Staunton-Augusta-Waynesboro Metropolitan Planning Organization (SAWMPO)

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Vice Chair, Wendell Coleman, Augusta County
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Doug Wolfe – Augusta County
Mack Frost – Federal Highway Administration (non-voting)
Michael Fulcher, Virginia Department of Transportation (non-voting)
Nancy Gourley – Central Shenandoah Planning District Commission (non-voting)
Susan Newbrough – Virginia Regional Transit (non-voting)
Terry Short, Virginia Department of Transportation (non-voting)
Report Contact and Documentation

Contact Information
Citizens, stakeholders, and interested parties may contact the following for information regarding this Title VI Plan, SAWMPO documents, plans and other public records. Submit oral and/or written comments about any advertised plan, and/or about the SAWMPO and its planning efforts to:

- SAWMPO Secretary/Treasurer
  112 MacTanly Place, Staunton, Virginia, 24401
  Phone: (540) 885-5174
  Fax: (540) 885-2687
  Email: cspdc@cspdc.org
  Website: www.sawmpo.org

Title VI Manager and Additional Assistance
Please submit any inquiries or comments for the SAWMPO Title VI Manager to CSPDC staff at the above contact information. Hearing and voice assistance are available from:

- Virginia Relay for Hearing and Voice Impaired: 7-1-1
- Outside Virginia: Voice 800-828-1140 | Hearing 800-828-1120

Title
Staunton-Augusta-Waynesboro Metropolitan Planning Organization Title VI Plan

Authors
Bonnie S. Riedesel, Secretary/Treasurer
Kevin McDermott, Transportation Program Manager
Ann Cundy, Transportation Planner

Report Date
May 1, 2019

Granting/Sponsoring Agencies
Federal Highway Administration
Federal Transit Administration
Virginia Department of Transportation
Virginia Department of Rail and Public Transit
Local Funds
Abstract

Title VI of the Civil Rights Act of 1964 states 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 subjected to discrimination under any program or activity receiving Federal financial assistance.” Subsequent laws and Presidential Executive Orders added handicap, sex, age, or income status to the criteria for which discrimination is prohibited. The Staunton-Augusta-Waynesboro Metropolitan Planning Organization (SAWMPO) Title VI Plan was developed to ensure the SAWMPO is in compliance with nondiscrimination requirements as outlined in Title 23 CFR and 49 CFR and related laws and provides specific information on how to file a nondiscrimination complaint.

This Plan also provides an overview of Environmental Justice and Limited English Proficiency (LEP) concepts, definitions of Title VI and associated nondiscrimination acts, and how Title VI, Environmental Justice and LEP are incorporated into the metropolitan transportation planning process. Public outreach strategies for minority, low-income, and LEP populations are included in the SAWMPO Public Participation Plan, amended on May 1, 2019.

Acknowledgements

This Plan was prepared by the SAWMPO in cooperation with the Virginia Department of Transportation (VDOT), Virginia Department of Rail and Public Transportation (DRPT), Federal Highway Administration (FHWA), and the Federal Transit Administration (FTA). The contents of this report reflect the views of the SAWMPO. The contents do not necessarily reflect the official views or policies of the FHWA, FTA, VDOT, DRPT, or the Central Shenandoah Planning District Commission (CSPDC). This report does not constitute a standard, specification, or regulation. FHWA, FTA or VDOT acceptance of this report as evidence of fulfillment of the objectives of this planning study does not constitute endorsement/approval of the need for any recommended improvements nor does it constitute approval of their location and design or a commitment to fund any such improvements. Additional project level environmental impact assessments and/or studies of alternatives may be necessary.
RESOLUTION APPROVING THE STAUNTON-AUGUSTA-WAYNESBORO METROPOLITAN PLANNING ORGANIZATION APPROVING THE TITLE VI PLAN

WHEREAS, the Title VI of the Civil Rights Act of 1964 (U.S.C. 2000D) provides that no person shall on the grounds of race, color, national origin, gender, or disabilities be excluded from participation in, be denied the benefits of, or be subject to discrimination under any program or activity receiving Federal Funds; and

WHEREAS, the Virginia Departments of Transportation and Rail and Public Transportation require that any Organization that is the recipient of Federal financial assistance shall have an adopted Title VI Plan and Policy; and

WHEREAS, the Staunton-Augusta-Waynesboro Metropolitan Planning Organization is responsible for transportation planning in the region and therefore is the recipient of said funds.

NOW, THEREFORE, BE IT RESOLVED, that the Staunton-Augusta-Waynesboro Metropolitan Planning Organization Policy Board does hereby approve and adopt the amended Title VI Plan on this, the 1st day of May, 2019, and in so doing, repeals the Title VI Plan approved on October 8, 2015 as amended on September 7, 2016.

SIGNED: 

James Hampton, Chairman
Staunton-Augusta-Waynesboro Metropolitan Planning Organization Policy Board

ATTEST:

Bonnie S. Riedesel, Secretary/Treasurer
Staunton-Augusta-Waynesboro Metropolitan Planning Organization Policy Board
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Purpose

The Staunton-Augusta-Waynesboro Metropolitan Planning Organization (SAWMPO), as a sub-recipient of federal financial assistance, is required to comply with Title VI and subsequent nondiscrimination laws, as well as provide an overview of how the SAWMPO addresses Executive Order 12898 on Environmental Justice and Executive Order 13166 on Limited English Proficiency (LEP). The purpose of this Title VI Plan is to describe the measures taken by the SAWMPO to assure compliance with the rules and regulations associated with Title VI and subsequent nondiscrimination laws, Environmental Justice, and LEP.

Staunton-Augusta-Waynesboro Metropolitan Planning Organization

The organization, for which this Title VI Plan is applicable, is the metropolitan planning organization (MPO) for the Staunton-Augusta-Waynesboro metropolitan (urbanized) area. As such, it is a federally mandated transportation policy board comprised of representatives from local, state, and federal governments, transit agencies, and other stakeholders and is responsible for transportation planning and programming for the Staunton-Augusta-Waynesboro Metropolitan Planning Area (MPA). The MPO is comprised of the Policy Board and Technical Advisory Committee. Members of both bodies are appointed by their respective agencies or localities, not by the MPO itself.

Any significant transportation project or program to be constructed or conducted within the MPA, must receive approval by the SAWMPO before any Federal funds can be expended.

Introduction

Title VI of the Civil Rights Act of 1964 prohibits federal agencies and sub-recipients of federal funds from discriminating, on the basis of race, color or national origin, against participants or clients of programs that receive Federal funding. Subsequent laws and Presidential Executive Orders added handicap, sex, age, or income status to the criteria for which discrimination is prohibited. This document addresses prohibition of discrimination as mandated by Title VI as well as by the authorities listed in the following section.

In addition to nondiscrimination, this document provides information regarding two Presidential Executive Orders pertaining to fairness and inclusiveness. Executive Order 12898 mandates that federal agencies address equity and fairness, or Environmental Justice, toward low-income and minority persons and populations. Executive Order 13166 mandates that federal agencies ensure that people who have Limited English Proficiency (LEP) have meaningful access to federally-conducted and/or funded programs and activities. Public outreach strategies, which include minority, low-income, and LEP populations and comply with Executive Order 12898 and Executive Order 13166, are outlined in the SAWMPO Public Participation Plan, amended on May 1, 2019.
Figure 1 SAWMPO Planning Area
Title VI Policy Statement

The SAWMPO is committed to ensuring that no person shall, on the grounds of race, color, national origin, as provided by Title VI of the Civil Rights Act of 1964 and the Civil Rights Restoration Act of 1987 (PL 100.259), be excluded from participation in, be denied the benefits of, or be otherwise subjected to discrimination under any program or activity, whether those programs and activities are federally funded or not.

The SAWMPO Title VI Manager is responsible for initiating and monitoring Title VI activities, preparing required reports, and other responsibilities as required by Title 23 Code of Federal Regulations (CFR) Part 200, and Title 49 CFR Part 21.

Appendix A contains the signed Title VI Non-discrimination Statement.
Title VI and Other Nondiscrimination Authorities

Title VI is usually referred to in the context of federal nondiscrimination laws. Title VI is one of eleven titles included in the Civil Rights Act of 1964. The following is a list of all of the Civil Rights Act titles:

- Voting Rights
- Public Accommodation
- Desegregation of Public Facilities IV
- Desegregation of Public Education
- Commission on Civil Rights
- Nondiscrimination in Federally Assisted Programs and Activities
- Equal Employment Opportunity
- Registration and Voting Statistics
- Intervention and Procedure after Removal in Civil Rights Cases
- Establishment of Community Relations Service
- Miscellaneous

Title VI “declares it to be the policy of the United States that discrimination on the ground of race, color, or national origin shall not occur in connection with programs and activities receiving federal financial assistance and authorizes and directs the appropriate federal departments and agencies to take action to carry out this policy.” Any organization that receives Federal funds is bound to comply with Title VI.

Since the Civil Rights Act of 1964, other nondiscrimination laws have been enacted to expand the range and scope of Title VI coverage and applicability:

- **The Uniform Relocation Assistance and Real Property Acquisition Policies Act of 1970** prohibits unfair and inequitable treatment of persons displaced or whose property will be acquired as a result of federal-aid programs and projects.

- **The Federal Aid Highway Act of 1973** states that no person shall, on the grounds of sex be excluded from participation in, be denied the benefits of, or be subjected to discrimination under any program or activity receiving federal assistance under this title or carried on under this title.

- **Section 504 of the Rehabilitation Act of 1973** states that no qualified handicapped person shall, solely by reason of his handicap, be excluded from participation in, be denied the benefits of, or be subjected to discrimination under any program or activity that receives or benefits from federal financial assistance. This Act protects qualified individuals from discrimination based on their disability.

- **The Age Discrimination Act of 1975** states that no person shall, on the basis of age, be excluded from participation in, be denied the benefits of, or be subjected to discrimination under any program or activity receiving federal financial assistance. This act prohibits age discrimination in Federally Assisted Programs.
• The Civil Rights Restoration Act of 1987, P.L.100-209 amends Title VI of the 1964 Civil Rights Act to make it clear that discrimination is prohibited throughout an entire agency if any part of the agency receives federal assistance.

• The Americans with Disabilities Act (ADA) of 1990 prohibits discrimination against people with disabilities in employment, transportation, public accommodation, communications, and governmental activities.

• 23 CFR Part 200 – Federal Highway Administration regulations: Title VI Program and Related Statutes – Implementation and Review Procedures provides guidelines for implementing the FHWA Title VI compliance program under Title VI of the Civil Rights Act of 1964 and related civil rights laws and regulations, and conducting Title VI program compliance reviews relative to the Federal-aid highway program.

• 49 CFR Part 21 – Nondiscrimination in Federally-Assisted Programs.

• 23 CFR Part 450 – Federal Highway Administration planning regulations.


• DOT Order 5610.2 on Environmental Justice summarized and expanded upon the requirements of Executive Order 12898 to include all policies, programs, and other activities that are undertaken, funded, or approved by the Federal Highway Administration (FHWA), the Federal Transit Administration (FTA), or other U.S. DOT components.

• The National Environmental Policy Act (NEPA) of 1969 addresses both social and economic impacts of environmental justice. NEPA stresses the importance of providing for “all Americans, safe, healthful, productive and aesthetically pleasing surroundings,” and provides a requirement for taking a “systematic interdisciplinary approach” to aid in considering environmental and community factors in decision-making.

• FHWA/FTA Memorandum Implementing Title VI Requirements in Metropolitan and Statewide Planning - This memorandum provides clarification for field officers on how to ensure that environmental justice is considered during current and future planning certification reviews. The intent of this memorandum was for planning officials to understand that environmental justice is equally as important during the planning stages as it is during the project development stages.

In addition to the laws listed above, two executive orders must be taken into account when ensuring compliance with federal nondiscrimination laws, directives, and mandates:

• Executive Order 12898 – Environmental Justice (February 11, 1994), a presidential mandate to address equity and fairness toward low-income and minority persons/population. Executive Order 12898 organized and explained the federal government’s commitment to promote Environmental Justice. Each federal agency was directed to review its procedures and make environmental justice part of its mission.

• U.S. DOT Order 5610.2 (April 15, 1997) expanded upon Executive Order 12898 requirements and describes process for incorporating Environmental Justice principles into DOT programs, policies, and activities.

• FHWA Order 6640.23 (December 2, 1998) – FHWA Actions to Address Environmental Justice in Minority Populations and Low-Income Populations.
Executive Order 13166 – Limited English Proficiency (August 11, 2000), a presidential directive to federal agencies to ensure people who have limited English proficiency have meaningful access to services. Executive Order 13166 ensures federal agencies and their recipients to improve access for persons with Limited English Proficiency to federally-conducted and federally assisted programs and activities.

Organization and Title VI Program Responsibilities

The role of SAWMPO Title VI Manager is the responsibility of the SAWMPO Secretary/Treasurer and is generally responsible for overseeing compliance with applicable nondiscrimination authorities in each of the metropolitan transportation planning and programming areas. Other staff members are expected to provide information and support to assist this staff member in performing his or her tasks.

Responsibilities of the Title VI Manager

The Title VI Manager is responsible for supervising staff activities pertaining to nondiscrimination regulations and procedures set forth in federal guidance and in accordance with the SAWMPO Title VI Plan. In support of this, the Title VI Manager will:

- Identify, investigate, and work to eliminate discrimination when found to exist.
- Process discrimination complaints received by the SAWMPO. Any individual may exercise his or her right to file a complaint with the SAWMPO, if that person believes that he or she or any other program beneficiaries have been subjected to discrimination, in their receipt of benefits/services or on the grounds of race, color, national origin, sex, handicap, age, or income status. The SAWMPO will make a concerted effort to resolve complaints in accordance with Discrimination Complaint Procedures.
- Meet with appropriate staff members to monitor and discuss progress, implementation, and compliance issues related to the SAWMPO Title VI Plan.
- Periodically review the SAWMPO Title VI Plan to assess whether administrative procedures are effective, staffing is appropriate, and adequate resources are available to ensure compliance.
- Work with staff involved with Consultant Contracts and the sub-recipient found to not be noncompliant, to resolve the deficiency status and write a remedial action if necessary, as described in the Consultant Contracts section of this document.
- Review important issues related to nondiscrimination with the SAWMPO Policy Board Chairperson, as needed.
- Maintain a list of Interpretation Service Providers.
- Assess communication strategies and address additional language needs when needed.
- Disseminate information related to the nondiscrimination authorities. The SAWMPO Title VI Plan is to be disseminated to SAWMPO employees, contractors, the general public, and any of the SAWMPO services.
- Coordinate with appropriate federal, state, and regional entities to periodically provide SAWMPO employees with training opportunities regarding nondiscrimination.
• Ensure that all new SAWMPO employees receive education and training regarding nondiscrimination regulations and procedures as set forth in this plan and in accordance with federal guidance.

Questions
For questions on the SAWMPO Title VI Plan and procedures, please contact the CSPDC at (540) 885-5174 or by email at cspdc@cspdc.org. For information on the SAWMPO’s work programs or publications, please see the SAWMPO website at www.sawmpo.org.

Annual Nondiscrimination Assurance to the Virginia Department of Rail and Public Transportation (DRPT)
Each year, in preparing for the Annual Report and Updates, the Title VI Manager will review the agency’s Title VI program to assure implementation of the Title VI plan. In addition, they will review agency operational guidelines and publications, including those for contractors, to verify that Title VI language and provisions are incorporated, as appropriate.

Title VI Clauses in Contracts
In all procurements requiring a written contract, SAWMPO’s contract will include the federal nondiscrimination clauses. The Title VI Manager will work with the Financial Compliance and Procurement Analyst.

Environmental Justice
On February 11, 1994, President William J. Clinton signed Executive Order 12898: Federal Actions to Address Environmental Justice in Minority Populations and Low-Income Populations, which directs federal agencies to develop strategies to help them identify and address disproportionately high and adverse human health or environmental effects of their programs, policies, and activities on minority and low-income populations. The Executive Order was also intended to provide minority and low-income communities with access to public information and opportunities for public participation in matters relating to human health or the environment.

Adverse effects as described in Executive Order 12898 is the totality of significant individual or cumulative human health or environmental effects, including interrelated social and economic effects, which may include, but are not limited to:

• Bodily impairment, infirmity, illness or death.
• Air, noise, and water pollution and soil contamination.
• Destruction or disruption of:
  o man-made or natural resources
  o aesthetic values
  o community cohesion or a community’s economic vitality
  o the availability of public and private facilities and services
• Adverse employment effects.
• Displacement of persons, businesses, farms, or non-profit organizations.
• Increased traffic congestion, isolation, exclusion or separation of minority or low-income individuals within a given community or from the broader community.
• Denial of, reduction in, or significant delay in the receipt of benefits of the SAWMPO programs, policies, or activities.

Environmental Justice joins social and environmental movements by addressing the unequal environmental burden often borne by minority and low-income populations. The right to a safe, healthy, productive, and sustainable environment for all, where "environment" is considered in its totality to include the ecological (biological), physical (natural and built), social, political, aesthetic, and economic environments.

Environmental Justice helps to ensure that programs, policies, and activities that have adverse effects on communities do not affect minority and low-income populations disproportionately. To prevent discrimination as described in Executive Order 12898, the Federal Highway Administration Order 6640.23 Order to Address Environmental Justice in Minority Populations and Low-Income Populations dated December 2, 1998 defines minority and low-income individuals and populations as follows:

- **Minority** – a person who is Black, Hispanic, American Indian and Alaskan Native, or Asian American:
  - Black – a person having origins in any of the black racial groups of Africa.
  - Hispanic – a person of Mexican, Puerto Rican, Cuban, Central or South American, or other Spanish culture or origin, regardless of race.
  - American Indian and Alaskan Native – a person having origins in any of the original people of North America and who maintains cultural identification through tribal affiliation or community recognition.
  - Asian American – a person having origins in any of the original peoples of the Far East, Southeast Asia, the Indian subcontinent, or the Pacific islands.

- **Minority Population** – any readily identifiable groups of minority persons who live in geographic proximity, and if circumstances warrant, geographically dispersed/transient persons (such as migrant workers or Native Americans) who will be similarly affected by a proposed program, policy or activity.

- **Low-Income** – a person whose household income is at or below the United States Department of Health and Human Services poverty guidelines.

- **Low-Income Population** – any readily identifiable group of low-income persons who live in geographic proximity, and, if circumstances warrant, geographically dispersed/transient persons (such as migrant workers or Native Americans) who would be similarly affected by a proposed program, policy or activity.

Environmental Justice is incorporated through all phases of the transportation planning and programming process. Environmental Justice is a main goal of the SAWMPO Public Participation Plan and a key consideration in the SAWMPO Long-Range Transportation Plan. Chapter 7 of the LRTP includes analysis on the potential for positive or negative impact that a given transportation investment program could have on underserved population groups.

The SAWMPO included an analysis of the benefits and burdens of Constrained Long Range Plan (CLRP) roadway and non-motorized projects on minority, low-income and limited English proficiency populations in the 2040 Long Range Transportation Plan. The benefits and burdens analysis concluded that neither undue
burdens would be imposed on, nor a lack of benefits would be afforded to these populations as the result of these planned investments. The analysis is included by reference in this document, and can be accessed via the SAWMPO website at: http://sawmpo.org/long-range-transportation-plan-lrtp-o in Chapter 7.

The FTA also requires an analysis of how current transit service serves minority and low income populations. Figures 3—9 depict current BRITE Transit service in the SAWMPO area with U.S. Census data by block group to indicate how transit routes directly serve these two populations.
2019
SAWMPO Title VI Plan

Figure 3 Transit Service to Minority Populations

Percentage of Minority by Block Group

Regional Average = 11.8%

- 0 - 11.8%
- 11.8 - 20.0%
- 20.0 - 30.0%
- 30.0 - 40.0%
- 40.0 - 50.0%
- 50.0 - 64.9%

BRITE Routes
SAWMPO Boundary
City Boundaries
Augusta County

The race/ethnic minority percentage of the population was calculated by subtracting the White Alone (non-Hispanic/ Latino) from the total population per block group and then dividing that number with the total population. The average for the combined area of Augusta County, City of Staunton and the City of Waynesboro is 11.8%. Data is from the U.S. Census Bureau, 2010-2014 American Community Survey 5-Year.
Figure 4 Transit Service to Minority Populations--Staunton detail

The racial/ethnic minority percentage of the population was calculated by subtracting the White Alone (non-Hispanic/Latino) from the total population per block group and then dividing that number with the total population. The average for the combined area of Augusta County, City of Staunton and the City of Waynesboro is 11.8%. Data is from the U.S. Census Bureau, 2010-2014 American Community Survey 5-Year Estimates.
Figure 5 Transit Service to Minority Populations—Waynesboro Detail

The racial/ethnic minority percentage of the population was calculated by subtracting the White Alone (non-Hispanic/Latino) from the total population per block group and then dividing that number with the total population. The average for the combined area of Augusta County, City of Staunton and the City of Waynesboro is 11.8%. Data is from the U.S. Census Bureau, 2010-2014 American Community Survey 5-Year Estimates.
Figure 6 Transit Service to Low-Income Populations

The percentage of the population below the poverty level was calculated by dividing the number of individuals living under the poverty level by the total population per block group. The average for the combined area of Augusta County, City of Staunton, and City of Waynesboro is 13.6%. Data is from the U.S. Census Bureau, 2010-2014 American Community Survey 5-Year Estimates.
Figure 7 Transit Service to Low-Income Populations--Staunton Detail

The percentage of the population below the poverty level was calculated by dividing the number of individuals living under the poverty level by the total population per block group. The average for the combined area of Augusta County, City of Staunton, and City of Waynesboro is 13.6%. Data is from the U.S. Census Bureau, 2010-2014 American Community Survey 5-Year Estimates.
Figure 8 Transit Service to Low-Income Populations—Waynesboro Detail

The percentage of the population below the poverty level was calculated by dividing the number of individuals living under the poverty level by the total population per block group. The average for the combined area of Augusta County, City of Staunton, and City of Waynesboro is 13.6%. Data is from the U.S. Census Bureau, 2010-2014 American Community Survey 5-Year Estimates.
Limited English Proficiency

On August 11, 2000, President William J. Clinton signed Executive Order 13166: Improving Access to Services for Persons with Limited English Proficiency. The Executive Order requires federal agencies to examine the services they provide, identify any need for services to those with limited English proficiency (LEP), and develop and implement a system to provide those services so LEP persons can have meaningful access to them. The Executive Order also requires that federal agencies work to ensure that recipients of federal financial assistance provide meaningful access to their LEP applicants and beneficiaries.

Individuals who do not speak English as their primary language and who have a limited ability to read, speak, write or understand English can be limited English proficient, or “LEP.” For an LEP individual, language can present a barrier to accessing benefits and services, understanding and exercising important rights, complying with applicable responsibilities, or understanding other information provided by federally funded programs and activities. These individuals may be entitled to language assistance at no cost to them with respect to a particular type of service, benefit, or encounter.

The United States Department of Transportation (USDOT) guidelines require that recipients of federal financial assistance provide “meaningful access to programs and activities” by giving LEP persons adequate and understandable information and allowing them to participate in programs and activities, where appropriate. Recipients of federal funds must take reasonable steps to remove barriers for LEP individuals. While designed to be a flexible and fact-dependent standard, the starting point is an individualized assessment that balances the following four factors:

1. Demography: number and/or proportion of LEP persons served and languages spoken in service area.
2. Frequency: rate of contact with service or program.
3. Importance: nature and importance of program/service to people’s lives.
4. Resources: available resources, including language assistance services.

The four-factor analysis should be used to determine which language assistance services are appropriate to address the identified needs of the LEP population. Public outreach strategies and language assistance pertaining to LEP individuals are included in the SAWMPO Public Participation Plan.

Assessment of Needs and Resources

The need and resources for the LEP language assistance were determined through a four-factor analysis as recommended by FTA guidance.

Factor 1: Assessment of the Number and Proportion of LEP Persons Likely to be Served or Encountered in Eligible Service Population

The agency has reviewed Census data on the number of individuals in its service area that have LEP, as well as the languages they speak.
**U.S. Census Data – American Community Survey 5 Year Data 2010-2014**

Data from the U.S. Census Bureau’s American Community Survey (ACS) were obtained through www.census.gov for the Augusta County and the cities of Staunton and Waynesboro. Information from the 2010-2014 ACS also provides more detail on the specific languages that are spoken by those who report that they speak English less than very well. Languages spoken at home by those with LEP are presented below. These data indicate the extent to which translations into other language are needed to meet the needs of LEP persons.

This data will be used to determine how best to disseminate information that is accessible to persons with LEP. According to the U.S. Census 2010-2014 ACS, there were 108,621 people, or 96.3% of the total population, who spoke English only. Tables 1, 2 and 3 show these figures in detail, broken down by locality. Table 2 shows that 1,393 people, or 1.24% of the total population, do not speak English “very well.” Based on this relatively low percentage, the need to address the LEP population is somewhat limited.

<table>
<thead>
<tr>
<th>Table 1 LEP Population Summary</th>
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<tr>
<td></td>
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<tr>
<td><strong>Total Pop 5yrs+</strong></td>
</tr>
<tr>
<td>City of Staunton 22,769</td>
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<tr>
<td>City of Waynesboro 19,701</td>
</tr>
<tr>
<td>Augusta County* 70,288</td>
</tr>
<tr>
<td><strong>Total</strong> 112,758</td>
</tr>
<tr>
<td><strong>Speak Only English at Home</strong></td>
</tr>
<tr>
<td>21,887 21,887 96.1% 882 3.9%</td>
</tr>
<tr>
<td>18,417 18,417 93.5% 1,284 6.5%</td>
</tr>
<tr>
<td>68,317 68,317 97.2% 1,971 2.8%</td>
</tr>
<tr>
<td><strong>% Only English at Home</strong></td>
</tr>
<tr>
<td>96.1% 96.1% 96.1% 96.1%</td>
</tr>
<tr>
<td>93.5% 93.5% 93.5% 93.5%</td>
</tr>
<tr>
<td>97.2% 97.2% 97.2% 97.2%</td>
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<tr>
<td><strong>Limited English Proficiency</strong></td>
</tr>
<tr>
<td>882 3.9% 882 3.9%</td>
</tr>
<tr>
<td>1,284 6.5% 1,284 6.5%</td>
</tr>
<tr>
<td>1,971 2.8% 1,971 2.8%</td>
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<tr>
<td><strong>% Limited English Proficiency</strong></td>
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<tr>
<td>3.9% 3.9% 3.9% 3.9%</td>
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<td>6.5% 6.5% 6.5% 6.5%</td>
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<tr>
<td>2.8% 2.8% 2.8% 2.8%</td>
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*Includes total population for Augusta County

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<thead>
<tr>
<th>Table 2 LEP English Speaking Ability</th>
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<tbody>
<tr>
<td>Spoke a Language other than English at Home</td>
</tr>
<tr>
<td>Total LEP</td>
</tr>
<tr>
<td>LEP Ability to Speak English</td>
</tr>
<tr>
<td>Very Well</td>
</tr>
<tr>
<td>Less Than Very Well</td>
</tr>
<tr>
<td></td>
</tr>
<tr>
<td>City of Staunton 882 640 242</td>
</tr>
</tbody>
</table>
The Spanish speaking classification makes up approximately 58% of the population that speaks a language other than English at home, making it by far, the largest LEP group in the region. Therefore, the SAWMPO’s focus will be on targeting this community. Language assistance will be made available to other limited English speaking individuals in the community as the need arises.

Figures 9, 10 and 11 display the LEP populations by US Census block groups for Staunton, Augusta County and Waynesboro. Of these, two census block groups in Waynesboro, and one block group in Staunton contain a LEP population concentration greater than 6%. Four other census block groups, one in Staunton, two in Waynesboro, and one in Weyers Cave have concentrations greater than 4%. These areas will be a focus of LEP language assistance programs as necessary.
Figure 9 SAW LEP Population and Transit Service

The Limited English Proficiency percentage was calculated by summing the populations of persons age 5 and older who do not speak English exclusively, but speak it well, not well, and not at all. That sum is then divided by the total population. The average for the combined area of Augusta County, City of Staunton and the City of Waynesboro is 1.2%. Data is from the U.S. Census Bureau, 2010-2014 American Community Survey 5-Year Estimates.
Figure 10 SAW LEP Population and Transit Service--Staunton Detail
The Limited English Proficiency (LEP) percentage was calculated by summing the populations of persons age 5 and older who do not speak English exclusively, but speak it well, not well, and not at all. That sum is then divided by the total population. The average for the combined area of Augusta County, City of Staunton and the City of Waynesboro is 1.2%. Data is from the U.S. Census Bureau, 2010-2014 American Community Survey 5-Year Estimates.
Factor 2: Assessment of the Frequency with which LEP Individuals Come into Contact with the Transit Services or System

The SAWMPO reviewed the relevant benefits, services, and information provided by the agency and determined the extent to which LEP persons have come into contact with these functions through the following channels:

- Calls to the SAWMPO’s offices;
- Visits to the SAWMPO’s office;
- Access to the SAWMPO’s website;
- Attendance at community meetings or public hearings hosted by the SAWMPO;
- Public involvement and public engagement meetings/hearings for projects affecting LEP communities or individuals; and
- Internet access: SAWMPO Website must be accessible to LEP persons.

The SAWMPO, at the time of this document, has not been contacted by any LEP individuals regarding projects or programs the SAWMPO administers. However, this is a newly formed body and it will continue to work to identify underserved populations.

The SAWMPO will continue to identify emerging populations as updated Census and American Community Survey data become available for our service area. In addition, when LEP persons contact our agency, we attempt to identify their language and keep records on contacts to accurately assess the frequency of contact. To assist in language identification, we use a language identification flashcard based on that which was developed by the U.S. Census. ([http://www.lep.gov/ISpeakCards2004.pdf](http://www.lep.gov/ISpeakCards2004.pdf))

Factor 3: Assessment of the Nature and Importance of the Transit Services to the LEP Population

The SAWMPO main function is to provide cooperative, comprehensive, and continuing transportation planning for the Staunton-Augusta-Waynesboro MPA. To this end, the SAWMPO develops the regional Transportation Improvement Program (TIP), the Long Range Transportation Plan, assists the member jurisdictions with development of their transportation planning documents, assist the local public transportation provider with planning needs, promote multi-modal transportation options for the region, and provides other services as needed. Figures 9—11 also depict how current BRITE transit service serves LEP populations in the SAWMPO area. These maps illustrate that current transit service in the two cities and across the MPO area provides adequate service to current LEP populations. The SAWMPO will continue to monitor which areas of the MPO host the largest concentrations of LEP persons to ensure that they continue to be served by transit.

Based on past experience serving and communicating with LEP persons and discussions with community agencies, we understand that our support of public transportation programs in the Staunton-Augusta-Waynesboro MPA is critical. These include the BRITE transit system, as well as the local Coordinated Human Services Mobility providers such as the Staunton Community Services Board, the Valley Program for Aging Services, and others. Additionally, the SAWMPO public involvement program including public information and planning meetings is extremely important to LEP persons. LEP persons, low-income populations, minority populations, the elderly, and the disabled must be considered in these processes. The SAWMPO will continue assessing this area by communicating with community organizations that serve LEP persons, as well as contact with LEP persons themselves.
Factor 4: Assessment of the Resources Available to the Agency and Costs

Costs

The only language assistance measure currently being provided by the SAWMPO includes the Spanish-language announcements of public involvement activities. Costs for these services are minimal $500 - $1,000 depending on the number of public involvement activities that occur in any given year. We do not expect these costs to increase in the future.

Based on the analysis of demographic data and contact with community organizations and LEP persons, the SAWMPO has determined that there is no need to expand our services at this time. However, when projects are based in areas identified as high LEP populations additional outreach or accommodations may be necessary. These may include translation of project information into additional languages and/or additional oral language services (interpreters) provided at public meetings. These could increase the project budget by up to $2,000 when necessary.

Resources

The SAWMPO provides flexibility in the Unified Planning and Work Program and could devote additional funds to language assistance expenses in certain cases that would provide meaningful benefit to LEP populations. As discussed this would be determined on an as needed basis related to projects that may impact those identified LEP populations.

In addition, assistance may be available through community organizations, city or county departments, or other agencies who may be able to partner for language assistance services. In the past the language department at James Madison University has provided translation services on an as needed basis to the Central Shenandoah Planning District (CSPDC) at a reasonable cost. The SAWMPO also has access to free language assistance products available through the web such as Google Translate™ that may be used to translate written phrases, documents, and websites for free.

LEP Implementation Plan

Considering the SAWMPO’s size and scope, LEP individuals in the Staunton-Augusta-Waynesboro MPA, and financial resources, it is necessary to provide at least the most basic and cost-effective services available to ensure compliance with Executive Order 13166. Many options were discussed and considered by SAWMPO staff, and the following recommendations were adopted as measures to provide meaningful access to LEP persons:

- Provide, if requested within seven calendar days, interpreter services at any meeting or public hearing. This will include foreign language and hearing impaired interpreter services.
- Include with 14 calendar days in advance, statements in notices and publications that interpreter services are available for meetings.
- Place notices of SAWMPO’s non-discrimination polices and information on the local and federal complaint process on the website in English and other languages via Google Translate and make the notices available at public meetings.
• Translate vital documents in languages other than English when there is potential for impact to LEP communities.
• Provide training to SAWMPO staff on the requirements for providing meaningful access to services for LEP persons.
• Include an LEP policy in the SAWMPO Public Participation Plan that details, 1) statements and notices that interpreters will be provided upon prior request for language assistance as well as for sign language, and 2) maintenance of a contact list for interpretation and translation providers.
• Utilize the VDOT’s LEP Guidelines and Public Participation Plan in conjunction with the DRPT’s LEP Plan to identify low-income populations, minority populations, the elderly, and the disabled; who may be part of the LEP population.

Public Outreach and Involvement

As described in the SAWMPO’s Public Participation Plan, since transportation has a direct and personal impact on the population of a region and is of critical importance to economic vitality and quality of life, the SAWMPO continually endeavors to provide citizens, affected public agencies, and other interested parties with reasonable opportunities to be involved in the transportation planning process.

Note: The Communications and Public Participation area applies to and affects the SAWMPO work program as a whole, particularly SAWMPO efforts and responsibilities related to the Planning and Programming and Environmental Justice areas. The SAWMPO Public Participation Plan includes specific information regarding outreach and communication strategies, with emphasis on outreach to minority, low-income, and LEP populations.

Demographic Profile

Data from the US Census was used to develop a demographic profile of the Staunton-Augusta-Waynesboro MPA and identify the locations and needs of socioeconomic groups, including low-income, LEP, and minority populations.

The SAWMPO believes that public input into its process is valuable and makes its products better. Transportation planning cannot, and should not, be based simply upon technical analysis. The qualitative information derived from citizen involvement is essential to good decision-making.

As a matter of SAWMPO policy and a requirement of federal law, the transportation planning process must make special efforts to consider the concerns of traditionally underserved communities, including low-income and minority communities and people with disabilities. These communities (as well as transit service) are mapped for the Staunton-Augusta-Waynesboro MPA in Figures 3-11.

To reach the largest number of minority and low-income communities throughout the Staunton-Augusta-Waynesboro MPA, a geographically focused public participation program will achieve the outcomes described in this plan. In addition to traditional methods of communication, SAWMPO will utilize strategies recommended
by community members for a specific neighborhood or population group. By partnering with community groups, SAWMPO can cost-effectively extend its reach and help partner organizations provide information that is of interest to groups they represent.

SAWMPO will establish and maintain active work relationships with all relevant local media, including minority-based media in order to communicate pertinent information to the public. SAWMPO will coordinate with individual institutions and organizations while implementing community-based public involvement strategies to reach out to members in affected minority and/or low income communities. SAWMPO shall also provide opportunities for public participation through alternative means other than public meetings or written communication; i.e., personal interviews or use of audio or video recording to capture comments as needed for particular projects.

**SAWMPO Responsibilities**

SAWMPO staff is responsible for evaluating and monitoring compliance with applicable nondiscrimination authorities in all aspects of the SAWMPO public participation process. SAWMPO staff members will:

- Ensure that all communications and public participation efforts comply with nondiscrimination authorities.
- Develop and distribute information on nondiscrimination and SAWMPO programs to the general public.
- Provide services for individuals with special needs – Upon advance notice, deaf interpreters, translators, and Braille documents can be provided for public meetings. Notifications of opportunities for public participation will include contact information for people needing these or other special accommodations.
- Include contact confirmation for people needing these or other special accommodations.
- Include the following statement in all of the SAWMPO public notices:
  - “The SAWMPO ensures nondiscrimination and equal employment in all programs and activities in accordance with Title VI and Title VII of the Civil Rights Act of 1964. If you have questions or concerns about your civil rights in regards to this project or special assistance for persons with disabilities or limited English proficiency, please contact the SAWMPO. Sign language or non-English language interpreters will be provided if needed and requested in advance of this meeting. Please contact the SAWMPO at 540-885-5174 to request an interpreter no later than <enter date at least seven calendar days prior to meeting>.”

- Include the above Title VI Statement in press releases and on the SAWMPO website.

**SAWMPO Title VI Program**

**Procedures for Ensuring Equity in Service Provision**

The SAWMPO is responsible for developing long- and short-range transportation plans and programs to provide efficient transportation services for the Staunton-Augusta-Waynesboro MPA. A comprehensive transportation process is used which entails the monitoring and collection of various data pertaining to transportation issues. The SAWMPO coordinates with VDOT, DRPT, cities, counties, and area transit agencies; seeks public participation; and provides technical support when needed.
SAWMPO Responsibilities

SAWMPO staff is responsible for evaluating and monitoring compliance with applicable nondiscrimination authorities in all aspects of the SAWMPO planning and programming processes. SAWMPO staff will:

- Ensure that all aspects of the planning and programming process operation comply with nondiscrimination authorities.
- Prepare and update a demographic profile of the region using the most current and appropriate statistical information available on race, income, and other pertinent data.
- Make the document available to the public and member agencies on the SAWMPO website or in hard copy format, if requested.
- Continue to ensure that staff makes concerted efforts to involve members of all social, economic, and ethnic groups in the planning process.

Consultant Contracts

The SAWMPO is responsible for selection, negotiation, and administration of its consultant contracts. The SAWMPO operates under its internal contract procedures and all relevant federal and state laws.

SAWMPO Responsibilities

SAWMPO staff is responsible for evaluating and monitoring consultant contracts for compliance with nondiscrimination authorities. SAWMPO staff will:

- Ensure inclusion of nondiscrimination language in contracts and Requests for Proposals.
- Review consultants for compliance as described below:
  - Ensure that all consultants verify their compliance with nondiscrimination authorities, procedures, and requirements.
  - If a recipient or sub-recipients is found to be not in compliance with nondiscrimination authorities, the Title VI Manager and relevant staff will work with the recipient or sub-recipient to resolve the deficiency status and write a remedial action if necessary.
- Review outreach activities to ensure small, disadvantaged, minority, women, and disabled veteran businesses are not excluded to participate in opportunities to compete for consulting contracts.

Education and Training

In an effort to continuously improve the SAWMPO's overall compliance posture, nondiscrimination training will be coordinated with FHWA, VDOT, DRPT, and the local transit provider, and made available to SAWMPO staff on an ongoing basis to ensure up-to-date knowledge of Title VI and other nondiscrimination statues.

SAWMPO Responsibilities

Under the category of education and training, nondiscrimination responsibilities include:

- Distribution of information to SAWMPO staff on training programs regarding Title VI and related statutes.
SAWMPO Title VI Plan

- Tracing staff participation in nondiscrimination training.
- Maintain and update nondiscrimination training as necessary.
- Maintain and update the SAWMPO Title VI Plan as necessary.

Appendix A: SAWMPO Title VI Non-Discrimination Statement

Title VI Non-Discrimination Statement

The Staunton-Augusta-Waynesboro Metropolitan Planning Organization (SAWMPO) gives public notice of its policy to assure full compliance with Title VI of the Civil Rights Act of 1964, the Civil Rights Restoration Act of 1987 (PL 100.259), and all related statutes. The SAWMPO is committed to ensuring that no person in the United States of America shall, on the grounds of race, color, or national origin, be excluded from the participation in, be denied the benefits of, or be otherwise subjected to discrimination under any program or activity for which the SAWMPO receives Federal financial assistance as required by Title VI.

Please contact the SAWMPO to request a copy of the department’s Title VI Plan.

Any person who believes that he or she has, individually, or as a member of any specific class of persons, been excluded from the participation in, been denied the benefits of, or been otherwise subjected to discrimination under any program or activity for which the SAWMPO provides assistance, and believes the discrimination is based upon race, color, national origin, gender, age, economic status, or limited English proficiency has the right to file a formal complaint.

The SAWMPO Title VI Manager is responsible for initiating and monitoring Title VI activities, preparing required reports, and other responsibilities as required by Title 23 Code of Federal Regulations (CFR) Part 200, and Title 49 CFR Part 21.

If a complaint addresses a particular service provider, the complaint should be lodged with that provider. A complaint must be submitted within 180 days of the alleged discriminatory act. Complaints may also be filed with the US Federal Transit Administration. If a complaint addresses DRPT, you may file the complaint thru email via the link below, by phone, or in writing.

For complainants who may be unable to file a written complaint, verbal information will be accepted by the SAWMPO at 540-885-5174, email bonnie@cspdc.org, as well as by the individual service providers.

To submit a formal complaint or to request additional information on Title VI obligations, contact Bonnie S. Riedesel, Title VI Manager, SAWMPO, 112 MacTanly Place, Staunton, Virginia, 24401; phone 540-885-5174; email bonnie@cspdc.org.
Appendix B: Notice Under the Americans with Disabilities Act

NOTICE UNDER THE AMERICANS WITH DISABILITIES ACT

In accordance with the requirements of Title II of the Americans with Disabilities Act of 1990 (ADA), the Staunton-Augusta-Waynesboro Metropolitan Planning Organization (SAWMPO) will not discriminate against qualified individuals with disabilities on the basis of disability in its services, programs or activities.

**Employment:** The Staunton-Augusta-Waynesboro Metropolitan Planning Organization (SAWMPO) does not discriminate on the basis of disability in its hiring or employment practices and complies with all regulations promulgated by the U.S. Equal Employment Opportunity Commission under Title I of the ADA.

**Effective Communication:** The Staunton-Augusta-Waynesboro Metropolitan Planning Organization (SAWMPO) will generally, upon request, provide appropriate aids and services leading to effective communication for qualified persons with disabilities so they can participate equally in SAWMPO’s programs, services and activities, including qualified sign language interpreters, documents in Braille, and other ways of making information and communications accessible to people who have speech, hearing or vision impairments.

**Modifications to Policies and Procedures:** The Staunton-Augusta-Waynesboro Metropolitan Planning Organization (SAWMPO) will make all reasonable modifications to policies and programs to ensure that people with disabilities have an equal opportunity to enjoy all of its programs, services and activities.

Anyone who requires an auxiliary aid or service for effective communication, or a modification of policies or procedures to participate in a Staunton-Augusta-Waynesboro Metropolitan Planning Organization (SAWMPO) program, service or activity, should contact Bonnie S. Riedesel, Title VI Manager, 112 MacTanly Place, Staunton, Virginia, 24401; phone 540-885-5174; email bonnie@cspdc.org as soon as possible but no later than 48 hours before the scheduled event.

The ADA does not require the Staunton-Augusta-Waynesboro Metropolitan Planning Organization (SAWMPO) to take any action that would fundamentally alter the nature of its programs or services, or impose any undue financial or administrative burden.

Complaints that a Staunton-Augusta-Waynesboro Metropolitan Planning Organization (SAWMPO) program, service or activity is not accessible to persons with disabilities should be directed to Bonnie S. Riedesel, Title VI Manager, 112 MacTanly Place, Staunton, Virginia, 24401; phone 540-885-5174; email bonnie@cspdc.org.
The Staunton-Augusta-Waynesboro Metropolitan Planning Organization (SAWMPO) will not place a surcharge on a particular individual with a disability or any group of individuals with disabilities to cover the cost of providing auxiliary aids/services or reasonable modifications of policy.
Appendix C: Discrimination Complaint Procedures

DISCRIMINATION COMPLAINT PROCEDURES – HANDLING, TRACKING, RESOLVING, AND REPORTING INVESTIGATIONS/COMPLAINTS

Any individual may exercise his or her right to file a complaint with the Staunton-Augusta-Waynesboro Metropolitan Planning Organization (SAWMPO) if that person believes that s/he or any other program beneficiaries have been subjected to unequal treatment or discrimination in the receipt of benefits/services or prohibited by non-discrimination requirements. The SAWMPO will make a concerted effort to resolve complaints locally, using the agency's Nondiscrimination Complaint Procedures, as described below. All Title VI complaints and their resolution will be logged as described under “Data collection” and reported immediately. Should any Title VI investigations be initiated by FTA, or any Title VI lawsuits be filed against the SAWMPO, the agency will follow these procedures:

These procedures apply to all complaints filed under Title VI of the Civil Rights Act of 1964 as amended, and the Civil Rights Restoration Act of 1987, relating to any program or activity administered by the SAWMPO, as well as to subrecipients, consultants, and/or contractors. Intimidation or retaliation of any kind is prohibited by law. These procedures do not deny the right of the complainant to file formal complaints with other state or federal agencies, or to seek private counsel for complaints alleging discrimination. These procedures are part of an administrative process that does not provide for remedies that include punitive damages or compensatory remuneration for the complainant. Every effort will be made to obtain early resolution of complaints at the lowest level possible. The option of informal mediation meeting(s) between the affected parties and the Title VI Manager may be utilized for resolution. The Title VI Manager will make every effort to pursue a resolution to the complaint. Initial interviews with the complainant and the respondent will request information regarding specifically requested relief and settlement opportunities.

Procedures

1. Any individual, group of individuals, or entity that believes they have been subjected to discrimination prohibited by Title VI nondiscrimination provisions may file a written complaint with the SAWMPO’s Title VI Program Manager. A formal complaint must be filed within 180 calendar days of the alleged occurrence or when the alleged discrimination became known to the complainant. The complaint must meet the following requirements:
   a. Complaint shall be in writing and signed by the complainant(s).
   b. Include the date of the alleged act of discrimination (date when the complainant(s) became aware of the alleged discrimination; or the date on which that conduct was discontinued or the latest instance of the conduct).
   c. Present a detailed description of the issues, including names and job titles of those individuals perceived as parties in the complained-of incident.
   d. Allegations received by fax or e-mail will be acknowledged and processed, once the identity(ies) of the complainant(s) and the intent to proceed with the complaint have been
established. The complainant is required to mail a signed, original copy of the fax or e-mail transmittal for the SAWMPO to process it.

e. Allegations received by telephone will be reduced to writing and provided to complainant for confirmation or revision before processing.

f. A complaint form will be forwarded to the complainant for him/her to complete, sign, and return to the SAWMPO for processing.

2. Upon receipt of the complaint, the Title VI Manager will determine its jurisdiction, acceptability, and need for additional information, as well as investigate the merit of the complaint. In cases where the complaint is against one of SAWMPO’s subrecipients of federal funds, the SAWMPO will assume jurisdiction and will investigate and adjudicate the case. Complaints against the SAWMPO will be referred to FTA or the appropriate Federal Agency for proper disposition pursuant to their procedures.

3. In order to be accepted, a complaint must meet the following criteria:

   a. The complaint must be filed within 180 calendar days of the alleged occurrence or when the alleged discrimination became known to the complainant.
   b. The allegation(s) must involve a covered basis such as race, color, or national origin.
   c. The allegation(s) must involve a program or activity of a federal-aid recipient, subrecipient, or contractor.

4. A complaint may be dismissed for the following reasons:

   a. The complainant requests the withdrawal of the complaint.
   b. The complainant fails to respond to repeated requests for addition information needed to process the complaint.
   c. The complainant cannot be located after reasonable attempts.

5. Once the SAWMPO decides to accept the complaint for investigation, the complainant and the respondent will be notified in writing of such determination within seven calendar days. The complaint will receive a case number and will then be logged into the SAWMPO’s records identifying its basis and alleged harm.

6. In cases where the SAWMPO assumes the investigation of the complaint, the SAWMPO will provide the respondent with the opportunity to respond to the allegations in writing. The respondent will have ten (10) calendar days from the date of the SAWMPO written notification of acceptance of the complaint to furnish his/her response to the allegations.

7. SAWMPO’s final investigative report and a copy of the complaint will be forwarded to FTA (or appropriate Federal Agency) and affected parties within 60 calendar days of the acceptance of the complaint.

8. The SAWMPO will notify the parties of its final decision.

9. If complainant is not satisfied with the results of the investigation of the alleged discrimination and practices the complainant will be advised of their right file a complaint with FTA.
10. Since the submission of the SAWMPO Title VI Plan to FTA in June, 2013, there have been no Title VI investigations complaints, or lawsuits received by the SAWMPO.

(Note: Item #10 was added based on comments received from the Virginia Department of Rail and Public Transportation (DRPT) on December 28, 2015; DRPT confirmed this comment was an administrative clarification and not an amendment to the plan.)
Title VI Discrimination Complaint Form

Staunton-Augusta-Waynesboro Metropolitan Planning Organization (SAWMPO)

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<td><strong>Name:</strong></td>
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<td><strong>Address:</strong></td>
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<tr>
<td><strong>Telephone (Home):</strong></td>
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<td><strong>Electronic Mail Address:</strong></td>
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<td><strong>Accessible Requirements?</strong></td>
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<th>Section II:</th>
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<tr>
<td>Are you filing this complaint on your own behalf?</td>
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<tr>
<td>*If you answered &quot;yes&quot; to this question, go to Section III.</td>
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<tr>
<td>If not, please supply the name and relationship of the person for whom you are complaining:</td>
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<td>Please explain why you have filed for a third party:</td>
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<td>Please confirm that you have obtained the permission of the aggrieved party if you are filing on behalf of a third party.</td>
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<th>Section III:</th>
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<td>I believe the discrimination I experienced was based on (check all that apply):</td>
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<td>[ ] Race</td>
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<td>Date of Alleged Discrimination (Month, Day, Year):</td>
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<tr>
<td>Explain as clearly as possible what happened and why you believe you were discriminated against. Describe all persons who were involved. Include the name and contact information of the person(s) who discriminated against you (if known) as well as names and contact information of any witnesses. If more</td>
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space is needed, please use the back of this form.

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<th>Section IV</th>
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<td>Have you previously filed a Title VI complaint with this agency?</td>
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<th>Section V</th>
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<td>Have you filed this complaint with any other Federal, State, or local agency, or with any Federal or State court?</td>
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<td>[ ] Yes</td>
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If yes, check all that apply:

- [ ] Federal Agency: __________________________
- [ ] Federal Court: ____________________________
- [ ] State Agency: ____________________________
- [ ] State Court: _____________________________
- [ ] Local Agency: ____________________________

Please provide information about a contact person at the agency/court where the complaint was filed.

Name:
Title:
Agency:
Address:
Telephone:

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<th>Section VI</th>
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<td>Name of agency complaint is against:</td>
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<td>Contact person:</td>
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<tr>
<td>Title:</td>
</tr>
<tr>
<td>Telephone number:</td>
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You may attach any written materials or other information that you think is relevant to your complaint.

Signature and date required below:

Signature ___________________________ Date ___________________________
### Sección I:

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<td>Teléfono (Casa):</td>
<td>Teléfono (Trabajo):</td>
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<td>Dirección de Correo Electrónico:</td>
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<tr>
<td>Requisitos formato accesible?</td>
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### Sección II:

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<th>¿Está presentando esta queja en su propio nombre?</th>
<th>Sí*</th>
<th>No</th>
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<tr>
<td>* Si su respuesta es &quot;sí&quot; a esta pregunta, vaya a la Sección III.</td>
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Si no es así, sírvase proporcionar el nombre y la relación de la persona para quien se queja:

Por favor, explique por qué usted ha presentado para un tercero:

Por favor, confirma que ha obtenido el permiso de la parte perjudicada, si usted está presentando en nombre de un tercero.

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<th>Si</th>
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### Sección III:

Creo que la discriminación que experimenté fue basado en (marque todo lo que corresponda):

- [ ] Carrera
- [ ] Color
- [ ] Origen Nacional

Fecha de la Discriminación Presunta (mes, día, año): _____________
**Explique lo más claramente posible lo que pasó y por qué cree que fue discriminado. Describir todas las personas que estuvieron involucradas. Incluya el nombre y la información de contacto de la persona (s) que lo discriminó (si se conoce), así como los nombres y la información de los testigos en contacto. Si se necesita más espacio, por favor use la parte de atrás de este formulario.**

**Sección IV**

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<tr>
<th>¿Ha presentado previamente una queja del Título VI con esta agencia?</th>
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**Sección V**

¿Ha presentado esta queja con cualquier otro, estatal o agencia local Federal, o con cualquier corte federal o estatal?

[ ] Si [ ] No

En caso afirmativo, marque todo lo que corresponda:

[ ] Agencia Federal ______________________

[ ] Tribunal Federal ______________________ [ ] Agencia Estatal ______________________

[ ] Tribunal Estatal ______________________ [ ] Agencia Local ______________________

Sirvanse proporcionar información sobre una persona de contacto en la agencia / tribunal donde se presentó la denuncia.

**Nombre:**

**Título:**

**Agencia:**

**Dirección:**

**Teléfono:**

**Sección VI**

Nombre de la agencia de queja es en contra:

Persona de contacto:

Título:

Número de teléfono:

Puede adjuntar cualquier material escrito o cualquier otra información que usted piensa que es relevante para su queja.
Firma y fecha requerida a continuación

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<th>Firma</th>
<th>Fecha</th>
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</thead>
</table>

Por favor, envíe este formulario en persona en la dirección indicada más abajo, o envíe este formulario a:

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