

**Oregon Department of Transportation Office of Civil Rights
Sub-recipient Title VI Program Review**

Albany Area MPO (AAMPO)



November 1, 2017

Prepared by:

Rebecca Williams, Title VI/EJ/ADA Program Manager
Oregon Department of Transportation, Office of Civil Rights

AAMPO

Title VI Review Final Report

November 1, 2017

| | |
|---|----|
| AAMPO Title VI Program Review Report November 1, 2017 | 1 |
| Introduction | 2 |
| Scope/Methodology | 3 |
| Summary of Key Observations..... | 3 |
| Title VI Program – Key Observations | 3 |
| 1. Civil Rights Organization and Staffing | 4 |
| 2. Program Plans/Documents: | 4 |
| 3. Program Implementation – Policies and Procedures:..... | 4 |
| 4. Data Collection and Analysis:..... | 4 |
| Americans with Disability Act (ADA)..... | 5 |
| Environmental Justice (EJ) | 6 |
| Limited English Proficiency (LEP) | 7 |
| Recommendations:..... | 7 |
| Conclusion | 7 |
| Appendix A | 9 |
| Scorecard | 10 |
| Appendix B | 11 |
| Letter | 11 |
| Appendix C | 17 |
| Questions..... | 18 |

Introduction

The U.S. Department of Transportation requires Oregon and its federal aid sub-recipients to comply with various non-discrimination laws and regulations, including Title VI of the Civil Rights Act of 1964. In order to meet these assurances, federal regulations require state highway agencies, such as Oregon Department of Transportation (ODOT), to perform audits of its federal aid sub recipients under 23 CFR 200.9 (b)(7).

On July 18, 2017 Rebecca Williams, from ODOT's Office of Civil Rights (OCR) conducted an on-site compliance review of Albany Area Metropolitan Planning Organization (AAMPO). The AAMPO which is located in the Willamette Valley is positioned at the foot of the Oregon Coast Range and comprises some of the most fertile and lush farmland in the Northwest. Stretching from just below the Oregon-Washington border to the city of Eugene, the Willamette Valley has long been considered the heartland of Oregon. The AAMPO falls under the umbrella of Oregon Cascades West Council of Governments (OCWCOG) which serves two counties in the Valley, Benton and Linn, which contain the regions two biggest cities, Corvallis and Albany, as well as Oregon State University, 18 smaller and diverse jurisdictions, including Lebanon and Philomath, and a multitude of housing, school, dining, and shopping options. OCWCOG also serves Lincoln County.

OCWCOG is located in the southern tip of the Valley and a one hour drive to Portland and 40 minutes to Eugene – the region's major airports and gateways; and, a twenty minute drive to Salem, Oregon's State Capitol, where many of OCWCOG funding agencies and partners are found. The Southern Willamette Valley is best known for its agriculture and its innovation, which include a flourishing wine industry, innovation accelerators, a growing start-up culture, high-tech industry and access to tens of thousands of students, professionals, and entrepreneurs affiliated with Oregon State University, Samaritan Health Systems, Linn-Benton Community College, Hewlett-Packard, the U.S. Department of Energy, and hundreds of other businesses, non-profits, agencies, and community partners. The Valley is divided into two distinct wine appellations, both known for their rich and robust Pinot Noir and exceptional Pinot Gris. Hazelnuts, raspberries, blackberries, and Christmas trees, are major exports of the Willamette Valley.

The purpose of the compliance review was to determine the extent to which AAMPO has met its general obligations and commitments with respect to Title VI implementation in its transportation activities. Furthermore, these reviews help identify areas where OCR can provide technical assistance and make recommendations regarding areas identified as needing improvement. Information gathered from our compliance reviews will be used to enhance the ideas and processes throughout the State. This report reflects the key findings and key observations from our on-site visit.

There may be areas of compliance indicated in this review as “**Meets All Expectations**” where the comments state that an update or more work is needed. This may appear contradictory, however due to recent guidance from the Federal Highway Administration, the Local Agency Guidelines (LAG) Manual will be updated in late 2017 to require all ODOT subrecipients that receive Federal Funds to complete a Title VI Plan for ODOTs approval. The Title VI Plans will be due to ODOT tri-annually, including an LEP Plan. It will no longer be compliant to sign off on ODOTs assurances or use ODOTs OCR Title VI Plan verbatim. The Annual Accomplishments Report (AAR) will now be required to be submitted to ODOTs OCR on a yearly basis. It will no longer be compliant to keep an AAR on file without submitting it for acknowledgement by ODOT. In fairness to ODOTs subrecipients, until the LAG Manual is updated, those following the older version of the LAG Manual will not be found in non-compliance.

Scope/Methodology

The scope of the AAMPO review involved Public Involvement, Diversity and Inclusion, EEO and Employment Services, ADA, Transportation Planning, Environmental Justice, Limited English Proficiency (LEP), complaint procedures, training and accomplishments. The OCR Title VI Coordinator examined AAMPO's vital documents, policies, and procedures as well as provided input regarding updating the cities Title VI and Title II ADA Transition Plan's. An interview was conducted that included Rebecca Williams OCR Title VI Coordinator and Tarah Campi, Community and Economic Development Planner/AAMPO Coordinator to evaluate how AAMPO incorporates the FHWA Title VI requirements into its transportation planning.

The OCR Title VI Coordinator reviewed and discussed the following documents:

- AAMPO website
- Survey Response Questions document
- Training strategy
- Title VI Complaint Process
- ADA Complaint Process
- Title II ADA Transition Plan
- Language Access Policy (LEP Plan)
- Public Outreach
- Data Analysis
- Translation resources

A number of tools were used to aid in information gathering, organization and analysis. These tools included:

- The **Initiation letter**, informing AAMPO of the upcoming review and detailing the goals, process and scope of the review;
- A **Survey Questionnaire** requesting information concerning program review areas;
- A **Scorecard** with rating criteria range of "Exceeds Expectations" (overall performance exceeds the expected level), "Meets All Requirements" (overall performance is at the expected level), "Needs Improvement" (overall performance falls below expected levels) served as an assessment tool that allowed us to collect information and determine the effectiveness of the Title VI Program;
- A **Final Report**, containing ODOT's observations, scores, accomplishments and recommendations.

Summary of Key Observations

Title VI Program – Key Observations

Title VI of the Civil Rights Act of 1964 states that, "No person in the United States 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 review revealed the following key observations:

1. Civil Rights Organization and Staffing

The Community and Economic Development Planner/AAMPO Coordinator also have the Title VI responsibilities, while the OCWCOG Deputy Director is the designated as the ADA Coordinator. The Title VI Coordinator position reports and has direct access to, the OCWCOG Deputy Director.

Score: Meets All Requirements

2. Program Plans/Documents

AAMPO has a **Regional Transportation Plan, Transportation Improvement Program, annual list of obligated projects, Unified Planning Work Program, Title VI Complaint Process, and Title VI Plan** completed. The county is working towards the completion of their **ADA Title II Transition Plan**.

Score: Meets All Requirements

*No ADA Plan. An ADA Plan is not a requirement of Title VI Reviews

3. Program Implementation – Policies and Procedures

The AAMPO follows Title VI and related legislation which include Americans with Disabilities Act of 1990, Section 504 of the Rehabilitation Act of 1973, Environmental Justice-Executive Order 12898, Age Discrimination Act of 1975, Federal Aid Highway Act of 1973, The Civil Rights Restoration Act of 1987 and Limited English Proficiency – Executive Order 13166.

Score: Meets All Requirements

4. Data Collection and Analysis:

The AAMPO utilizes a variety of approaches to collect demographic information on Title VI, EJ, LEP and low income populations. Some of the tools include; United States Census and the Environmental Protection Agency (EJ Screen).

Score: Meets All Requirements

*It is helpful to look at data from local schools within a project area.

5. Complaint Procedures

The AAMPO has an easily accessible complaint process in place. The Complaint form with instructions is available on the AAMPO website. Information on how to contact the Title VI Coordinator is posted in the same area as the Complaint form.

Score: Meets All Requirements

6. Training

AAMPO staff members have attended “Incorporating Social Equity into Regional Planning and Project Development” session during the “New Thinking for a New Era” Symposium at Portland State University during the first quarter of the year. In the fourth quarter “Workplace Diversity” compliance training through City-County Insurance services was attended by staff.

Staff will continue to stay engaged with ODOT’s ADA settlement and potential implications for regional planning efforts and would like to be informed of any ADA training becomes available.

Score: Meets All Requirements

Americans with Disability Act (ADA)

The evaluation of sub-recipient ADA programs is based on Section 504 of the Americans with Disabilities Act. It states that, “...no qualified individual with a disability in the United States shall be excluded from, denied the benefits of, or be subject to discrimination under” any program or activity that receives Federal financial assistance, or is conducted by any Executive agency. ADA is a civil rights statute (1990) prohibiting discrimination against people with disabilities in all aspects of life, including transportation. Title II of the ADA prohibits discrimination based on disability by public entities. Title II extends the nondiscrimination mandate to Section 504 to all public entities, **regardless of funding status.**

AAMPO does not have a current ADA Title II Transition Plan. An application was submitted to Transportation and Growth Management (TGM) at ODOT and the Oregon Department of Land Conservation and Development (DLCD) in 2016 for funding to begin work on their ADA Title II Transition Plan. However, the application was not selected for funding. The AAMPO will continue to seek grant funding when the opportunity arises and is interested in any assistance that may become available through ODOT.

Environmental Justice (EJ)

The overarching principles of environmental justice (EJ) include: To avoid, minimize, or mitigate high and adverse impacts to the human environment and to ensure fair and full participation and to prevent the denial of benefits to minority and low-income populations. Executive Order 12989 states “each...agency shall make achieving environmental justice part of its mission by identifying and addressing, as appropriate, disproportionately high and adverse human health or environmental effects of its programs, policies, and activities on minority populations and low-income populations.” The goals should be achieved throughout transportation planning, project development, and through all public participation outreach efforts of federally funded recipients.

The goal of environmental justice is to ensure all segments of the population are involved in the planning process. Part of this responsibility involves evaluating the impact of proposed transportation investments on historically underserved and underrepresented segments of the community and ensuring that these individuals have a meaningful opportunity to be a part of the transportation planning process.

As a recipient of federal funds, AAMPO is responsible for integrating Environmental Justice (EJ) into its Title VI program and transportation planning activities. The following are examples of questions that should be asked when determining whether meaningful participation is being achieved:

- How will the public participation process reach low income and minority populations?
- What information should be disseminated that will adequately apprise the public transportation projects?
- Is the public involved early in the planning process?
- Is collected public input relayed to public officials and the proper decision makers?
- Are specific public contributions addressed in transportation policies?

Title VI and the associated EJ principles call for evaluation of potential negative impacts that may disproportionately affect minority or low income populations.

Examples of AAMPO’s current outreach and inclusion efforts include:

- Extensive Public Outreach on amending framework for Regional Transportation Plan and Transportation Improvement Program,
- Began work on AAMPO’s Demographic Profile, including demographic data regarding participants in, and beneficiaries of, MPO planning and programming efforts,
- Translated meeting accommodation and complaint language into Spanish for use on the website agenda’s,
- Included Title VI/Non Discrimination notices in applicable documents and on the AAMPO website,
- Made improvements on AAMPO’s website to include additional Spanish-language information and posted meeting minutes for the public,

- Continued outreach to local stakeholders in an effort to build an ‘interested parties’ list

Score: Exceeds Expectations in this area

Limited English Proficiency (LEP)

The evaluation AAMPO standards for Limited English Proficiency (LEP) services derives from Executive Order 13166 which states that each agency is to examine the services they provide, identify any need for services to those with limited English proficiency (LEP), and develop and implement a system to provide those services to LEP persons so that they have meaningful access to them.

The key to providing meaningful access for LEP persons is to ensure effective communication exists between the service provider and the LEP person. AAMPO has translated some vital documents in to Spanish and has made them available on their website. AAMP also offers translation and interpretation assistance when necessary. However, a complete LEP Plan was not available and will need to be submitted along with the updated Title VI Plan to meet full compliance in the future.

Score: Meets All Requirements

*AAMPO is being given additional time to complete an LEP Plan

Recommendations

- Continue to work towards compliance with an ADA Title II Transition Plan, and
- Create an LEP Plan as required by Executive Order 13166.

Conclusion

AAMPO’s public outreach process for its Regional Transportation Plan is a core work area currently; it has incorporated extensive public outreach, including providing information to the region’s Senior Services Advisory Council, Disability Services Advisory Council, and groups representing minority populations. AAMPO is proactive in ongoing communication with stakeholders and public notifications of its meetings, which follow public meetings laws for accommodations. AAMPO also reviews its website and printed materials regularly from a health-literacy perspective, ensuring that design, fonts, and content are accessible.

As recommended the AAMPO should look at continuing to move forward with their work towards a compliant ADA Title II Transition Plan. The updated Title VI Plan and complaint process will be due in 2018 and the Annual Accomplishments Report is due to the Office of Civil Rights on a yearly basis.

The review guidelines stipulate that subrecipients have 90 days to come in to compliance with Federal and State regulations when found to be in noncompliance. The OCR finds AAMPO is compliant at this time with Title VI. However, the work on an LEP Plan will need to begin soon so that it is ready with the next submission of AAMPO's Title VI Plan.

It was a pleasure to meet the dedicated staff at AAMPO. I am looking forward to working alongside the staff to ensure compliance and equity for Title VI, LEP and EJ communities.

Sincerely,

Rebecca J. Williams
Office of Civil Rights M-23
Title VI/EJ/ADA Program Manager
3930 Fairview Industrial Drive SE
Salem, OR 97302-1166
Office: 503-986-3870
Cell: 971-239-9438
Fax: 503-986-6382
Rebecca.J.Williams@odot.state.or.us

Appendix A

MPO Scorecard



Title VI Program Review Scorecard

AAMPO

Key: E = Exceeds Expectations in this area M = Meets Expectations in this area
 N = Needs improvement in this area

| Review Area | Comments | score |
|--|--|-------|
| Program Management Role of the Coordinator Access To Director | The Title VI Coordinator has direct access to the Director. | M |
| Program Implementation: | | |
| Transportation Decision Making/ Planning EJ, LEP, Title Vi, ADA, Demographics | AAMPO has a Title VI Plan that will need updated in 2018 and will be working toward a new ADA Title II Transition Plan. They will also be working on an LEP Plan. | M |
| Public Involvement Engaging stakeholders Targeting Protected Populations Documentation public involvement & public participation | The AAMPO has done some extensive public outreach and put together a very detailed public involvement summary. | E |
| Monitoring: | | |
| Data Collection: Collection & Analysis Board and Committee Compositions | AAMPO does not gather demographic information about its Policy Board and Technical Advisory Committee members. They do work proactively in their recruitment practices. However, data collection on Board Members is a requirement and is something will need to happen in the future. | N |
| Improving Access for Contractors: | | |
| Complaint Procedures: | | |
| Training: Internal/External | A complaint procedure is in place that meets requirements. AAMPO has conducted the required training during this reporting period. | M |
| Accomplishments | | |
| Publications/Guidance Title VI Plan (Nondiscrimination policy) Annual Accomplishment Report (on file) | AAMPO has a current Title VI Plan and Annual Accomplishments Report. | M |

Appendix B

Notice of Review Letter & Schedule



Oregon

Kate Brown, Governor

Department of Transportation

Office of Civil Rights, MS 23

Industrial Drive SE

Salem, OR 97302-1166

Phone: (503) 986-4350

Fax: (503) 986-6382

June 13, 2017

Tarah Campi
Community and Economic Development Planner
Oregon Cascades West Council of Governments
1400 Queen Avenue SE, Suite 205A
Albany, OR 97322

RE: Albany Area MPO Title VI Audit

Dear Ms. Campi:

The Oregon Department of Transportation (ODOT) Office of Civil Rights (OCR) will be conducting a Title VI Audit of Albany Area MPO. The purpose of this letter is to provide information regarding the schedule, scope, and process of the audit. ODOT's Title VI Program designed these audits to be an informative and instructive experience. We are confident that with your cooperation and participation, the audit will be a success.

The U.S. Dept. of Transportation requires state transportation agencies and their federal aid sub-recipients to comply with various non-discrimination laws and regulations, including Title VI of the Civil Rights Act of 1964. Title VI requires that federal aid recipients assure that no person shall, on the basis of race, color, national origin or gender, be excluded from participation in, be denied the benefits of, or be otherwise subject to discrimination under any federally assisted program or activity. Pursuant to 23 CFR 200 (9) (b) (7), as part of its oversight obligations, state highway agencies, such as ODOT, are required to perform compliance audits of its federal aid sub-recipients to determine whether there are any findings of non-compliance.

Compliance audits can deter discrimination and encourage accurate record keeping techniques. They also provide an opportunity for ODOT to provide education and technical assistance to recipients. The goal of this audit is two-fold: 1) to learn how the agency can better assist local agencies and MPO's in meeting their Title VI responsibilities and 2) to provide insight and guidance that fosters better community service and reduces the local agency risk to Title VI complaints.

In selecting recipients for audit, OCR applied a neutral system of assessing population size, diversity within population areas, the likelihood of Title VI impact and receipt of federal funds. The ODOT Title VI office has made the commitment to audit sub-recipients yearly on a random basis and according to highest populations served. Based on these criteria, Albany Area MPO was selected for an on-site review. On **July 18, 2017 at 10:00 am**, ODOT's Title VI staff plans to visit the Albany Area MPO office to interview staff and review documents regarding the implementation and administration of the Title VI program.

We ask that you determine the individuals that should be interviewed during our audit, coordinate the employee schedules, and suggest times that will allow us to conduct the interviews during the course of our visit. The ODOT's OCR

2017 Title VI Sub-Recipient Review Notification Letter, Schedule, and Authorities

1

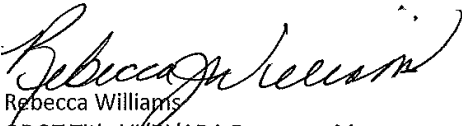
will make every effort to accommodate the proposed schedules however; **all interviews must be completed by 5:00 pm Tuesday, July 18, 2017 at 5:00 pm.**

A detailed **Schedule of Events** is attached to this letter. The Schedule of Events identifies the OCR staff conducting the review, the review process, and the staff selected for interviews from Albany Area MPO. We provide you this information in order to remain as transparent and as inclusive as possible. The Office of Civil Rights can work with you on a day and time that works for you if the proposed schedule does not work. Those that should be invited to the interview should include the Title VI Officer, ADA Coordinator and the Transportation Manager. If appropriate, any supervisory or other staff that you feel can best answer questions and talk about the great things that are happening in your community.

Thank you in advance for your participation during this process. The spirit behind Title VI is one of combined efforts of collaboration, good faith, and cooperation in addressing the disparities within our society. Compliance under Title VI will help strike a balance between Oregon's transportation projects and the needs of the community that we serve.

Please contact Rebecca Williams, Title VI/EJ/ADA Program Manager, with your proposed interview schedule. Should you have any questions or concerns, please do not hesitate to contact our office. We look forward to working with you.

Sincerely,



Rebecca Williams
ODOT Title VI/EJ/ADA Programs Manager
Office of Civil Rights MS23
3930 Fairview Industrial Drive SE
Salem, OR 97302-1166
Office: 503-986-3870
Fax: 503-986-6382
Email: Rebecca.J.Williams@odot.state.or.us



Oregon

Kate Brown, Governor

Department of Transportation

Office of Civil Rights, MS 23
3930 Fairview Industrial Drive SE
Salem, OR 97302-1166
Phone: (503) 986-4350
Fax: (503) 986-6382

Oregon Department of Transportation
Office of Civil Rights
Title VI Program
Schedule of Events for Title VI On-Site Review
July 18, 2017

ODOT's Office of Civil Rights (OCR) wants the 2017 review of your agency to be one of collaboration and cooperation. Our goals for this process are to better serve Oregonians, preserve future federal funding, and continually improve our relationships with the local agencies as we strive to make Oregon a leader in Title VI awareness and implementation.

Review Team:

The Title VI audit team consists of Rebecca Williams Title VI/EJ/ADA Programs Manager, of the Office of Civil Rights.

Scope:

The interview process of the audit will include questions pertaining to transportation activities and the general Title VI activities managed by Albany Area MPO. We will be asking to speak with the manager of your transportation division, the Title VI Coordinator, and any other staff responsible for Title VI administration.

We will also be reviewing the following policies and documentation:

- The Title VI plan;
- The complaint process;
- Public outreach/involvement efforts;
- Documentation procedures for Title VI actions;
- Public involvement plans and strategy;
- Partnerships with minority and underrepresented groups;
- The composition of planning boards and commissions;
- Consultant contract activities;
- Training available and utilized;
- Presence and accessibility in the community;
- How well actions and policies align with your agency's statements and plans; and
- Each department's plan, goals, and actions to integrate Title VI concepts into its operation areas (e.g. planning, project development, construction, central services, legal or any other major department within your division's organization scheme)

We are aware of and sensitive to the fact of increasingly heavier workloads and fewer employees. To facilitate the compliance audit, please prepare in advance and provide access to documents that pertain to the previously mentioned activities and procedures.

Additionally, please provide us with a proposed time that is the least disruptive to the interviewees' schedule.

To provide context and a clearer expectation, we have additionally provided a format of the audit process.

1. **June 14, 2017:** Letter of Notification, Schedule of Events, and Questionnaire distributed to agency The Questionnaire should be completed and returned to ODOT by email or US Postal Service no later than June 30, 2017.
2. **July 18, 2017:** On-site audit
3. **September 18, 2017:** OCR sends a Final Report with its specific findings, observations, recommendations to the local agency.

The Final Report provides the recipient with a complete overview of its Title VI program, findings of fact, recommendations, and compliance status. It will explain any required actions or recommendations and may provide some additional methods for improving your program.

Following the results of the final report, the agency may be required to make corrections or additions to their program.

4. OCR will notify the recipient of any findings of noncompliance. The recipient is responsible for taking **corrective action** to overcome any deficiencies within **90 days of notice**.

OCR is committed to providing any guidance or assistance needed and will continue to monitor the agency's steps in completing the necessary changes.

Oregon Department of Transportation
Office of Civil Rights
Title VI Program
Authorities

ODOT and the OCR are required to perform Title VI audits of its sub recipients of federal aid under the following authorities:

- 23 Code of Federal Regulations (CFR), Part 200
- 49 CFR, Part 21
- United States Department of Transportation (USDOT) Federal Transportation Administration (FTA) Circular (C) 4704.1, Equal Employment Opportunity Program Guidelines for Grant Recipients and C 4702.1A, Title VI Program Guidelines for Federal Transit Administration Recipients
- USDOT Order 5610.2, Order to Address Environmental Justice in Minority Populations and Low-Income Populations
- Executive Order (EO) 12898, Federal Actions to Address Environmental Justice in Minority Populations and Low-income Populations
- EO 13166, Improving Access to Services for Persons with Limited English Proficiency
- Director's Policy Number 21, Environmental Justice
- Director's Policy Number 28, Title VI of the Civil Rights Act of 1964 and Related Statutes.

Please contact OCR with any additional questions. We look forward to working with you.

Appendix C

Questions

**Oregon Department of Transportation
Office of Civil Rights**

Title VI Compliance Questionnaire

Audit Team: Rebecca Williams
Sub-recipient: Albany Area MPO

*Please indicate name and title of person completing form: **Tarah Campi, Community and Economic Development Planner, Oregon Cascades West Council of Governments (OCWCOG). This form completed 6/29/17.***

| |
|--|
| Legend: |
| ADA: Americans with Disabilities Act |
| LEP: Limited English Proficiency |
| EJ: Environmental Justice |
| DBE: Disadvantaged Business Enterprise |

Purpose: This questionnaire is designed to extract information relevant to the Title VI Compliance review for the 2016-2017 reporting period. A prior assessment of the submitted responses ensures that efficiency is maintained while conducting the on-site review.

A. General Program Management

1. What office or section within the MPO is responsible for Title VI issues?
 - a. Provide the name and contact information responsible for the Title VI Program

| |
|---|
| Tarah Campi, Community and Economic Development Planner / AAMPO Coordinator tcampi@ocwcog.org, 541-924-8480 1400 Queen Ave. SE, Suite 2015A, Albany OR 97322 |
|---|

2. Does the MPO maintain a current ADA Transition Plan?
 - a. Is there an individual designated as the ADA Coordinator?
 - b. Describe the procedure for handling ADA requests or complaints.

Tarah Campi, Community and Economic Development Planner / AAMPO
Coordinator
tcampi@ocwcog.org, 541-924-8480
1400 Queen Ave. SE, Suite 2015A, Albany OR 97322

Tarah Campi oversees ADA-related work for AAMPO on an interim basis while an AAMPO Coordinator recruitment process is ongoing (the former AAMPO manager departed in March 2017). The OCWCOG Deputy Director is the ADA Coordinator for the agency.

AAMPO submitted a grant application to the Transportation and Growth Management (TGM) program at the Oregon Department of Transportation

Albany Area MPO Page 1 of 8

(ODOT) and the Oregon Department of Land Conservation and Development (DLCD) in 2016; it was denied. AAMPO partnered with Linn County Public Works staff on preliminarily drafting a 2017 application, but the County ultimately did not submit it.

AAMPO has a Discrimination Complaint Procedure document and accompanying complaint form available to the public and published on the AAMPO website (www.ocwcog.org/transportation/aampo/aampo-title-vi-program). Any person who believes he or she has been aggrieved by any unlawful discriminatory practice under Title VI may file a complaint with AAMPO. Additionally, any person or group may also file a general complaint related to any transportation planning or programming of AAMPO. All complaints, whether by a recipient of AAMPO funds or against AAMPO, after initial investigation and with recommendations(s) for resolution, will be forward to the ODOT Office of Civil Rights Title VI Officer or to the FHWA Office of Civil Rights. All Title VI and Environmental Justice Complaints are required to be submitted to FHWA for final determination where federal funding is utilized on projects.

B. Transportation Decision Making/Planning

1. What methods does the MPO use to collect demographic data to identify Title VI, EJ, LEP, and low-income populations?

(ODOT) and the Oregon Department of Land Conservation and Development (DLCD) in 2016; it was denied. AAMPO partnered with Linn County Public Works staff on preliminarily drafting a 2017 application, but the County ultimately did not submit it.

AAMPO has a Discrimination Complaint Procedure document and accompanying complaint form available to the public and published on the AAMPO website (www.ocwcog.org/transportation/aampo/aampo-title-vi-program). Any person who believes he or she has been aggrieved by any unlawful discriminatory practice under Title VI may file a complaint with AAMPO. Additionally, any person or group may also file a general complaint related to any transportation planning or programming of AAMPO. All complaints, whether by a recipient of AAMPO funds or against AAMPO, after initial investigation and with recommendations(s) for resolution, will be forward to the ODOT Office of Civil Rights Title VI Officer or to the FHWA Office of Civil Rights. All Title VI and Environmental Justice Complaints are required to be submitted to FHWA for final determination where federal funding is utilized on projects.

Data from the United States Census as well as the United States Environmental Protection Agency is utilized.

2. Indicate any projects that were identified as posing a negative impact on traditionally underrepresented populations?
 - a. What mitigation efforts were considered and how did they affect the project plan?
 - b. Are procedures for mitigation measures included in environmental and planning documents and agreements?

(ODOT) and the Oregon Department of Land Conservation and Development (DLCD) in 2016; it was denied. AAMPO partnered with Linn County Public Works staff on preliminarily drafting a 2017 application, but the County ultimately did not submit it.

AAMPO has a Discrimination Complaint Procedure document and accompanying complaint form available to the public and published on the AAMPO website (www.ocwcoq.org/transportation/aampo/aampo-title-vi-program). Any person who believes he or she has been aggrieved by any unlawful discriminatory practice under Title VI may file a complaint with AAMPO. Additionally, any person or group may also file a general complaint related to any transportation planning or programming of AAMPO. All complaints, whether by a recipient of AAMPO funds or against AAMPO, after initial investigation and with recommendations(s) for resolution, will be forward to the ODOT Office of Civil Rights Title VI Officer or to the FHWA Office of Civil Rights. All Title VI and Environmental Justice Complaints are required to be submitted to FHWA for final determination where federal funding is utilized on projects.

Data from the United States Census as well as the United States Environmental Protection Agency is utilized.

No projects are identified as posing a negative impact on underrepresented populations.

Environmental justice is addressed in AAMPO's Title VI program (www.ocwcoq.org/transportation/aampo/aampo-title-vi-program/)

Albany Area MPO Page 2 of 8

3. Describe any considerations made with respect to Tribal government involvement and reservation road issues if any.

No Tribal governments are located in the AAMPO area.

C. Public Involvement

1. What is the demographic composition of any citizen advisory boards and/or commissions?

- a. What efforts are in place to encourage membership/representation from traditionally underrepresented populations (i.e. minority, women, and low-income participations)?

No Tribal governments are located in the AAMPO area.

AAMPO does not gather demographic information about its Policy Board and Technical Advisory Committee members.

AAMPO works proactively to engage diverse and traditionally underrepresented populations, including coordinating with the region's Disability Services Advisory Council, Social Services Advisory Council, Albany Human Relations Commission, Linn Benton Health Equity Alliance (bilingual Spanish-English representation), Linn Benton Hispanic Advisory Committee, and Medicaid recipients.

2. Of the projects planned during the reporting period, how many were associated with a public involvement or public outreach event (i.e. hearings, meetings, open houses)?

- a. Explain how public outreach differs based on the type impacts associated with each project.
- b. Describe the public outreach/involvement efforts targeted to traditionally underrepresented group (protected populations) and outcomes.

No Tribal governments are located in the AAMPO area.

AAMPO does not gather demographic information about its Policy Board and Technical Advisory Committee members.

AAMPO works proactively to engage diverse and traditionally underrepresented populations, including coordinating with the region's Disability Services Advisory Council, Social Services Advisory Council, Albany Human Relations Commission, Linn Benton Health Equity Alliance (bilingual Spanish-English representation), Linn Benton Hispanic Advisory Committee, and Medicaid recipients.

During the reporting period (July 1, 2016 to June 30, 2017), AAMPO held several public outreach events and hearings, as detailed here:

Quarter 1 (July 1 – Sept. 30, 2016):

- **Public hearing on amending framework of Regional Transportation Plan, and Transportation Improvement program, preceded by a 20- day public comment period. Included email notification to stakeholders, legal notification, press notification, and website**

Albany Area MPO Page 3 of 8

- **Posting.**
- **Attended “Incorporating Social Equity into Regional Planning and Project Development” session during the “New Thinking for a New Era” Symposium**
- **Began work on AAMPO Demographic Profile, including demographic data regarding participants in, and beneficiaries of, MPO planning and programming efforts.**
- **Began work on Title VI / Non-Discrimination Plan monitoring report**
- **Translated meeting accommodation and complaint language into Spanish for use on website and agendas.**
- **Continued outreach to transportation disadvantaged stakeholders.**
- **Included Title VI /Non-Discrimination notices in applicable documents and on the AAMPO website. No Title VI complaints were received.**
- **Participated in technical committees for Linn County and Benton County Public Transit - Human Services Coordinated Plans**
- **Provided technical support for Travel Training project, conducted by Cascades West Rideline (Medicaid non-emergent medical transportation program). Outcomes include informational interview and preparation of GIS map of common destinations of Rideline clients in relation to Albany Transit routes .**

Quarter 2 (Oct. 1, 2016 – Dec. 31, 2016):

- **Made improvements to AAMPO website including additional Spanish-language information, identification of new banner photos, and more clearly posted meeting minutes; maintained up to date documents on AAMPO website, including UPWP, TIP, RTP-related materials, and meeting materials**
- **Continued outreach to local stakeholders in an effort to build ‘Interested Parties’ list**
- **Initiated research on public outreach protocols for major and minor RTP and TIP amendments**

- **Incorporated additional Spanish-language information onto the AAMPO website, including information about meeting accommodations and complaint processes.**
- **Included Title VI /Non-Discrimination notices in applicable documents and on the AAMPO website. No Title VI complaints were received.**

Quarter 3 (Jan. 1, 2017 – March 31, 2017):

- **Incorporated additional Spanish-language information onto the AAMPO website, including information about meeting accommodations and complaint processes.**

Albany Area MPO Page 4 of 8

- **Maintained up to date documents on AAMPO website, including UPWP, TIP, RTP-related materials, and meeting materials**
- **Worked with RTP Public Engagement consultant on robust outreach schedule to AAMPO jurisdictions for the spring**
- **Included Title VI /Non-Discrimination notices in applicable documents and on the AAMPO website. No Title VI complaints were received.**
- **Participated in technical committees for Linn County and Benton County Public Transit - Human Services Coordinated Plans**

Quarter 4 (April 1, 2017 – June 30, 2016):

- **RTP Public Engagement including: City of Albany Bicycle and Pedestrian Advisory Committee, Millersburg City Council, interviews with key stakeholders including employers, Tangent Fire District, Jefferson Fire District, Linn Benton Community College student leadership, North Albany Neighborhood Association, and on-bus outreach to transit riders. Outcomes: Public input summary**
- **Included Title VI /Non-Discrimination notices in applicable documents and on the AAMPO website. No Title VI complaints were received.**

2. How does the MPO communicate its Title VI, ADA, EJ and LEP policies to underrepresented populations?

Outreach tactics have been referenced above and include website postings, MailChimp targeted email distributions, in-person presentations for community groups, stakeholder interviews, engagement with partner organizations, public meetings / hearings, press coordination, and legal notices, as well as coordination with staff and peers at regional and statewide agencies.

4. Describe the procedure for handling LEP requests.
 - a. Which documents were translated into other languages?
 - b. Does the MPO employ external translators?
 - c. Does the MPO maintain a working list of volunteer and certified staff that provide interpretation and translation services?
 - d. How are these services communicated to project managers and other front line staff?

Outreach tactics have been referenced above and include website postings, MailChimp targeted email distributions, in-person presentations for community groups, stakeholder interviews, engagement with partner organizations, public meetings / hearings, press coordination, and legal notices, as well as coordination with staff and peers at regional and statewide agencies.

Albany Area MPO Page 5 of 8

AAMPO's website (www.ocwcoq.org/aampo) includes significant portions translated in Spanish. Key RTP documents including the summary / timeline, public input surveys, and event posters are available in Spanish. The Oregon Cascades West Council of Governments (OCWCOG), which staffs AAMPO, has native Spanish-speaking staff available to help with Spanish-language calls, document translation, and in-person interpretation as needed. Therefore, AAMPO does not employ external translators. OCWCOG maintains a list of Spanish-speaking staff members which is made available to AAMPO staff and other OCWCOG managers and coordinators.

D. Monitoring

1. What monitoring and oversight activities did the MPO perform of its sub-recipients or contractors during this reporting period?

AAMPO's website (www.ocwcog.org/aampo) includes significant portions translated in Spanish. Key RTP documents including the summary / timeline, public input surveys, and event posters are available in Spanish. The Oregon Cascades West Council of Governments (OCWCOG), which staffs AAMPO, has native Spanish-speaking staff available to help with Spanish-language calls, document translation, and in-person interpretation as needed. Therefore, AAMPO does not employ external translators.

OCWCOG maintains a list of Spanish-speaking staff members which is made available to AAMPO staff and other OCWCOG managers and coordinators.

AAMPO staff and OCWCOG staff (including financial-management and contract-management staff) provide direct oversight of all contractors, including regular check-in phone calls, email communications, and monitoring of reports and invoices.

E. Improving Accessibility to the MPO Programs

1. Explain how diversity is considered when hiring new staff or transferring current staff and/or bilingual staff.

a. Is there a designated EEO officer?

AAMPO's website (www.ocwcog.org/aampo) includes significant portions translated in Spanish. Key RTP documents including the summary / timeline, public input surveys, and event posters are available in Spanish. The Oregon Cascades West Council of Governments (OCWCOG), which staffs AAMPO, has native Spanish-speaking staff available to help with Spanish-language calls, document translation, and in-person interpretation as needed. Therefore, AAMPO does not employ external translators.

OCWCOG maintains a list of Spanish-speaking staff members which is made available to AAMPO staff and other OCWCOG managers and coordinators.

AAMPO staff and OCWCOG staff (including financial-management and contract-management staff) provide direct oversight of all contractors, including regular check-in phone calls, email communications, and monitoring of reports and invoices.

OCWCOG is an affirmative action/equal opportunity employer. Applicants are considered for employment without regard to race, color, religion, gender, ancestry, national origin, age, sexual orientation, marital or veteran status, the presence of a non-job-related medical condition or disability, or any other legally protected status. OCWCOG maintains a list of bilingual staff.

OCWCOG's Deputy Director is the designated EEO officer.

2. What are the strategies for improving the diversity of employees for the next reporting period?

AAMPO's website (www.ocwcog.org/aampo) includes significant portions translated in Spanish. Key RTP documents including the summary / timeline, public input surveys, and event posters are available in Spanish. The Oregon Cascades West Council of Governments (OCWCOG), which staffs AAMPO, has native Spanish-speaking staff available to help with Spanish-language calls, document translation, and in-person interpretation as needed. Therefore, AAMPO does not employ external translators.

OCWCOG maintains a list of Spanish-speaking staff members which is made available to AAMPO staff and other OCWCOG managers and coordinators.

AAMPO staff and OCWCOG staff (including financial-management and contract-management staff) provide direct oversight of all contractors, including regular check-in phone calls, email communications, and monitoring of reports and invoices.

OCWCOG is an affirmative action/equal opportunity employer. Applicants are considered for employment without regard to race, color, religion, gender, ancestry, national origin, age, sexual orientation, marital or veteran status, the presence of a non-job-related medical condition or disability, or any other legally protected status. OCWCOG maintains a list of bilingual staff.

OCWCOG's Deputy Director is the designated EEO officer.

OCWCOG conducts broad recruitments following the guidelines noted above.

3. Describe the process for providing advanced public notice for public review and comment on key decisions, approvals, and amendments.

AAMPO provides notifications of key decisions, approvals, and amendments via its website, direct email notification to stakeholders, notification to the press including local newspapers, and legal notifications. When open houses are held, AAMPO ensures relevant staff members are present to address questions, and also provides public comment opportunities via mail, phone, and online to accommodate interested parties who are unable to attend in person. AAMPO also provides outreach at diverse locations / times to ensure accessibility by a wider range of residents.

F. Complaint Procedure

1. Were there any Title VI, ADA, EJ or LEP complaints lodged by beneficiaries or participants in this reporting period?
 - a. Is a documentation process in place to record complaints that did not rise to the level of formal complaint?
 - b. How does the MPO document these complaints that are informally resolved?

AAMPO provides notifications of key decisions, approvals, and amendments via its website, direct email notification to stakeholders, notification to the press including local newspapers, and legal notifications. When open houses are held, AAMPO ensures relevant staff members are present to address questions, and also provides public comment opportunities via mail, phone, and online to accommodate interested parties who are unable to attend in person. AAMPO also provides outreach at diverse locations / times to ensure accessibility by a wider range of residents.

No complaints were received, formal or otherwise. AAMPO would document any complaints by notifying its Policy Board and OCWCOG leadership. Also, all complaints, whether by a recipient of AAMPO funds or against AAMPO, after initial investigation and with recommendations(s) for resolution, will be forward to the ODOT Office of Civil Rights Title VI Officer or to the FHWA Office of Civil Rights. All Title VI and Environmental Justice Complaints are required to be submitted to FHWA for final determination where federal funding is utilized on projects.

G. Training

1. Report any nondiscrimination training attended by MPO staff during the reporting period.

AAMPO provides notifications of key decisions, approvals, and amendments via its website, direct email notification to stakeholders, notification to the press including local newspapers, and legal notifications. When open houses are held, AAMPO ensures relevant staff members are present to address questions, and also provides public comment opportunities via mail, phone, and online to accommodate interested parties who are unable to attend in person. AAMPO also provides outreach at diverse locations / times to ensure accessibility by a wider range of residents.

No complaints were received, formal or otherwise. AAMPO would document any complaints by notifying its Policy Board and OCWCOG leadership. Also, all complaints, whether by a recipient of AAMPO funds or against AAMPO, after initial investigation and with recommendations(s) for resolution, will be forward to the ODOT Office of Civil Rights Title VI Officer or to the FHWA Office of Civil Rights. All Title VI and Environmental Justice Complaints are required to be submitted to FHWA for final determination where federal funding is utilized on projects.

Quarter 1, "Incorporating Social Equity into Regional Planning and Project Development" session during the "New Thinking for a New Era" Symposium at Portland State University.

Quarter 4, completed Workplace Diversity compliance training through

City-County Insurance Services.

2. Describe any identified areas where training is needed.

City-County Insurance Services.

Staff will continue to stay engaged with ODOT's ADA settlement and potential implications for regional planning efforts.

H. Accomplishments

1. Prepare to discuss any lessons learned or best practice concepts developed or integrated at Albany Area MPO.

City-County Insurance Services.

Staff will continue to stay engaged with ODOT's ADA settlement and potential implications for regional planning efforts.

AAMPO's public outreach process for its Regional Transportation Plan is a core work area currently; it has incorporated extensive public outreach, including providing information to the region's Senior Services Advisory Council, Disability Services Advisory Council, and groups representing minority populations. AAMPO is proactive in ongoing communication with stakeholders and public notifications of its meetings, which follow public meetings laws for accommodations. AAMPO also reviews its website and printed materials regularly from a health-literacy perspective, ensuring that design, fonts, and content are accessible.