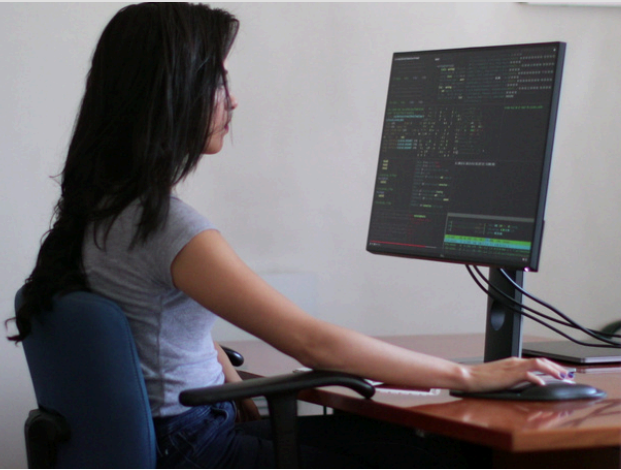


# Title VI E-Newsletter

Spring 2026



## TDOT's annual Employee Title VI Training

by Wes White

As a recipient of federal financial assistance, the Tennessee Department of Transportation (TDOT) is legally mandated to provide comprehensive training on Title VI of the Civil Rights Act of 1964 and related nondiscrimination authorities. This training ensures that all personnel understand the regulatory protections provided to the public and the best practices required to maintain agency-wide compliance.

### 2026 Training Schedule and Delivery

In a collaborative effort between the Civil Rights Division (CRD) and the Human Resources Division, the 2026 Title VI training module has been developed to ensure TDOT employees are aware of and upholding federal nondiscrimination mandates.

- Training Period: April 1, 2026, through June 30, 2026
- Platform: TDOT Learning Network
- Course Title: "Title VI Training 2026"

### Access Instructions

Prior to the launch date of April 1, all employees will receive a formal email invitation containing a direct link to the module. To ensure your completion is recorded accurately, please verify that you are enrolled in the specific "2026" iteration of the course within the Learning Network portal.

### Compliance and Support

Employees are encouraged to complete this training at their earliest convenience to ensure department-wide adherence ahead of the June 30 deadline. If you encounter technical difficulties or require clarification regarding Title VI regulations, please contact your Divisional Title VI Liaison or the CRD Title VI program staff for assistance. (See list of Title VI Liaisons on page 8.)

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# How to build and maintain a Title VI Complaint Process

by Robert Edwards



This article provides a professional framework for establishing and managing a Title VI Complaint Process in accordance with Title VI of the Civil Rights Act of 1964. Organizations receiving federal financial assistance are legally mandated to maintain a transparent, accessible, and efficient system for addressing allegations of discrimination.

## 1. Defining a Title VI Complaint

Under Title VI, a formal complaint is defined as an allegation of discrimination based on race, color, or national origin within any program or activity conducted by a recipient of federal funding. Establishing a clear definition ensures that both the agency and the public understand the scope of protected rights.

## 2. Complaint Procedures and Accessibility

To maintain compliance, agencies must standardize the intake process through formal documentation and public outreach.

- **Standardized Complaint Forms:** Agencies should provide a dedicated Title VI Complaint Form that captures essential data, including the nature of the incident, the date and location, and the complainant's contact information.
- **Public Access:** Forms must be readily available on the agency's official website and in physical formats at administrative offices.
- **Written Protocols:** Beyond the form itself, agencies must publish written procedures detailing how complaints are submitted, the criteria for review, and the subsequent steps of the administrative process.

## 3. Investigation Timelines and Review

- **Efficiency and due process** are critical to a defensible complaint system.
- **Filing Window:** In accordance with federal regulations, complaints should typically be filed within 180 days of the alleged discriminatory act.
- **Initial Review:** Upon receipt, the agency must conduct a preliminary assessment to determine if the complaint falls under Title VI jurisdiction.
- **Investigative Phase:** If the criteria are met, the agency initiates a formal investigation. This involves document review, witness interviews, and evidence gathering.
- **Defined Milestones:** To ensure accountability, agencies should establish internal timelines for each phase of the investigation to prevent indefinite delays.

# How to build and maintain a Title VI Complaint Process

Continued

## 4. Documentation and Record-Keeping

Rigorous documentation serves as the primary evidence of an agency's commitment to Title VI compliance.

- **Complaint Log:** Agencies are required to maintain a centralized log to track the lifecycle of every complaint. This log must include the filing date, the complainant's name, a summary of the allegation, and the final disposition.
- **Case Files:** Comprehensive records—including the original form, investigative notes, correspondence, and final findings—must be securely archived to demonstrate that the agency addressed the matter appropriately.

## 5. Regulatory Reporting Requirements

Compliance often extends beyond internal resolution.

Depending on the funding source, agencies may be required to report complaints to state or federal oversight bodies.

- **Oversight Notification:** For example, transportation agencies may need to report findings to the State Department of Transportation (DOT) or the Federal Highway Administration (FHWA).
- **Program-Specific Guidance:** It is incumbent upon the recipient agency to stay informed of the specific reporting intervals and formats required by their respective federal granting authority.

## 6. Conclusion

A robust Title VI complaint process is more than a regulatory hurdle; it is a fundamental component of organizational integrity.



**By prioritizing accessibility, maintaining strict investigative timelines, and ensuring meticulous documentation, agencies protect both the rights of the public and their own standing as recipients of federal funds.**

# Limited English Proficiency (LEP): Understanding the Four Factor Analysis

by Robert Edwards



Under Title VI of the Civil Rights Act of 1964, agencies receiving federal financial assistance are federally mandated to provide "meaningful access" to individuals with Limited English Proficiency (LEP). The primary framework for determining the appropriate level of language assistance is the Four-Factor Analysis.

This evidence-based assessment allows agencies to balance the need for language services with available resources, ensuring that no individual is excluded from essential programs due to a language barrier.

## The Four Factors of Analysis

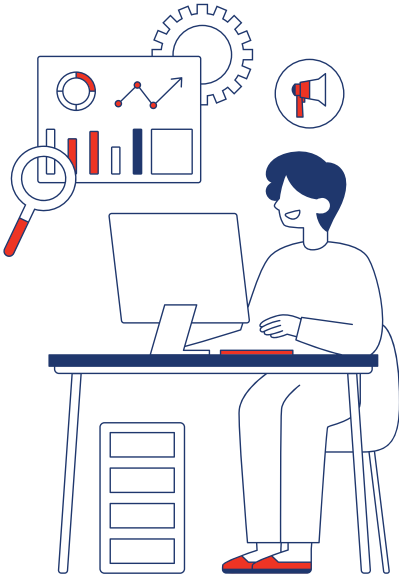
To remain compliant, agencies must evaluate their service area through the following four lenses:

- 1. Demographic Reach:** Assess the number or proportion of LEP individuals eligible to be served or likely to be encountered by the program. This requires a granular review of local population data.
- 2. Frequency of Interaction:** Analyze how often employees come into contact with LEP individuals. Higher frequency of contact necessitates more robust and readily available language services.
- 3. Nature and Importance:** Determine the criticality of the service. Programs involving safety, healthcare, or fundamental transportation access require more comprehensive language support than those of a discretionary nature.
- 4. Resource Allocation:** Evaluate the agency's available resources and the costs associated with various language service options. While financial constraints are a valid consideration, they do not exempt an agency from the obligation to provide meaningful access.

Continued on next page

# Limited English Proficiency (LEP): Understanding the Four Factor Analysis

Continued



## Data Acquisition and Evidence

A defensible analysis must be rooted in verified data rather than anecdotal evidence. Recommended sources include:

- The U.S. Census Bureau: Specifically the American Community Survey (ACS), which provides reliable metrics on "Language Spoken at Home" and English proficiency levels.
- Local Institutional Data: Reports from school districts, community health organizations, and internal agency interaction logs.



## Common Compliance Pitfalls

During federal and state reviews, several recurring errors often result in findings of non-compliance:

- Extrapolated Data: Utilizing another organization's demographic data rather than conducting a specific analysis of the agency's unique service area.
- Lack of Narrative Depth: Listing the four factors without providing a data-driven explanation for how the agency arrived at its conclusions.
- Static Documentation: Failing to update the analysis as regional demographics shift or neglecting to integrate the analysis findings into the broader LEP Plan.



## Best Practices for Documentation

A complete and professional Four-Factor Analysis should serve as a transparent roadmap for the agency's language access strategy. To ensure a successful audit, the documentation must:

- Define the Service Area: Clearly outline the geographic or programmatic boundaries of the study.
- Cite Sources: Explicitly reference the datasets used to justify the findings.
- Bridge Analysis to Action: Conclude with a clear explanation of how these findings dictate the specific language assistance measures (e.g., translation, interpretation) the agency will deploy.



2025 National Summer Transportation Institute Students

## 2026 National Summer Transportation Institute

by Pamela Sharp

The National Summer Transportation Institute (NSTI) is a four-week Science, Technology, Engineering and Math (STEM) - focused program that aims to increase awareness and educate middle and high school students about a wide range of careers in the transportation industry. Additionally, the program targets underrepresented populations, encouraging students to pursue transportation-related fields of study at the college and university level.

TDOT's Civil Rights Division (CRD) administers the program annually and solicits colleges and universities to serve as host sites. Middle Tennessee State University (MTSU) and Tennessee State University (TSU) were selected as host sites for 2026. The MTSU Program will start July 6 and end on July 31. TSU Program will start June 15 and end on July 10. Both universities offer educational and fun-filled programs.

Lastly, the CRD has collaborated with the host sites to assist with their outreach efforts. Davidson County and Rutherford County high school's communications offices have sent information about the program to guidance counselors throughout their respective territories. The CRD Title VI Program has sent out approximately 105 emails to guidance counselors throughout the state.

If you know of someone who would be a good candidate for the program, please have them submit an online application. Should you have questions or would like to discuss this further, please contact Pamela Sharp at [Pamela.Sharp@tn.gov](mailto:Pamela.Sharp@tn.gov) or (615) 253-1074. To apply, scan the QR codes below.



**Middle Tennessee State University's Application**

4-week, residential  
July 6 - July 31, 2026



**Tennessee State University's Application**

4-week, residential  
June 15 - July 10, 2026



## Role and strategic importance of Title VI liaisons

*by Wes White*

The Title VI Liaison Committee is a cornerstone of TDOT's commitment to federal and state nondiscrimination mandates.

Liaisons serve as the primary conduits between the Civil Rights Division and the agency's various operational arms. Their role is multifaceted, focusing on:

- **Regulatory Dissemination:** Ensuring Title VI information reaches all regions, divisions, and departments.
- **Compliance Oversight:** Acting as the divisional point of contact to ensure that programs and activities adhere to Title VI of the Civil Rights Act of 1964.
- **Technical Assistance:** Supporting the CRD in the practical implementation of non-discrimination policies at the ground level.

The committee met March 24, 2026, focusing on:

- **2026 Annual Employee Training:** Strategic planning for the mandatory training rollout, scheduled to run from April 1 through June 30, 2026.
- **Limited English Proficiency (LEP) Protocols:** Review of current language assistance usage and standardized methods for data collection to ensure "meaningful access."
- **Administrative "Housekeeping":** Verification of Title VI Public Notification postings in common areas to ensure constant visibility and regulatory transparency.

Continue reading to see the TDOT Title VI Liaison List



TDOT Title VI Liaisons - 2026



Department	2024 Liaison	Contact Phone	Location	E-mail	Director
Audit	Nichole Wellman	615-253-2437	HQ	<a href="mailto:nichole.wellman@tn.gov">nichole.wellman@tn.gov</a>	Brian Ballard
Civil Rights Office	Wes White	615-253-1076	HQ	<a href="mailto:James.W.White@tn.gov">James.W.White@tn.gov</a>	Jessica Starling
Community Relations Division	Amanda Tidwell	615-532-3276	HQ	<a href="mailto:Amanda.K.Tidwell@tn.gov">Amanda.K.Tidwell@tn.gov</a>	Beth Emmons
Construction	Blake Fulton	615-741-3542	HQ	<a href="mailto:Blake.Fulton@tn.gov">Blake.Fulton@tn.gov</a>	Gwen Whittaker
Environmental	Kimberly Brogan	615-253-2476	HQ	<a href="mailto:kimberly.brogan@tn.gov">kimberly.brogan@tn.gov</a>	Sharon Schutz
Finance	Teresa Rippetoe	615-741-2109	HQ	<a href="mailto:teresa.rippetoe@tn.gov">teresa.rippetoe@tn.gov</a>	Kenitha Reed
Human Resources	Mark Prange	61-574-17486	HQ	<a href="mailto:mark.prange@tn.gov">mark.prange@tn.gov</a>	Kristen Lynch
Information Technology	Debra Guerin	615-741-3298	HQ	<a href="mailto:Debra.Guerin@tn.gov">Debra.Guerin@tn.gov</a>	Jermaine Scales
Legal Division	Brian Carroll	615-335-8785	HQ	<a href="mailto:brian.carroll@tn.gov">brian.carroll@tn.gov</a>	Leslie South
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Materials & Test	Erin Napier	615-350-4103	HQ	<a href="mailto:erin.napier@tn.gov">erin.napier@tn.gov</a>	Heather Purdy
Occupational Health & Safety	Clay Culwell	615-253-3023	HQ	<a href="mailto:clay.culwell@tn.gov">clay.culwell@tn.gov</a>	Clay Culwell
Passenger Transportation, Rail and Freight	Nicky Moore	615-741-3865	HQ	<a href="mailto:Nicquayleeonntea.Moore@tn.gov">Nicquayleeonntea.Moore@tn.gov</a>	Dan Pallme
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