

# ***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.

**Jenny Newcomb, Digital Media Specialist, [jnewcomb@oki.org](mailto:jnewcomb@oki.org)**

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

**Yes, it can be downloaded at: <https://www.oki.org/about/civil-rights/title-vi/>**

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

**Yes, it can be downloaded at <https://www.oki.org/about/civil-rights/title-vi/>**

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

**Yes, it can be found at <https://www.oki.org/about/civil-rights/title-vi/>**

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

**Yes, it can be found at <https://www.oki.org/about/civil-rights/title-vi/>**

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 <https://www.oki.org/about/civil-rights/title-vi/> and signage is displayed in our lobby.**

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.

**No, our organization has not been named in any 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 have been provided to ODOT. The Title VI Assurance is also included in OKI's MPO self-certification resolution and a copy of the resolution 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) Copy of Title VI Policy in our office lobby

## 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? **Yes, it can be found at: <https://www.oki.org/about/civil-rights/participation-plan/> and the most recent was 2022. It is being updated for 2026.**
13. Please select which of the following outlets your organization uses to provide notices to different population groups (select all that apply):
- i. Neighborhood and community paper advertisements
  - ii. Community radio station announcements
  - iii. Church and community event outreach
  - iv. Targeted fliers distributed in particular neighborhoods

- v. Other (Please explain)- social media channels, dedicated pages on oki.org, press releases to media outlets

14. Do you coordinate with local community groups to facilitate outreach to minorities and low-income populations? If so, please list groups. **Tristate Transportation Equitable Opportunity Team, Community Advisory Committee**

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 the community with the 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. **There have been no requests.**

### Language Assistance

17. Are you familiar with the four-factor methodology for assessing a potential need for language assistance? **Yes**

18. Are you familiar with the Safe Harbor guideline? **Yes**

19. Does your organization have a Language Assistance Plan? If so, please provide the website link or attach a copy.  
**Yes**

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. **Yes, the 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 placed in OKI's Title VI Program Plan.**

21. Do you have a list of staff who speak languages other than English? **Yes**

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? **We have not received requests 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?

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

## 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**

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

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

30. Does your organization conduct Transportation Plan and Transportation Improvement Program analyses of the impacts that planned transportation system investments will have on affected populations? 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.**

31. Does your organization track demographic information of participants in its transportation planning program's 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.**

## 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 to contact for follow-up questions? If not, please provide the name, title, and contact information for that individual. **Jenny Newcomb, Digital Media Specialist, [jnewcomb@oki.org](mailto:jnewcomb@oki.org), 513-205-7858, completed this questionnaire on December 10, 2025.**
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. **No**
34. Would your organization like Title VI training or other Civil Rights technical assistance from ODOT? If yes, please explain. **Yes, the Title VI Coordinator would love to be more in touch and familiar with the ODOT Title VI office.**

## Standard Title VI DOT Assurances

The Ohio-Kentucky-Indiana Regional Council of Governments (hereinafter referred to as the "Recipient") **HEREBY AGREES THAT**, as a condition to receiving any Federal financial assistance from the United States Department of Transportation (DOT), through the **Federal Highway Administration (FHWA)**, is subject to and will comply with the following:

### Statutory/Regulatory Authorities

- Title VI of the Civil Rights Act of 1964 (42 U.S.C. § 2000d *et seq.*, 78 stat. 252), (prohibits discrimination on the basis of race, color, national origin);
- 49 C.F.R. Part 21 (entitled *Nondiscrimination In Federally-Assisted Programs Of The Department Of Transportation-Effectuation Of Title VI Of The Civil Rights Act Of 1964*);
- 28 C.F.R. section 50.3 (U.S. Department of Justice Guidelines for Enforcement of Title VI of the Civil Rights Act of 1964);

The preceding statutory and regulatory cites hereinafter are referred to as the "Acts" and "Regulations," respectively.

### General Assurances

In accordance with the Acts, the Regulations, and other pertinent directives, circulars, policy, memoranda, and/or guidance, the Recipient hereby gives assurance that it will promptly take any measures necessary to ensure that:

*No person in the United States shall, on the grounds of race, sex, 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 Recipient receives Federal financial assistance from DOT, including the **FHWA**. Sex was added as a protected class under Title VI programs due to Section 162(a) of the Federal Highway Aid Act of 1973." (23 USC 324)*

The Civil Rights Restoration Act of 1987 clarified the original intent of Congress, with respect to Title VI and other Non-discrimination requirements (The Age Discrimination Act of 1975, and Section 504 of the Rehabilitation Act of 1973) by restoring the broad, institutional-wide scope and coverage of these non- discrimination statutes and

requirements to include all programs and activities of the Recipient, so long as any portion of the program is Federally assisted.

## **Specific Assurances**

More specifically, and without limiting the above general Assurance, the Recipient agrees with and gives the following Assurances with respect to its Federally-assisted **Federal Highway Program**:

1. The Recipient agrees that each "activity," "facility," or "program," as defined in §§ 21.23 (b) and 21.23 (e) of 49 C.F.R. § 21 will be (with regard to an "activity") facilitated, or will be (with regard to a "facility") operated, or will be (with regard to a "program") conducted in compliance with all requirements imposed by, or pursuant to the Acts and the Regulations.
2. The Recipient will insert the following notification in all solicitations for bids, Requests For Proposals for work, or material subject to the Acts and the Regulations made in connection with all **Federal Highway Programs** and, in adapted form, in all proposals for negotiated agreements regardless of funding source:

### **Construction Proposals**

*"The Ohio-Kentucky-Indiana Regional Council of Governments, Department of Highways, in accordance with the provisions of Title VI of the Civil Rights Act of 1964 (78 Stat. 252, 42 USC §§ 2000d to 2000d- 4) and the Regulations, hereby notifies all bidders that it will affirmatively ensure that any contract entered into pursuant to this advertisement, disadvantaged business enterprises will be afforded full and fair opportunity to submit bids in response to this invitation and will not be discriminated against on the grounds of race, sex, color, or national origin in consideration for an award. "*

### **Agreements for Other Services**

*"Compliance with Regulations: The Consultant shall comply with the regulations of the Ohio- Kentucky-Indiana Regional Council of Governments, Department of Highways, relative to nondiscrimination in Federally Assisted Programs of the Transportation Cabinet, Department of Highways (49 CFR, Part 21) which are herein incorporated by reference and made a part of this contract."*

1. The Recipient will insert the clauses of Appendix A and E of this Assurance in every contract or agreement subject to the Acts and the Regulations.
2. The Recipient will insert the clauses of Appendix B of this Assurance, as a covenant running with the land, in any deed from the United States effecting or recording a

transfer of real property, structures, use, or improvements thereon or interest therein to a Recipient.

3. That where the Recipient receives Federal financial assistance to construct a facility, or part of a facility, the Assurance will extend to the entire facility and facilities operated in connection therewith.
4. That where the Recipient receives Federal financial assistance in the form, or for the acquisition of real property or an interest in real property, the Assurance will extend to rights to space on, over, or under such property.
5. That the Recipient will include the clauses set forth in Appendix C and Appendix D of this Assurance, as a covenant running with the land, in any future deeds, leases, licenses, permits, or similar instruments entered into by the Recipient with other parties:
  - a) for the subsequent transfer of real property acquired or improved under the applicable activity, project, or program; and
  - b) for the construction or use of, or access to, space on, over, or under real property acquired or improved under the applicable activity, project, or program.

That this Assurance obligates the Recipient 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 therein, or structures or improvements thereon, in which case the Assurance obligates the Recipient, or any transferee for the longer of the following periods:

- a. the period during which the property is used for a purpose for which the Federal financial assistance is extended, or for another purpose involving the provision of similar services or benefits; or
  - b. the period during which the Recipient retains ownership or possession of the property.
6. The Recipient will provide for such methods of administration for the program as are found by the Secretary of Transportation or the official to whom he/she delegates specific authority to give reasonable guarantee that it, other recipients, sub-recipients, sub-grantees, contractors, subcontractors, consultants, transferees, successors in interest, and other participants of Federal financial assistance under such program will comply with all requirements imposed or pursuant to the Acts, the Regulations, and this Assurance.

7. The Recipient agrees that the United States has a right to seek judicial enforcement with regard to any matter arising under the Acts, the Regulations, and this Assurance.

By signing this ASSURANCE, The Ohio-Kentucky-Indiana Regional Council of Governments also agrees to comply (and require any sub-recipients, sub-grantees, contractors, successors, transferees, and/or assignees to comply) with all applicable provisions governing the FHWA access to records, accounts, documents, information, facilities, and staff. You also recognize that you must comply with any program or compliance reviews, and/or complaint investigations conducted by the FHWA. You must keep records, reports, and submit the material for review upon request to FHWA, or its designee in a timely, complete, and accurate way. Additionally, you must comply with all other reporting, data collection, and evaluation requirements, as prescribed by law or detailed in program guidance.

The Ohio-Kentucky-Indiana Regional Council of Governments gives this ASSURANCE in consideration of and for obtaining any Federal grants, loans, contracts, agreements, property, and/or discounts, or other Federal aid and Federal financial assistance extended after the date hereof to the recipients by the U.S. Department of Transportation under the **Federal Highway Program**. This ASSURANCE is binding on Kentucky, other recipients, sub-recipients, sub-grantees, contractors, subcontractors and their subcontractors', transferees, successors in interest, and any other participants in the **Federal Highway Program**. The person (s) signing below is authorized to sign this ASSURANCE on behalf of the Recipient.

Signed and approved this 12 day of November, 2025.



Mark R. Policinski,  
CEO/Executive Director  
Ohio-Kentucky-Indiana Regional Council of  
Governments

Attest:



Julia Brossart,  
Communications  
and Legislative  
Affairs Manager

Josh Gerth      Mark R. Policinski  
President                      CEO

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**STAFF PROFILE REPORT - AGENCY and MPO**  
**EFFECTIVE DATE FEBRUARY 20, 2026**

|                                  |               |             |                               |        |               |             |                            |        |
|----------------------------------|---------------|-------------|-------------------------------|--------|---------------|-------------|----------------------------|--------|
| <b>TABLE 1:</b>                  |               |             |                               |        |               |             |                            |        |
| <u>TOTAL PERMANENT EMPLOYEES</u> | <u>FEMALE</u> | <u>MALE</u> | <u>Agency</u><br><u>TOTAL</u> |        | <u>FEMALE</u> | <u>MALE</u> | <u>MPO</u><br><u>TOTAL</u> |        |
| MINORITY                         | 3             | 3           | 6                             | (20%)  | 3             | 3           | 6                          | (25%)  |
| MAJORITY                         | 13            | 11          | 24                            | (80%)  | 9             | 9           | 18                         | (75%)  |
| TOTAL                            | 16<br>(53%)   | 14<br>(47%) | 30                            | (100%) | 12<br>(50%)   | 12<br>(50%) | 24                         | (100%) |

|                                     |               |             |                               |        |               |             |                            |        |
|-------------------------------------|---------------|-------------|-------------------------------|--------|---------------|-------------|----------------------------|--------|
| <b>TABLE 1A:</b>                    |               |             |                               |        |               |             |                            |        |
| <u>PROFESSIONAL LEVEL EMPLOYEES</u> | <u>FEMALE</u> | <u>MALE</u> | <u>Agency</u><br><u>TOTAL</u> |        | <u>FEMALE</u> | <u>MALE</u> | <u>MPO</u><br><u>TOTAL</u> |        |
| MINORITY                            | 3             | 3           | 6                             | (20%)  | 3             | 3           | 6                          | (25%)  |
| MAJORITY                            | 13            | 11          | 24                            | (80%)  | 9             | 9           | 18                         | (75%)  |
| TOTAL                               | 16<br>(53%)   | 14<br>(47%) | 30                            | (100%) | 12<br>(50%)   | 12<br>(50%) | 24                         | (100%) |

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

|                            |               |             |                               |        |               |             |                            |        |
|----------------------------|---------------|-------------|-------------------------------|--------|---------------|-------------|----------------------------|--------|
| <b>TABLE 2:</b>            |               |             |                               |        |               |             |                            |        |
| <u>TEMPORARY EMPLOYEES</u> | <u>FEMALE</u> | <u>MALE</u> | <u>Agency</u><br><u>TOTAL</u> |        | <u>FEMALE</u> | <u>MALE</u> | <u>MPO</u><br><u>TOTAL</u> |        |
| MINORITY                   | 0             | 1           | 1                             | (25%)  | 0             | 1           | 1                          | (25%)  |
| MAJORITY                   | 3             | 0           | 3                             | (75%)  | 3             | 0           | 3                          | (75%)  |
| TOTAL                      | 3<br>(75%)    | 1<br>(25%)  | 4                             | (100%) | 3<br>(75%)    | 1<br>(25%)  | 4                          | (100%) |