

# Madera County Transportation Commission Title VI Program

*with Limited English Proficiency (LEP) Plan*

## **Updated**

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## **Adopted**

**July 23, 2014**



**Madera County Transportation Commission  
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**[www.maderactc.org](http://www.maderactc.org)**

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## Introduction

The Federal Highway Administration (FHWA) and the Federal Transit Administration (FTA) have a longstanding policy of actively ensuring nondiscrimination in federally funded activities under Title VI of the 1964 Civil Rights Act. Title VI issues and environmental justice are an integral focus of the transportation planning and programming process. This document establishes a framework for the Madera County Transportation Commission's (MCTC) efforts to ensure compliance with Title VI and related statutes regarding nondiscrimination and environmental justice. MCTC is the Regional Transportation Planning Agency (RTPA), Metropolitan Planning Organization (MPO), and the Local Transportation Commission for Madera County designated pursuant to Title 3, Division 3, Chapter 2, Article II, and Section 29532 of the California Government Code.

MCTC is committed to ensuring that no person is excluded from participation in, denied the benefits of, or discriminated against under its projects, programs, or activities on the basis of race, color, creed, national origin, sex or age, as provided in the Title VI of the Civil Rights Act and 49 United States Code Section 5332.

## Governance and the Board

MCTC is organized into a Policy Board supported by the Transportation Policy Committee and the Technical Advisory Committee. There is currently one standing committee - the Social Services Transportation Advisory Council (SSTAC) which reports through the Technical Advisory Committee. The relationship between the Board, its staff, and the committees are discussed in more detail below.

The Commission Policy Board is comprised of three (3) members from the Madera County Board of Supervisors; two (2) members from the Madera City Council; and one (1) member from the Chowchilla City Council. The members are appointed by the member agencies. Each member agency designates at least one alternate who shall be an elected member of the designated agency. The Transportation Policy Committee (TPC) has the same membership as the Board with the addition of one (1) person representing the Caltrans District 06 Director. This committee reviews transportation plans and programs prior to action by the Commission, with particular attention to compliance with applicable state and federal planning and programming requirements.

The Technical Advisory Committee (TAC) includes the County of Madera, City of Madera, City of Chowchilla, and one representative from Caltrans District 06. The North Fork Mono Rancheria of California, Picayune Rancheria of Chukchansi Indians of California, and other tribal governments are also invited to participate in the monthly TAC meetings. The TAC reviews staff work conducted pursuant to the Overall Work Program; advises the Commission and TPC on transportation issues; and makes recommendations on planning and programming actions to be taken by the Commission. TAC review is generally focused upon the technical merits of various transportation issues coming before the Commission. Staff consults with tribal governments as it relates to

transportation planning issues and initiates consultation with the tribal governments at the government to government level.

### **MCTC Title VI Policy Statement**

MCTC assures that no person shall on the grounds of race, color, or national origin, as provided by Title VI of the Civil Rights Act of 1964, and the Civil Rights Restoration Act of 1987 (P.L. 100.259), be excluded from participation in, be denied the benefits of or otherwise subjected to discrimination under any agency-sponsored program or activity. Nor shall sex, age, or disability stand in the way of fair treatment of all individuals.

MCTC further assures that every effort will be made to ensure nondiscrimination in all of its programs and activities, whether those programs and activities are federally funded or not.

In the event that MCTC distributes Federal-aid funds to another entity, MCTC will include Title VI language in all written agreements and will monitor for compliance. Title VI compliance is a condition of the receipt of federal funds. MCTC's Executive Director and Title VI Coordinator are authorized to ensure compliance with provisions of this policy and with the law, including the requirements of Title 23 Code of Federal Regulation (CFR) 200 and Title 49 CFR 21.

MCTC acknowledges its responsibility for initiating and monitoring Title VI activities, preparing required reports and fulfilling other responsibilities as required by Title 23 CFR 200 and by Title 49 CFR 21.

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Patricia Taylor, Executive Director  
Madera County Transportation Commission  
Date: February 21, 2024

## Organization and Title VI Coordinator Responsibilities

### Title VI General Responsibilities

Madera County Transportation Commission  
Executive Director  
Patricia Taylor  
(559) 675-0721, ext. 1  
[patricia@maderactc.org](mailto:patricia@maderactc.org)

Title VI Coordinator  
Jeff Findley  
Principal Regional Planner  
(559) 675-0721, ext. 4  
[jeff@maderactc.org](mailto:jeff@maderactc.org)

The Executive Director is responsible for ensuring MCTC's Title VI Program. The Title VI Coordinator, on behalf of the Executive Director, is responsible for the overall management and day-to-day administration of the Title VI program. Title VI responsibilities are as follows:

1. Process the disposition of Title VI complaints as received by MCTC.
2. Collect statistical data (race, color, sex, age, disability, or national origin) of participants in and beneficiaries of state highway programs.
3. Conduct annual Title VI reviews of program areas (planning, consultant selection) to determine the effectiveness of program activities at all levels.
4. Conduct Title VI reviews of consultants and other recipients of federal-aid highway fund contracts administered through MCTC.
5. Participate in training programs on Title VI and other related statutes for MCTC employees and recipients of federal highway funds.
6. Prepare a yearly report of Title VI accomplishments and goals, as required by 23 CFR 200.
7. Develop Title VI information for dissemination to the general public and, where appropriate, in languages other than English.
8. Conduct post-grant approval reviews of MCTC programs and applicants (e.g. consultants, design and relocation, and persons seeking contracts with MCTC) for compliance with Title VI requirements.
9. Identify and eliminate discrimination.
10. Establish procedures for promptly resolving deficiency status and reducing to writing the remedial action agreed to be necessary, all within a period not to exceed 90 days.

### Program Area Responsibilities

The Title VI Coordinator shall be responsible for coordinating the administration of the Title VI program, plan, and assurances. The Title VI Coordinator serves under the direct supervision of the Executive Director of MCTC and is responsible for day-to-day administration.

## **Complaints**

Any individual who believes that he or she or any other program beneficiaries have been subjected to unequal treatment or discrimination in their receipt of benefits and/or services, or on the grounds of race, color, national origin, sex, disability, age, or income status he or she may exercise their rights to file a complaint with MCTC. Every effort will be made to resolve the complaint pursuant to Appendix C, MCTC Discrimination Complaint Procedures.

## **Current Investigations or Complaints**

MCTC has never received any Title VI complaints. As a result, no Title VI investigations have ever taken place. Additionally, there are no Title VI investigations taking place at this time. Additionally, the three local transit agencies have not received any Title VI complaints.

## **Data Collection**

Data on race, color, national origin, sex, age, disability, and income status of participants in and beneficiaries of federally funded programs will be gathered and maintained by the Title VI Coordinator. The data gathering process will be reviewed regularly to ensure sufficiency of the data in meeting the requirements of the Title VI program administration.

## **Title VI Program Reviews**

MCTC's Title VI Program reviews will be performed by the Title VI Coordinator to assess our administrative procedures, staffing and resources available for Title VI compliance. All programs will be reviewed annually to assure their effectiveness in compliance with Title VI provisions. This is in addition to the day-to-day monitoring. The Title VI Coordinator will coordinate efforts to ensure their equal participation in all programs and activities at all levels. The Title VI Coordinator will also conduct reviews of consultants and all other sub-recipients of federal funds to ensure compliance with Title VI provisions.

## **Annual Reports**

An annual report may be submitted to Caltrans reviewing Title VI accomplishments achieved during the year. The Title VI Coordinator will be responsible for coordination and preparation of the report. The report will describe the accomplishments and changes to the program occurring during the preceding year and will include any changes to the goals and objectives for the upcoming year.

## **Public Dissemination**

The Title VI Coordinator will disseminate Title VI Program information to MCTC employees, sub-recipients, consultants, and beneficiaries as well as the general public. Public dissemination will include the posting of public statements, and the inclusion of the Title VI language in contracts. In accordance with Title VI of the Civil Rights Act of 1964, MCTC is committed to establishing and maintaining practices that will ensure meaningful access to MCTC's plans and programs by persons with Limited English Proficiency (LEP). It is the policy of MCTC to ensure that no person is denied access to plans and programs as a result of the inability to communicate in the English language.

### **Remedial Action**

MCTC will actively pursue the prevention of Title VI deficiencies and violations and will take the necessary steps to ensure compliance with all program administrative requirements. When irregularities occur in the administration of the program's operation, corrective action will be taken to resolve Title VI issues, within a period not to exceed 90 days.

1. Sub-recipients placed in a deficiency status will be given reasonable time to voluntarily correct deficiencies that is not to exceed 90 days.
2. MCTC will seek the cooperation of the sub-recipient in correcting deficiencies found during the review. MCTC will also provide technical assistance and guidance needed to aid the sub-recipient to voluntarily comply.
3. When a sub-recipient fails or refuses to voluntarily comply with requirements within the time frame allotted, the MPO will submit to Caltrans Civil Rights Office or the FHWA two copies of the case file and a recommendation that the sub-recipient be found in noncompliance.
4. A follow-up review will be conducted within 180 days of the initial review to ensure that the sub-recipient has complied with the Title VI Program requirements in correcting deficiencies previously identified.

## **Title VI Responsibilities for Program Areas**

### **Planning**

MCTC has the responsibility to develop long-and short-range plans to provide efficient transportation services to the residents of Madera County.

MCTC annually updates and coordinates the MPO's future transportation improvement plans and programs. A comprehensive transportation planning process is used which incorporates input from the public in coordination with the various jurisdictions affected. Planning includes the monitoring and collection of data. Title VI responsibilities include but are not limited to:

1. Ensure that all aspects of the planning process operation comply with Title VI of the Civil Rights Act of 1964.
2. Ensure that various social, economic, and ethnic interest groups are represented in the planning process by disseminating program information to minority media and ethnic related organizations participating in roundtable meetings in predominantly minority communities.
3. Assist the Title VI Coordinator in gathering and organizing the Planning section of the Annual Title VI Update Report.
4. Review MCTC's work program and other directives to ensure compliance with Title VI and other nondiscrimination program requirements.

### **Contracting Services**

MCTC is also responsible for setting policy and establishing procedures for consultant selection, negotiation, and administration of consultant contracts. Title VI responsibilities include but are not limited to:

1. Monitor DBE program requirements.
2. Ensure that all consultant contracts administered by the MPO have the appropriate Title VI provisions included.
3. Review directives and procedures to ensure Title VI compliance.
4. Maintain necessary data and documentation required for completion of the agency's Title VI Annual Report.

### **Project Construction**

MCTC is involved primarily in the planning of federally funded transportation projects only. MCTC is not involved in the construction of transportation projects. As a result, Title VI requirements pertaining to agencies involved in construction do not apply.

### **Public Transportation Title VI Investigations**

No Title VI complaints have been filed with MCTC or other transit agencies in Madera County.

### **Systemwide Service Standards and Policies**

**FTA C 4702.1B Chapter IV-4** states "These requirements apply to all fixed route providers of public transportation service." MCTC is not a provider of fixed route transit service therefore this does not apply.

### **Public Participation Plan**

MCTC's Public Participation Plan (PPP) is updated periodically. MCTC developed the PPP as a guide to meeting the MPO requirements for public participation. The PPP is intended to provide direction for public participation activities to be conducted by MCTC and contains the procedures, strategies and techniques used by MCTC for public participation. The current PPP may be found on MCTC's website at [MCTC Public Participation Plan](#).

## **Public Notification Process**

The MCTC's goal is not to discriminate against any person with respect to an MCTC program or service. This commitment is incorporated into all public outreach efforts to engage all segments of the population in the transportation planning process. The MCTC actively provides information regarding its Title VI obligations to the public using a variety of methods. Information, such as reference to the FTA circulars and the MCTC Title VI and LEP programs and complaint procedure, is available upon request at the MCTC office and on the MCTC website. Notice of the nondiscrimination policy is included in all MCTC contracts, public meetings, and bid advertisements.

The MCTC, as well as each subgrantee and transportation provider, must certify each year that there have been no Title VI complaints or lawsuits.

As a policy, MCTC staff is educated on the Title VI requirements including how to assist a person who is limited English proficient. The entire FTA non-discrimination clauses are included in all consultant contracts and subgrantee



agreements. The following statement is posted in the MCTC office in English and Spanish:

"The Madera County Transportation Commission does not discriminate on the basis of race, color or national origin in administration of its programs, activities or services."

## Requirements for Metropolitan Planning Organizations

This section describes the procedures unique to MCTC's role as an MPO regarding compliance with the US Department of Transportation's regulations.

### Demographic Profile of the Metropolitan Area

The metropolitan planning area for MCTC is the County of Madera, which includes the cities of Chowchilla and Madera. The following table depicts the population estimates for different races and ethnicities in Madera County. Statistics on LEP populations in Madera County can be found in Appendix E. Locations of aggregate minority populations can be viewed on the map below.

Demographic Profile of Madera County – 2020 Census

Subject	Madera County, California	
	Estimate	Percent
<b>Total Population</b>	160,256	100%
<b>Ethnicity</b>		
Hispanic or Latino (of any race)	97,499	60.8%
Not Hispanic or Latino	62,757	39.2%
	<b>Total</b>	<b>100%</b>
<b>Race</b>		
White (alone)	57,165	35.7%
Black or African American (alone)	3,952	2.5%
American Indian and Alaska Native (alone)	4,053	2.5%
Asian (alone)	4,248	2.7%
Native Hawaiian and Other Pacific Islander (alone)	894	0.6%
Some other race (alone)	59,644	37.2%
Two or more races	30,300	18.8%
	<b>Total</b>	<b>100%</b>

### Identification and Consideration of Mobility Needs of Minority Populations within MCTC's Planning Process

#### *Planning Process*

MCTC regularly collects and analyzes demographic information to help plan for a more accessible regional transportation system. An environmental

justice analysis was prepared as part of the 2022 Regional Transportation Plan (RTP) process.

#### *Consideration of Minority Populations Mobility Needs*

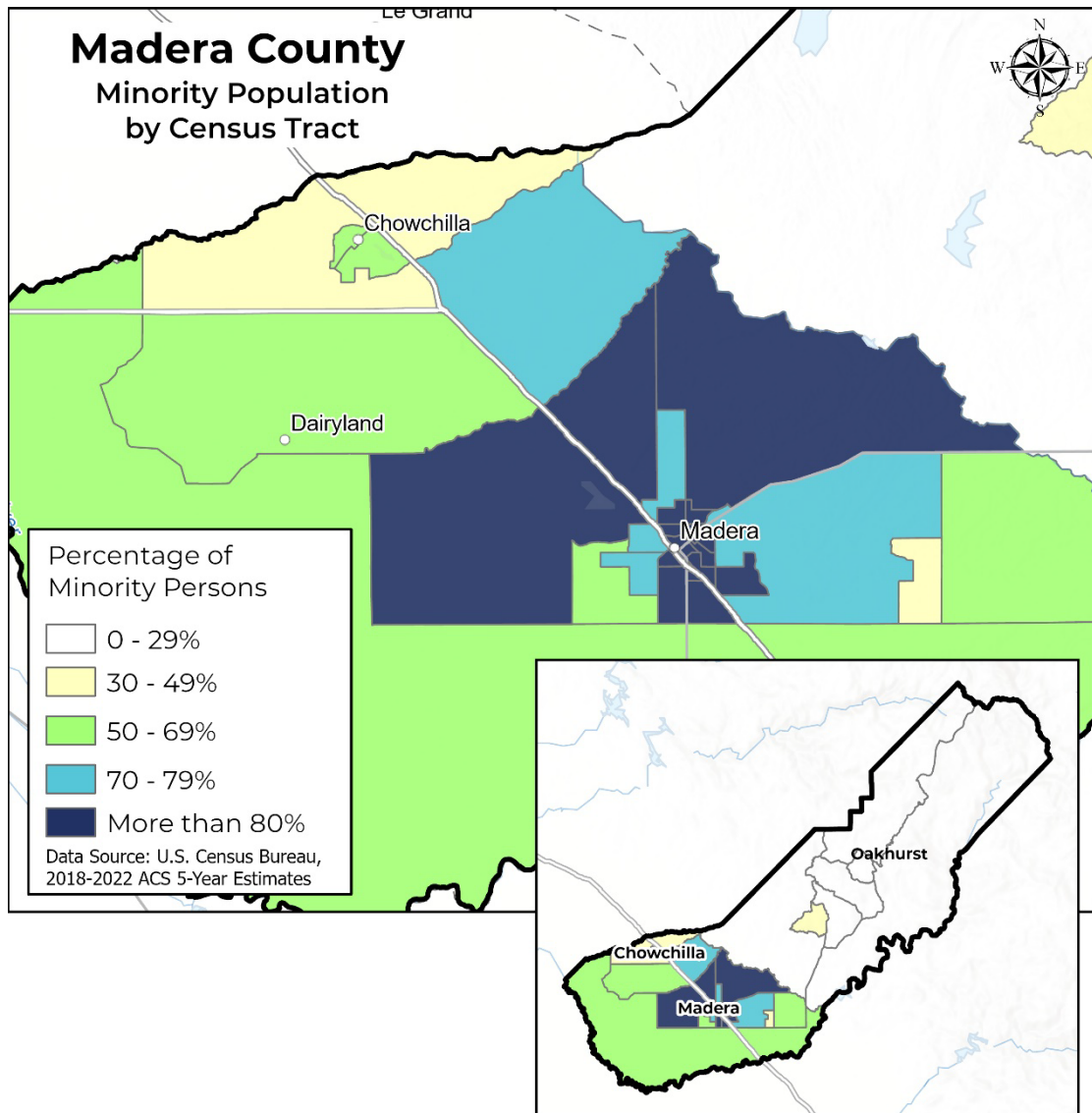
MCTC ensures that the communities are provided opportunities to engage in the transportation process in the following ways:

- MCTC reacts promptly to questions and concerns, including those that address minority populations.
- MCTC holds certain meetings outside of regular business hours as demand arises and when subject matter warrants a more accessible meeting time.
- MCTC considers additional outreach at events with higher concentrations of Spanish speakers as demand arises. For example, in the development of the RTP, surveys and other meeting materials were translated into Spanish. Additionally, two Spanish-only workshops were conducted as part of the RTP outreach process. These efforts increased the number of Spanish speakers who participated in the process.
- MCTC has translated the following documents into Spanish and are available online:
  - Title VI Public Notice
  - Title VI Complaint Procedures
  - Title VI Complaint Form
- MCTC is adding accessibility features to its website ([MCTC Website](#)).
- MCTC provides special accommodations (language interpretation, etc.) upon request.
- MCTC provides sufficient public notice for public comment periods and meetings as required, so individuals, including minorities, have enough time to review draft documents and/or plan to attend MCTC meetings.

#### **Demographic Maps of Minority and LEP Populations**

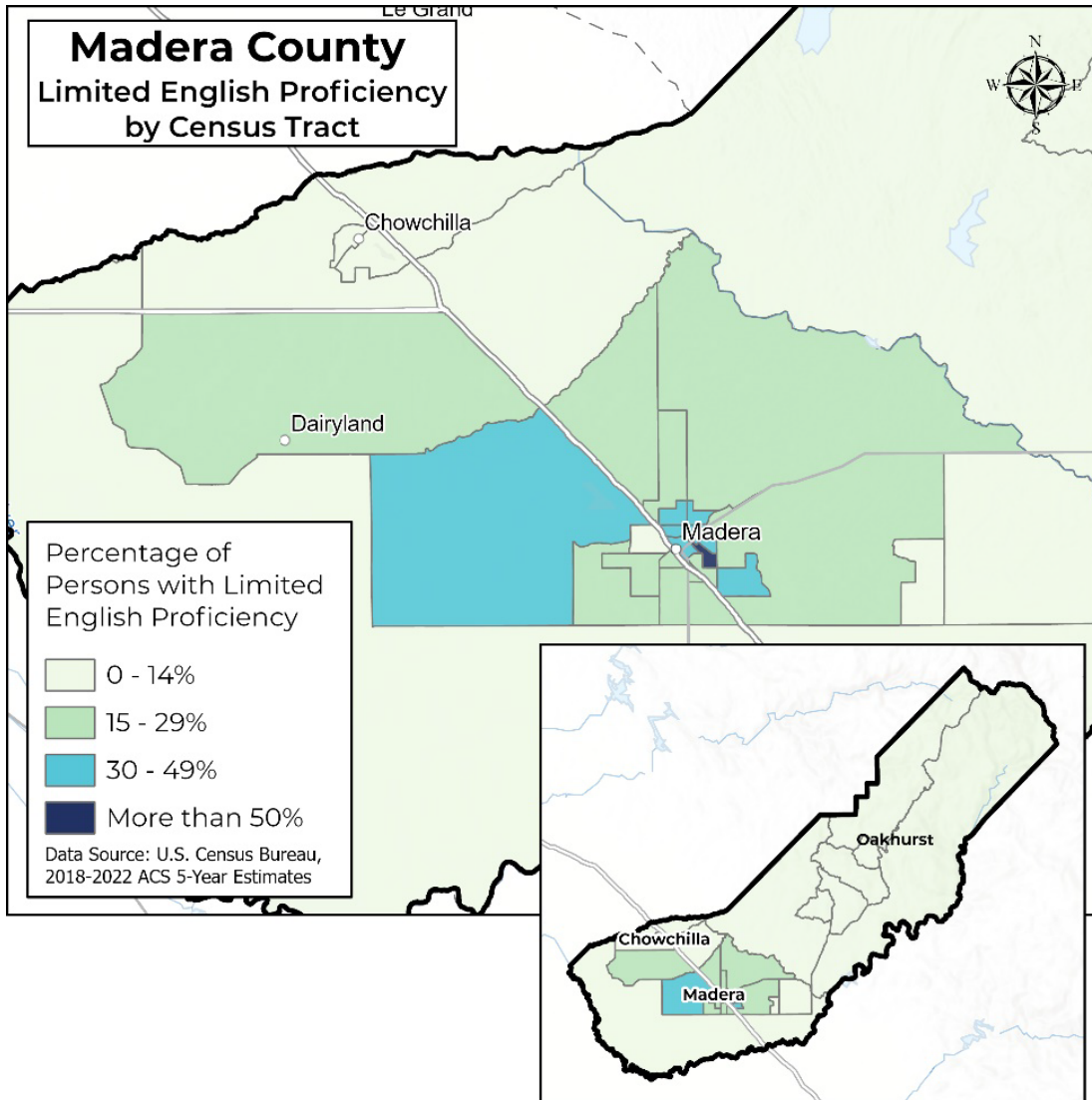
The maps below depict the percentage of minority and LEP populations in Madera County by census tract. The only FTA funds MCTC receives are Section 5303 planning funds.

Map 1



Map 1 – Minority Population Demographic Map of Madera County Region by Census Tract (The only FTA funds that MCTC receives (via Caltrans) are for transit planning, and these funds are for region-wide planning)

Map 2



Map 2 –LEP Demographic Map of Madera County Region by Census Tract (The only FTA funds that MCTC receives (via Caltrans) are for transit planning, and these funds are for region-wide planning)

**Analysis of MCTC’s Transportation System Investments**

Section 5303 funds are the only funds that MCTC receives, and since these funds are for public transportation planning in the region, all of the minority populations shown in the above map stand to benefit from these FTA-funded planning efforts.

*Appendices*

## ***Appendix A – Title VI Assurances***

## **Madera County Transportation Commission Department of Transportation Title VI Assurances**

The Madera County Transportation Commission (hereinafter referred to as the “Recipient”) HEREBY AGREES THAT as a condition to receiving any Federal financial assistance from the Department of Transportation it will comply with Title VI of the Civil Rights Act of 1964, 78 Stat. 252, 42 U.S.C. 2000d-42 U.S.C. 2000d-4 (hereinafter referred to as the Act), and all requirements imposed by or pursuant to Title 49, Code of Federal Regulations, Department of Transportation, Subtitle A, Office of the Secretary, 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) and other pertinent directives, to the end that in accordance with the Act, Regulations, and other pertinent directives, no person in the United States shall, on the grounds of race, color, or national origin, be excluded from participation in, be denied benefits of, or be otherwise subjected to discrimination under any program or activity for which the Recipient receives Federal financial assistance from the Department of Transportation, including the Federal Transit Administration, and HEREBY GIVES ASSURANCES THAT it will promptly take any measures necessary to effectuate this agreement. This assurance is required by subsection 21.7(a) of the Regulations More specifically and without limiting the above general assurance, the Recipient hereby gives the following specific assurances with respect to its Unified Planning Work Program:

1. That the Recipient agrees that each “program” and “facility” as defined in subsections 21.23(e) and 21.23(b) of the Regulations, will be (with regard to the “program”) conducted, or will be (with regard to the “facility”) operated in compliance with all requirements imposed by, or pursuant to, the Regulations.
2. That the Recipient shall insert the following notification in all solicitations for work or material subject to the Regulations and made in connection with all Unified Planning and Work Program work elements and, in adapted form in all proposals for negotiated agreement:  
The Madera County Transportation Commission, in accordance with Title VI of the Civil Rights Act of 1964, 78 Stat. 252, 42. U.S.C. 2000D TO 2000d-4 and Title 49, Code of Federal Regulations, Transportation, Office of the Secretary, Part 21, Nondiscrimination in Federally-Assisted Programs of the Department of Transportation issued pursuant to such Act, hereby notifies all bidders that it will affirmatively insure that any contract entered into pursuant to this advertisement, minority business enterprises will be afforded full opportunity to submit bids in response to this invitation and will not be discriminated against on the grounds of race, color, or national origin in consideration for an award.
3. That the Recipient shall insert the clauses of this assurance in every contract subject to this Act and the Regulations.
4. That the Recipient shall insert the clauses of this assurance, as a covenant running with the land, in any deed from the United States effecting a transfer of real property, structures, or improvements thereon, or interest therein.
5. That where the Recipient receives Federal financial assistance to construct a facility, or part of a facility, the assurance shall extend to the entire facility and facilities operating in connection therewith.
6. That where the Recipient receives Federal financial assistance in the form, of 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.
7. That the Recipient shall include the appropriate clauses set forth in Appendix C of this assurance, as a covenant running with the land, in any future deeds, leases, permits, licenses, and similar agreements enter into by the Recipient with other parties: (a) for the subsequent transfer of real property acquired or improved under the Unified Planning Work Program; and (b) for the construction or use of or access

to space on, over, or under real property acquired, or improved under the Unified Planning Work Program.

8. 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 of 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 the 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 Recipient retains ownership or possession of the property.
9. The Recipient shall 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, subgrantees, contractors, subcontractors, transferees, successors in interest, and other participants of Federal financial assistance under such program will comply with all requirements imposed or pursuant to the Act, the Regulations, and this assurance.
10. The Recipient 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 any and all Federal grants, loans, contracts, property, discounts or other Federal financial assistance extended after the date hereof to the Recipient by the Department of Transportation under the Unified Planning Work Program and is binding on it, other recipients, subgrantees, contractors, subcontractors, transferees, successors in interest and other participants in the Unified Planning Work Program. The person or persons whose signatures appear below are authorized to sign this assurance on behalf of the Recipient.

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Patricia Taylor, Executive Director  
Madera County Transportation Commission  
Date: February 21, 2024



*Appendix B – Notifying the Public of Rights Under Title VI*

# **Notifying the Public of Rights Under Title VI**

## **Madera County Transportation Commission**

- **Madera County Transportation Commission operates its programs and services without regard to race, color, and national origin in accordance with Title VI of the Civil Rights Act. Any person who believes she or he has been aggrieved by any unlawful discriminatory practice under Title VI may file a complaint with the Madera County Transportation Commission.**
- **Madera County Transportation Commission opera sus programas y servicios sin distinción de raza, color y origen nacional, de conformidad con el Título VI del Acta de Derechos Civiles. Cualquier persona que cree o que ha sido perjudicada por una práctica discriminatoria ilegal bajo el Título VI, puede presentar una queja con Madera County Transportation Commission.**
- **For more information on Madera County Transportation Commission civil rights program, and the procedures to file a complaint, contact (559)-675-0721; email [jeff@maderactc.org](mailto:jeff@maderactc.org); or visit our website at [www.maderactc.org](http://www.maderactc.org).**
- **A complaint may be filed directly with the Federal Transit administration by filing a complaint with the Office of Civil Rights, Attention: Title VI Program Coordinator, East Building, 5th Floor – TCR, 1200 New Jersey Ave., SE, Washington, DC 20590.**
- **If information is needed in another language, contact (559) 675-0721.**
- **Si se necesita información en otro idioma, comuníquese con (559) 675-0721.**

## ***Appendix C – MCTC Discrimination Complaint Procedures***

## Madera County Transportation Commission Complaint Procedures

As a recipient of federal dollars, MCTC is required to comply with Title VI of the Civil Rights Act of 1964 and ensure that services and benefits are provided on a non-discriminatory basis. MCTC has in place a Title VI Complaint Procedure, which outlines the process for local disposition of Title VI complaints and is consistent with Federal guidelines. The complaint procedure has five steps, outlined below:

1. **Submission of Complaint:** Any person who feels that he or she, individually, or as a member of any class of persons, on the basis of race, color, national origin, or low-income status has been excluded from or denied the benefits of, or subjected to discrimination under any program or activity receiving federal financial assistance through MCTC may file a written complaint to the MCTC Title VI Coordinator. Such a complaint must be filed within 60 calendar days after the date the person believes the discrimination occurred.
2. **Referral to Review Officer:** Upon receipt of the Complaint, the Title VI Coordinator shall review, investigate and evaluate the Complainant, in consultation with the Executive Director. The Title VI Coordinator shall complete the review no later than 45 calendar days after the date MCTC received the Complaint. If more time is required, the Title VI Coordinator shall notify the complainant of the estimated time-frame for completing the review. Upon completion of the review, the Title VI Coordinator shall make a recommendation regarding the merit of the Complaint and whether remedial actions are available to provide redress.

Additionally, the Title VI Coordinator may recommend improvements to MCTC's processes relative to Title VI and environmental justice, as appropriate. The Title VI Coordinator shall forward their recommendations to the Executive Director for concurrence. If the Executive Director concurs, he or she shall issue MCTC's written response to the Complainant.

3. **Request for Reconsideration:** If the Complainant disagrees with the response, he or she may request reconsideration by submitting the request, in writing, to the Executive Director within 10 calendar days after its receipt. The request for reconsideration shall be sufficiently detailed to contain any items the Complainant feels were not fully understood by the MCTC Title VI Coordinator. The Executive Director will notify the complainant of their decision either to accept or reject the request for reconsideration within 10 calendar days. In cases where the Executive Director agrees to reconsider, the matter shall be returned to the Title VI Coordinator to re-evaluate in accordance with Paragraph 2, above.
4. **Appeal:** If the request for reconsideration is denied, the complainant may appeal the Executive Director's response to the Complaint by submitting a written appeal to MCTC's Policy Board no later than 10 calendar days after receipt of the Executive Director's written decision rejecting reconsideration.
5. **Submission of Complaint to the Federal Transit Administration.** If the complainant is dissatisfied with MCTC's resolution of the Complaint, he or she may also submit a complaint to the Federal Transit Administration:

Federal Transit Administration's Office of Civil Rights  
Attention: Title VI Program Coordinator  
East Building 5th Floor – TCR  
1200 New Jersey Ave., SE  
Washington, DC 20590

For further information, see [Federal Transit Administration Website](#).

***Appendix D – Title VI Discrimination Complaint Form***

## Title VI Complaint Form Madera County Transportation Commission MCTC)

MCTC is committed to ensuring that no person is excluded from participation in or denied the benefits of its services on the basis of race, color, national origin, age, gender, or disability pursuant to Title VI of the Civil Rights Act of 1964, as amended. Title VI complaints must be filed within 180 days from the date of the alleged discrimination.

The following information is necessary to assist us in processing your complaint. If you require any assistance in completing this form, please contact MCTC, Title VI Coordinator, by calling (559) 675-0721. The completed form must be returned to MCTC's Office, Title VI Coordinator, 2001 Howard Road, Suite 201, Madera, CA 93637.

Your Name:	Phone:
Street Address:	Other Phone:
	City, State and Zip Code:
Person(s) Discriminated against (if someone other than complainant): Name(s):	
Street Address, City, State and Zip Code:	

Which of the following best describes the reason for the alleged discrimination? (Check one)

- RACE
- COLOR
- NATIONAL ORIGIN (LIMITED ENGLISH PROFICIENCY)
- AGE
- GENDER
- DISABILITY

Date of Incident: \_\_\_\_\_

Time of Incident: \_\_\_\_\_

Please describe the alleged discrimination incident. Provide the names and titles of all MCTC employees responsible. Explain what happened, whom you believe was responsible, and other specific relevant information. Please use the next page of this form if additional space is required.

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(Complete next page of form)

**Title VI Complaint Form**  
**Madera County Transportation Commission (MCTC)**

Please describe the alleged discrimination incident (continued)

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Have you filed a complaint with any other federal, state, or local agencies? (Check one)

YES

NO

If so, list agency / agencies and contact information below:

Agency: \_\_\_\_\_ Contact Name: \_\_\_\_\_  
Street Address, City, State & Zip Code: \_\_\_\_\_ Phone: \_\_\_\_\_

Agency: \_\_\_\_\_ Contact Name: \_\_\_\_\_  
Street Address, City, State & Zip Code: \_\_\_\_\_ Phone: \_\_\_\_\_

I affirm that I have read the above charge and it is true to the best of my knowledge.

\_\_\_\_\_  
Complainant's Signature:

\_\_\_\_\_  
Date:

\_\_\_\_\_  
Print or Type Name of Complainant

Date Received: \_\_\_\_\_

Received By: \_\_\_\_\_



## Formulario de Quejas Title VI Madera County Transportation Commission MCTC)

MCTC centra sus esfuerzos en garantizar que nadie sea excluido de la participación en sus servicios ni que nieguen los beneficios de éstos, con base en raza, color, origen nacional, edad, sexo, y discapacidad, en conformidad con las disposiciones del Title VI de la Ley de Derechos Civiles de 1964. Las quejas bajo el Title VI deben presentarse en el transcurso de 180 días a partir de que ocurre la discriminación supuesta.

La información siguiente es necesaria para ayudarnos en el procesamiento de su queja. Si requiere ayuda para llenar este formulario, le agradeceremos que se dirija a MCTC, Coordinadora del Title VI, al teléfono 559) 675-0721. El formulario completo debe devolverse al MCTC's Office, Title VI Coordinator, 2001 Howard Road, Suite 201, Madera, CA 93637.

Su nombre:	Teléfono:
Dirección:	Segundo Teléfono :
	Ciudad, estado, y Código Postal :
Persona(s) que sufrieron discriminación (si es otra que el firmante): Nombre(s):	
Dirección, Ciudad, estado, y Código Postal:	

¿Cuál de los siguientes describe mejor la razón por la supuesta discriminación? (Marque uno)

- RAZA
- COLOR
- ORIGEN NACIONAL
- EDAD
- SEXO
- DISCAPACIDAD

Fecha del incidente: \_\_\_\_\_

Hora del incidente: \_\_\_\_\_

Por favor, describa el supuesto incidente de discriminación. Proporcione los nombres y títulos de todos los empleados de MCTC involucrados, si cuenta con la información. Explique lo sucedido: quien considera que fue responsable; y otra información específica pertinente. Por favor, use el reverso de este formulario si requiere espacio adicional.

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(Llene el reverso de este formulario)

**Formulario de Quejas Title VI  
Madera County Transportation Commission (MCTC)**

Pro favor, describa el supuesto incidente de discriminación (continuación).

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¿Ha presentado alguna queja ante otra agencia federal, estatal, o local con respecto este incidente?

Marque Uno)

Si

No

Si la respuesta es afirmativa, por favor, a continuación enumere la agencia or agencias y la información de contacto:

Agencia: \_\_\_\_\_ Nombre de contacto: \_\_\_\_\_  
Dirección, Ciudad, estado, y Código Postal: \_\_\_\_\_ Teléfono: \_\_\_\_\_

Agencia: \_\_\_\_\_ Nombre de contacto: \_\_\_\_\_  
Dirección, Ciudad, estado, y Código Postal: \_\_\_\_\_ Teléfono: \_\_\_\_\_

Confirмо que he leído el cargo que se indica arriba y que es verdadero hasta donde tengo conocimiento.

\_\_\_\_\_  
Firma del declarante:

\_\_\_\_\_  
Fecha:

\_\_\_\_\_  
Escriba o escriba en letra de imprenta el nombre de declarante

Fecha de recepción: \_\_\_\_\_

Recibido por: \_\_\_\_\_

***Appendix E – MCTC Plan for Engaging Individuals with Limited  
English Proficiency (LEP)***

## MADERA COUNTY TRANSPORTATION COMMISSION PLAN FOR ENGAGING INDIVIDUALS WITH LIMITED ENGLISH PROFICIENCY (LEP)

### Introduction

On August 11, 2000, President William J. Clinton signed executive order, *Executive Order 13166: Improving Access to Service for Persons with Limited English Proficiency*, to clarify Title VI of the Civil Rights Act of 1964. Its purpose was to ensure accessibility to programs and services to eligible persons who are not proficient in the English language.

This executive order states that individuals who do not speak English well and who have a limited ability to read, write, speak, or understand English are entitled to language assistance under Title VI of the Civil Rights Act of 1964 with respect to a particular type of service, benefit, or encounter. It reads in part, *each federal agency shall prepare a plan to improve access to its federally conducted programs and activities by eligible LEP persons. Each plan shall be consistent with the standards set forth in the LEP Guidance, and shall include the steps the agency will take to ensure that eligible LEP persons can meaningfully access the agency's programs and activities.*

Not only do all federal agencies have to develop LEP Plans, as a condition of receiving federal financial assistance, recipients have to comply with Title VI and LEP guidelines of the federal agency from which funds are provided.

Federal financial assistance includes grants, training, use of equipment, donations of surplus property, and other assistance. Recipients of federal funds range from state and local agencies, to nonprofits and other organizations. Title VI covers a recipient's entire program or activity. The US Department of Transportation (DOT) published *Policy Guidance Concerning Recipients' Responsibilities to Limited English Proficient Person* December 14, 2005. The guidance explicitly identifies MPO's (of which MCTC is one) as organizations that must follow this guidance:

*The guidance applies to all DOT funding recipients, which include state departments of transportation, state motor vehicle administrations, airport operators, **metropolitan planning organizations**, and regional, state, and local transit operators, among many others. Coverage extends to a recipient's entire program or activity, i.e., to all parts of a recipient's operations. For example, if DOT provides assistance to a state department of transportation to rehabilitate a particular highway on the National Highway System, all of the operations of the entire state department of transportation—not just the particular highway program or project—are covered by the DOT guidance.*

The intent of this Limited English Proficiency Plan is to ensure access to the planning process and information published by MCTC where it is determined that a substantial number of residents in Madera County do not speak or read English proficiently. MCTC shall provide appropriate assistance, auxiliary aids, a translator/interpreter for non-English speaking and hearing impaired individuals and/or services when necessary if requested at least 3 working days in advance of the meeting. If MCTC is unable to accommodate a request for a public hearing, then the hearing will be continued on a specified date when accommodations are available.

An LEP Plan starts with an assessment to identify LEP individuals who need assistance. Implementation includes the development of language assistance measures, staff training, notification procedures to LEP individuals, and monitoring of the plan.

In addition to this LEP Plan, a separate, related document, MCTC’s Public Participation Plan identifies opportunities for the public to get involved in the transportation planning process. Copies of the MCTC Public Participation Plan can be found on MCTC’s website at: [MCTC website](#).

**Determination of Need**

In order to prepare this Plan, MCTC undertook the U.S. Department of Transportation’s four-factor LEP analysis, which considers the following:

1. The number and proportion of LEP persons served or encountered in the eligible service population.
2. The frequency with which LEP persons come in contact with MCTC programs, activities, or services.
3. The importance to LEP persons of MCTC’s program, activities, and services.
4. The resources available to MCTC and overall cost to provide LEP assistance.

**Factor 1: Number and proportion of LEP persons served or encountered**

For planning purposes, MCTC looked at American Community Survey data for people who speak English “less than very well” as Limited English Proficient persons. Table 1 shows the languages spoken at home, by ability to speak English, for persons five years of age or older, with numbers and percentages for the languages with the higher percentages.

Table 1 shows the ability to speak English and languages spoken at home for persons five years of age and older. The six most frequently spoken languages in the region other than English are Spanish (39.79 percent), Other Indic (0.65 percent), Other Pacific Island (0.41 percent), Tagalog (0.29 percent), Arabic (0.20 percent) and Japanese (0.18 percent). However, many of these respondents indicated that they also speak English under the “Very Well” category. Table 1 also shows that Spanish-speakers are the only population representing more than 1 percent of the county’s population that is identified as not speaking English very well.

**Table 1**

<b>Number of Persons Over 5 years of age with the Ability to Speak English Less Than "Very Well" within Madera County</b>		
<b>Language</b>	<b>Estimate</b>	<b>Percent</b>
Spanish	26,902	18.55%
Indo-European Languages	796	0.55%
Asian and Pacific Island	477	0.33%
Other Unspecified	64	0.04%
Source: American Community Survey – 5 Year Estimate C16001: LANGUAGE SPOKEN AT HOME		

***Factor 2: Frequency of LEP populations' contact with programs, activities and services***

MCTC's prior experience with Limited English Proficient persons has been primarily with Spanish speakers. MCTC has worked with community-based organizations for the update of its long-range transportation plan to gather input from minority and low-income residents. Such meetings have been helpful in providing insight into the needs and concerns of residents who often do not participate in regional government. Material is translated into the language or languages recommended by the community group. Additionally, some informational workshops/meetings for the update to the long-range transportation plan were conducted in Spanish.

***Factor 3: Importance to LEP population of programs, services and activities***

Most MCTC programs, activities, and services of importance to LEP persons in general are long-term in nature since we primarily engage in planning activities. MCTC serves as the region's transportation banker and planner rather than a direct provider of services. MCTC works to ensure that all segments of the population, including LEP persons, have the opportunity to be involved in the transportation planning process.

***Factor 4: Resources available to MCTC and overall cost to provide LEP assistance***

Providing translation services to allow LEP populations to participate in the development of MCTC's core planning and investment policies is a routine practice for MCTC. MCTC works with advocacy groups representing LEP persons to determine their needs and concerns for planning purposes.

MCTC has two staff members that are fluent in Spanish.

**Safe Harbor**

Based on the four-factor analysis, staff has determined that Spanish is the only language that must be translated. The only groups besides English and Spanish are a small amount, and MCTC will provide interpreters if requested by an individual, or translate documents, as appropriate.

**Language Assistance Measures**

MCTC uses a number of techniques and practices to provide productive opportunities for all interested Madera County residents to participate in the dialogue that informs important decisions, regardless of language barriers. This is done in several ways, including:

**General Practices:**

- Extensive use of visual aids including maps, charts, and photographs to illustrate trends, options, etc.,
- Avoid complex terminology and technical terms and target the presentation / document in a manner that is appropriate to the intended audience.
- Notices widely disseminated through partnerships with community based and interest organizations.
- Translation software for the MCTC website.
- Multi-lingual instruction on how to request translation services.
- Tailor public participation activities to reflect the unique LEP population with a respective community.
- Review prior experiences with LEP populations to determine the types of language services needed.
- Flyers for major community workshops and similar meetings include instructions on how to request translation services.
- Public participation plans for MCTC's long-range plan include seeking out views of LEP populations.

### **Work with Advocacy Groups**

- Work to involve non-profit groups that advocate for persons with limited English proficiency in MCTC activities.
- Make regular reports to MCTC's ongoing committees such as the Technical Advisory Committee, SSTAC, etc.
- Partner with community groups who can assist in tailoring presentations, meeting materials and announcements to meet the language needs of local participants.

### **Staff Training**

MCTC works to instill in staff an awareness of and sensitivity to the needs of LEP residents. Staff is trained on LEP guidance from U.S. Department of Transportation on procedures for accommodating LEP populations.

### **Notification to LEP or Low Literacy Persons**

The public must be informed of their rights under Title VI. This will be done in several ways including:

- Notifications posted in MCTC's office.
- Notifications on MCTC's website.
- Documentation that describes a LEP person's right to access MCTC's services.
- Multi-lingual instruction on how to request translation services.
- Flyers for major community workshops and similar meetings include instructions on how to request translation services.
- Routine use of language on printed or electronic announcements for public workshops on key planning efforts that alert interested individuals on how to request translation services.

### **Representation on MCTC's Committees**

MCTC's committees include representatives from local government agencies, public and private organizations, and the general public.

#### Technical Advisory Committee (TAC)

The Technical Advisory Committee consists of Caltrans, transit, planning, engineering and public works staff of the member agencies (2 cities and county).

#### Social Services Transportation Advisory Council (SSTAC)

The Social Services Transportation Advisory Council (SSTAC) serves as a non-elected citizen advisory committee to the Commission on matters related to public participation needs of Madera County residents. The SSTAC is involved in the "unmet transit needs" process and works with MCTC staff to develop recommendations for the Commission towards finding that public transit needs that are reasonable to be met, are being met. The SSTAC membership is comprised of several categories:

- Potential Transit User 60 Years or Older (minimum of 1)
- Representatives of the Local Service Providers for Seniors (minimum of 2)
- Potential Transit User Who is Disabled (minimum of 1)
- Representatives of the Local Service Provider for Disabled (minimum of 2)
- Representative of a Local Service Provider for Persons of Limited Means (minimum of 1)
- Representatives from the Local Consolidated Transportation Service Agency (minimum of 2)

Ethnicity	Number	Percentage
Hispanic or Latino	4	40%
Not Hispanic or Latino	6	60%
Race	Number	Percentage
White	5	50%
Black	2	20%
American Indian or Alaska Native	0	0
Asian	0	0
Native Hawaiian or Other Pacific Islander	0	0
Other Race	2	20%
Two or More Races	1	10%

**Maintenance and Monitoring of the MCTC LEP Plan**

MCTC will monitor requests for translation and adjust practices to meet demand while maintaining a basic level of access by LEP populations to key programs and documents. MCTC’s LEP Plan will be updated every three years as required by U.S. DOT. At a minimum, the plan will be reviewed and updated when data from the 2030 U.S. Census is available, or when it is evident that higher concentrations of LEP individuals are present in the MCTC area and will be coordinated with the Public Participation Plan.



*Appendix F – Signed MCTC Assurances*

## **STANDARD DOT TITLE VI ASSURANCES**

Madera County Transportation Commission (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 CFR 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. Without limiting the above general assurance, the Sponsor agrees concerning this grant that:

1. Each "program" and "facility" (as defined in Section 21.23(a) 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 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 of the official to whom he delegates specific authority to give reasonable guarantees that it, other sponsors, subgrantees, contractors, subcontractors, transferees, successors in interest, and other participants of 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.

Date: February 21, 2024

Madera County Transportation Commission  
(Sponsor)

By \_\_\_\_\_  
(Signature of Authorized Official)

## ***Appendix G – Resolutions***

**BEFORE  
THE COMMISSIONERS OF THE  
MADERA COUNTY TRANSPORTATION COMMISSION  
COUNTY OF MADERA, STATE OF CALIFORNIA**

In the matter of  
**APPROVE MCTC TITLE VI PROGRAM UPDATE**

Resolution No.: **24-##**

**WHEREAS**, MCTC obtains financial assistance from the Federal Transit Administration (FTA) and must comply with federal regulations including Title VI; and

**WHEREAS**, the purpose of the Title VI Program is to prohibit discrimination on the basis of race, color, or national origin in programs and activities; and

**WHEREAS**, the MCTC Policy Board adopted the Title VI Program on July 23, 2014; and

**WHEREAS**, an update to the Title VI Program with Limited English Efficiency Proficiency Plan is needed;

**NOW, THEREFORE, LET IT BE RESOLVED**, that MCTC adopts the Updated Title VI Program with Limited English Proficiency Plan and authorizes the MCTC Executive Director to approve additional updates, as necessary.

The foregoing resolution was adopted this 21st day of February 2024 by the following vote:

Commissioner Ahmed	_____
Commissioner Gallegos	_____
Commissioner Gonzales	_____
Commissioner Poythress	_____
Commissioner Rodriguez	_____
Commissioner Rogers	_____

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Chairman, Madera County Transportation Commission

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Executive Director, Madera County Transportation Commission

## *Appendix H – Caltrans Checklist*

# Caltrans Division of Transportation Planning

## Office of Regional Planning – Title VI Program Checklist

Agency Name: Madera County Transportation Commission

Title VI Adoption Date: Adopted - 7/23/14, Updated 2/18/15, 4/6/18, 4/21/21, 2/21/24

### General Requirements Chapter III – Metropolitan Transportation Planning Organizations (MPOs)

Page #	Select One
A-5	Yes
A-5	Yes
A-5	Yes

1. Notice to the Public
  - a. Race, color, and national origin (Sample notice in Appendix B)
  - b. Translated into non-English language and consistent with the agency’s Limited English Proficiency (LEP) Plan (Chapter III-4)

A-18	Yes
A-18	Yes
A-18	Yes
N/A	N/A
N/A	N/A

2. List of locations where notice is posted, at a minimum (Chapter III-4 and Appendix B)
  - a. Agency’s website
  - b. Public areas of the agency’s office, including reception desk and meeting rooms
  - c. Station or stops
  - d. Transit vehicles

A-7	Yes
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3. How to file a Title VI discrimination complaint and complaint form must be on agency’s website (Chapter III-5 and Appendix C and D)

A-4	Yes
-----	-----

4. List of any public transportation Title VI investigations, complaints or lawsuits filed since last submission (Appendix E)

A-30-46	Yes
A-30-46	Yes
A-30-46	Yes

5. Public Participation Plan – Promoting Inclusive Public Participation (Chapter III-5)
  - a. Summary of outreach efforts made
  - b. Outreach plan to engage minority and limited English proficient population (can be a component of a larger outreach for those that are traditionally underserved)

A-15	Yes
A-15	Yes
A-16	Yes

6. LEP Plan
  - a. Four Factor Analysis (Chapter III-7)
    - i. The number of proportion of LEP persons eligible to be served or likely to be encountered by the program or recipient.
    - ii. The frequency with LEP persons come into contact with the program.
    - iii. The nature and importance of the program, activity, or service provided by the program to people’s lives.
    - iv. The resources available to the recipient for LEP outreach, as well as the costs associated with that outreach.

A-17	Yes
A-17	Yes

A-17	Yes
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A-17, 18	Yes
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- b. Describe how the agency provides language assistance services by language (Chapter III-8)

Page # Select  
One

A-17 Yes

c. Safe Harbor Provision – applies to the translation of written documents only (Chapter III-9)

A-17, 18 Yes

d. Describe how the agency provides notice to LEP person about the availability of language assistance

A-18 Yes

e. Describe how the agency monitors, evaluates and updates the language access plan

A-18 Yes

f. Describe how the agency trains employees to provide timely and reasonable language assistance to LEP population

A-19 Yes

7. A table depicting the racial breakdown of the membership of those committees, and a description of efforts made to encourage the participation of minorities on such committees.

6 Yes

8. If a facility has been constructed, a Title VI equity analysis must have been conducted during the planning stage regarding the location. A copy of the analysis must be provided. (Chapter III-11)

A-48 Yes

9. Board Resolution or similar approving the Title VI Plan (Chapter III-1)

### **Additional Requirements for MPOs**

Requirements in Chapter IV apply to MPO that are a provider of fixed route public transportation service that receive federal assistance.

If the MPO is a direct recipient or primary recipient, the MPO will be required to submit additional information to FTA.

7 Yes

10. A demographic profile of the metropolitan area that includes identification of the locations of minority populations in the aggregate

7 Yes

11. A description of the procedures by which the mobility needs of minority populations are identified and considered within the planning process

8 Yes

12. Demographic maps that overlay the percent minority and non-minority populations as identified in Census or ACS data, at Census tract or block group level, and charts that analyze the impacts of the distribution of State and Federal funds in the aggregate for public transportation purposes, including Federal funds managed by the MPO as a designated recipient

8 Yes

13. An analysis of impacts identified in the paragraph above that identifies any disparate impacts on the basis of race, color, or national origin, and, if so, determines whether there is a substantial legitimate justification for the policy that resulted in the disparate impacts, and if there are alternatives that could be employed that would have a less discriminatory impact.



## Planning Certification Review

All MPOs are required to self-certify compliance with all applicable federal requirements. Planning certification reviews conducted jointly by Federal Transit Administration (FTA) and Federal Highway Administration (FHWA) of the metropolitan transportation planning processes of transportation management areas include a review of Title VI compliance.

By checking the following boxes, the MPO certifies that the below items are achieved for Planning certification reviews by FTA and FHWA.

Check

- a. Analyze regional demographic data to identify minority populations within the region.
- b. Where necessary, provide member agencies with regional data to assist them in identifying minority populations in their service area.
- c. Ensure that members of minority communities are provided with full opportunities to engage in the transportation planning process. This includes actions to eliminate language, mobility, temporal, and other obstacles to allow these populations to participate fully in the process.
- d. Monitored the activities of subrecipients with regard to Title VI compliance, where the MPOs passes funds through to subrecipients.

## Requirements for Program Administration

In order to comply with 49 CFR Section 21.5, the general nondiscrimination provision, MPOs shall document that they pass through FTA funds under any FTA programs to subrecipient without regard to race, color, or national origin and assure that minority populations are not being denied the benefits of or excluded from participating in these programs. MPOs shall prepare and maintain, but not report unless requested by FTA, the following information:

Check

- a. A record of funding requests received from private non-profit organizations, State or local governmental authorities, and Indian tribes. The record shall identify those applicants that would use grant program funds to provide assistance to predominantly minority populations. The record shall also indicate which applications were rejected and accepted for funding.
- b. A description of how the MPO develops its competitive selection process or annual program of projects submitted to FTA as part of its grant applications. This description shall emphasize the method used to ensure the equitable distribution of funds to subrecipients that serve predominantly minority populations, including Native American tribes, where present. Equitable distribution can be achieved by engaging in outreach to diverse stakeholders regarding the availability of funds, and ensuring the competitive process is not itself a barrier to selection of minority applicants.
- c. A description of the MPO's criteria for selecting entities to participate in an FTA grant program.

I have reviewed the above information and certify that it is correct and complete.

\_\_\_\_\_  
(Must be signed by MPO/RTPA  
Executive Director or designated representative)

\_\_\_\_\_  
Date

**For additional information and resources see the web addresses below:**

Federal requirements FTA Circular 4702.1B (October 1, 2012)

<http://www.fta.dot.gov/civilrights/12328.html>

Overview of Final Circular 4702.1B Title VI Requirements and Guidelines for Recipients

[http://www.fta.dot.gov/documents/Title\\_VI\\_Overview\\_4702.1B\\_11.05.12\\_ER.pdf](http://www.fta.dot.gov/documents/Title_VI_Overview_4702.1B_11.05.12_ER.pdf)

For information, guidance, and technical assistance on the implementation of the LEP initiative please visit <http://www.LEP.gov>