APPENDIX C

TITLE VI
General

1. Which office within your organization has lead responsibility for Title VI compliance?
   Communications Department

2. Who is your designated Title VI Coordinator? Please provide the person’s name, title and contact information.
   Florence Parker, Public Involvement Specialist, fparker@oki.org, 513-619-7686 Direct

3. Does your organization have a Title VI Program Plan? If so, please provide the website link or attach a copy.
   https://www.oki.org/plans-and-programs/title-vi-program/

4. Does your organization have a Title VI policy? If so, please provide the website link or attach a copy.
   https://www.oki.org/plans-and-programs/title-vi-program/

5. Does your organization have written Title VI complaint procedures? If so, please provide the website link or attach a copy.
   https://www.oki.org/plans-and-programs/title-vi-program/

6. Does your organization have a Title VI complaint form? If so, please provide the website link or attach a copy.
   https://www.oki.org/plans-and-programs/title-vi-programs/

7. Does your organization make the public aware of the right to file a complaint? If so, describe how this is accomplished.
   A Title VI Notification to the Public or Beneficiary Notice is posted on www.oki.org and signage is displayed in the lobby of the OKI office in both English and Spanish.

8. In the past three years, has your organization been named in any Title VI and/or other
discrimination complaints or lawsuits? If so, please provide the date the action was filed, a brief description of the allegations and the current status of the complaint or lawsuit. Describe any Title VI-related deficiencies that were identified and the efforts taken to resolve those deficiencies.

As of the date of this submission, including the past three years, OKI has not been named in any Title VI and/or other discrimination complaints or lawsuits.

9. Has your organization provided written Title VI Assurances to ODOT? Is the Title VI Assurance included in the MPO self-certification resolution (Note, this only applies to MPOs, RTPOs do not approve self-certification resolutions)? If so, please provide a copy as an attachment.

Written Title VI Assurances are included in OKI’s Title VI Program Plan currently posted on [www.oki.org](http://www.oki.org) and last provided to ODOT July 2015. The Title VI Assurances are also included in OKI’s MPO self-certification. A copy of the Title VI Assurances is attached.

10. Does your contract language include Title VI and other non-discrimination assurances? Yes

11. Do you use any of the following methods to disseminate Title VI information to the public (select all that apply):

   i. Title VI posters in public buildings
   
   ii. Title VI brochures at public events
   
   iii. Title VI complaint forms in public buildings
   
   iv. Title VI complaint forms at public events
   
   v. Title VI policy posted on your website
   
   vi. Title VI Program Plan posted on your website
   
   vii. Other (Please explain)

Public Involvement

12. Does your organization have a Public Participation Plan? If so, please provide the website link or attach a copy. When was the Public Participation Plan most recently updated?

OKI does have a Public Participation Plan that was most recently updated January 2018. The website link is [https://www.oki.org/wp-content/uploads/2018/02/participationplan.pdf](https://www.oki.org/wp-content/uploads/2018/02/participationplan.pdf).
13. Please select which of the following outlets your organization uses to provide notices to different population groups (select all that apply):

- Neighborhood and community paper advertisements
- Community radio station announcements
- Church and community event outreach
- Targeted fliers distributed in particular neighborhoods
- Other (Please explain)
  - Social Media Channels of Facebook and Twitter
  - Interactive Open Houses
  - Dedicated page on www.oki.org
  - Local, Regional, State and Federal Agencies
  - Press Releases sent to major regional media sources and minority oriented newspapers
  - Publication of Public Hearings, Legal Ads and Classified Ads in major regional newspaper and local newspapers oriented to the African American and Hispanic communities

14. Do you coordinate with local community groups to facilitate outreach to minorities and low-income populations? If so, please list groups.

- OKI Environmental Justice Advisory Committee
- Tristate Transportation Equitable Opportunity Team
- Area African American and Hispanic Chambers of Commerce
- Steering Committee for the Transit Planning 4 All grant award project for the Clovernook Center for the Blind and Visually Impaired
- Cincinnati Accessibility Board of Advisors
15. Do you take the following into consideration when identifying a public meeting location (select all that apply):
   i. Parking
   ii. Accessibility by public transportation
   iii. Meeting times
   iv. Existence of ADA ramps
   v. Familiarity of community with meeting location

16. Have meeting participants requested special assistance (e.g., interpretation services) ahead of any public event in the past year? If so, describe how the request was addressed.
   OKI has not received requests for special assistance such as interpretation or translation services. However, if such requests should be received OKI has an established working relationship with the local Affordable Language Services (can provide translations in over 200 languages), La Jornada Latina (local Spanish newspaper), Clovernook Center for the Blind and Visually Impaired and the Cincinnati Accessibility Board of Advisors.

Limited English Proficiency (LEP) and Language Assistance

17. Are you familiar with the LEP four-factor analysis methodology? Yes
18. Are you familiar with the LEP language assistance Safe Harbor threshold? Yes
19. Does your organization have an LEP Plan and/or a Language Assistance Plan (LAP)? If so, please provide the website link or attach a copy.
   The website link to OKI’s LEP Plan and/or a Language Assistance Plan (LAP) is https://www.oki.org/plans-and-programs/title-vi-programs/

20. Has your organization identified vital documents that need to be made available in languages other than English? If so, describe how that need is being addressed.
   At the time of this submission, OKI has identified/determined that its Title VI Complaint Form needs to be made available in its Title VI Program Plan in both English and Spanish. A translation of the Complaint Form into Spanish is in process.
21. Do you have a list of staff who speak languages other than English?

OKI does not have a formal list but is aware that at this time of the (13) OKI staff members either somewhat familiar with a language other than English or in the process of learning a language other than English, there are (4) individuals on staff who speak a second or third language other than English fluently.

22. Do you provide free translation services in languages other than English to the public upon request?

Yes

23. How often do you receive requests for language assistance?

At the time of this submission, OKI has yet to receive a request for language assistance.

Title VI Training

24. Who provides Title VI training to your staff?

i. ODOT staff

ii. Title VI Coordinator

iii. Other (Please explain)

25. How often are Title VI trainings conducted?

OKI will provide written notice of OKI’s commitment to ensure compliance with the tenets of Title VI to all current employees at its annual All Staff meeting. For new employees, there will be a Title VI module conducted during New Employee Orientation. The Title VI Coordinator will participate in the module and subsequently report on the benefit of the training to pertinent OKI staff and program departmental heads.

The external component of OKI’s Title VI Training Program involves the training of OKI’s sub-recipients and beneficiaries (if any). As a part of its Sub-Recipient Monitoring Program, the Title VI Coordinator will conduct reviews and the sub-recipients will be provided with explanatory materials and technical assistance as necessary to ensure their knowledge of, and compliance with Title VI requirements.

26. How many staff were trained on Title VI this year?

This year (30) staff members were trained on Title VI at OKI’s annual All Staff meeting.

Transportation Planning Program - Data Collection and Analysis

27. Does your agency maintain documentation describing its procedures for incorporating Title VI requirements into the region’s transportation planning program?
Yes, OKI does maintain documentation describing our procedures for incorporating Title VI requirements into our region’s transportation planning program.

28. **Does your organization maintain socio-demographic data and mapping for the transportation planning region?**

Yes, OKI does maintain socio-demographic data and mapping for our transportation planning region.

29. **Does your organization use data to identify protected groups for consideration in the planning process?**

Yes, OKI does use data to identify protected groups for consideration in our planning process.

30. **Does your organization conduct Transportation Plan and Transportation Improvement Program environmental justice analyses of the impacts that planned transportation system investments will have on both minority (including low-income status populations) and non-minority areas? Discuss the assessment methodology and resulting documentation.**

Yes, OKI staff does conduct environmental justice analyses of our Regional Transportation Plan and our Transportation Improvement Program to ascertain the impacts that our planned transportation system investments will have on minority, low-income and non-minority areas. During the course of our analyses, maps identifying the location of our EJ population groups are reviewed relative to the location of our planned transportation system investments. That data is shared with members of OKI’s Environmental Justice Advisory Committee (EJAC) for consideration when the Committee reviews and scores the applications requesting funding for those planned transportation investments. At the conclusion of OKI’s 2016 update of our 2040 Regional Transportation Plan, it was determined that nearly 85%, or over $5.8 billion of its total $6.5 billion, of recommended expenditures are within EJ communities.

31. **Does your organization track demographic information of participants in its transportation planning program public involvement events?**

OKI does not have a formal methodology for tracking the demographic information of participants at the public involvement events of our transportation planning program. Staff analysis of the participants attending our public involvement events is based primarily on observation.
Technical Assistance

32. Provide the name, title, and contact information for the person who completed this questionnaire and the date the questionnaire was completed. Is this the person who should be contacted with follow-up questions? If not, please provide the name, title, and contact information for that individual.

Florence Parker, Public Involvement Specialist/DBE Liaison Officer, fparker@oki.org, 513-619-7686, completed this questionnaire on February 12, 2019. Ms. Parker is also OKI’s designated Title VI Coordinator and she should be contacted with any follow-up questions.

33. Do you have any questions regarding this questionnaire? If so, please include them here along with your email address or telephone number and an ODOT representative will respond.

OKI staff does not have any questions regarding this questionnaire at this time.

34. Would your organization like Title VI training or other Civil Rights technical assistance from ODOT?

If yes, please explain.

Thank you for the offer to work with our organization. OKI staff has found ODOT’s centralized training approach very helpful because it provides the opportunity for OKI staff to network with peers from other parts of the state and share best practices. It would be helpful if ODOT has a template that OKI staff can refer to when preparing Title VI materials for OKI’s annual All Staff meeting to ensure that the key tenets of Title VI are highlighted from among the abundance of Title VI information.
ATTACHMENTS
TITLE VI POLICY STATEMENT ASSURANCES

Ohio-Kentucky-Indiana (OKI) Regional Council of Governments (hereinafter referred to as the Sponsor) hereby agrees that as a condition to receiving Federal financial assistance from the Department of Transportation (DOT), it will comply with Title VI of the Civil Rights Act of 1964 (42 U.S.C. 2000d, et seq.) and all requirements imposed by 49 C.F.R. Part 21, - Nondiscrimination in Federally Assisted Programs of the Department of Transportation -- Effectuation of Title VI of the Civil Rights Act of 1964 (hereinafter referred to as the "Regulations") to the end 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 otherwise subjected to discrimination under any program or activity for which the applicant receives Federal financial assistance and will immediately take any measures necessary to effectuate this agreement. As a federal-aid recipient the Sponsor understands that Title VI obligations apply to all projects and activities, regardless of the funding source. Without limiting the above general assurance, the Sponsor agrees concerning this grant that:

1. Each "program" and "facility" (as defined in Sections 21.23(e) and 21.23(b) ) will be conducted or operated in compliance with all requirements of the Regulations.

2. It will insert the clauses of Attachment 1 of this assurance in every contract subject to the Act and the Regulations.

3. Where Federal financial assistance is received to construct a facility, or part of a facility, the assurance shall extend to the entire facility and facilities operated in connection therewith.

4. Where Federal financial assistance is in the form or for the acquisition of real property or an interest in real property, the assurance shall extend to rights to space on, over, or under such property.

5. It will include the appropriate clauses set forth in Attachment 2 of this assurance, as a covenant running with the land, in any future deeds, leases, permits, licenses, and similar agreements entered into by the Sponsor with other parties:

   (a) for the subsequent transfer of real property acquired or improved with Federal financial assistance under this Project; and

   (b) for the construction or use of or access to space on, over, or under real property acquired or improved with Federal financial assistance under this Project.

6. This assurance obligates the Sponsor for the period during which Federal financial assistance is extended to the program, except where the Federal financial assistance is to provide, or is in the form of personal property or real property or interest

Amended 1-9-14
therein or structures or improvements thereon, in which case the assurance obligates the Sponsor or any transferee for the longer of the following periods:

(a) the period during which the property is used for a purpose for which Federal financial assistance is extended, or for another purpose involving the provision of similar services or benefits, or

(b) the period during which the Sponsor retains ownership or possession of the property.

7. It will provide for such methods of administration for the program as are found by the Secretary of Transportation or the official to whom he delegates specific authority to give reasonable guarantee that it, other sponsors, sub-grantees, contractors, subcontractors, transferees, successors in interest, and other participants or Federal financial assistance under such program will comply with all requirements imposed or pursuant to the Act, the Regulations, and this assurance.

8. It agrees that the United States has a right to seek judicial enforcement with regard to any matter arising under the Act, the Regulations, and this assurance.

THIS ASSURANCE is given in consideration of and for the purpose of obtaining Federal financial assistance for this Project and is binding on its contractors, the sponsor, subcontractors, transferees, successors in interest and other participants in the Project. The person or persons whose signatures appear below are authorized to sign this assurance on behalf of the Sponsor.

DATED \textit{January 15, 2019}

\textbf{OKI Regional Council of Governments}  
(Sponsor)

\textbf{By}  
(Signature of Authorized Official)

Amended 1-9-14
### TABLE 1: TOTAL PERMANENT EMPLOYEES

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<th>Agency</th>
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### TABLE 1A: PROFESSIONAL LEVEL EMPLOYEES

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### TABLE 1B: SUPPORT LEVEL EMPLOYEES

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### TABLE 2: TEMPORARY EMPLOYEES

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<tr>
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<td>2 (67%)</td>
<td>3 (100%)</td>
<td>1 (33%)</td>
<td>2 (67%)</td>
<td>3 (100%)</td>
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ATTACHMENT 1

CONTRACTOR CONTRACTUAL REQUIREMENTS

During the performance of this contract, the contractor, for itself, its assignees and successors in interest (hereinafter referred to as the “Contractor”) agrees as follows:

1. **Compliance with Regulations.** The Contractor shall comply with the Regulations relative to nondiscrimination in federally assisted programs of the Department of Transportation (hereinafter, “DOT”), Title 49, Code of Federal Regulations, Part 21, as they may be amended from time to time (hereinafter referred to as the Regulations), which are herein incorporated by reference and made a part of this contract.

2. **Nondiscrimination.** The Contractor, with regard to the work performed by it during the contract, shall not discriminate on the grounds of race, color, or national origin in the selection and retention of subcontractors, including procurements of materials and leases of equipment. The Contractor shall not participate either directly or indirectly in the discrimination prohibited by Section 21.5 of the Regulations, including employment practices when the contract covers a program set forth in Appendix B of the Regulations.

3. **Solicitations for Subcontracts, Including Procurements of Materials and Equipment.** In all solicitations either by competitive bidding or negotiation made by the Contractor for work to be performed under a subcontract, including procurements of materials or leases of equipment, each potential subcontractor or supplier shall be notified by the Contractor of the contractor’s obligations under this contract and the Regulations relative to nondiscrimination on the grounds of race, color, or national origin.

4. **Information and Reports.** The Contractor shall provide all information and reports required by the Regulations or directives issued pursuant thereto and shall permit access to its books, records, accounts, other sources of information, and its facilities as may be determined by the Sponsor or the Federal Aviation Administration (FAA) to be pertinent to ascertain compliance with such Regulations, orders, and instructions. Where any information required of a Contractor is in the exclusive possession of another who fails or refuses to furnish this information, the Contractor shall so certify to the Sponsor or the FAA, as appropriate, and shall set forth what efforts it has made to obtain the information.

5. **Sanctions for Noncompliance.** In the event of the Contractor’s noncompliance with the nondiscrimination provisions of this contract, the Sponsor shall impose such contract sanctions as it or the FAA may determine to be appropriate, including, but not limited to:

   a. Withholding of payments to the Contractor under the contract until the Contractor complies, and/or
   b. Cancellation, termination, or suspension of the contract, in whole or in part.

6. **Incorporation of Provisions.** The Contractor shall include the provisions of paragraphs 1 through 5 in every subcontract, including procurements of materials and leases of equipment, unless exempt by the Regulations or directives issued pursuant thereto. The Contractor shall take such action with respect to any
subcontract or procurement as the Sponsor or the FAA may direct as a means of enforcing such provisions including sanctions for noncompliance. Provided, however, that in the event a Contractor becomes involved in, or is threatened with, litigation with a subcontractor or supplier as a result of such direction, the Contractor may request the Sponsor to enter into such litigation to protect the interests of the Sponsor and, in addition, the Contractor may request the United States to enter into such litigation to protect the interests of the United States.
ATTACHMENT 2

CLauses for Deeds, Licenses, Leases, Permits or Similar Instruments

The following clauses shall be included in deeds, licenses, leases, permits, or similar instruments entered into by the Sponsor pursuant to the provisions of Assurances 5(a) and 5(b).

1. The (grantee, licensee, lessee, permittee, etc., as appropriate) for himself, his heirs, personal representatives, successors in interest, and assigns, as a part of the consideration hereof, does hereby covenant and agree (in the case of deeds and leases add “as a covenant running with the land”) that in the event facilities are constructed, maintained, or otherwise operated on the said property described in this (deed, license, lease, permit, etc.) for a purpose for which a DOT program or activity is extended or for another purpose involving the provision of similar services or benefits, the (grantee, licensee, lessee, permittee, etc.) shall maintain and operate such facilities and services in compliance with all other requirements imposed pursuant to 49 CFR Part 21, Nondiscrimination in Federally Assisted Programs of the Department of Transportation, and as said Regulations may be amended.

2. The (grantee, licensee, lessee, permittee, etc., as appropriate) for himself, his personal representatives, successors in interest, and assigns, as a part of the consideration hereof, does hereby covenant and agree (in the case of deeds and leases add “as a covenant running with the land”) that: (1) no person on the grounds of race, color, or national origin shall be excluded from participation in, denied the benefits of, or be otherwise subjected to discrimination in the use of said facilities, (2) that in the construction of any improvements on, over, or under such land and the furnishing of services thereon, no person on the grounds of race, color, or national origin shall be excluded from participation in, denied the benefits of, or otherwise be subjected to discrimination, (3) that the (grantee, licensee, lessee, permittee, etc.) shall use the premises in compliance with all other requirements imposed by or pursuant to 49 CFR Part 21, Nondiscrimination in Federally Assisted Programs of the Department of Transportation, and as said Regulations may be amended.