FTA Transit Award Management System (TrAMS) User Guide

Vol 07, Civil Rights Management Recipient User Guide

Version 2.0

FEBRUARY 2018
# Document Revision History

<table>
<thead>
<tr>
<th>Revision History</th>
<th>Dates</th>
<th>Summary of Changes</th>
<th>Author</th>
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<tbody>
<tr>
<td>1.0</td>
<td>02/17/2016</td>
<td>Initial draft</td>
<td>Alison Cubero, Pamela Bruffy, Mark Choi</td>
</tr>
<tr>
<td>1.1</td>
<td>06/10/2016</td>
<td>Updates to Screen shots and adding content</td>
<td>Pamela Bruffy</td>
</tr>
<tr>
<td>2.0</td>
<td>08/25/2017 - 02/02/2018</td>
<td>Separated Civil Rights information to independent volume. Updated overview. Reformatted content and updated screenshots.</td>
<td>CollabraLink</td>
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# CIVIL RIGHTS MANAGEMENT

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15 Civil Rights Management

15.1 Overview
Recipient organizations are required to comply with civil rights programs in order to receive FTA funding. These programs include:

1) Equal Employment Opportunity (EEO) Program
2) Disadvantaged Business Enterprise (DBE) Program
3) DBE Goal
4) Title VI of the Civil Rights Act of 1964.

Not all programs are required by all recipients. Recipients can consult FTA Circulars or other guidance to determine which programs apply. Recipients can view and update civil rights information from their Recipient Records. To ensure recipients stay in a fundable status, FTA Regional Civil Rights Officers review civil rights program submissions for adequate documentation of the requirements. While individual applications may raise new compliance concerns for a recipient, FTA determinations of compliance are completed at the recipient level, not on the basis of individual applications.

15.1.1 Responsibilities
Recipient users with the Civil Rights role can modify and submit civil rights information for their organizations. All other recipient users have viewing privileges of the civil rights information for their organizations. FTA Regional Civil Rights Officers review recipient civil rights program submissions for adequate documentation of the requirements. All other FTA and DOL users can view civil rights information as well.

15.1.2 Programs
The four civil rights programs in TrAMS are:

1) **Equal Employment Opportunity (EEO) Program:** Federal Transit Law provides that "no person in the United States shall on the grounds of race, color, religion, national origin, sex, or age be excluded from the participation in, be denied the benefits of, or be subjected to discrimination under any project, program or activity funded in whole or in part through financial assistance under this Act." This applies to employment and supplements employment protections found in Title VI of the Civil Rights Act of 1964. The Equal Employment Opportunity (EEO) program documents the recipient plan for compliance with these laws. Updated programs are due to FTA every four years.

2) **Disadvantaged Business Enterprise (DBE) Program:** The DBE program is intended to foster equal opportunity in DOT-assisted contracts by ensuring a “level playing field” for small businesses owned and controlled by socially and economically disadvantaged individuals to bid on and participate in Federally-funded highway, transit, and airport projects. The Disadvantaged Business Enterprise (DBE) program documents the recipient plan for compliance with these laws. DBE programs are a one-time submission, but must be updated whenever recipients make significant changes.
3) **DBE Goal:** Recipients with a DBE program must set an overall goal for DBE participation in their DOT-assisted contracts. The DBE goal documents the goal-setting and public participation process. DBE goals must be submitted to FTA every three years.

4) **Title VI of the Civil Rights Act of 1964:** Title VI is a Federal statute and provides that no person shall, on the grounds 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. The Title VI program documents the recipient plan for compliance with these laws. Title VI program updates are due to FTA every three years.

### 15.1.3 Program Statuses

When a recipient submits a civil rights program to FTA for review, the program status is set to ‘In Review – Submitted to FTA.’ The program cannot be modified until the review is complete. FTA Regional Civil Rights Officers will review and update civil rights information for the recipients within their region. Civil Rights Officers will set the appropriate review status for the program as the programs move through the review process. An explanation of each status is provided in the table below.

<table>
<thead>
<tr>
<th>Program Status</th>
<th>Description</th>
<th>Recipient Can Edit Program</th>
</tr>
</thead>
<tbody>
<tr>
<td>1) In Review – Submitted to FTA</td>
<td>The program has been submitted to FTA for review.</td>
<td>No</td>
</tr>
<tr>
<td>2) In Review – Under FTA Review</td>
<td>The FTA Regional Civil Rights Officer is currently reviewing the recipient’s civil rights program submission.</td>
<td>No</td>
</tr>
<tr>
<td>3) In Review – Returned to Grantee</td>
<td>The FTA Regional Civil Rights Officer has reviewed the civil rights program and has returned it to the recipient for updates.</td>
<td>Yes</td>
</tr>
<tr>
<td>4) Concur</td>
<td>The FTA Regional Civil Rights Officer has reviewed and approved the program submission. <em>The first time the DBE Goal, Title VI and EEO programs are approved, FTA will enter a ‘New Due Date’ and ‘New Expiration Date’ for the programs. For subsequent approvals, the dates will automatically move forward three years from the previous dates unless the Civil Rights Officer has changed the dates.</em></td>
<td>Yes</td>
</tr>
<tr>
<td>5) Expired</td>
<td>The validity of the civil rights program has expired and the recipient needs to resubmit the program to FTA.</td>
<td>Yes</td>
</tr>
<tr>
<td>6) Incomplete</td>
<td>The default program status for new recipients. This status cannot be selected by the reviewer or recipient. Additionally, this status will not generate a DBE Report task.</td>
<td>Yes</td>
</tr>
<tr>
<td>7) N/A</td>
<td>The FTA Regional Civil Rights Officer can set this status after review of any civil rights program if the program does not apply to a recipient organization.</td>
<td>Yes</td>
</tr>
</tbody>
</table>
15.2 View Recipient Civil Rights Information

Recipient users with the Civil Rights role can modify and submit civil rights information for their organizations. All other recipient users have viewing privileges of the civil rights information for their organizations. FTA and DOL users can view civil rights information as well.

To view and/or update a recipient’s civil rights information:

1) Go to the Records tab and select the Recipient Organization link.

2) Click on the Recipient Organization record.
3) Click the ‘Related Actions’ link in the navigation pane at the top of the screen and then click the ‘Civil Rights Information’ related action.

4) The ‘Civil Rights Compliance’ form will display. The four civil rights programs with their current statuses for the selected recipient will display in a table under the ‘Status History’ section.
5) To leave the form and return to the ‘Related Actions’ menu, click the ‘CANCEL’ button.

6) To view or edit program details, select a program from the ‘Status History’ grid and click the ‘CONTINUE’ button.

7) The relevant program page will open showing the program details to include a history of the program status, supporting documentation, and comments. From this page, the civil rights office for a recipient organization can manage their recipient’s program. On any of the program forms, click the ‘CANCEL’ button to return to the ‘Civil Rights Compliance’ form. Click the ‘SAVE CHANGES’ button to save all information entered on the form.
15.3 Manage and Submit Recipient Civil Rights Information

Only recipient users with the Civil Rights role can modify and submit civil rights information for their organizations. Information may only be edited when the program statuses are ‘In-Review – Returned to Grantee’, ‘Expired’ or ‘Concur’. Not all programs are required for all recipients.

15.3.1 EEO Program

As previously stated, Federal Transit Law provides that "no person in the United States shall on the grounds of race, color, religion, national origin, sex, or age be excluded from the participation in, be denied the benefits of, or be subjected to discrimination under any project, program or activity funded in whole or in part through financial assistance under this Act." This applies to employment and supplements employment protections found in Title VI of the Civil Rights Act of 1964. The Equal Employment Opportunity (EEO) program documents the recipient plan for compliance with these laws. Updated programs are due to FTA every four years.

Recipients must demonstrate that they have developed, implemented, and maintained an effective EEO Program to ensure that they do not discriminate against any employees or applicants for employment because of race, color, religion, sex, disability, age or national origin.

To update your organization’s EEO Program information:
1) Go to your recipient organization record and select the ‘Civil Rights Information’ related action.

![Image of TrAMS interface with highlighted Civil Rights Information action]

2) On the ‘Civil Rights Compliance’ page, select the check box for ‘EEO Program.’ Then click the ‘CONTINUE’ button.

![Image of TrAMS interface with EEO Program selected]
3) The ‘Equal Employment Opportunity (EEO) Program’ form will open. The form content includes the program status, existing documents, and comments.

![Civil Rights Compliance | Equal Employment Opportunity (EEO) Program](image.png)

4) Click the ‘MANAGE DOCUMENTS’ button to add or delete any related documents.

![Existing Document Details](image.png)

5) The ‘Manage Documents’ form will open.
   a) **Add Document**: Enter the following information on the ‘Upload Document’ section to add a document. Only the document type and document itself are required entries. Once finished, click the ‘SAVE’ button to add the document. The document will be added to the grid under ‘Existing Document Details’.
      i) **Document Type**: Use the drop-down menu to select a document type.
      ii) **Document Name**: Enter the name for the document into the text box.
      iii) **Program Begin and End Dates**: Enter the date range for the program’s duration.
      iv) **Civil Rights Document**: Click the ‘Upload’ button to select a file to upload. Click the ‘X’ on the uploaded document link to remove the file.
b) **Delete Document**: If any document needs to be removed (e.g. the wrong document was uploaded), select the check box for the document from the 'Existing Document Details' grid, then click the 'DELETE' button.

c) Click the ‘CLOSE’ button to return to the ‘EEO Program’ form.

6) Enter any comments into the optional ‘Civil Rights Program Comments’ field, then click the ‘SAVE CHANGES’ button.
7) If the program is ready to submit to FTA, there will be a ‘SUBMIT’ button visible. Click the ‘SUBMIT’ button to send to FTA for review. Programs are only submitted to FTA once the ‘SUBMIT’ button is clicked.

8) The ‘Civil Rights Compliance’ form will display. The EEO Program entry in the Status History section will show an updated status ‘In Review - Submitted to FTA’ as well as an updated ‘Submitted Date’.

![](image)

15.3.2 DBE Program

The DBE program is intended to foster equal opportunity in DOT-assisted contracts by ensuring a “level playing field” for small businesses owned and controlled by socially and economically disadvantaged individuals to bid on and participate in Federally-funded highway, transit, and airport projects. The Disadvantaged Business Enterprise (DBE) program documents the recipient plan for compliance with these laws. DBE programs are a one-time submission, but must be updated whenever recipients make significant changes. If required, the recipient must have an approved DBE program.

To update your organization’s DBE Program information:
1) Go to your recipient organization record and select the ‘Civil Rights Information’ related action.

![Image 1]

2) On the ‘Civil Rights Compliance’ page, select the check box for ‘DBE Program.’ Then click the ‘CONTINUE’ button.

![Image 2]
3) The ‘Disadvantaged Business Enterprise (DBE) Program’ form will display.

![Disadvantaged Business Enterprise (DBE) Program form](image)

4) Click the ‘MANAGE DOCUMENTS’ button to add or delete any related documents.

![Existing Document Details](image)

5) The ‘Manage Documents’ form will open.
   a) **Add Document:** Enter the following information on the ‘Upload Document’ section to add a document. Only the document type and document are required entries. Once finished, click the ‘SAVE’ button to add the document. The document will be added to the grid under ‘Existing Document Details’.
      i) **Document Type:** Use the drop-down menu to select a document type.
      ii) **Document Name:** Enter the name for the document into the text box.
      iii) **Program Begin and End Dates:** Enter the date range for the program’s duration.
      iv) **Civil Rights Document:** Click the ‘Upload’ button to select a file to upload. Click the ‘X’ on the uploaded document link to remove the file.
b) **Delete Document:** If any document needs to be removed (e.g. the wrong document was uploaded), select the check box for the document from the ‘Existing Document Details’ grid, then click the ‘DELETE’ button.

c) Click the ‘Close’ button to return to the ‘DBE Program’ form.

6) Enter any comments into the optional ‘Civil Rights Program Comments’ field, then click the ‘SAVE CHANGES’ button. To discard any changes made prior to saving, click the ‘CANCEL’ button to return to the ‘Civil Rights Compliance’ form.
7) If the program is ready to submit to FTA, there will be a ‘SUBMIT’ button visible. Click the ‘SUBMIT’ button to send to FTA for review. Programs are only submitted to FTA once the ‘SUBMIT’ button is clicked.

8) The ‘Civil Rights Compliance’ form will display. The DBE Program entry in the Status History section will show an updated status ‘In Review - Submitted to FTA’ as well as an updated ‘Submitted Date’.

### 15.3.3 DBE Goal

When recipients have a DBE program, recipients must set an overall goal for DBE participation in their DOT-assisted contracts. Goals must be based on demonstrable evidence of the availability of ready, willing and able DBEs relative to all businesses available to participate on the recipient’s DOT-assisted contracts. The goal must reflect the recipient’s determination of the level of DBE participation the organization would expect absent the effects of discrimination.

If your organization has a DBE program, you must ensure that triennial goals have been submitted to FTA for review as required. **Recipients with a triennial DBE Goal must submit the Uniform Report of DBE Commitments/Awards and Payments (the semiannual DBE report), as described in the Post-Award User Guide. If your DBE Goals status is set to NA, Incomplete, or blank, the system will not generate the task to complete your semiannual DBE report.**

To update a recipient’s DBE Goal information:

1) Go to your recipient organization record and select the ‘Civil Rights Information’ related action.
2) On the ‘Civil Rights Compliance’ page, select the check box for ‘DBE Goal.’ Then click the ‘CONTINUE’ button.

![Image of 'Civil Rights Compliance' page with selected 'DBE Goal' option and related forms]

3) The ‘Disadvantaged Business Enterprise (DBE) Goal’ form will display.

![Image of 'DBE Goals' section with goal values entered as percentages]

4) Enter or review and update your goals in the ‘DBE Goals’ section. Values should be entered as a percentage between 0% and 100% (e.g., 10%). Up to two digits beyond the decimal can be entered (e.g. 20.25%).
a) **DBE Race Conscious Goal**: Enter as a percentage (e.g. 10.1%).

b) **DBE Race Neutral Goal**: Enter as a percentage (e.g. 13%).

c) **Overall Goal**: The system will automatically calculate the Overall Goal by combining the DBE Race Conscious Goal and the Race Neutral Goals.

![DBE Goals](image)

5) Click the ‘MANAGE DOCUMENTS’ button to add or delete any related documents.

![Existing Document Details](image)

6) The ‘Manage Documents’ form will open.

   a) **Add Document**: Enter the following information in the ‘Upload Document’ section to add a document. Only the document type and document itself are required entries. Once finished, click the ‘SAVE’ button to add the document. The document will be added to the grid under ‘Existing Document Details’.

      i) **Document Type**: Use the drop-down menu to select a document type.

      ii) **Document Name**: Enter the name for the document into the text box.

      iii) **Program Begin and End Dates**: Enter the date range for the program’s duration.

      iv) **Civil Rights Document**: Click the ‘Upload’ button to select a file to upload. Click the ‘X’ on the uploaded document link to remove the file.
b) **Delete Document:** If any document needs to be removed (e.g. the wrong document was uploaded), select the check box for the document from the ‘Existing Document Details’ grid, then click the ‘DELETE’ button.

c) Click the ‘Close’ button to return to the ‘DBE Goal’ form.

7) If the program is ready to submit to FTA, there will be a ‘SUBMIT’ button visible. Click the ‘SUBMIT’ button to send to FTA for review. Programs are only submitted to FTA once the ‘SUBMIT’ button is clicked. **If your DBE Goals status is set to NA, Incomplete, or blank, the system will not generate the task to complete your semiannual DBE report.**
8) Enter any comments into the optional ‘Civil Rights Program Comments’ field, then click the ‘SAVE CHANGES’ button. To discard any changes made prior to saving, click the ‘CANCEL’ button to return to the ‘Civil Rights Compliance’ form.

9) The ‘Civil Rights Compliance’ form will display. The DBE Goal entry in the Status History section will show an updated status ‘In Review - Submitted to FTA’ as well as an updated ‘Submitted Date’.

15.3.4 Title VI

Title VI of the Civil Rights Act of 1964: Title VI is a Federal statute and provides that no person shall, on the grounds 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. The recipient must prepare and submit a Title VI program update every three years.

To update your organization’s Title VI program:

1) Go to your recipient organization record and select the ‘Civil Rights Information’ related action.
2) On the ‘Civil Rights Compliance’ page, select the check box for ‘Title VI Program.’ Then click the ‘CONTINUE’ button.

3) The ‘Title VI Program’ form will display.
4) Click the ‘MANAGE DOCUMENTS’ button to add or delete any related documents.

5) The ‘Manage Documents’ form will open.
   a) **Add Document**: Enter the following information on the ‘Upload Document’ section to add a document. Only the document type and document itself are required entries. Once finished, click the ‘SAVE’ button to add the document. The document will be added to the grid under ‘Existing Document Details’.
      i) **Document Type**: Use the drop-down menu to select a document type ‘Title VI’.
      ii) **Document Name**: Enter the name for the document into the text box.
      iii) **Program Begin and End Dates**: Enter the date range for the program’s duration.
      iv) **Civil Rights Document**: Click the ‘Upload’ button to select a file to upload. Click the ‘X’ on the uploaded document link to remove the file.
b) **Delete Document:** If any document needs to be removed (e.g. the wrong document was uploaded), select the check box for the document from the ‘Existing Document Details’ grid, then click the ‘DELETE’ button.

![Manage Civil Rights Documents: Title VI Program](image)

**Manage Civil Rights Documents: Title VI Program**

Grantee Details

Grantee ID

9900

Grantee Name

Transit Organization

Existing Document Details

<table>
<thead>
<tr>
<th>Document Type</th>
<th>Document Name</th>
<th>Program Begin and End Dates</th>
<th>Date Uploaded</th>
<th>Uploaded By</th>
</tr>
</thead>
<tbody>
<tr>
<td>Title VI</td>
<td>Document sample</td>
<td>June 2014 - June 2016</td>
<td>6/8/2016 10:23 AM EDT</td>
<td>Civil Rights1 TRAMS</td>
</tr>
<tr>
<td>Title VI</td>
<td>Text Title VI Document</td>
<td>June 2017 - June 2018</td>
<td>6/15/2017 11:07 AM EDT</td>
<td>region92.civilRightz1</td>
</tr>
</tbody>
</table>

DELTE

![Comments](image)

**Comments**

**Civil Rights Program Comments**

![SUBMIT SAVE CHANGES CANCEL](image)

7) If the program is ready to submit to FTA, there will be a ‘SUBMIT’ button visible. Click the ‘SUBMIT’ button to send to FTA for review. Programs are only submitted to FTA once the ‘SUBMIT’ button is clicked.

8) The ‘Civil Rights Compliance’ form will display. The Title VI entry in the Status History section will show an updated status ‘In Review - Submitted to FTA’ as well as an updated ‘Submitted Date’.

### 15.4 Review Civil Rights Submissions

The FTA Regional Civil Rights Officer will be able to review and modify civil rights information for any recipient within their region.

To review an organization’s civil rights information:
1) Go to the target recipient organization record and select the ‘Civil Rights Information’ related action.

![Image of TrAMS Transit Organization | TRAMS | 9900](image)

2) On the ‘Civil Rights Compliance’ page, select the check box for the appropriate program to review and click the ‘CONTINUE’ button.

![Image of TrAMS Transit Organization | Civil Rights Compliance](image)
3) The program form will open (EEO sample shown below). The form content includes the program status, existing documents, and comments.

![Civil Rights Compliance | Equal Employment Opportunity (EEO) Program](image)

4) Review the provided documentation by clicking on the document links in the ‘Existing Document Details’ section and reviewing any comments submitted. You can manage documents and add comments following the same directions in Section 15.3 Manage and Submit Recipient Civil Rights Information.

5) After reviewing the provided information, use the drop-down menu provided under the ‘Program Status’ field to set a status for the DBE Program.

![Program Status](image)

a) Select ‘In Review - Under FTA Review’ to lock the civil rights program for review. The recipient’s users will be unable to modify any details for the program but you will be able to add review comments and manage documents.
b) Select ‘Returned to Grantee’ to return the civil rights program to the recipient with your review comments for updates. During this status, the recipient civil rights user can make edits to the program.

c) Select ‘Concur’ to approve the submission and reveal the ‘New Due Date’ and ‘New Expiration Date’ fields. Click in either of these fields to enter dates or display the date picker to select dates from. Both of these fields are required.

d) Select ‘Expired’ to indicate that the recipient’s civil rights program has passed the expiration date since the last ‘Concur’ status. The recipient’s Civil Rights Officer will need to resubmit the program to FTA for review.

e) Select ‘N/A’ to indicate that the civil rights program does not apply to the recipient organization.

6) Click the ‘SAVE CHANGES’ button to submit your review.