

# ***APPENDIX C***

## ***TITLE VI***



## Metropolitan Planning Organizations (MPOs) & Regional Transportation Planning Organizations (RTPOs)

### General

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

**OKI's Communications Department has the lead responsibility for Title VI compliance.**

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](mailto: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.

The link to OKI's Title VI Program Plan is <https://www.oki.org/plans-and-programs/title-vi-non-discrimination/>

4. Does your organization have a Title VI policy? If so, please provide the website link or attach a copy.

**OKI's Title VI policy can be found at <https://www.oki.org/plans-and-programs/title-vi-non-discrimination/>**

Does your organization have written Title VI complaint procedures? If so, please provide the website link or attach a copy.

The link to OKI's written Title VI complaint procedures is <https://www.oki.org/plans-and-programs/title-vi-non-discrimination/>

5. Does your organization have a Title VI complaint form? If so, please provide the website link or attach a copy.

The link to OKI's Title VI complaint form is <https://www.oki.org/plans-and-programs/title-vi-non-discrimination/>

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](http://www.oki.org) and signage is displayed in the lobby of the OKI office in both English and Spanish.

6. 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.

**In the past three years OKI has not been named in any Title VI and/or other discrimination complaints or lawsuits.**

7. 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 have been provided to ODOT. The Title VI Assurance is also included in the OKI's MPO self-certification resolution and a copy of the resolution is attached.**

8. Does your contract language include Title VI and other non-discrimination assurances? **Yes.**
9. Do you use any of the following methods to disseminate Title VI information to the public (select all that apply):
- Title VI posters in public buildings
  - Title VI brochures at public events
  - Title VI complaint forms in public buildings
  - Title VI complaint forms at public events
  - Title VI policy posted on your website
  - Title VI Program Plan posted on your website
  - Other (Please explain)

## **Public Involvement**

10. 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?

The link to the Public Participation Plan is <https://www.oki.org/plans-and-programs/participation-plan/> and the Plan was updated February 2022.

11. 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 including You Tube
  - Interactive Open Houses
  - Dedicated page on [www.oki.org](http://www.oki.org)
  - Local, Regional, State and Federal Agencies
  - Press Releases sent to major regional media outlets and minority oriented newspapers
  - Publication of Virtual Public Meetings, Legal Ads and Classified Ads in major regional newspapers and local newspapers oriented to the African American and Hispanic communities

12. 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
- Cincinnati Accessibility Board of Advisors

13. Do you take the following into consideration when identifying a public meeting location (select all that apply):

- Parking

- Accessibility by public transportation
- Meeting times
- Existence of ADA ramps
- Familiarity of community with meeting location

14. 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.

In the past year 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 Mega Media (the largest Hispanic media platform in Ohio for the Hispanic market via radio, print, digital and events), Cincinnati Association for the Blind and Visually Impaired, Cloverbrook Center for the Blind and Visually Impaired, and the Cincinnati Accessibility Board of Advisors.

### Limited English Proficiency (LEP) and Language Assistance

15. Are you familiar with the LEP four-factor analysis methodology? **Yes**
16. Are you familiar with the LEP language assistance Safe Harbor threshold? **Yes**
17. 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/participation-plan/>

18. 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.

Since OKI's last submission/completion of this Questionnaire the Title VI Complaint Procedure, Title VI Complaint Form, Title VI Notification To The Public and Title VI Notice of Protections Against Discrimination have all been translated into Spanish and are appropriately placed in OKI's Title VI Program Plan in both English and Spanish.

19. Do you have a list of staff who speak languages other than English?

OKI does not have a formal list but is aware that 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.

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

21. 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**

22. Who provides Title VI training to your staff?

- ODOT staff
- **Title VI Coordinator**
- Other (Please explain)

23. How often are Title VI trainings conducted? **Title VI trainings are conducted annually.**

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

**The last Title VI training was conducted November 18, 2021 at an All Staff Meeting and 28 of the 29 staff members participated.**

### **Transportation Planning Program - Data Collection and Analysis**

25. Does your agency maintain documentation describing its procedures for incorporating Title VI requirements into the region's transportation planning program? **Yes**

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

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

28. 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 does conduct analyses of the impacts that planned transportation system investments will have on both minority and non-minority areas. During the course of the process to finalize the update of OKI's 2050 Metropolitan Transportation Plan, OKI staff evaluated projects that are within or adjacent to Environmental Justice areas. It was determined that more than \$7 billion, nearly 77% of total recommended expenditures, are within EJ communities. This represents about 55 percent of all recommended projects. OKI is a transportation planning organization that conducts research to identify current needs and project future transportation needs for the residents living in its eight-county region. The FTA financial assistance for which OKI is the Designated Recipient includes the 5310 Program.

29. 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 and that observation is now challenged by the fact that civic engagement has gone virtual. Virtual Public Involvement (VPI) continues to gain traction and is now the accepted norm.

### Technical Assistance

30. 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](mailto:fparker@oki.org), 513-619-7686, completed this questionnaire on February 15, 2022. Ms. Parker is also OKI's designated Title VI Coordinator and she should be contacted with any follow-up questions.

31. 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.

32. 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. In addition to the template the centralized training might be provided via a Zoom meeting or 1-2 day in-person workshop.



# ATTACHMENT

**STAFF PROFILE REPORT - AGENCY and MPO  
EFFECTIVE DATE FEBRUARY 25, 2022**

<b>TABLE 1:</b> <u>TOTAL PERMANENT EMPLOYEES</u>	<u>FEMALE</u>	<u>MALE</u>	<u>Agency TOTAL</u>		<u>FEMALE</u>	<u>MALE</u>	<u>MPO TOTAL</u>	
MINORITY	5	1	6	(21%)	3	1	4	(18%)
MAJORITY	9	13	22	(79%)	6	12	18	(82%)
TOTAL	<u>14</u> (50%)	<u>14</u> (50%)	<u>28</u>	(100%)	<u>9</u> (41%)	<u>13</u> (59%)	<u>22</u>	(100%)

<b>TABLE 1A:</b> <u>PROFESSIONAL LEVEL EMPLOYEES</u>	<u>FEMALE</u>	<u>MALE</u>	<u>Agency TOTAL</u>		<u>FEMALE</u>	<u>MALE</u>	<u>MPO TOTAL</u>	
MINORITY	5	1	6	(21%)	3	1	4	(18%)
MAJORITY	9	13	22	(79%)	6	12	18	(82%)
TOTAL	<u>14</u> (50%)	<u>14</u> (50%)	<u>28</u>	(100%)	<u>9</u> (41%)	<u>13</u> (59%)	<u>22</u>	(100%)

<b>TABLE 1B:</b> <u>SUPPORT LEVEL EMPLOYEES</u>	<u>FEMALE</u>	<u>MALE</u>	<u>Agency TOTAL</u>		<u>FEMALE</u>	<u>MALE</u>	<u>MPO TOTAL</u>	
MINORITY	0	0	0	#DIV/0!	0	0	0	#DIV/0!
MAJORITY	0	0	0	#DIV/0!	0	0	0	#DIV/0!
TOTAL	<u>0</u> #DIV/0!	<u>0</u> #DIV/0!	<u>0</u>	#DIV/0!	<u>0</u> #DIV/0!	<u>0</u> #DIV/0!	<u>0</u>	#DIV/0!

<b>TABLE 2:</b> <u>TEMPORARY EMPLOYEES</u>	<u>FEMALE</u>	<u>MALE</u>	<u>Agency TOTAL</u>		<u>FEMALE</u>	<u>MALE</u>	<u>MPO TOTAL</u>	
MINORITY	0	1	1	(33%)	0	1	1	(50%)
MAJORITY	2	0	2	(67%)	1	0	1	(50%)
TOTAL	<u>2</u> (67%)	<u>1</u> (33%)	<u>3</u>	(100%)	<u>1</u> (50%)	<u>1</u> (50%)	<u>2</u>	(100%)