil Rights Division
608 E Boulevard Ave.
Bismarck, ND 58507-0700
Phone: (701) 328-2576
TTY: 711 or (800) 366-6888
E-mail: civilrights@nd.gov

FHWA

North Dakota Division Office
4503 Coleman St. N., Suite 205
Bismarck, ND 58503
Phone: (701) 250-4204
Fax: (701) 250-4395
E-mail: NorthDakota.fhwa@dot.gov

Federal Transit Administration (FTA)

Office of Civil Rights
Attention: Complaint Team
East Building, 5th Floor - TCR
1200 New Jersey Ave., S.E.
Washington, DC 20590
Phone: (888) 446-4511

USDOJ - ADA Complaints

U.S. Department of Justice (USDOJ)
950 Pennsylvania Avenue, N.W.
Civil Rights Division
Disability Rights Section - 1425 NYAV
Washington, DC 20530
Fax: (202) 307-1197
ADA Information Line:
(800) 514-0301 (voice) or (800)514-0383 (TTY)
Main Section Telephone Number:
(202) 307-0663 (voice and TTY)

United States Department of Transportation (USDOT)

Departmental Office of Civil Rights
U.S. Department of Transportation
Office of Civil Rights
1200 New Jersey Ave., S.E.
Washington, DC 20590
Phone: (202) 366-4648
Fax: (202) 366-5575
TTY/Assistive Device: (202) 366-9696

USDOJ - Race, Color, National Origin Complaints

Federal Coordination and Compliance Section - NWB
Civil Rights Division
U.S. Department of Justice (USDOJ)
950 Pennsylvania Avenue, N.W.
Washington, DC 20530
Phone: (888) 848-5306 (English and Spanish)
(202) 307-2222 (voice)
(202) 307-2678 (TDD)

United States Department of Transportation (FHWA)

Federal Highway Administration
U.S. Department of Transportation
Office of Civil Rights
1200 New Jersey Ave., S.E.
8th Floor E81-105
Washington, DC 20590
Phone: (202) 366-0693
Fax: (202) 366-1599
TTY: (202) 366-5132
E-mail: CivilRights.FHWA@dot.gov

PART 1- CONTRACTOR COMPLIANCE

I. Organization and structure

A. NDDOT EEO Coordinator (External) and staff support

Daniel Weaver is the External EEO Officer and has held this position since May 2020.

B. District or Division Personnel

3. Describe training provided for personnel having EEO compliance responsibility.

External Civil Rights Training for construction personnel was provided virtually thru the TEAMS application, the training included a variety of topics and was held on March 29, 2023. Attendees were required to pre-register for the training and also take a comprehension test at the conclusion of the training session. All construction personnel are required to attend the training. All consultant engineer assignments in LCP Tracker were verified prior to assignment to ensure that they attended the 2023 external civil rights training. B2G Now and LCP Tracker training for Contractors was held on April 05, 2023. The trainings were recorded and placed both on our internal and external NDDOT website so that anyone who was unable to attend, could view the training later.

CRD Staff engaged in training **this year** as well:

Civil Rights Director Ramona Bernard:

Learner Transcript

NDSLMO02

Run Date: 9/12/2023
Run Time: 11:20 AM

Learner Name: Bernard,Ramona M
Learner ID: 49140

From Date: 10/01/2022
To Date: 09/01/2023

Course Name	Component	Class Code	Attendance Status	Enrollment Status	Completed Dt	Edu Units	Edu Unit Type
10 Ways to Avoid Phishing Scams with Quiz	KnowBe4	0	Completed	Completed	8/14/23	0	
2022 Kevin Mitnick Security Awareness Training - 15 minutes	KnowBe4	0	Completed	Completed	10/6/22	0	
2023 Affirmative Action Newsletter	2023 Affirmative Action Newsle	37499	Unknown	Completed	1/20/23	0	
2023 DOL Forum	External Learning	0	Completed	Completed	5/3/23	0	
2023 Danger Zone	KnowBe4	0	Completed	Completed	5/24/23	0	
Building a Strengths Based Team & Leading with Your Strengths	Internal Learning	0	Completed	Completed	10/13/22	0	
DOT Safe Lift	DOT Safe Lift	38473	Attended	Completed	6/20/23	0	
Ergonomics	Ergonomics	230	Attended	Completed	6/7/23	0	
Getting the Facts Straight about the DBE Program	External Learning	0	Completed	Completed	7/13/23	0	
Insider Threats for End Users	KnowBe4	0	Completed	Completed	2/17/23	0	
Links and Attachments: Think Before You Click	KnowBe4	0	Completed	Completed	8/3/23	0	
MINK Conference	Conference	0	Completed	Completed	10/6/22	0	
NDDOT DMP (Designated Medical Provider)	NDDOT DMP (Designated Medical	38303	Attended	Completed	5/24/23	0	
NHI - Understanding the Uniform Guidance Requirements 2 CFR 200 For Federal Awards	External Learning	0	Completed	Completed	3/28/23	0	
Risk Management Policy Review	Risk Management Policy Review	28195	Attended	Completed	5/24/23	0	
Slip, Trip and Falls	Slip, Trip, and Falls	17589	Attended	Completed	6/8/23	0	
Taking Time Off - For Real	External Learning	0	Completed	Completed	7/12/23	0	
The Value of Employee Resource Groups	External Learning	0	Completed	Completed	11/25/22	0	
Third-Party Risk Management Training	Third-Party Risk Management Tr	38437	Attended	Completed	7/26/23	0	
Total for Education Type:						0.00	
2023 Affirmative Action Employee Training	2023 Affirmative Action Employ	38318	Attended	Completed	6/8/23	1	CH
Total for Education Type:						1.00	CH
2023 Affirmative Action Employee Training	2023 Affirmative Action Newsle	35669	Attended	Completed	1/19/23	1	PDH
Gallup Impact Engagement Leader Workshop	Gallup Impact Engagement Leade	37747	Attended	Completed	2/23/23	2	PDH
Gallup Leading Through Disruption	Gallup Leading Through Disrupt	37748	Attended	Completed	3/24/23	1	PDH
IDEAA Event: International Friendship Day	IDEAA Event: International Fri	38664	Attended	Completed	7/13/23	1	PDH
IDEAA Event: National Civility Month	IDEAA Event: National Civility	38685	Attended	Completed	8/17/23	1	PDH

Learner Transcript

NDSLM002

Run Date: 9/12/2023
Run Time: 11:20 AM

Learner Name: Bernard,Ramona M
Learner ID: 49140

From Date: 10/01/2022
To Date: 09/01/2023

Course Name	Component	Class Code	Attendance Status	Enrollment Status	Completed Dt	Edu Units	Edu Unit Type
IDEAA Event: Panel for LGBTQS+	IDEAA Event: Panel for LGBTQS+	38323	Attended	Completed	6/29/23	1	PDH
Team ND Manager Event: Boss to Coach Intensive - Performance Priorities (Gallup)	Team ND Manager Event: Boss to	37920	Attended	Completed	4/21/23	1.5	PDH
Team ND Manager Event: Culture Shock: The Path Forward	Team ND Manager Event: Culture	38982	Attended	Completed	8/25/23	1	PDH
Understanding Poverty and Impacts on North Dakota Youth	Understanding Poverty and Impa	37449	Attended	Completed	1/27/23	1.5	PDH
Total for Education Type:						11.0	PDH
Total Education Units for Bernard,Ramona M:						12.00	

End of Report for Bernard,Ramona M

Civil Rights Admin. Heather Christianson:

Learner Transcript

NDSL002

Run Date: 9/1/2023
Run Time: 10:31 AM

Learner Name: Christianson, Heather M
Learner ID: 113033

From Date: 10/01/2022
To Date: 09/01/2023

Course Name	Component	Class Code	Attendance Status	Enrollment Status	Completed Dt	Edu Units	Edu Unit Type
10 Ways to Avoid Phishing Scams with Quiz	KnowBe4	0	Completed	Completed	8/22/23	0	
2022 Kevin Mitnick Security Awareness Training - 15 minutes	KnowBe4	0	Completed	Completed	10/3/22	0	
2023 Affirmative Action Newsletter	2023 Affirmative Action Newsle	37499	Attended	Completed	1/20/23	0	
2023 Danger Zone	KnowBe4	0	Completed	Completed	5/23/23	0	
DOT Safe Lift	DOT Safe Lift	38473	Attended	Completed	7/13/23	0	
Insider Threats for End Users	KnowBe4	0	Completed	Completed	2/10/23	0	
Mindfulness, Diversity, and the Quest for Inclusion	External Learning	0	Completed	Completed	4/4/23	0	
Mindfulness, Diversity, and the Quest for Inclusion	External Learning	0	Completed	Completed	4/5/23	0	
Overcome Overthinking	External Learning	0	Completed	Completed	4/4/23	0	
Overcome Overthinking	External Learning	0	Completed	Completed	4/5/23	0	
Slip, Trip and Falls	Slip, Trip, and Falls	17589	Attended	Completed	6/1/23	0	
Supporting Allyship and Anti-Racism at Work	External Learning	0	Completed	Completed	4/4/23	0	
Supporting Allyship and Anti-Racism at Work	External Learning	0	Completed	Completed	4/5/23	0	
Third-Party Risk Management Training	Third-Party Risk Management Tr	38437	Attended	Completed	8/2/23	0	
Total for Education Type:						0.00	
Colors Personality Assessment	Colors Personality Assessment	37080	Attended	Completed	4/20/23	4	PDH
Historical Trauma & Healing for Native Americans	Historical Trauma & Healing fo	37082	Attended	Completed	11/18/22	2	PDH
IDEAA Event - Black History Month: Black Resistance	IDEAA Event - Black History Mo	37751	Attended	Completed	2/22/23	1	PDH
IDEAA Event: Environmental Impact on Mental Health	IDEAA Event: Environmental Imp	38248	Attended	Completed	5/25/23	1	PDH
IDEAA Event: International Friendship Day	IDEAA Event: International Fri	38864	Attended	Completed	7/13/23	1	PDH
IDEAA Event: National Civility Month	IDEAA Event: National Civility	38885	Attended	Completed	8/17/23	1	PDH
IDEAA Event: Panel for LGBTQs+	IDEAA Event: Panel for LGBTQs+	38323	Attended	Completed	6/29/23	1	PDH
Leadership Everywhere for Everyone - Servant Leadership-Service and Support of Others	Leadership Everywhere for Ever	30130	Attended	Completed	7/5/23	1	PDH
Leadership Everywhere for Everyone - Teamwork	Leadership Everywhere for Ever	37361	Attended	Completed	6/9/23	1.5	PDH
Statewide Mentorship Program Overview and Career Planning/Goal Setting	Statewide Mentorship Program O	37982	Attended	Completed	4/25/23	1.5	PDH
Understanding Poverty and Impacts on North Dakota Youth	Understanding Poverty and Impa	37449	Attended	Completed	1/27/23	1.5	PDH
Total for Education Type:						16.5	PDH
						0	

Civil Rights Admin. Daniel Weaver:

Learner Transcript

NDSLMO02

Run Date: 9/6/2023
Run Time: 9:44 AM

Learner Name: Weaver, Daniel L
Learner ID: 129223

From Date: 10/01/2022
To Date: 09/01/2023

Course Name	Component	Class Code	Attendance Status	Enrollment Status	Completed Dt	Edu Units	Edu Unit Type
10 Ways to Avoid Phishing Scams with Quiz	KnowBe4	0	Completed	Completed	8/9/23	0	
2022 Kevin Mitnick Security Awareness Training - 15 minutes	KnowBe4	0	Completed	Completed	10/3/22	0	
2023 Affirmative Action Newsletter	2023 Affirmative Action Newsle	37499	Attended	Completed	1/20/23	0	
2023 Danger Zone	KnowBe4	0	Completed	Completed	5/22/23	0	
DOT Safe Lift	DOT Safe Lift	38473	Attended	Completed	6/20/23	0	
Ergonomics	Ergonomics	230	Attended	Completed	6/7/23	0	
Insider Threats for End Users	KnowBe4	0	Completed	Completed	2/13/23	0	
NDDOT DMP (Designated Medical Provider)	NDDOT DMP (Designated Medical	38303	Attended	Completed	5/22/23	0	
Risk Management Policy Review	Risk Management Policy Review	28195	Attended	Completed	5/22/23	0	
Slip, Trip and Falls	Slip, Trip, and Falls	17589	Attended	Completed	5/31/23	0	
Total for Education Type:						0.00	
2023 Affirmative Action Employee Training	2023 Affirmative Action Employ	38318	Attended	Completed	6/8/23	1	CH
Total for Education Type:						1.00	CH
IDEAA Event: Panel for LGBTQS+	IDEAA Event: Panel for LGBTQS+	38323	Attended	Completed	6/29/23	1	PDH
Total for Education Type:						1.00	PDH
Total Education Units for Weaver, Daniel L:						2.00	

End of Report for Weaver, Daniel L

Civil Rights Admin. Amy Conklin:

Learner Transcript

NDSLM002

Run Date: 9/1/2023
Run Time: 10:45 AM

Learner Name: Conklin,Amy R
Learner ID: 37336

From Date: 10/01/2022
To Date: 09/01/2023

Course Name	Component	Class Code	Attendance Status	Enrollment Status	Completed Dt	Edu Units	Edu Unit Type
10 Ways to Avoid Phishing Scams with Quiz	KnowBe4	0	Completed	Completed	8/9/23	0	
2022 Kevin Mitnick Security Awareness Training - 15 minutes	KnowBe4	0	Completed	Completed	10/3/22	0	
2023 Affirmative Action Newsletter	2023 Affirmative Action Newsle	37499	Attended	Completed	1/20/23	0	
2023 Danger Zone	KnowBe4	0	Completed	Completed	5/17/23	0	
DOT Safe Lift	DOT Safe Lift	38473	Attended	Completed	6/20/23	0	
Ergonomics	Ergonomics	230	Attended	Completed	6/7/23	0	
Insider Threats for End Users	KnowBe4	0	Completed	Completed	2/8/23	0	
NDDOT DMP (Designated Medical Provider)	NDDOT DMP (Designated Medical	38303	Attended	Completed	5/23/23	0	
Risk Management Policy Review	Risk Management Policy Review	28195	Attended	Completed	5/23/23	0	
Slip, Trip and Falls	Slip, Trip, and Falls	17589	Attended	Completed	6/1/23	0	
Total for Education Type:						0.00	
2023 Affirmative Action Employee Training	2023 Affirmative Action Employ	38318	Attended	Completed	6/8/23	1	CH
Total for Education Type:						1.00	CH
IDEAA Event: Panel for LGBTQS+	IDEAA Event: Panel for LGBTQS+	38323	Attended	Completed	6/29/23	1	PDH
Leadership Everywhere for Everyone - Working at a Distance	Leadership Everywhere for Ever	35438	Attended	Completed	11/3/22	1.5	PDH
Team ND Manager Event: Boss to Coach Intensive - Culture of Wellbeing (Gallup)	Team ND Manager Event: Boss to	37922	Attended	Completed	7/20/23	1.5	PDH
Team ND Manager Event: Culture Shock: The Path Forward	Team ND Manager Event: Culture	38982	Attended	Completed	8/25/23	1	PDH
Total for Education Type:						5.00	PDH
Total Education Units for Conklin,Amy R:						6.00	

End of Report for Conklin,Amy R

Civil Rights Admin. Jessica Stadick-Feist:

Learner Transcript

NDSLMO02

Run Date: 9/1/2023
Run Time: 11:00 AM

Learner Name: Stadick-Feist, Jessica L
Learner ID: 130493

From Date: 10/01/2022
To Date: 09/01/2023

Course Name	Component	Class Code	Attendance Status	Enrollment Status	Completed Dt	Edu Units	Edu Unit Type
10 Ways to Avoid Phishing Scams with Quiz	KnowBe4	0	Completed	Completed	8/9/23	0	
2022 Kevin Mitnick Security Awareness Training - 15 minutes	KnowBe4	0	Completed	Completed	10/3/22	0	
2023 Affirmative Action Newsletter	2023 Affirmative Action Newsle	37499	Attended	Completed	3/20/23	0	
2023 Danger Zone	KnowBe4	0	Completed	Completed	5/18/23	0	
DOT Safe Lift	DOT Safe Lift	38473	Attended	Completed	6/20/23	0	
Elevate: 7 Go to Strategies to Tame Stress	Elevate: 7 Go to Strategies t	37828	Attended	Completed	3/17/23	0	
Ergonomics	Ergonomics	230	Attended	Completed	6/7/23	0	
Insider Threats for End Users	KnowBe4	0	Completed	Completed	2/8/23	0	
NDDOT DMP (Designated Medical Provider)	NDDOT DMP (Designated Medical	38303	Attended	Completed	5/23/23	0	
Risk Management Policy Review	Risk Management Policy Review	28195	Attended	Completed	5/23/23	0	
Slip, Trip and Falls	Slip, Trip, and Falls	17589	Attended	Completed	6/1/23	0	
Total for Education Type:						0.00	
2023 Affirmative Action Employee Training	2023 Affirmative Action Employ	38318	Attended	Completed	6/6/23	1	CH
2023 Affirmative Action Employee Training	2023 Affirmative Action Employ	38318	Attended	Completed	7/21/23	1	CH
Total for Education Type:						2.00	CH
2023 Affirmative Action Employee Training	2023 Affirmative Action Newsle	35669	Attended	Completed	1/17/23	1	PDH
2023 Affirmative Action Employee Training	2023 Affirmative Action Newsle	35669	Attended	Completed	1/18/23	1	PDH
Colors Personality Assessment	Colors Personality Assessment	37060	Attended	Completed	4/20/23	4	PDH
Defensive Driving Course (Online Version)	Defensive Driving Course (Onli	35351	Attended	Completed	3/24/23	2.5	PDH
Defensive Driving Course (Online Version)	State Fleet Policy Manual Revi	35351	Attended	Completed	3/24/23	2.5	PDH
Driver License, Civil Rights, and Customer Service	Driver License, Civil Rights,	37447	Attended	Completed	3/21/23	1	PDH
IDEAA Event: Environmental Impact on Mental Health	IDEAA Event: Environmental Imp	38248	Attended	Completed	5/25/23	1	PDH
Team ND Event: Focus Your Strengths for Performance (Gallup)	Team ND Event: Focus Your Stre	38174	Attended	Completed	5/23/23	1	PDH
Total for Education Type:						14.00	PDH
Total Education Units for Stadick-Feist, Jessica L:						16.00	

End of Report for Stadick-Feist, Jessica L

Civil Rights Admin. James Saylor:

Learner Transcript

NDSLMO02

Run Date: 9/5/2023
Run Time: 10:01 AM

Learner Name: Saylor, James P
Learner ID: 47541

From Date: 04/07/2023
To Date: 09/05/2023

Course Name	Component	Class Code	Attendance Status	Enrollment Status	Completed Dt	Edu Units	Edu Unit Type
2010 ADA Standards	Internal Learning	0	Completed	Completed	4/12/23	0	
ADA-Rocky Mountain	Internal Learning	0	Completed	Completed	4/11/23	0	
Accessible Parking	External Learning	0	Completed	Completed	4/12/23	0	
Accessible Transportation	External Learning	0	Completed	Completed	4/13/23	0	
Accessible Transportation	Internal Learning	0	Completed	Completed	4/12/23	0	
Active Shooter Video	Active Shooter Video	35004	Attended	Completed	9/1/23	0	
Addiction, Recovery and the ADA	Internal Learning	0	Completed	Completed	4/12/23	0	
DOT Fraud Awareness	DOT Fraud Awareness	35078	Attended	Completed	9/1/23	0	
DOT Safe Lift	DOT Safe Lift	38473	Attended	Completed	6/21/23	0	
Disability Awareness and Etiquette	Internal Learning	0	Completed	Completed	4/11/23	0	
Effective Communication and the ADA	External Learning	0	Completed	Completed	4/24/23	0	
Emergency Preparedness and the ADA	Internal Learning	0	Completed	Completed	4/11/23	0	
Ergonomics	Ergonomics	230	Attended	Completed	6/9/23	0	
LCP Tracker Training	Internal Learning	0	Completed	Completed	4/25/23	0	
Minimizing Implicit Bias for Law Enforcement	External Learning	0	Completed	Completed	4/14/23	0	
NDDOT DMP (Designated Medical Provider)	NDDOT DMP (Designated Medical	38303	Attended	Completed	6/2/23	0	
NDDOT Policies, Harassment, and Diversity	NDDOT Policies, Harassment, D	35001	Attended	Completed	9/1/23	0	
RTAP Cost Association 101	External Learning	0	Completed	Completed	4/13/23	0	
RTAP Toolkit	Internal Learning	0	Completed	Completed	4/13/23	0	
Risk Management Policy Review	Risk Management Policy Review	28196	Attended	Completed	6/7/23	0	
Self-Evaluation and Transition Plans	External Learning	0	Completed	Completed	4/13/23	0	
Service Animals in the Workplace	External Learning	0	Completed	Completed	4/25/23	0	
Slip, Trip and Falls	Slip, Trip, and Falls	17589	Attended	Completed	6/1/23	0	
Temporary Employee Benefits	Temporary Employee Benefits	35007	Attended	Completed	9/1/23	0	
Title VI New Employee	Title VI New Employee	34961	Attended	Completed	9/1/23	0	
Total for Education Type:						0.00	
2023 Affirmative Action Employee Training	2023 Affirmative Action Employ	38318	Attended	Completed	6/21/23	1	CH
NDDOT Employee Orientation	NDDOT Employee Orientation	38312	Attended	Completed	7/12/23	4	CH
Timesheet New Hire	Timesheet New Hire	31465	Attended	Completed	9/1/23	1	CH
Updating Your Employee Job Description	Updating Your Employee Job Des	37913	Attended	Completed	6/7/23	1	CH

1

Learner Transcript

NDSLMO02

Run Date: 9/5/2023
Run Time: 10:01 AM

Learner Name: Saylor, James P
Learner ID: 47541

From Date: 04/07/2023
To Date: 09/05/2023

Course Name	Component	Class Code	Attendance Status	Enrollment Status	Completed Dt	Edu Units	Edu Unit Type
Total for Education Type:						7.00	CH
10 Ways to Avoid Phishing Scams with Quiz	KnowBe4	0	Completed	Completed	8/10/23	.09	PDH
2023 Danger Zone	KnowBe4	0	Completed	Completed	8/17/23	.23	PDH
IDEAA Event: Panel for LGBTQS+	IDEAA Event: Panel for LGBTQS+	38323	Attended	Completed	6/29/23	1	PDH
Total for Education Type:						1.32	PDH
Total Education Units for Saylor, James P:						8.32	

End of Report for Saylor, James P

II. Compliance procedures

The Civil Rights Division uses the Certification & Compliance System (CCS), which became mandatory for contractors in October 2017.

CCS combines online tools for contract compliance reporting, payment tracking, applying for DBE Certification, and submitting electronic certified payrolls. Contractors will submit documents and information supporting their Good Faith Efforts after bid openings and will submit all required certified payroll through the system. Contractors/vendors and the Department will be able to communicate with each other easily through the system. The system is based on a partnership between B2Gnow Certification & Compliance System and LCPtracker, a certified payroll tracking firm. Both are national firms that supply business to government online data services.

In 2023, 100% of payrolls were filed using LCPtracker, allowing the NDDOT to track most workers onsite by sex and race/ethnicity and to accurately identify percentages of female and minority workers. This allowed for more advanced Contractor Compliance Reviews in 2023. The system will also allow for easy and efficient reporting of Forms 1391 and 1392.

III. Accomplishments

Describe accomplishments in the construction EEO compliance program during the past fiscal year.

A. Regular project compliance review program

1. Number of compliance reviews conducted	10
2. Number of contractors reviewed.	10
3. Number of contractors found in compliance.	10
4. Number of contractors found in noncompliance.	0
5. Number of show cause notices issued.	0
6. Number of show cause notices rescinded.	0
7. Number of show cause actions still unresolved	0
8. Number of follow-up reviews conducted.	0

For 2023, NDDOT set a goal of 10 compliance reviews and completed 10.

There have been no other changes in this area since the filing of the 2020-24 Plan.

VI. Complaints

Identify the Federal-aid highway contractors that have had discrimination complaints filed against them during the past fiscal year and provide current status.

No discrimination complaints have been filed in fiscal year 2023.

VII. External training programs, including supportive services

A. Participation by women and minorities in construction training programs.

To follow is a chart of female and minority completions in the 2023 OJT Program:

NDDOT had 14 trainees in skilled craft training programs during 2023, of which 3 were non-minority females, 1 was a minority female and 10 were minority males. Of the 4 females, 3 were trained as Operators and 1 was trained as a Truck Drivers. Of 10 minority male trainees, 2 were trained as Operators, 3 were trained as Truck Drivers, 2 were trained as Structural Carpenters and 3 were trained as a Concrete Masons.

NDDOT's OJT Program does not include a training program in the laborer category. At the time of this report 8 trainees have completed training. NDDOT will likely meet our goal of 12 trainee completions by the end of the 2023 construction season.

Trainees	Equipment Operators	Truck Drivers	Carpenters	Concrete Masons
Female Trainees	3	1	0	0
Minority Male Trainees	2	3	2	3
Non-minority male (economically disadvantaged)	0	0	0	0
Total Trainees	5	4	2	3

For 2023, the following represents **all participation of females in the contractor workforce**, as reported on Forms 1391:

Classification	Total Workforce	Women in Workforce	2023 % of Women in Workforce	Benchmark as %	% (+) or (-) Benchmark
Officials	52	3	5.77%		
Supervisors	24	0	0.00%		
Foremen/women	7	0	0.00%		
Clerical	23	17	73.91%		
Operator	1509	63	4.17%	6.9%	-2.73%
Mechanic	0	0	0%	6.9%	-6.9%
Truck Driver	932	64	6.87%	6.9%	-0.03%
Ironworker	0	0	0%	6.9%	-6.9%
Carpenter	84	0	0%	6.9%	-6.9%
Cement Mason	77	1	1.30%	6.9%	-5.6%
Electrician	146	0	0%	6.9%	-6.9%
Painters	0	0	0%	6.9%	-6.9%
Laborer	2318	151	6.51%	6.9%	+0.39%
Apprentices (not OJT)	1	0	0%	6.9%	-6.9%
TOTALS	5173	299	5.78%	6.9%	-1.12%

The contract goal of 6.9% for women set by the Office of Federal Contract Compliance Programs (the OFCCP) is used here as a benchmark. North Dakota federal-aid highway contractors attained a female representation in their workforce of 5.78%.

For 2023, the following represents all participation of minorities in the contractor workforce, as reported on Forms 1391:

Classification	Total Workforce	Minorities in Workforce	2023 % of Minorities in Workforce	Benchmark as %	% (+) or (-) Benchmark
Officials	52	6	11.54%		
Supervisors	24	2	8.33%		
Foremen/women	7	1	14.29%		
Clerical	23	3	13.04%		
Operator	1509	239	15.84%	4.4%	+11.44%
Mechanic	0	0	0%	4.4%	-4.4%
Truck Driver	932	212	22.75%	4.4%	+18.35%
Ironworker	0	0	0%	4.4%	-4.4%
Carpenter	84	42	50.00%	4.4%	+45.60%
Cement Mason	77	37	48.05%	4.4%	+43.65%
Electrician	146	9	6.16%	4.4%	+1.76%
Painters	0	0	0%	4.4%	-4.4%
Laborer	2318	584	25.19%	4.4%	+20.79%
Apprentices (not OJT)	1	0	0%	4.4%	-4.4%
TOTALS	5173	1135	21.94%	4.4%	+17.54%

North Dakota's minority participation is greater than the OFCCP benchmark goal of 4.4% (or less) set in the contract special provisions. NDDOT acknowledges it has no authority to enforce OFCCP goals. They are used here only to provide a basis of comparison. Minority participation met the benchmark goal in most categories and met the goal overall.

VIII. Disadvantaged Business Enterprise Program (DBE)

Goal-setting for disadvantaged business enterprises (DBEs) with capabilities in the transportation industry is required by 49 Code of Federal Regulations Part 26. The following goals are applicable for the 2023 federal fiscal year (October 1, 2022 through September 30, 2023).

2021-2023 FEDERAL HIGHWAY ADMINISTRATION DBE GOAL: 4.66 Percent

This goal represents the percentage of work to be accomplished by DBE prime contractors, subcontractors, consultants, vendors, and material suppliers on federal-aid transportation projects.

NDDOT's FHWA 2021-2023 Goal Setting Methodology is posted on the Department's website at: <https://www.dot.nd.gov/divisions/civilrights/dbeprogram.htm#dbe-annual-goals-statistics>

XI. Liaison

Describe the liaison established by the State between public (State, county and municipal) agencies and private organizations involved in EEO programs. How is the liaison maintained on a continuing basis?

FHWA Sub Recipients

Currently, sub recipient federal-aid projects are let by NDDOT and subject to the requirements of the Contractor Compliance Review Program. When a sub recipient's prime contractor is selected for a compliance review, Civil Rights Division sends a notice of review letter to the prime contractor with a copy to NDDOT's Assistant District Engineer. A representative of the city or county is invited to participate in the process, if applicable.

Additionally, NDDOT has developed a process to conduct Title VI reviews of sub recipients (Metropolitan Planning Organizations, cities, and counties). Title VI Specialists are responsible to conduct Title VI pre-award and post-award compliance reviews of their program area sub recipients.

Pre-award compliance reviews require applicants for federal financial assistance to identify all the components necessary to develop a Title VI Plan including EEO and ADA requirements. The Title VI Specialist provides one-on-one training and assistance to the applicant to develop their Title VI Program. The Title VI Sub

Recipient Information web page provides templates and information for the development of Title VI, EEO, and ADA program documents. For pre-award, the Title VI sub recipient is required to submit their signed Title VI Assurances document, signed Title VI/Nondiscrimination and ADA Policy Statement, and the sub recipient Title VI Checklist. The Title VI Specialist reviews these documents for the pre-award compliance review.

Post-award compliance reviews require ten percent of sub-recipients to be audited or a minimum of one sub recipient per division or district must be reviewed annually. Sub recipients selected for post-award reviews are required to produce all the documentation of all the components of the sub recipient's Title VI Plan. The Title VI Specialists conduct on-site reviews for post-award compliance.

NDDOT Title VI/Nondiscrimination and ADA Program has Review Selection and Procedures that are a step-by-step guidance from pre-award through post-award compliance including corrective action within specified timeframes.

During the period between July 1, 2022, and June 30, 2023, NDDOT had one division and no districts with sub recipients.

Local Government Division had a total of four sub recipients for federal highway funds. These four sub recipients are the same every year. We have audited all of them previously, so we know they have a Title VI/Nondiscrimination and ADA Program. New sub recipients or sub recipients from past years require the pre-award compliance review.

Sub recipients are randomly selected for annual reviews in the year in which the project is to be constructed or for funds used on other eligible activities. Ten percent of the available pool or a minimum of one review will be conducted in the year the project is constructed.

The Title VI Specialist conducted one Title VI review. This review was conducted on Bismarck-Mandan (Bis-Man) MPO, who also received FTA funds.

Title VI review criteria includes personnel employed, composition and selection of commission, council, committee, and boards, recruitment, and internal and external outreach. Findings will be provided to Bis-Man MPO for their review, response, and revision after their final documentation is reviewed.

OTHER GENERAL COMMENTS

The Title VI criteria has been modified to prevent the repeated review in subsequent years of subrecipients for which prior reviews have not revealed deficiencies. The exact wording is as follows:

1. *NDDOT sub recipients*

- a) *All sub recipients will complete a pre-award Sub Recipient Audit Checklist.*
- b) *Sub recipients shall be randomly selected for review in the year in which the project is constructed. Ten percent of the available pool or a minimum of one review will be conducted in the year the project is constructed. If a sub recipient is selected in subsequent years, provided no deficiencies were identified in the previous audit, a new sub recipient will be selected for review.*

If deficiencies are found during the review, the sub recipient shall be reviewed the following year

ADDITIONAL SUB RECIPIENT REVIEWS – FTA Reviews-Transit Agencies

FTA Circular 4702.1B Requirements

Local Government, Transit Section, is required to audit 10% or a minimum of three of Transit Providers that receive 5310, 5311 or 5339 federal funds. 4 transit providers were selected for review.

- a) Transit Section had a total of 28 sub recipients that received 5310, 5311 or 5339 federal funds, therefore 3 transit providers were required to be audited. A total of 4 audits were performed in 2023.