

TITLE VI PLAN

2022

ASSOCIATION OF CENTRAL OKLAHOMA GOVERNMENTS

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200 Northeast 21st Street
Oklahoma City, OK 73105
(405) 521-3186
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United States Department of Transportation
Departmental Office of Civil Rights
1200 New Jersey Ave, S.E.
Washington, DC 20590
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The contents of this report reflect the views of the Association of Central Oklahoma Governments (ACOG), the Metropolitan Planning Organization for the Central Oklahoma Transportation Management Area (TMA). ACOG is responsible for the facts and the accuracy of the data presented herein. The contents do not necessarily reflect official views or policy of the U.S. Department of Transportation. This report does not constitute a standard, specification, or regulation.

Non-Discrimination Policy

It is the policy of the Association of Central Oklahoma Governments (ACOG), under Title VI of the Civil Rights Act of 1964; Title VII of the Civil Rights Act of 1964; Section 504 of the Rehabilitation Act of 1973; Age Discrimination Act of 1975; Section 324 of the Federal-aid Highway Act of 1973; Civil Rights Restoration Act of 1987; Americans with Disabilities Act of 1990; and other related authorities and regulations, that no person in the United States shall, on the basis of race, color, national origin, disability, sex, age, genetic information, religion, or familial status be excluded from participation in, be denied the benefits of, or be otherwise subjected to discrimination or retaliation under any federally or non-federally funded program or activity administered by ACOG or its subrecipients.

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INTRODUCTION

METROPOLITAN PLANNING ORGANIZATION

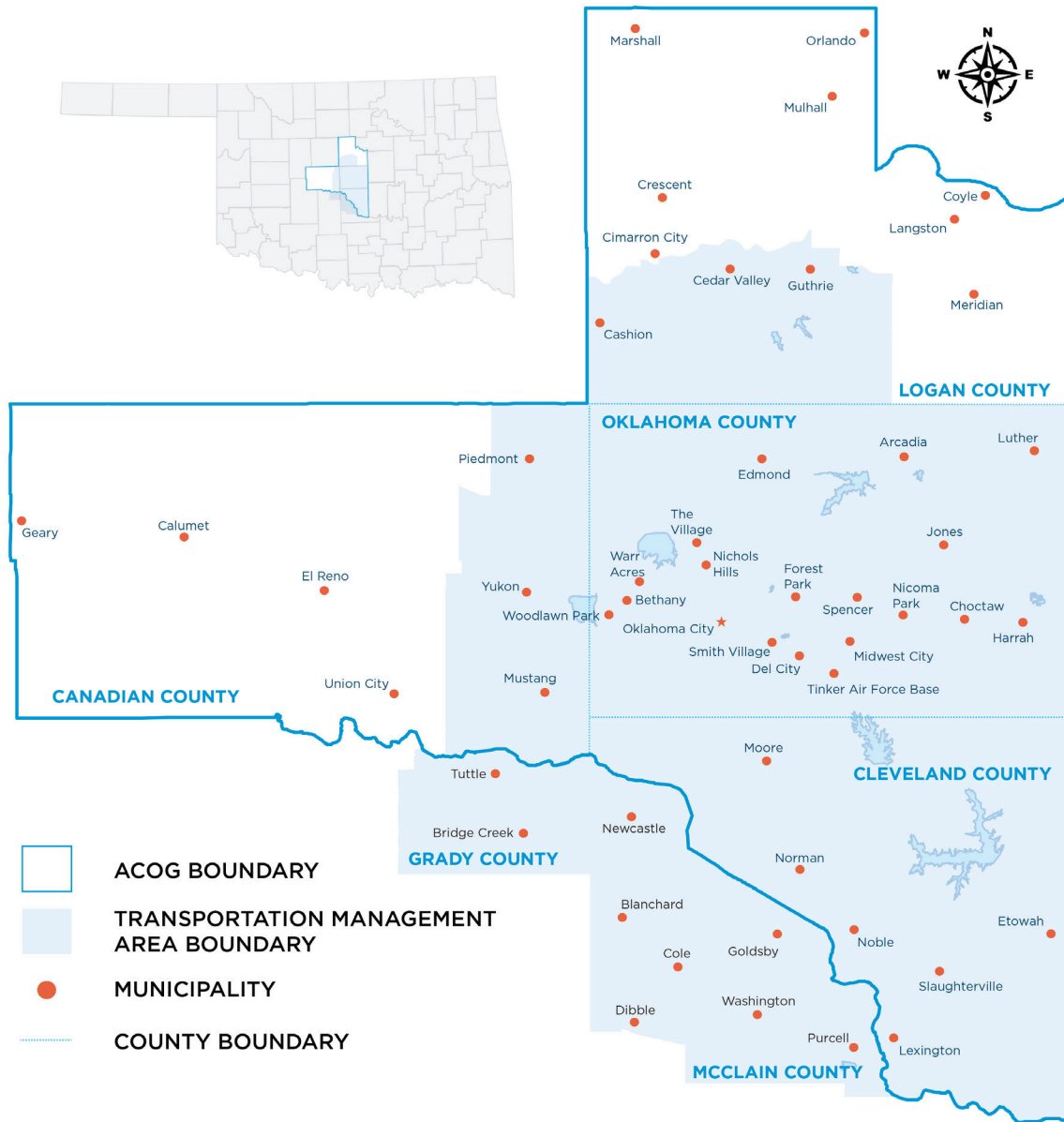
The Association of Central Oklahoma Governments (ACOG) serves as the Metropolitan Planning Organization (MPO) for the Central Oklahoma region. This is in compliance with the provisions of the Federal Highway and Federal Transit Acts of 1962, as amended by the Fixing America's Surface Transportation (FAST) Act, signed into law December 4, 2015. ACOG is a voluntary association of city, town, and county governments within the Central Oklahoma region. Established in 1966, ACOG's purpose is to aid local governments in planning for common needs, cooperating for mutual benefit, and coordinating for sound regional development. Key functions of the MPO include:

- Establish a setting for effective regional decision-making
- Identify and evaluate alternative transportation improvement options
- Prepare and maintain the Metropolitan Transportation Plan (MTP)
- Prepare and maintain the Transportation Improvement Program (TIP)
- Implement Performance-based Planning and Programming (PBPP) initiatives in the MTP and TIP
- Involve the public

ACOG is responsible for transportation planning throughout the Central Oklahoma Transportation Management Area (TMA), which encompasses all of Oklahoma County, Cleveland County, and portions of Logan County, McClain County, Grady County, and Canadian County. See Figure 1 for a map of the ACOG TMA.

ACOG supports and manages a variety of missions aimed at improving the lives of Central Oklahomans by serving as the MPO for the region. In this capacity, ACOG's primary role is to lead comprehensive, coordinated, and continuous transportation planning. As such, ACOG works with Federal Highway Administration (FHWA), Federal Transit Administration (FTA), Oklahoma Department of Transportation (ODOT), area transit providers, local governments, the public, and other stakeholders to prepare the MTP and TIP. The MPO planning process and planning products are prerequisites for Central Oklahoma to receive federal transportation funding. The subsequent sections highlight a few of the major activities ACOG is involved with.

Figure 1: ACOG Transportation Management Area (TMA)



METROPOLITAN TRANSPORTATION PLAN

The Metropolitan Transportation Plan (MTP) is developed every five years by ACOG and includes priorities for the next 30 years. The MTP is a fiscally constrained plan that outlines future investment in highway and transit improvements to support regional growth and ACOG goals. The plan includes recommendations for streets and highways, airport access, transit, freight movement, and bicycle and pedestrian ways. Encompass 2045, the current MTP for the ACOG TMA, was adopted by the MPO in November 2021. As of December 20, 2017, the ACOG TMA is an air quality attainment area, and therefore the MTP for Central Oklahoma is updated every five years. Encompass 2045 includes over \$10 billion in multimodal transportation investment projects, including preservation of the existing system.

TRANSPORTATION IMPROVEMENT PROGRAM

The [Transportation Improvement Program \(TIP\)](#) is a cooperatively developed four-year program outlining multimodal transportation improvements and services to be implemented within the TMA. The improvements and services implemented work towards achieving the goals of the MTP. Selected projects must receive ACOG committee approvals before they are forwarded onto ODOT and then to FHWA for approval. The TIP is also responsible for implementing and monitoring Performance-based Planning and Programming initiatives.

UNIFIED PLANNING WORK PROGRAM

The [Unified Planning Work Program \(UPWP\)](#) is a description of the proposed multimodal transportation planning activities to be conducted in the ACOG region during the fiscal year. The UPWP is prepared annually and serves as a basis for requesting federal planning funds from the U.S. Department of Transportation, as well as a management tool for scheduling, budgeting, and monitoring the planning activities of the participating entities. The UPWP presents the scope and direction of all transportation planning activities in the region and specifies which work program tasks will be accomplished during the fiscal year.

PUBLIC PARTICIPATION PLAN

The [Public Participation Plan \(PPP\)](#) is routinely updated by ACOG to document guidelines and standards when soliciting for public comments on local transportation plans and programs. The PPP includes descriptions of the public participation tools ACOG utilizes, the strategies and guidelines that are essential to public participation, and a series of performance measurements to be used to evaluate the effectiveness of the plan.

ENVIRONMENTAL JUSTICE PLAN

Environmental justice is defined as the fair treatment and meaningful involvement of all people regardless of race, color, ethnicity, national origin, or income with regards to the development, implementation, and enforcement of laws, regulations, and policies. FHWA requires ACOG to carry out environmental justice responsibilities as part of its non-discrimination program. The ACOG [Environmental Justice Plan](#) identifies the environmental justice populations in the TMA as the following:

- Racial minority populations, including Black or African American, Asian, American Indian or Alaskan Native, and Native Hawaiian or other Pacific Islander populations
- Hispanic/Latino ethnicity origins populations
- Limited English Proficiency (LEP) populations
- Elderly populations
- Young populations

- Populations with a disability
- Low-income populations
- Single female-headed households with children
- Zero-vehicle households

ACOG's Environmental Justice Plan is used to evaluate the MTP, TIP, UPWP, and other transportation planning activities in order to identify and address disproportionately high and adverse effects these programs may have these populations.

LIMITED ENGLISH PROFICIENCY PLAN

Limited English Proficient (LEP) individuals are those who do not speak English as their primary language and who have a limited ability to read, speak, write, or understand English. Failure to provide meaningful access to or providing differing treatment towards LEP individuals is a type of national origin discrimination, which is prohibited under Title VI of the Civil Rights Act. As part of ACOG's compliance with Title VI, ACOG must ensure that LEP individuals have meaningful access to its programs and activities.

ACOG's [LEP Plan](#) identifies LEP populations in the region and sets forth guidance and strategies for providing language assistance to LEP individuals to ensure meaningful access to the transportation planning process. ACOG's LEP Plan identifies the most prevalent LEP populations in the TMA as those who speak Spanish, Chinese, and Vietnamese. Staff at ACOG are provided a guide for assisting LEP individuals, an interpreter-translator database, language identification cards, and forms for reporting encounters with LEP individuals in person, on the phone, or in writing.

TITLE VI OVERVIEW

FEDERAL REQUIREMENTS

The focal point of non-discrimination law in the United States is Title VI of the Civil Rights Act of 1964, which prohibits discrimination on the basis of race, color, or national origin. However, the broader application of non-discrimination law may be found in other statutes, regulations, and executive orders. Discrimination based on sex (Federal-Aid Highway Act of 1973), disability (Section 504 of the Rehabilitation Act of 1973), and age (Age Discrimination Act of 1975) are prohibited as well. The Civil Rights Restoration Act of 1987 clarified the intent of Title VI to include all programs and activities whether they are federally funded or not. Executive Order 12898, "Federal Actions to Address Environmental Justice in Minority Populations and Low-income Populations" requires a federal agency to identify disproportionately high and adverse human health or environmental effects of its programs, policies, and activities on minority and low-income populations. Executive Order 13166 "Improving Access to Services for Persons with Limited English Proficiency" requires federal agencies to examine the services they provide, identify any need for services to those with Limited English Proficiency, and develop and implement a system to provide those services to LEP individuals.

TITLE VI COMPLIANCE

There are two types of discrimination prohibited under Title VI. The first is disparate or intentional discrimination in which a claimant alleges that similarly situated persons are treated differently because of their race, color, or national origin. The second type of discrimination is disparate impact or disparate effects. This second type of discrimination occurs when a policy, procedure, or practice results in different or inferior services or benefits to members of a protected group.

An agency's efforts to prevent such discrimination must address, but not be limited to, a program's impacts, access, benefits, participation, services, contracting and training opportunities, investigation of complaints,

allocation of funds, and prioritization of projects.

ACOG TITLE VI PROGRAM

ACOG is a recipient of federal transportation funds and as a regulatory condition of receiving these funds, ACOG is required to administer a program that establishes Title VI goals and objectives which pertain to highway and transportation programs. ACOG is required to protect the public interest by developing a plan for their benefit. In addition, the Title VI plan indicates what ACOG will do to prevent discrimination, how it will achieve non-discrimination, and the steps it will take to monitor Title VI. ACOG deals with Title VI issues through the monitoring of its compliance with the principles specifically set forth in the Title VI law. ACOG also acknowledges its responsibilities to work toward increased effectiveness regarding Title VI compliance. Title VI assurances are the foundation of ACOG's commitment to non-discrimination and can be found in Appendix II.

POLICY STATEMENTS

As a recipient of federal financial assistance, ACOG is required to comply with Title VI of the Civil Rights Act of 1964. The policy below is inserted into all significant publications that are distributed to the public, such as future versions and updates of the MTP. The text has also been placed permanently on the agency's website. The following is ACOG's Title VI policy statement:

It is the policy of the Association of Central Oklahoma Governments (ACOG), under Title VI of the Civil Rights Act of 1964 that no person in the United States shall, on the basis of race, color, or national origin be excluded from participation in, be denied the benefits of, or be otherwise subjected to discrimination or retaliation under any federally or non-federally funded program or activity administered by ACOG or its subrecipients.

In addition to the Title VI policy statement, ACOG maintains a more inclusive Non-discrimination policy statement:

It is the policy of the Association of Central Oklahoma Governments (ACOG), under Title VI of the Civil Rights Act of 1964; Title VII of the Civil Rights Act of 1964; Section 504 of the Rehabilitation Act of 1973; Age Discrimination Act of 1975; Section 324 of the Federal-aid Highway Act of 1973; Civil Rights Restoration Act of 1987; Americans with Disabilities Act of 1990; and other related authorities and regulations, that no person in the United States shall, on the basis of race, color, national origin, disability, sex, age, genetic information, religion, or familial status be excluded from participation in, be denied the benefits of, or be otherwise subjected to discrimination or retaliation under any federally or non-federally funded program or activity administered by ACOG or its subrecipients.

STAFF RESPONSIBILITIES

ACOG staff will do the following to ensure compliance with Title VI in all MPO activities. As appropriate, ACOG staff will also coordinate efforts with ODOT, FHWA, and the FTA.

Title VI Coordinator: The Title VI Coordinator is charged with the responsibility of implementing, monitoring, and ensuring ACOG's compliance with Title VI and related non-discrimination regulations. The Title VI Coordinator's responsibilities include:

- Implementing ACOG's Title VI Program to ensure that all components of the transportation planning process comply with Title VI.
- Identifying minority populations in the MPO's planning area and assessing the needs and distribution of

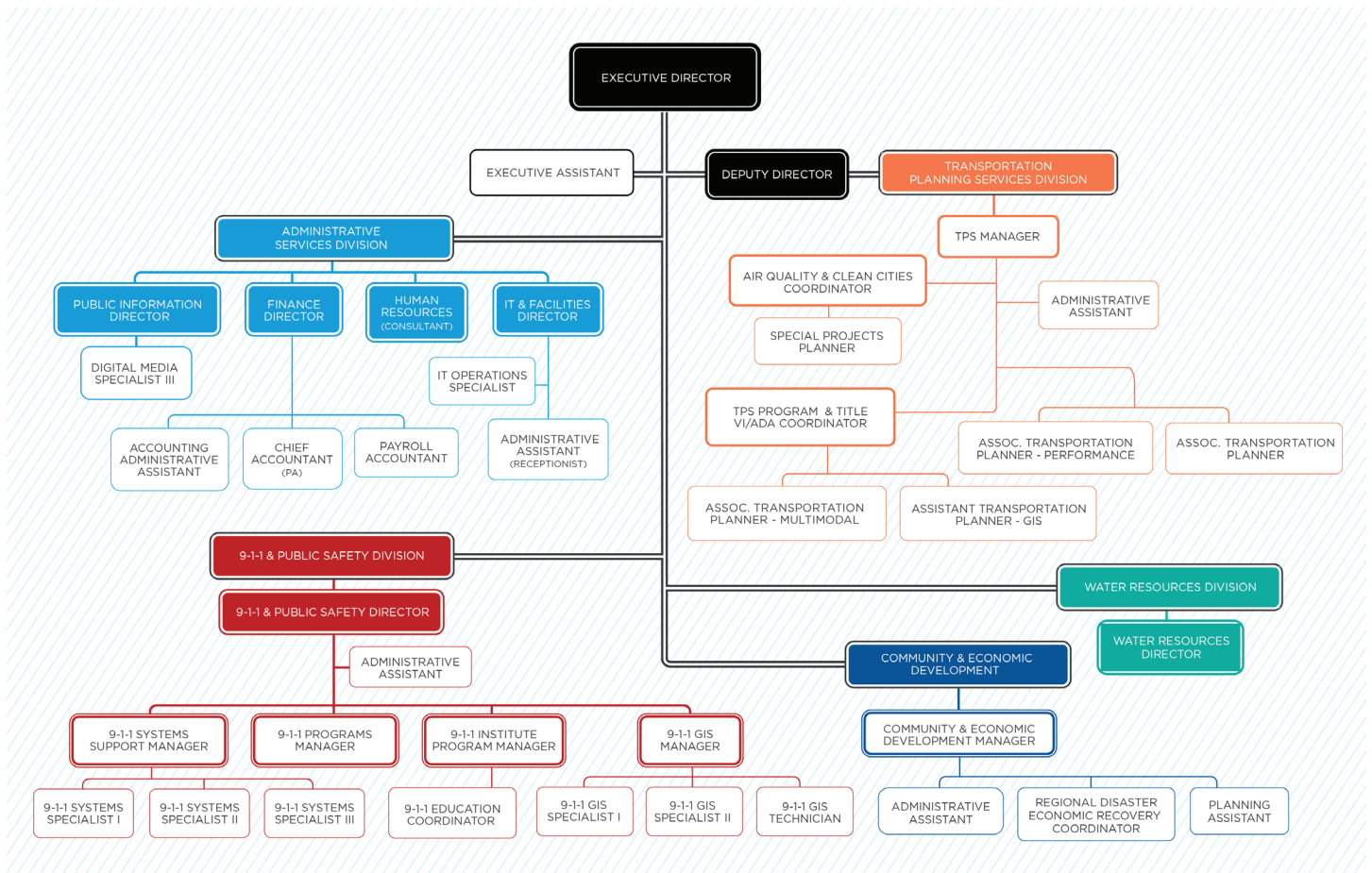
benefits/burdens across those populations.

- Monitor compliance with E.O. 13166, Limited English Proficiency, to improve access and understanding of transportation planning processes for those in the population confronted with language barriers.
- Accepting and investigating all Title VI complaints as well as consulting with or referring to the appropriate parties if needed, in accordance with the Title VI complaint process.
- Coordinating periodic Title VI and non-discrimination training for staff.
- Assisting appropriate staff in devising and implementing any monitoring activities deemed necessary for contractors, consultants, suppliers, vendors, cities, counties, and other sub-recipients of ACOG's programs.
- Preparing reports of Title VI accomplishments and goals (Appendix III).
- Developing Title VI information for dissemination to the public, where appropriate. Periodically examine what efforts have been made to engage minority and LEP populations in public outreach efforts.
- Monitoring ACOG's procedures and programs for compliance with Title VI requirements and working to resolve any deficiencies which may be discovered in ACOG's Title VI Program.

Division Directors: ACOG's Division Directors works closely with the Title VI Coordinator to develop and implement policies and procedures to monitor and ensure Title VI compliance in all of ACOG's programs and activities. ACOG will continue to ensure that female and minority-owned firms have an equal opportunity to participate in the consultant solicitation and selection phase of the transportation planning and research process.

Executive Director: ACOG's Executive Director is responsible for ensuring that ACOG remains in full compliance with the provisions of Title VI of the Civil Rights Act of 1964 and related non-discrimination regulations. The Executive Director provides leadership, guidance, direction, and support for ACOG's Title VI Program. If deficiencies are found during a compliance review, the Executive Director will be apprised and recommendations for corrective action will be established within 90 days.

Figure 2: ACOG Organization Chart 2022



SUBRECIPIENTS

A subrecipient is an entity or person that indirectly receives federal financial assistance in order to implement a program or activity, which obligates them to Title VI compliance responsibilities as well. Subrecipients of ACOG include, but are not limited to, all cities, counties, and transit agencies within the Central Oklahoma Transportation Management Area. The transit providers that fall in the TMA include the Central Oklahoma Transportation and Parking Authority and Edmond Citylink. All transit operations and their Title VI compliance are monitored by the FTA.

All subrecipients of ACOG are required to comply with Title VI and other related Federal regulations. Contracts with ACOG include non-discrimination responsibilities, non-compliance sanctions, and related information. Contractors and subrecipients are required to comply with the Regulations of the U.S. Department of Transportation relative to non-discrimination in Federally assisted programs of the U.S. Department of Transportation. The contractor or subrecipient agrees to not directly or indirectly discriminate on the grounds of race, color, or national origin, in the selection and retention of subcontractors, including procurement of materials and leases of equipment. Contractors and Subrecipients are required to include this information in all subcontractor solicitations and contracts.

All subrecipients of ACOG are encouraged to develop their own Title VI Plans. However, subrecipients may also adopt ACOG’s Title VI Plan, non-discrimination notice, Title VI complaint procedures, and complaint form developed by ACOG. ACOG will review subrecipients programs for compliance as well as its process to ensure compliance with Title VI requirements. See Appendix II for Contractual Assurances.

TRAINING

The ACOG Title VI Coordinator, as well as other interested staff, regularly participate in Title VI and non-discrimination related training conducted by FHWA, FTA, and ODOT, as well as online webinars covering Title VI issues. The ACOG Title VI Coordinator provides internal training on Title VI issues to other ACOG staff when necessary. More information can be found in ACOG's Work Plan and Accomplishments Report in Appendix III.

TRANSPORTATION PLANNING PROCESS

For projects and programs conducted by ACOG, the Transportation Planning Division will take steps to ensure non-discrimination and Title VI compliance. These steps include making certain that all contracts include Title VI requirements and that Title VI and non-discrimination regulations are adhered to in the selection of research contracts. ACOG will make efforts to ensure that protected groups are not discriminated against in the selection process. All contractors will be required to follow Title VI and non-discrimination requirements.

The sections below address how Title VI compliance is incorporated into the transportation planning process. Considerations for minority and Environmental Justice populations in outreach and participation activities are addressed in the ACOG [Public Participation Plan \(PPP\)](#).

DEMOGRAPHIC ANALYSIS

ACOG uses demographic data to ensure that all members of minority communities are provided with full opportunities to engage in the transportation planning process. This includes, but is not limited to, actions to eliminate language, mobility, temporal, and other obstacles to allow these populations to participate fully in the process.

The following groups and definitions are utilized by ACOG when conducting demographic analyses:

- Racial minority populations (non-Hispanic): Racial minorities defined by the U.S. Census Bureau are: Black, Asian, American Indian or Alaskan Native, Native Hawaiian or Pacific Islander, Some Other Race, and Two or More Races
 - Black or African American: A person having origins in any of the Black racial groups of Africa.
 - Asian: A person having origins in any of the original peoples of the Far East, Southeast Asia, or the Indian subcontinent including, for example, Cambodia, China, India, Japan, Korea, Malaysia, Pakistan, the Philippine Islands, Thailand, and Vietnam.
 - American Indian or Alaskan Native: A person having origins in any of the original peoples of North and South America (including Central America) and who maintains tribal affiliation or community attachment.
 - Native Hawaiian or Other Pacific Islander: A person having origins in any of the original peoples of Hawaii, Guam, Samoa, or other Pacific Islands.
 - Some other race: A person reported as not belonging to the following racial categories: White, Black or African American, Asian, American Indian or Alaskan Native, or Native Hawaiian or Other Pacific Islander.
 - Two or more races: A person belonging to two or more of the following racial categories: White, Black or African American, Asian, American Indian or Alaskan Native, Native Hawaiian or Other Pacific Islander, or Some Other Race.
- Hispanic/Latino ethnicity origin populations: A person of Cuban, Mexican, Puerto Rican, South or Cen-

tral American, or other Spanish culture or origin regardless of race. The U.S. Census Bureau identifies a minimum of two categories for ethnicity: “Hispanic or Latino” and “Not Hispanic or Latino.” Hispanic or Latino ethnic origin populations are considered an ethnic minority, rather than a racial minority. Persons who report themselves as Hispanic or Latino may be of any race and will report as such on the American Community Survey (ACS).

- Limited-English Proficiency (LEP) populations: Any person aged 5 or older who reported speaking English less than “very well” (meaning they reported that they spoke English “well”, “not well”, or “not at all”).
- Elderly populations: Any person aged 65 and over.
- Young populations: Any person aged 17 and under.
- Populations with a disability: A noninstitutionalized civilian reported as having one or more of the following disabilities: Hearing difficulty, vision difficulty, cognitive difficulty, ambulatory difficulty, self-care difficulty, or independent living difficulty.
- Low-income households: Median household income for the Oklahoma City Metropolitan Statistical Area (MSA) is \$58,765 (ACS 2019 5-year estimate). A household with income of less than 80% of the MSA median household income, \$47,012, is considered to be low-income. Due to the data available, a household income of \$45,000 or less was considered to be low-income.
- Female-headed households with children under 18: Households including children (age 17 and under) headed by an unmarried female parent or guardian with no husband or partner present.
- Zero-vehicle households: Households in which a vehicle is not owned.

ACOG analyzed regional demographic data from the U.S. Census Bureau’s American Community Survey (ACS) to identify these minority groups in the TMA. A regional overview of the demographic makeup of the Central Oklahoma TMA can be found in Table 1. Maps can be found in Appendix I and in the following web-map: <https://arcg.is/148LHy1>.

Table 1: Regional Demographic Overview

TMA Populations	Total Populations	Percent of Total Population
Total Population	1,265,185	
Population Age 5 and Older	1,177,372	93%
Noninstitutionalized Civilian Population	1,250,361	98%
Total Households	473,860	
Households with Children	156,677	33%
Total Population by Sex		
Male	622,679	49%
Female	642,506	51%
Total Population by Age		
Youth - 17 Years Old and Under	313,925	25%
Adults - Age 18 through 64	782,895	62%
Elderly - 65 and Older	168,365	13%
Total Population by Race		
Caucasian	921,941	73%
Total Racial Minorities	343,244	27%
Black/African American	136,380	10.8%
Asian	43,460	4.7%
American Indian/Alaskan Native	41,917	3.3%
Native Hawaiian/Pacific Islander	1,018	0.7%
Some Other Race	36,640	2.9%
Two or More Races	83,829	6.6%
Other Demographics		
Hispanic Populations	176,287	14%
LEP Populations*	64,377	5%
Populations with a Disability**	168,480	13%
Low-Income Households***	179,630	38%
Zero-Vehicle Households	24,133	5%
Female-Headed Households with Children	41,126	26%

United States Census Bureau 2015-2019 ACS 5-year estimates

*Based on TMA population age 5 and older

**Based on Noninstitutionalized civilian population by census tract

***Less than \$45,000/year

REGIONAL TRANSPORTATION INVESTMENTS

Projects completed using federal funds must not disproportionately benefit or burden any population or group. ACOG monitors the geographic distribution of projects funded through ACOG, as well as significant regional improvements. Below are links to webmaps on ACOG's ArcGIS Online account which show the location of regional transportation investments:

- Current transportation network: <https://arcg.is/Ofm5Pz>
- Current public transportation system: <https://arcg.is/OKCXP>
- Current bicycle facilities network: <https://arcg.is/1vyK59>

Each map includes demographic data layers that can be toggled on/off to see how they align with the transportation network. The following webmap shows recent transportation investments funding by ACOG with demographic information: <https://arcg.is/OzGLTC>.

277 projects were submitted for inclusion in Encompass 2045, the most recent adopted MTP for the region. This list of projects includes road widenings, bicycle/pedestrian facilities, intersections, bridges, reconstruction, new road construction, and more. The following webmap shows these projects with demographic data: <https://arcg.is/OjneeG>.

IDENTIFICATION AND EVALUATION OF DISPARATE IMPACTS

Various types of disparate impacts are considered when evaluating the impacts of transportation investments. The sections below summarize these impacts and present regional results. To summarize the various minority populations considered, ACOG's Environmental Justice Index of Communities of Concern was looked at. See ACOG's [Environmental Justice Plan](#) for more information.

Studies were conducted for neighborhoods affected by planned roadway projects, the public transportation system, and the planned bicycle/pedestrian system. Results from that examination showed areas with high concentrations of minority populations are well served by the proposed improvements and that consideration should be given to those areas when specific projects are implemented. The current bicycle facility network in the region is limited and not cohesive. However, the planned bicycle network has greater coverage and connections that extend throughout many areas with high concentrations of minority populations. Most block groups with high concentrations of minority populations are served by at least one public transportation route, although there are a few Environmental Justice Community of Concern block groups, particularly on the west side of Oklahoma City that are currently unserved by transit.

This analysis will be conducted on a regular basis as new data become available. With every new MTP, ACOG conducts an Impacts Analysis which involves comparing selected transportation projects with various environmental, social, cultural, and economic factors. These full results can be found in [Encompass 2045](#).

TITLE VI EQUITY ANALYSES

ACOG and subrecipients who plan to acquire land to construct certain facilities must not discriminate on the basis of race, color, or national origin as well as against persons who may, as a result of the construction, be displaced from their homes or businesses. Facilities such as storage facilities, maintenance facilities, and operation centers would require a Title VI equity analysis prior to construction. ACOG has not yet had to complete a Title VI equity analysis.

MONITORING

It is the responsibility of ACOG management, including the Executive Director, Division Directors, and program area managers to promote compliance with Title VI of the Civil Rights Act of 1964. Compliance will be monitored through proactive oversight, reports to the ACOG Title VI Coordinator, and/or compliance reviews.

Each of the following areas will be monitored for compliance with Title VI requirements (areas specified are not all inclusive):

- All advertisements
- Bid proposals, requests, and evaluations
- Contracts and subcontracts
- Title VI reports, issues, and complaints
- Public meetings and internal meetings
- Title VI contract provisions and other legal documents

SUBRECIPIENT MONITORING

The ACOG Title VI Coordinator will assist ODOT, if asked, in periodically conducting Title VI compliance reviews of ACOG's subrecipients. The review of select recipients of federal-aid highway or other federal funds will be conducted to ensure adherence to Title VI requirements. ACOG will work cooperatively with ODOT to confirm operational guidelines provided to consultants, contractors, and subrecipients, including Title VI language, provisions, and related requirements, as applicable.

ACOG will request that subrecipients who provide transportation services verify that their level and quality of service is provided on an equitable basis and meet all Title VI requirements. ACOG will ask subrecipients to develop system-wide service standards and verify that service provided to predominately people with disabilities, minority, and low-income communities meets these standards. In order to monitor compliance with Title VI regulations, ACOG will require that subrecipients provide or perform the following:

- Required Certifications and Assurances with authorized signatures and current dates
- An up-to-date copy of subrecipient's Title VI Plan
- Subrecipient has reviewed and is knowledgeable about regional demographic data regarding Environmental Justice populations. ACOG will provide data as necessary.

ACOG staff will review plans, reports, contractual agreements related to the project, and certifications submitted under the above items according to the provisions of the guiding Federal regulations and discuss with subrecipients to clarify all requirements as needed. Staff will monitor progress reports and invoices sent for payment of costs incurred and process as efficiently as possible. Staff will maintain regular contact with subrecipients to stay apprised of program status at a minimum of quarterly intervals, one of which may be a site visit. As appropriate and requested, ACOG will provide the following information to subrecipients:

- Sample notices to the public informing beneficiaries of their rights under Title VI and procedures on how to file a Title VI complaint
- Sample procedures for tracking and investigating Title VI complaints filed with a subrecipient
- Demographic information such as race and income for the region served by the subrecipient

CORRECTIVE ACTION

Subrecipients placed in a deficiency status due to lack of Title VI compliance will be given a reasonable period of time, not to exceed 90 days after receipt of the deficiency letter, to voluntarily correct deficiencies. When a subrecipient fails or refuses to voluntarily comply with requirements within the allotted time frame, ACOG will submit to ODOT and FHWA/FTA copies of the case file and a recommendation that the subrecipient be found in noncompliance.

A follow-up review will be conducted within 180 days of the initial review to ascertain if the subrecipient has complied with the Title VI Program requirements in correcting deficiencies previously identified. If the subrecipient refuses to comply, ACOG and ODOT may, with FHWA/FTA concurrence, initiate sanctions.

There are three alternatives for Corrective Action (CFR 200.11):

1. Resolution of the noncompliance (or potential noncompliance) “by voluntary means” by entering into an agreement with the applicant, which becomes a condition of the assistance agreement; or
2. Where voluntary compliance efforts are unsuccessful, a refusal to grant or continue the assistance; or
3. Where voluntary compliance efforts are unsuccessful, referral of the violation to the Department of Justice for judicial action.

A follow-up review will be conducted within 180 days of the initial review to ensure that deficiencies are being corrected. All findings, recommendations, and progress made in implementing corrective action will be reported to the Executive Director and Title VI Coordinator.

TITLE VI COMPLAINT PROCESS

ACOG uses the following internal procedures for prompt processing and resolution of all Title VI complaints received.

These procedures include but are not limited to:

1. Title VI Complaint

- a. Any person who believes that they have been subjected to discrimination prohibited by Title VI of the Civil Rights Act of 1964, as amended, by ACOG or any of their recipients may file a written complaint with ACOG’s Title VI Coordinator via the [Title VI Complaint Form](#) (Appendix IV). A complaint may also be filed by a representative on behalf of such a person.
- b. All complaints should be directed to:
Association of Central Oklahoma Governments
Attention: Title VI Coordinator
4205 North Lincoln Blvd
Oklahoma City, OK 73105
(405) 234-2264
title.vi@acogok.org
- c. In order to have the complaint considered, the complaint must be filed no later than 180 calendar days after:
 - i. The date of the alleged act of discrimination; or
 - ii. Where there has been a continuing course of conduct, the date of the most recent incident

- d. Complaints shall set forth, as fully as possible, the facts and circumstances surrounding the claimed discrimination.
- e. In the event that a person makes a verbal complaint of discrimination, the person shall be interviewed by the Title VI Coordinator. If necessary, the Title VI Coordinator will assist the person in reducing the complaint to writing and submit the written version of the complaint to the person for signature. The complaint shall then be handled in the usual manner.

2. Receipt of Complaint

- a. Upon receipt of the signed complaint form, the Title VI Coordinator will log the complaint.
- b. The Title VI Coordinator will determine the basis of the complaint, authority/jurisdiction, and who should conduct the investigation.
- c. The Title VI Coordinator reviews and determines the appropriate action regarding every Title VI complaint. The department will not proceed with or continue a complaint investigation if:
 - i. The complaint is, on its face, without merit
 - ii. The same allegations and issues of the complaint have been addressed in a recently closed investigation or by previous federal court decisions
 - iii. The complainant's or injured party's refusal to cooperate (including refusal to give permission to disclose their identity) has made it impossible to investigate further
- d. All Title VI complaints made against ACOG shall be directly forwarded and investigated by ODOT.
- e. Within ten (10) business days, the Title VI Coordinator will acknowledge receipt of the allegation, inform the complainant of action taken or proposed action to be taken to process the allegation(s), and the complainant is advised of other avenues of redress available, such as the FHWA/FTA, U.S. Department of Justice, U.S. Department of Transportation, and the State Department of Transportation. The notification letter to be sent to the complainant shall contain:
 - i. The basis of the complaint
 - ii. A brief statement of the allegation(s) over which ACOG has jurisdiction
 - iii. A brief statement of ACOG's jurisdiction over the recipient to investigate the complaint
 - iv. An indication of when the parties will be contacted
 - v. A copy of ACOG's Notice of Investigatory Uses of Personal Information and a Complainant Consent/Release Form

3. Notification of ODOT

- a. The Title VI Coordinator notifies the Oklahoma Department of Transportation's (ODOT) Civil Rights Division within ten (10) calendar days of receipt of the allegations.
- b. The following information will be included in every notification to the ODOT Civil Rights Division:
 - i. Name, address, and phone number of the complainant
 - ii. Email address, if available
 - iii. Basis of complaint (i.e., race, color, national origin)
 - iv. Date of the alleged discriminatory act(s)
 - v. Date of complaint received by the recipient
 - vi. A statement of the complaint
 - vii. Other agencies (state, local or Federal) where the complaint has been filed

- viii. An explanation of the actions the recipient has taken or proposed to resolve the issue(s) raised in the complaint

4. Investigation

- a. Within sixty (60) calendar days from the date the original complaint was received, the Title VI Coordinator will conduct and complete an investigation of the allegation(s).
- b. The Title VI Coordinator will conduct an in-depth, personal interview with the complainant(s). Information gathered in this interview includes:
 - i. Identification of each complainant by race, color, or national origin
 - ii. Name of the complainant
 - iii. Complete statement concerning the nature of the complaint, including names, places, and incidents involved in the complaint
 - iv. Date the complaint was filed
 - v. Any other pertinent information the investigation team feels is relevant to the complaint
- c. The interviews are recorded either in audio format or by taking notes. The Title VI Coordinator arranges for the complainant to read, make necessary changes to, and sign the interview transcripts or interview notes.
- d. If, for some reason, the investigation cannot be completed within the required timeframe, a status report shall be submitted to the complainant and the report shall follow upon completion.

5. Findings

- a. Based on the information obtained from the investigation, ACOG will render a recommendation for action in a report of findings. Included with the recommendation report shall be:
 - i. A copy of the complaint
 - ii. Copies of all documentation pertaining to the complaint
 - iii. The date the complaint was filed
 - iv. The date the investigation was completed
 - v. The disposition and the date of the disposition
 - vi. Any other pertinent information
- b. ACOG, or the appropriate Federal Agency, issues the official Letter of Findings to the complainant. Every effort will be made to obtain early resolution of complaints at the lowest possible level.
- c. If the complaint cannot be resolved by ACOG to the satisfaction of all parties concerned, the party not satisfied is advised of their right to appeal pursuant to Title 49, Code of Federal Regulations, Part 21. The appeal must be filed to the appropriate agency, in writing no later than 180 calendar days after the date of the alleged discrimination, unless the time for filing is extended by the Secretary to the USDOT. The letter should be addressed to either the Federal Transit Administration (FTA) or Federal Highway Administration (FHWA), whichever is most appropriate, and sent to:

United States Department of Transportation
Departmental Office of Civil Rights
1200 New Jersey Ave, S.E.
Washington, DC 20590
(202) 366-4648

CONCLUSION

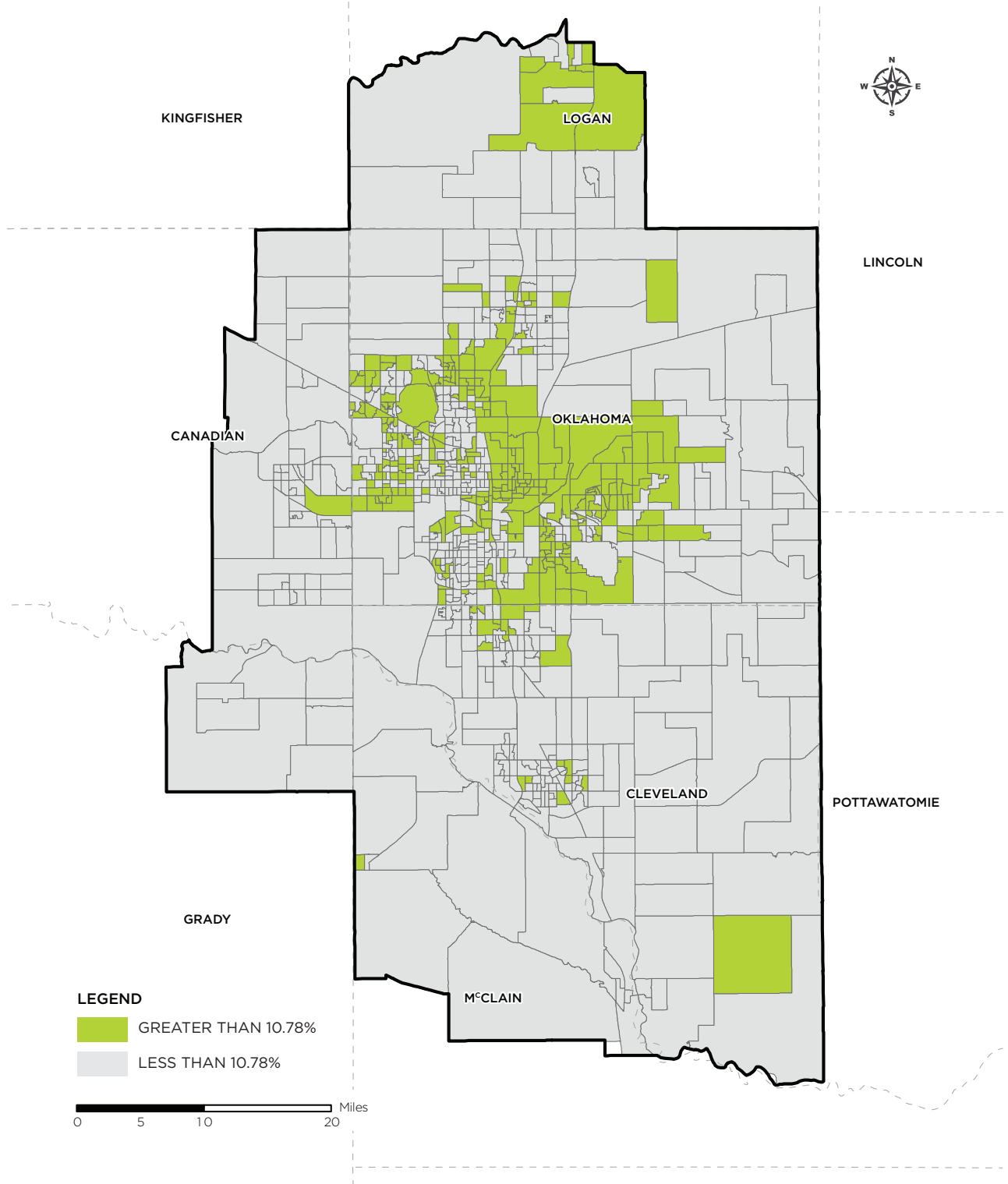
After each revision, ACOG notifies the public about its new Title VI plan. The Title VI plan will be available on ACOG's website and paper copies will be available upon request. In addition, announcements will be sent to affected public agencies, private transportation providers, minority organizations, and special interest groups such as bicyclists, transit riders, rail advocates, trucking industry representatives, chambers of commerce, neighborhood organizations, elderly and disabled advocacy groups, and others for their information and inclusion in their newsletters. Furthermore, announcements about the Title VI Plan will be posted on ACOG's Facebook and Twitter pages. ACOG's Title VI plan will continually be monitored for efficacy and updated as needed.

APPENDIX I

DEMOGRAPHIC MAPS

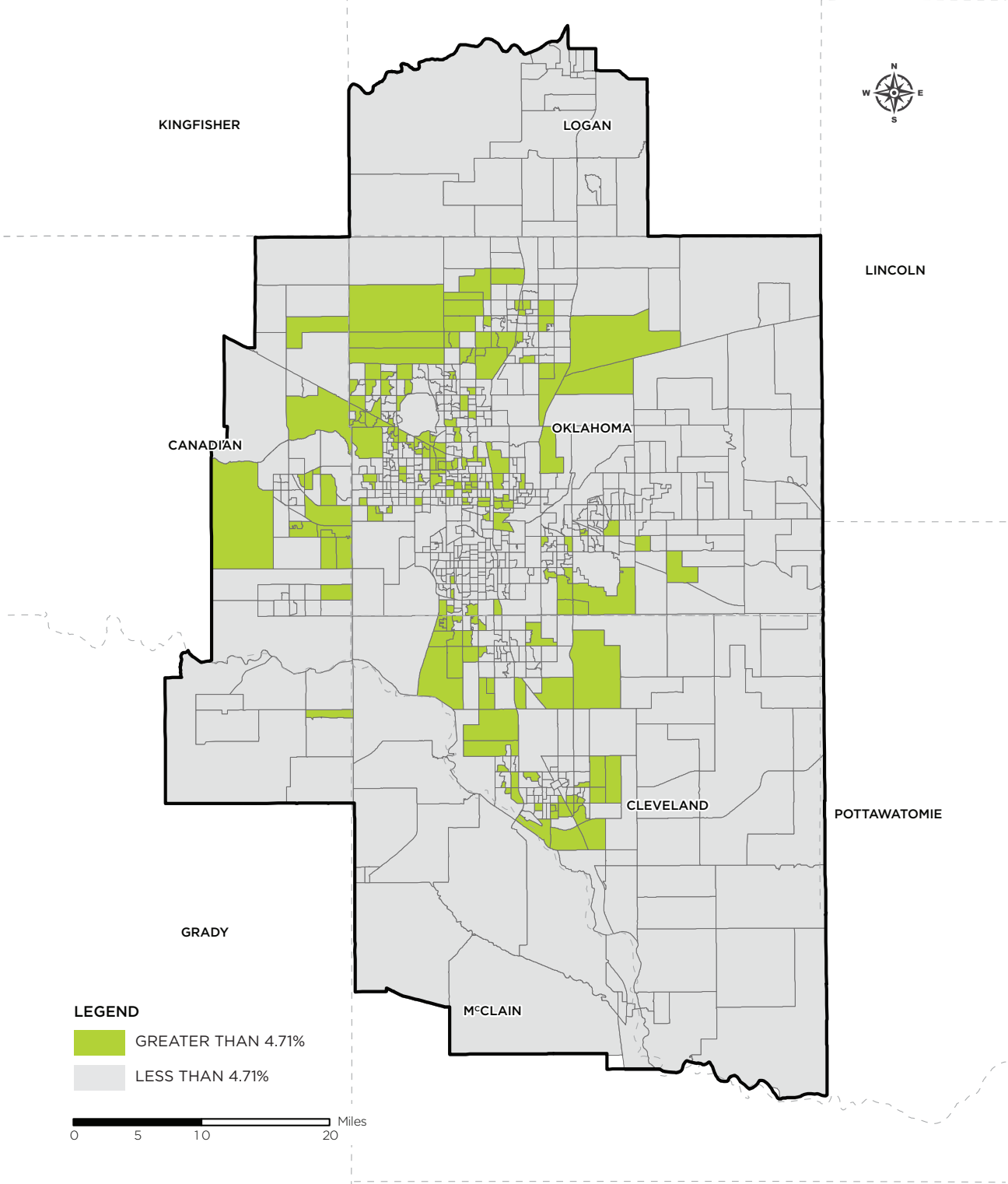
Webmaps can also be found here: <https://arcg.is/1X1mWq>

BLACK OR AFRICAN AMERICAN 2015-2019 ACS 5 YEAR ESTIMATES



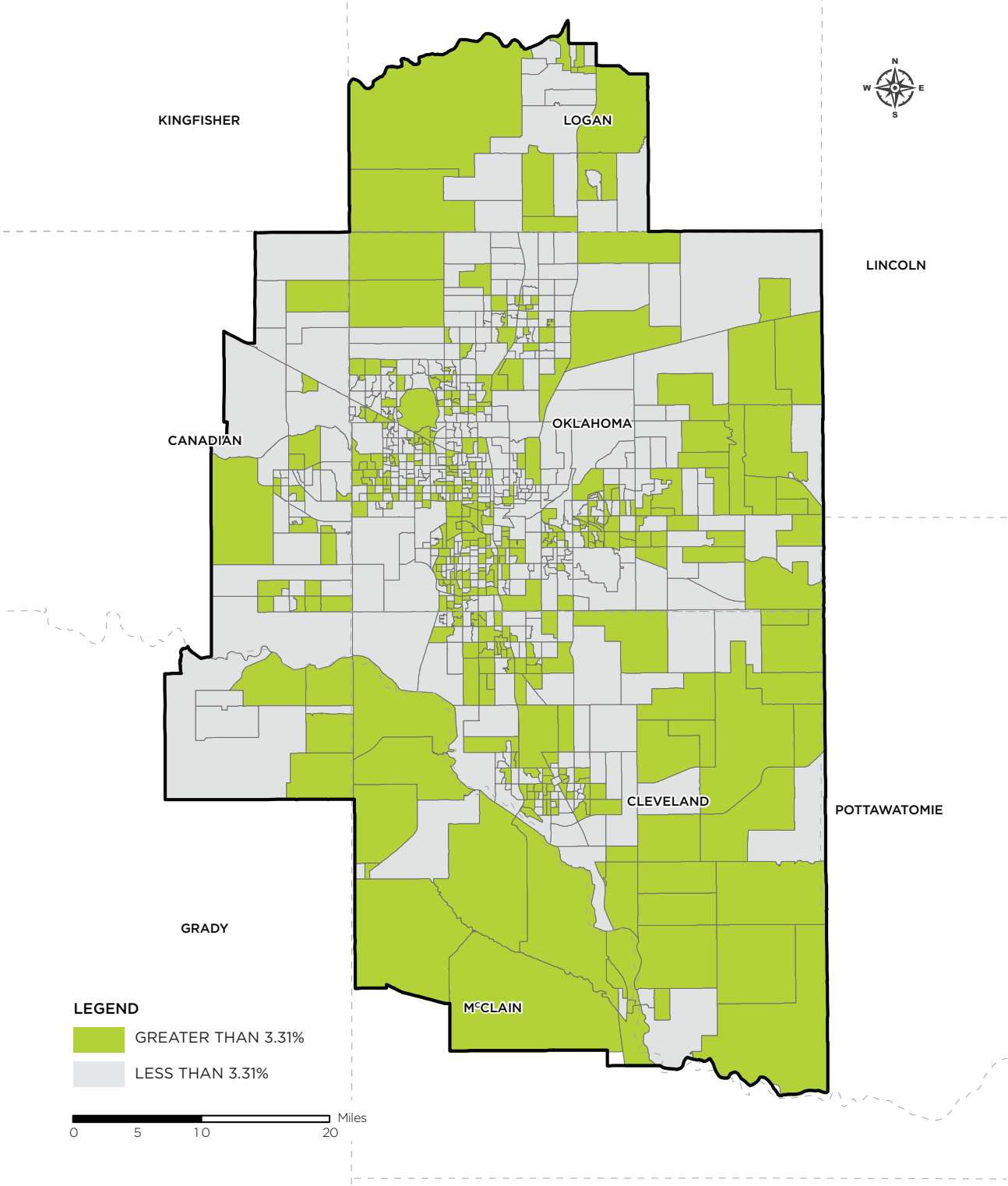
ASIAN

2015-2019 ACS 5 YEAR ESTIMATES



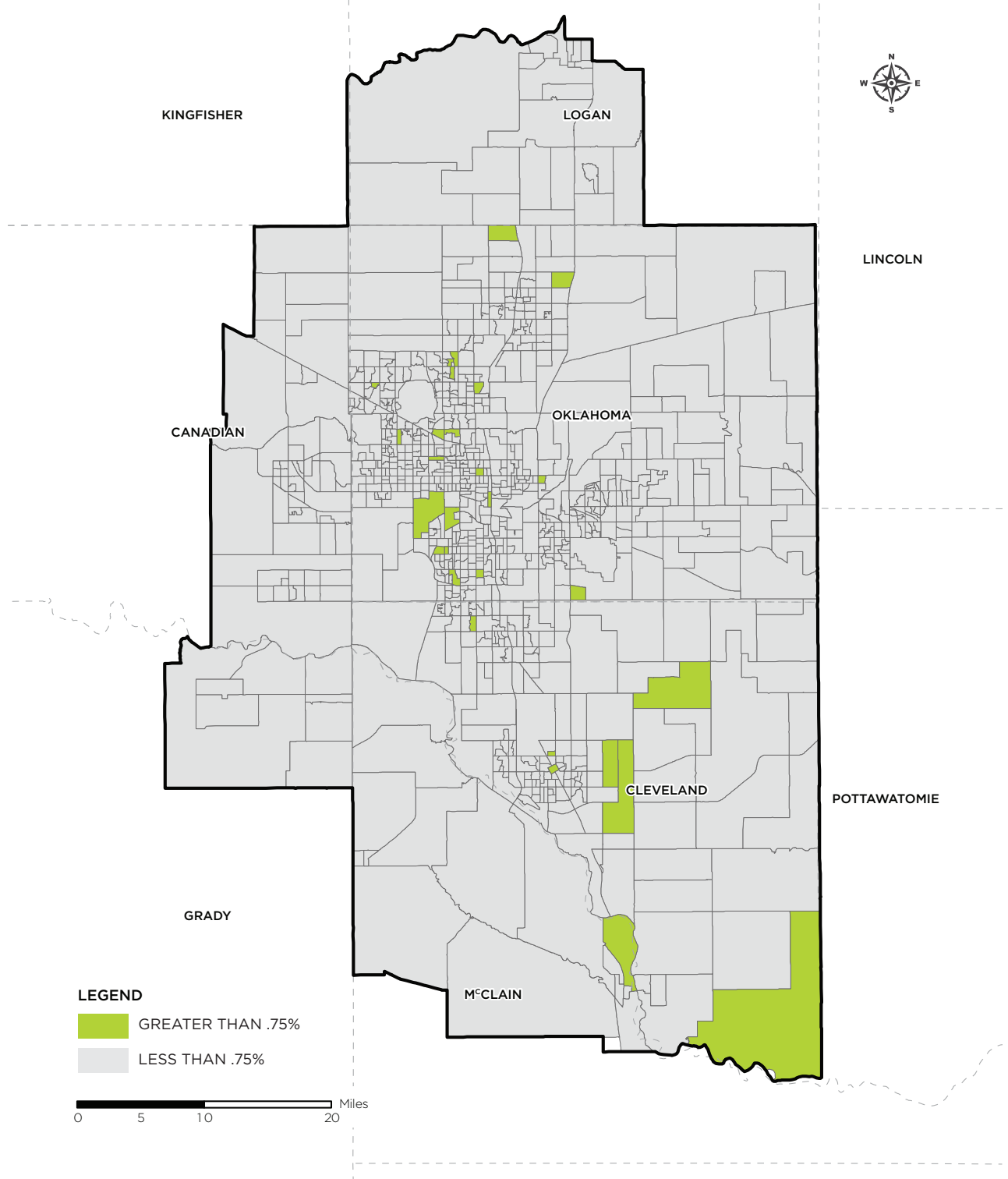
AMERICAN INDIAN OR ALASKAN NATIVE

2015-2019 ACS 5 YEAR ESTIMATES



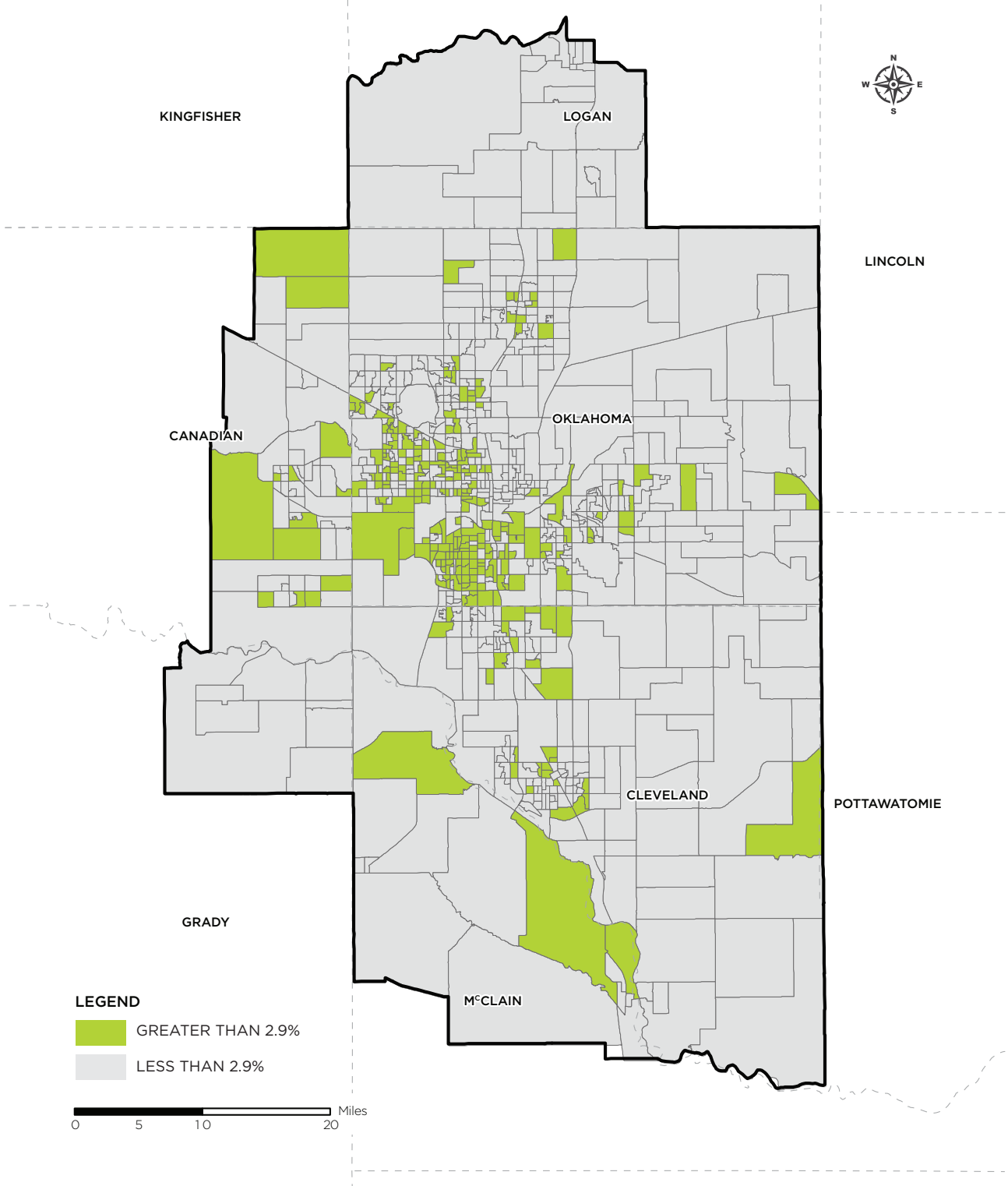
NATIVE HAWAIIAN OR OTHER PACIFIC ISLANDER

2015-2019 ACS 5 YEAR ESTIMATES



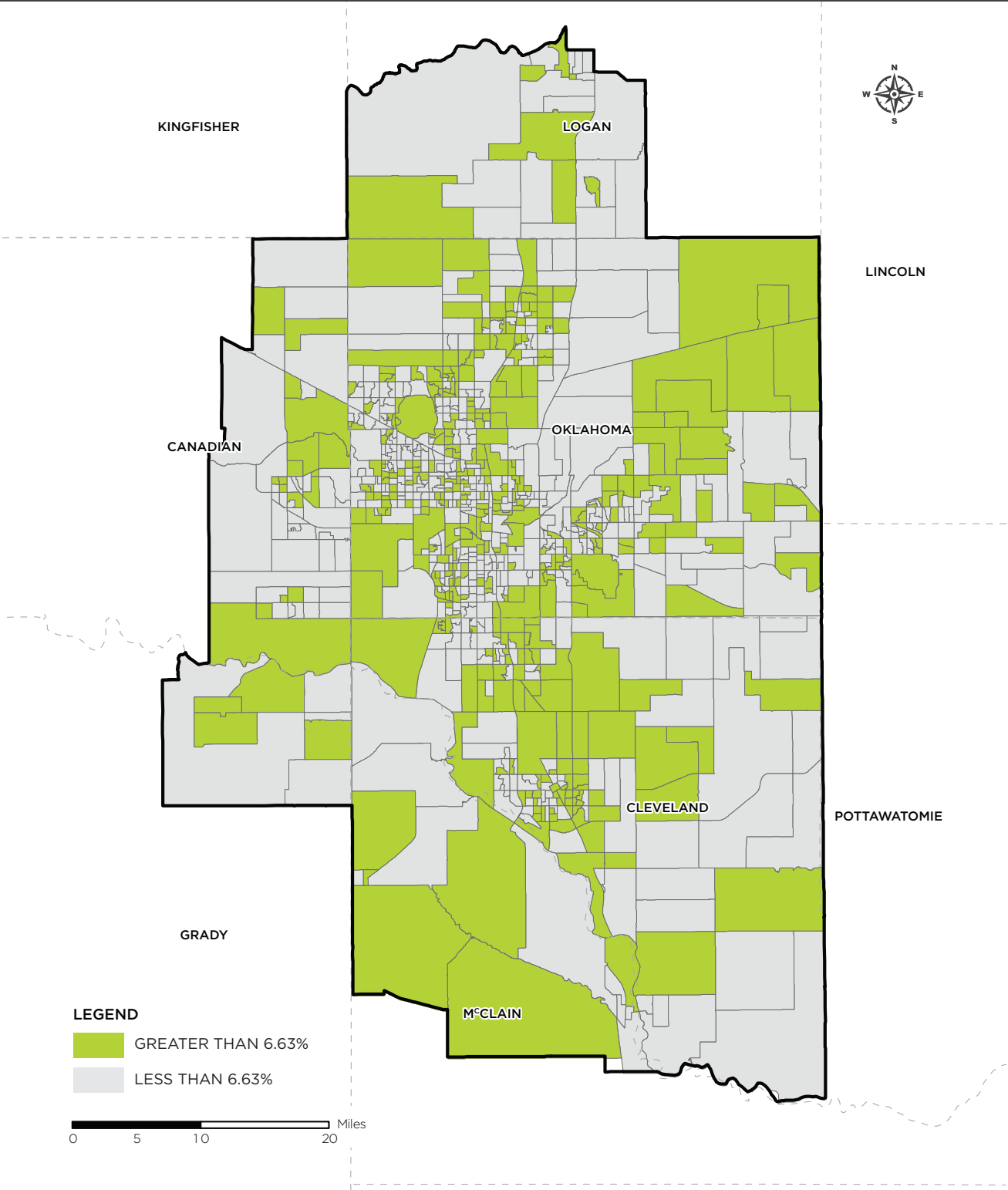
OTHER RACE

2015-2019 ACS 5 YEAR ESTIMATES



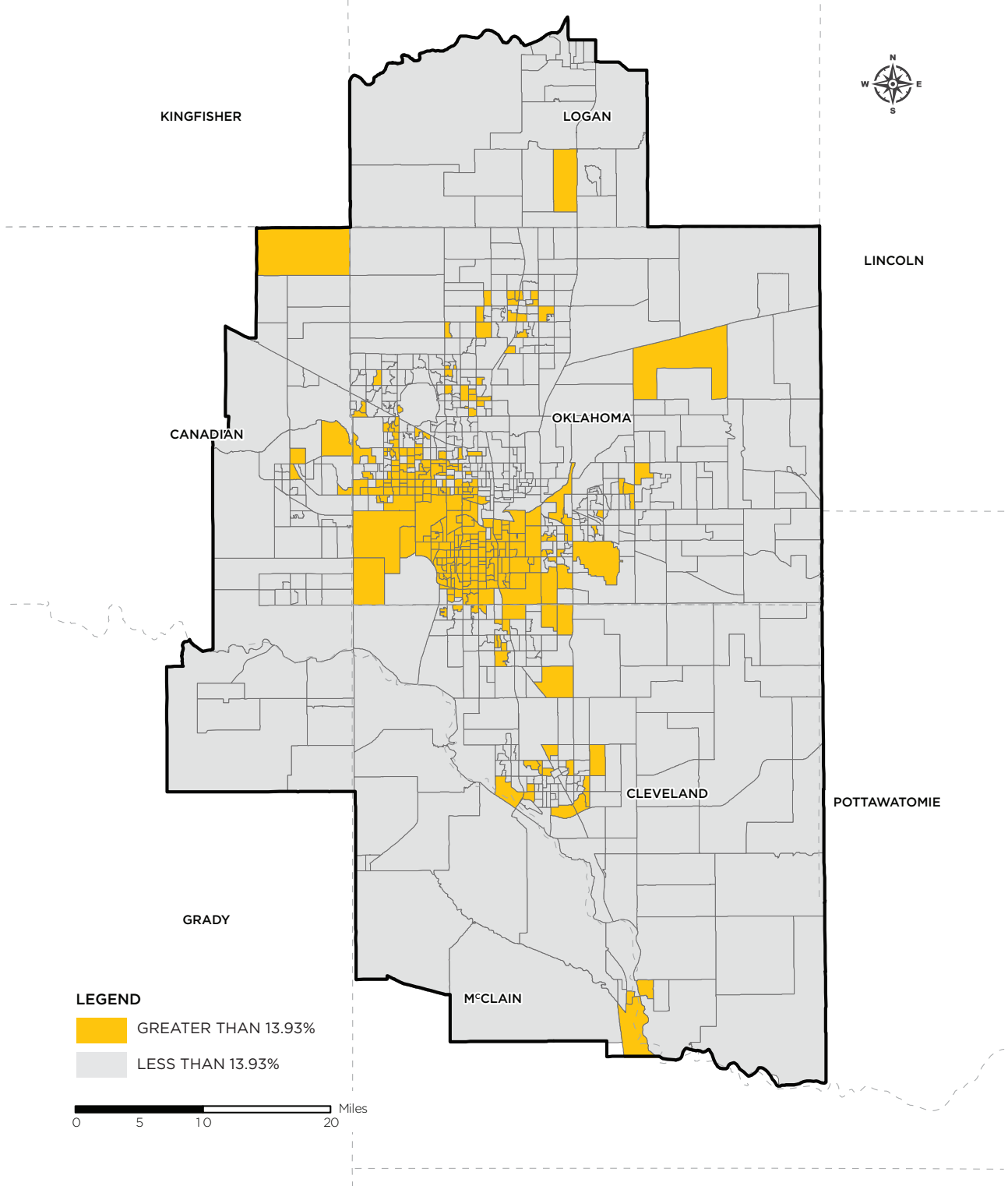
TWO OR MORE RACES

2015-2019 ACS 5 YEAR ESTIMATES



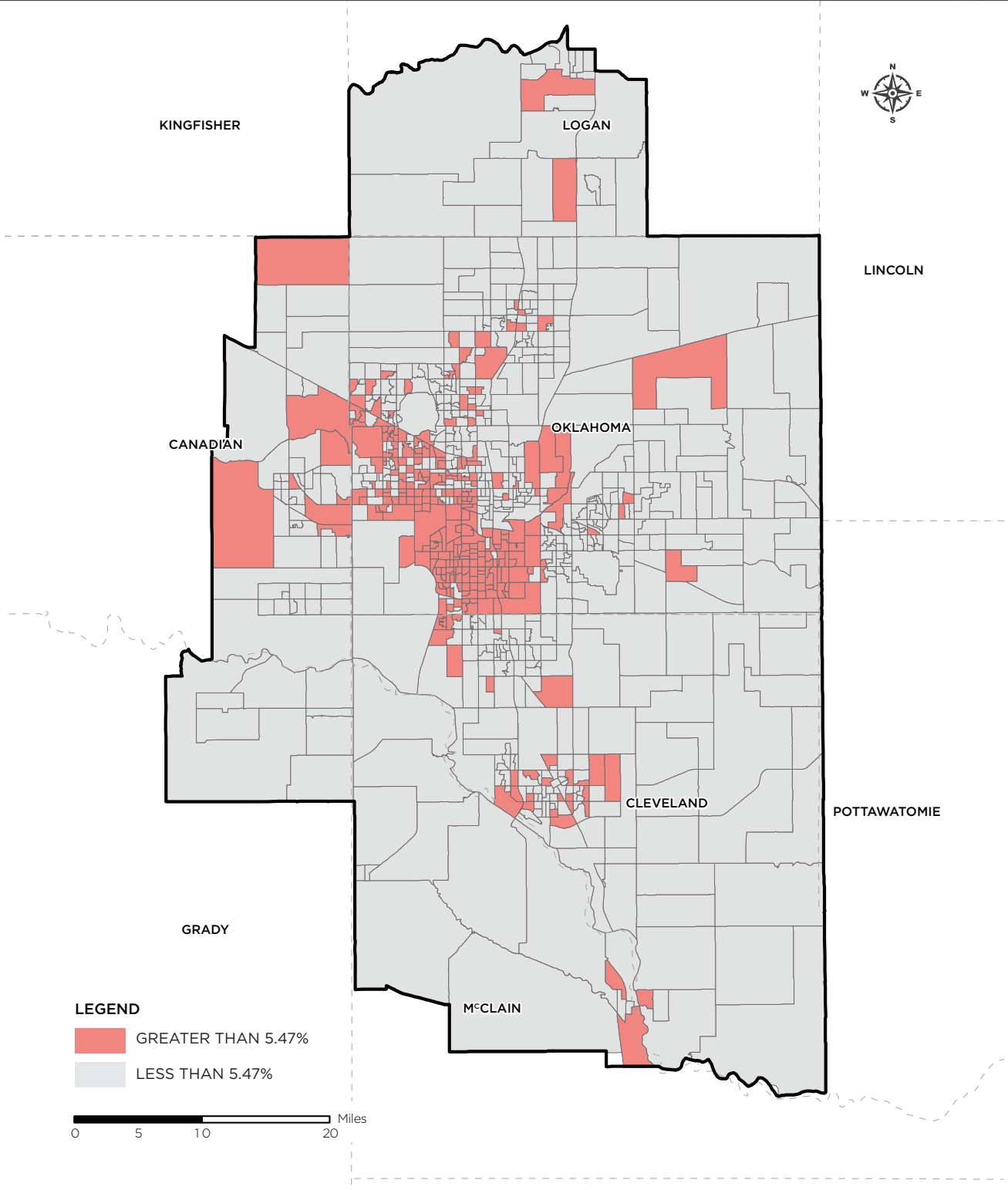
HISPANIC/LATINO ETHNICITY ORIGINS

2015-2019 ACS 5 YEAR ESTIMATES



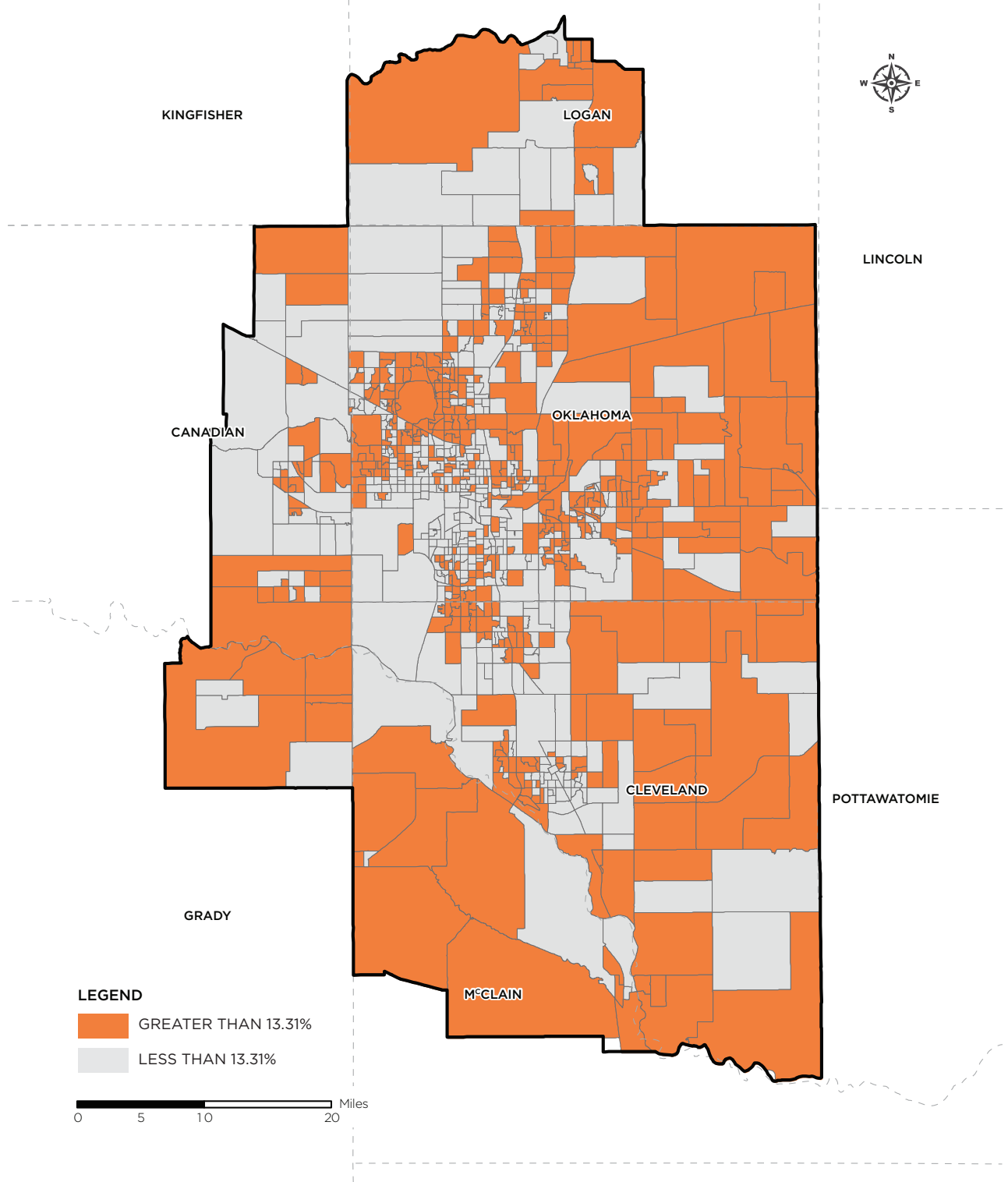
LIMITED ENGLISH PROFICIENCY (LEP)

2015-2019 ACS 5 YEAR ESTIMATES



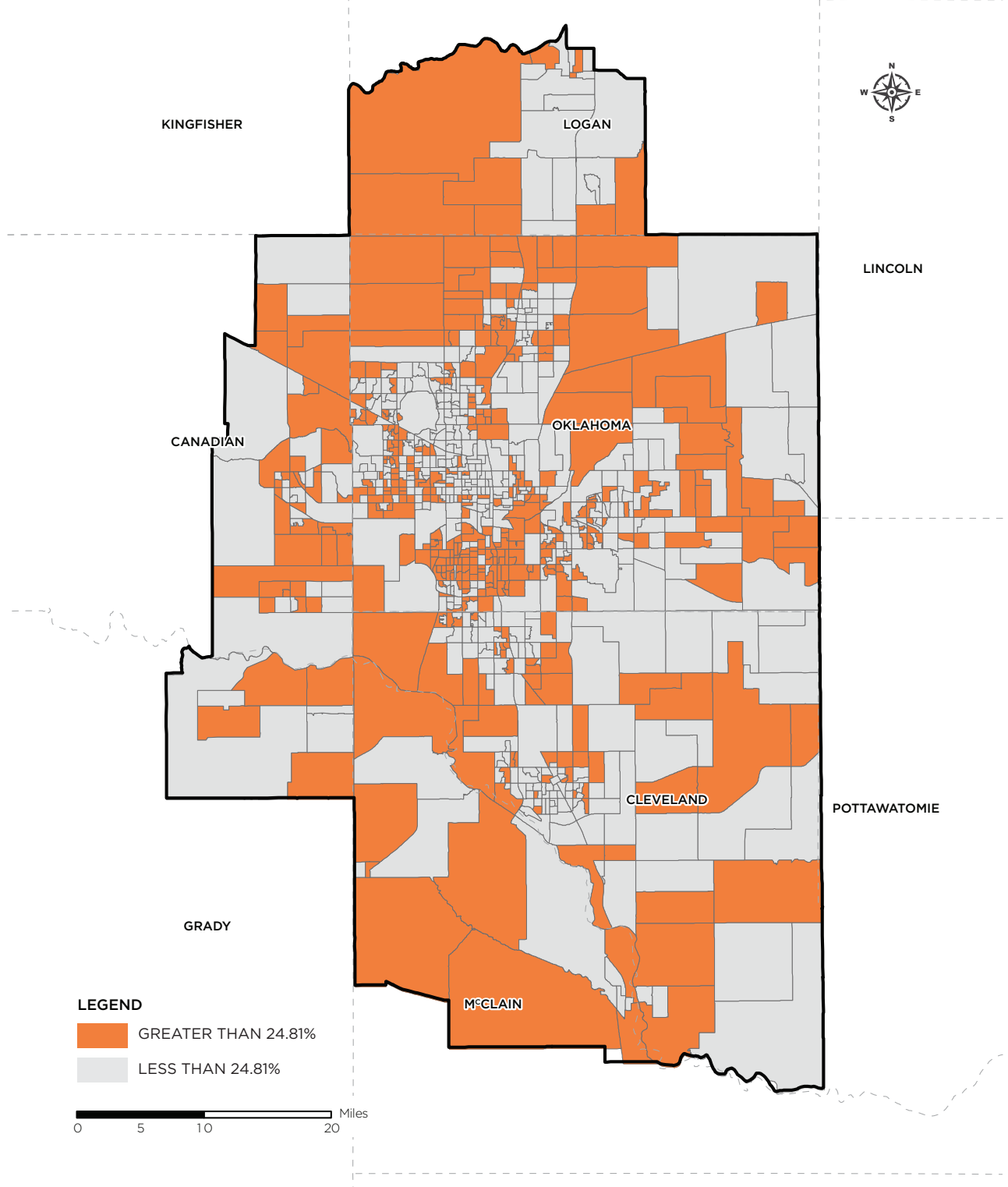
ELDERLY

2015-2019 ACS 5 YEAR ESTIMATES



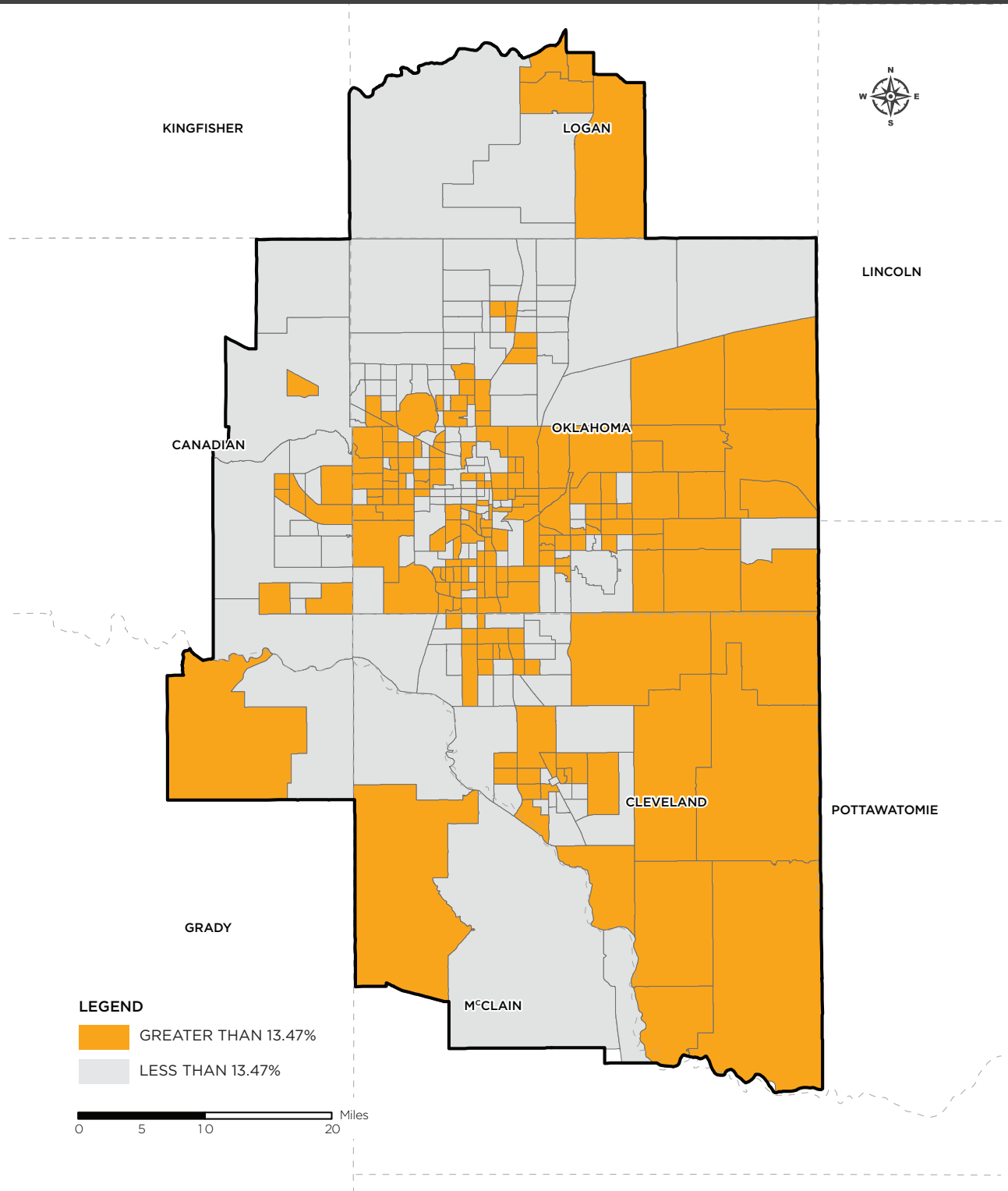
YOUTH

2015-2019 ACS 5 YEAR ESTIMATES



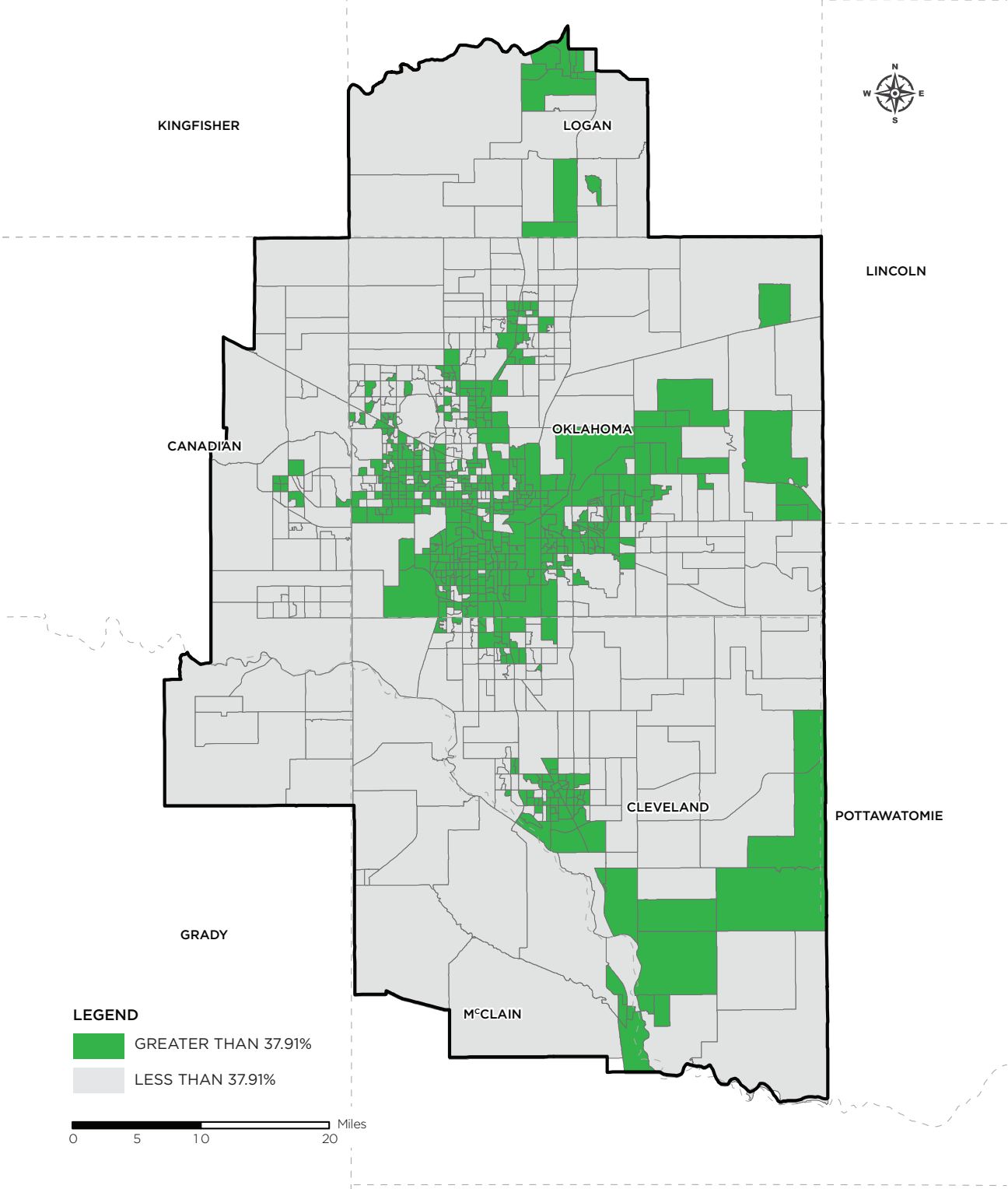
POPULATIONS WITH A DISABILITY

2015-2019 ACS 5 YEAR ESTIMATES



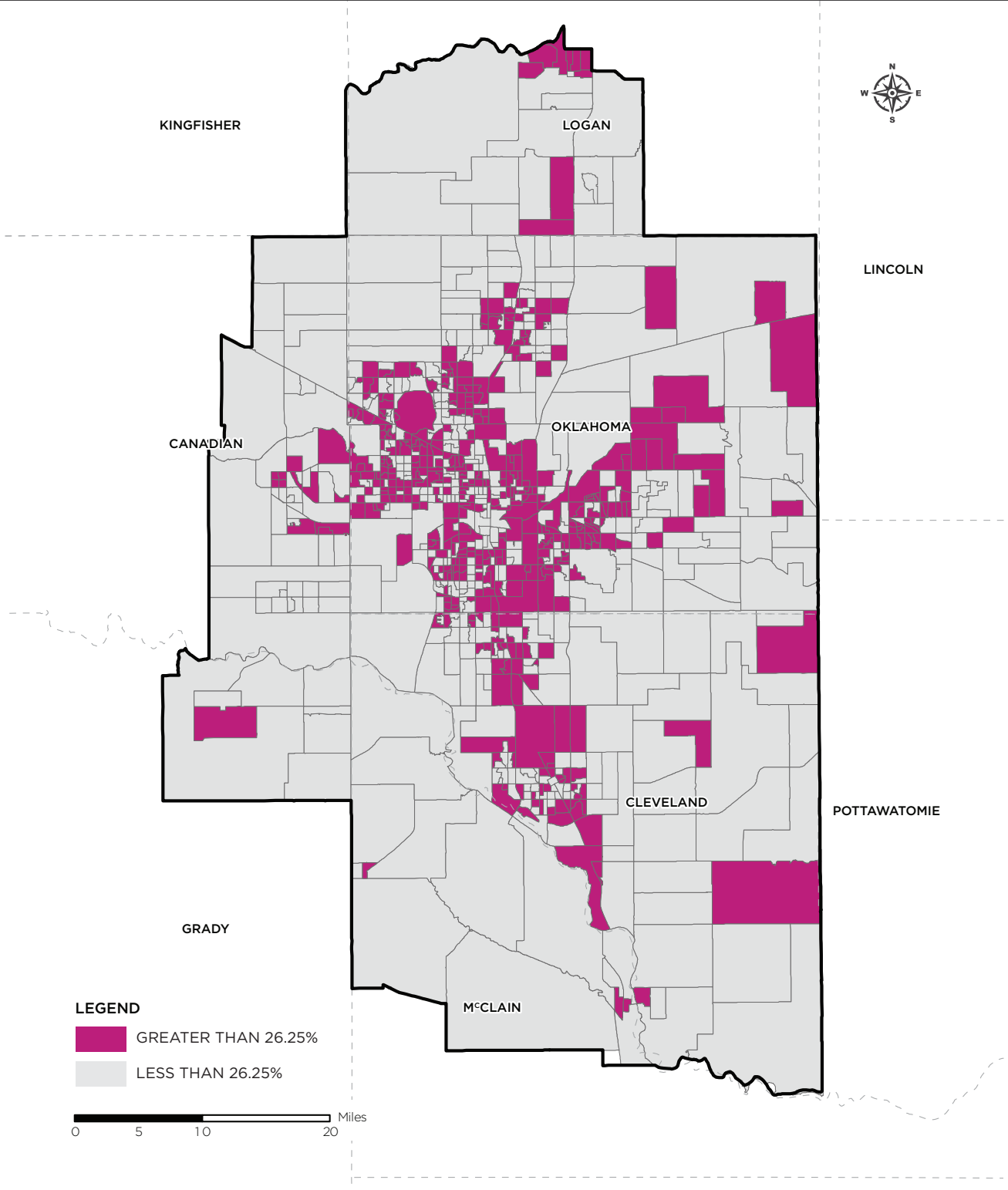
LOW-INCOME

2015-2019 ACS 5 YEAR ESTIMATES



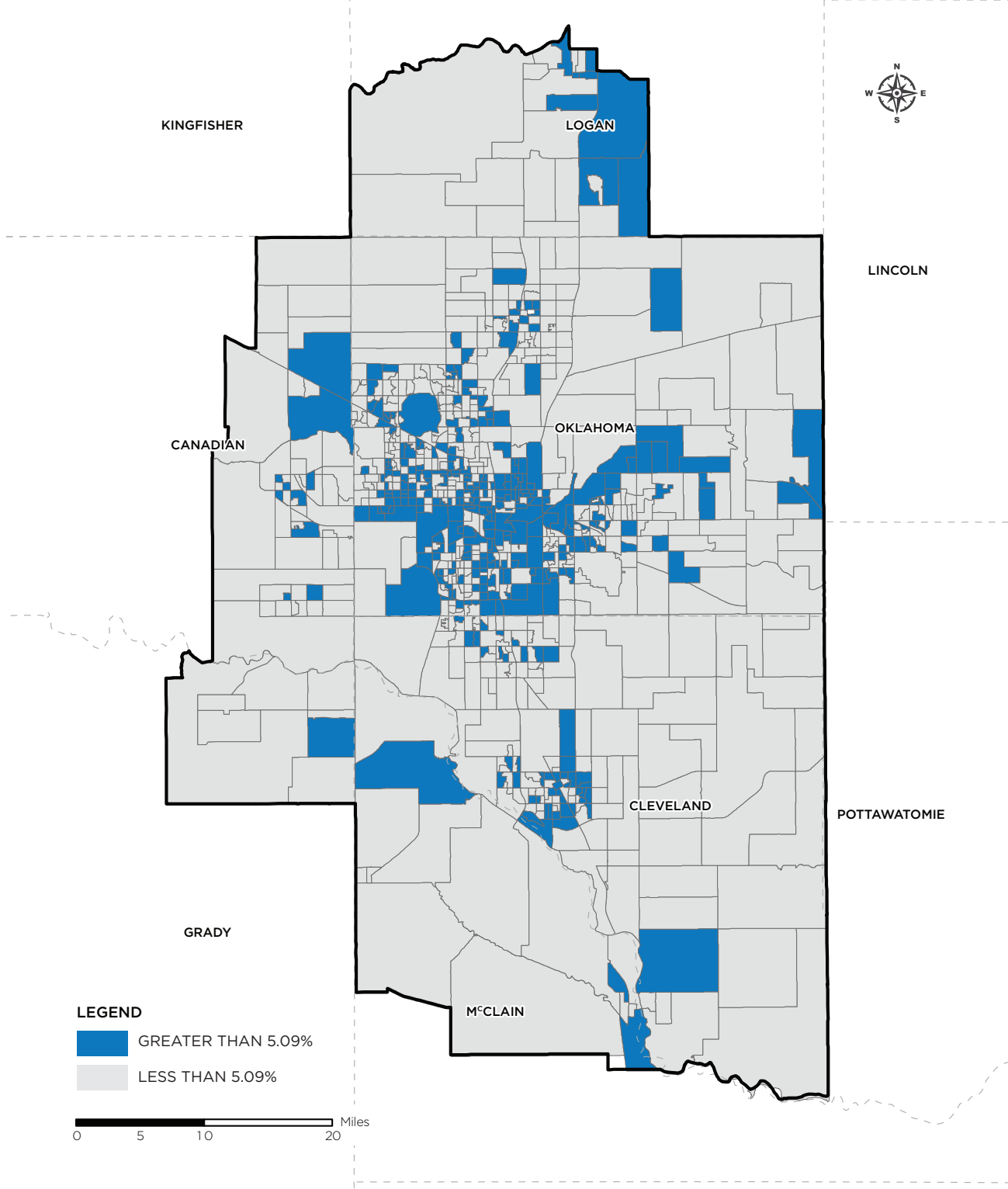
FEMALE-HEADED HOUSEHOLD

2015-2019 ACS 5 YEAR ESTIMATES



ZERO-VEHICLE HOUSEHOLD

2015-2019 ACS 5 YEAR ESTIMATES



APPENDIX II

TITLE VI ASSURANCES

Below is the text of ACOG's Title VI Assurances. The most recent signed version of the Assurances may be viewed and downloaded from the [ACOG website](#).

The Association of Central Oklahoma Governments (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 to 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, Non-discrimination 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, sex, age, national origin, disability/handicap, or income status, be excluded from participation in, be denied the benefits of, or be otherwise subjected to discrimination under any program or activity for which the Recipient receives Federal financial assistance from the Department of Transportation, including the Federal Highway Administration; and HEREBY GIVES ASSURANCE THAT it will promptly take any measures necessary to effectuate this agreement. This assurance is required by Subsection 21.7(a) (1) of the Regulations, a copy of which is attached.

More specifically and without limiting the above general assurance, the Recipient hereby gives the following specific assurances with respect to its Federal-aid Highway Program:

1. That the Recipient agrees that each "program" and each "facility," as defined in Subsections 21.23(e) and 21.23(b) of the Regulations, will be (with regard to a "program") conducted or will be (with regard to a "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 bids for work or materials subject to the regulations made in connection with the Federal-aid Highway Program and, in adapted form, in all proposals for negotiated agreements: The Association of Central Oklahoma Governments, 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, Department of Transportation, Subtitle A, Office of the Secretary, Part 21, Non-discrimination in Federally-assisted Programs of the Department of Transportation, issued pursuant to such Act, hereby notifies all bidders that it will affirmatively ensure that in any contract entered into pursuant to this advertisement, Disadvantaged 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, sex, age, national origin, disability/handicap, or income status in consideration for an award.
3. That the Recipient shall insert the clauses of Part A of this assurance in every contract subject to the Act and the Regulations.
4. That the clauses of Part B of this assurance shall be included, 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 operated in connection therewith.
6. That where the Recipient receives federal financial assistance in the form, or for the acquisition of real property or an interest in real property, the assurance shall extend to rights to space on, over, or under such property.

7. That the Recipient shall include the appropriate clauses set forth in Parts C and D of this assurance, as a covenant running with the land, in any future deeds, leases, permits, licenses, and similar agreements entered into by the Recipient with other parties:
 - a. For the subsequent transfer of real property acquired or improved under the Federal-aid Highway Program; and
 - b. For the construction or use of, or access to space on, over, or under, real property acquired or improved under the Federal-aid Highway 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 in the form of, personal property, or real property or interest therein, or structures or improvements thereon; in which case the assurance obligates the Recipient or any transferee for the longer of the following periods:
 - a. The period during which the property used for a purpose for which the Federal financial assistance is extended, or for another purpose involving the provision of similar services or benefits; or
 - b. The period during which the Recipient retains ownership or possession of the property.
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 or 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 by 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 federal-aid Highway Program and is binding on it, other recipients, subgrantees, contractors, subcontractors, transferees, successors in interest, and other participants in the federal-aid Highway Program. The person or persons whose signatures appear below are authorized to sign this assurance on behalf of the Recipient.

PART A: CONTRACTUAL ASSURANCES

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

1. **Compliance with Regulations:** The Contractor shall comply with the regulations relative to non-discrimination in federally assisted programs of the Department of Transportation, Title 49, Code of Federal Regulations, Part 21, as they may be amended from time to time (hereinafter referred to as the Regulations), which are herein incorporated by reference and made a part of this contract.
2. **Non-discrimination:** The Contractor, with regard to the work performed by it during the contract, shall not discriminate on the grounds of race, color, sex, age, national origin, disability/handicap, or income status, in the selection and retention of subcontractors, including procurements of materials and leases of equipment. The Contractor shall not participate, either directly or indirectly, in the discrimination prohibited by Section 21.5 of the Regulations, including employment practices when the contract covers a program set forth in the Regulations.
3. **Solicitations for Subcontracts, Including Procurement of Materials and Equipment:** In all solicitations, either by competitive bidding or negotiation, made by the Contractor for work to be performed under a

subcontract, including procurements of materials or leases of equipment, each potential subcontractor or supplier shall be notified by the Contractor of the Contractor's obligations under this contract and the Regulations relative to non-discrimination on the grounds of race, color, sex, age, national origin, disability/handicap, or income status.

4. Information and Reports: The contractor shall provide all information and reports required by the Regulations, or directives issued pursuant thereto, and shall permit access to its books, records, accounts, other sources of information and its facilities as may be determined by the State Department of Transportation or the Federal Highway Administration to be pertinent to ascertain compliance with such Regulations or directives. Where any information required of a Contractor is in the exclusive possession of another who fails or refuses to furnish this information, the Contractor shall so certify to the State Department of Transportation, or the Federal Highway Administration, as appropriate, and shall set forth what efforts it has made to obtain the information.
5. Sanctions for Noncompliance: In the event of the Contractor's noncompliance with the non-discrimination provision of this contract, the State Department of Transportation shall impose such contract sanctions as it or the Federal Highway Administration may determine to be appropriate, including but not limited to withholding of payments to the Contractor under the contract until the Contractor complies and/or cancellation, termination, or suspension of the contract in whole or in part.
6. Incorporation of Provisions: The Contractor shall include the provisions of paragraphs 1 through 6 in every subcontract, including procurements of materials and leases of equipment, unless exempt by the Regulations or directives issued pursuant thereto.

The Contractor shall take such action with respect to any subcontract or procurement as the State Department of Transportation or the Federal Highway Administration may direct as a means of enforcing such provisions, including sanctions for noncompliance provided, however, that in the event a Contractor becomes involved in, or is threatened with, litigation by a subcontractor or supplier as a result of such direction, the Contractor may request the State Department of Transportation to enter into such litigation to protect the interests of the State; and, in addition, the Contractor may request the United States to enter into such litigation to protect the interests of the United States.

PART B: CLAUSES FOR DEEDS TRANSFERRING UNITED STATES PROPERTY

The following clauses shall be included in any and all deeds effecting or recording the transfer of real property, structures, or improvements thereon, or granting interest therein from the United States pursuant to the provisions of Assurance 4:

GRANTING CLAUSE

NOW, THEREFORE, the Department of Transportation, as authorized by law and upon the condition that the State of Oklahoma will accept title to the lands and maintain the project constructed thereon in accordance with Title 23, United States Code, the Regulations for the Administration of Federal Aid for Highways, and the policies and procedures prescribed by the Federal Highway Administration of the Department of Transportation, and also in accordance with and in compliance with all requirements imposed by or pursuant to Title 49, Code of Federal Regulations, Department of Transportation, Subtitle A, Office of the Secretary, Part 21, Non-discrimination in Federally-assisted Programs of the Department of Transportation (hereinafter referred to as the Regulations), pertaining to and effectuating the provisions of Title VI of the Civil Rights Act of 1964 (78 Stat.252; 42 U.S.C. 2000d to 2000d-4), does hereby remise, release, quitclaim, and convey unto the State of Oklahoma all the right, title, and interest of the Department of Transportation in and to said lands and made a part hereof.

HABENDUM CLAUSE

TO HAVE AND TO HOLD said lands and interests therein unto the State of Oklahoma and its successors forever subject however, to the covenant, conditions, restrictions, and reservations herein contained as follows, which will remain in effect for the period during which the real property or structures are used for a purpose for which federal financial assistance is extended, or for another purpose involving the provision of similar services or benefits, and shall be binding to the State of Oklahoma, its successors, and assigns.

The State of Oklahoma, in consideration of the conveyance of said lands and interests in lands, does hereby covenant and agree, as a covenant running with the land, for itself, its successor, and assigns that (1) no person shall, on the grounds of race, color, sex, age, national origin, disability/handicap, or income status, be excluded from participation in, be denied the benefits of, or be otherwise subjected to discrimination with regard to any facility located wholly or in part on, over, or under such lands hereby conveyed [,][and]* (2) that the State of Oklahoma shall use the lands and interests in lands so conveyed in compliance with all requirements imposed by or pursuant to Title 49, Code of Federal Regulations, Department of Transportation, Subtitle A, Office of the Secretary, Part 21, Non-discrimination in Federally-assisted Programs of the Department of Transportation-Effectuation of Title VI of the Civil Rights of 1964, and as said Regulations may be amended [,] and (3) that in the event of breach of any of the above-mentioned non-discrimination conditions, the Department shall have a right to re-enter said lands and facilities on said land; and the above described land and facilities shall thereon revert to and vest in and become the absolute property of the Department of Transportation and its assignees as such interest existed prior to the deed.*

*Reverter clause and related language to be used only when it is determined that such a clause is necessary in order to effectuate the purposes of Title VI of the Civil Rights Act of 1964

PART C: CLAUSES FOR TRANSFER OF REAL PROPERTY ACQUIRED OR IMPROVED UNDER THE ACTIVITY, FACILITY, OR PROGRAM

The following clauses shall be included in all deeds, licenses, leases, permits, or similar instruments entered into by the State of Oklahoma, pursuant to the provisions of Assurance 7(a).

The (grantee, licensee, lessee, permittee, etc., as appropriate), for him or herself, his or her heirs, personal representative, successors in interest, and assigns, as a part of the consideration hereof, does hereby covenant and agree [in the case of deeds and leases add “as a covenant running with the land”] that:

In the event facilities are constructed, maintained, or otherwise operated on the said property described in this (deed, license, lease, permit, etc.) for a purpose for which a U.S. Department of Transportation activity, facility, or program is extended, or for another purpose involving the provision of similar services or benefits, the (grantee, licensee, lessee, permittee, etc.) shall maintain and operate such facilities and services in compliance with all requirements imposed by the Acts and Regulations (as may be amended) such that no person on the grounds of race, color, or national origin, will be excluded from participation in, denied the benefits of, or be otherwise subjected to discrimination in the use of said facilities.

With respect to licenses, leases, permits, etc., in the event of breach of any of the above non-discrimination covenants, the State of Oklahoma shall have the right to terminate the [license, lease, permit, etc.] and to enter, re-enter, and repossess said lands and the facilities thereon and hold the same as if said [license, lease, permit, etc.] had never been made or issued.*

With respect to a deed, in the event of breach of any of the above non-discrimination covenants, the State of Oklahoma shall have the right to enter or re-enter said lands and facilities thereon, and the above described lands and facilities shall thereupon revert to and vest in and become the absolute property of the State of Oklahoma and its assigns.*

*Reverter clause and related language to be used only when it is determined that such a clause is necessary in order to effectuate the purposes of Title VI of the Civil Rights Act of 1964.

PART D: CLAUSES FOR CONSTRUCTION/USE/ACCESS TO REAL PROPERTY ACQUIRED UNDER THE ACTIVITY, FACILITY, OR PROGRAM

The following shall be included in all deeds, licenses, leases, permits, or similar agreements entered into by the State of Oklahoma, pursuant to the provisions of Assurance 6(b).

The (grantee, licensee, lessee, permittee, etc., as appropriate), for him or herself, his or her personal representatives, successors in interest, and assigns, as a part of the consideration hereof, does hereby covenant and agree [in the case of deeds and leases add “as a covenant running with the land”] that (1) no person, on the grounds of race, color, sex, age, national origin, disability/handicap, or income status, shall be excluded from participation in, be denied the benefits of, or be otherwise subjected to discrimination in the use of said facilities, (2) that in the construction of any improvements on, over, or under such land and the furnishing of services thereon, no person, on the grounds of race, color, sex, age, national origin, disability/handicap, or income status, shall be excluded from participation in, be denied the benefits of, or otherwise be subjected to discrimination, (3) that the (grantee, licensee, lessee, permittee, etc.) shall use the premises in compliance with all other requirements imposed by or pursuant to the Acts and Regulations, as amended, set forth in this Assurance.

With respect to [licenses, leases, permits, etc.], in the event of breach of any of the above non-discrimination covenants, the State of Oklahoma shall have the right to terminate the [license, lease, permit, etc.] and to enter or re-enter and repossess said land and the facilities thereon and hold the same as if said [license, lease, permit, etc.] had never been made or issued.*

With respect to deeds, in the event of breach of any of the above non-discrimination covenants, the State of Oklahoma shall have the right to re-enter said land and facilities thereon, and the above described lands and facilities shall thereupon revert to and vest in and become the absolute property of the State of Oklahoma and its assigns.*

*Reverter clause and related language to be used only when it is determined that such a clause is necessary in order to effectuate the purpose of Title VI of the Civil Rights Act of 1964.

PART E: TITLE VI AUTHORITIES

During the performance of this contract, the contractor, for itself, its assignees, and successors in interest (hereinafter referred to as the “contractor”) agrees to comply with the following nondiscrimination statutes and authorities; including, but not limited to:

- Title VI of the Civil Rights Act of 1964 (42 U.S.C. § 2000d et seq., 78 stat. 252), (prohibits discrimination on the basis of race, color, national origin); and 49 CFR Part 21.
- The Uniform Relocation Assistance and Real Property Acquisition Policies Act of 1970, (42 U.S.C. § 4601), (prohibits unfair treatment of persons displaced or whose property has been acquired because of Federal or Federal-aid programs and projects)

- Federal-Aid Highway Act of 1973, (23 U.S.C. § 324 et seq.), (prohibits discrimination on the basis of sex)
- Section 504 of the Rehabilitation Act of 1973, (29 U.S.C. § 794 et seq.), as amended, (prohibits discrimination on the basis of disability); and 49 CFR Part 27.
- The Age Discrimination Act of 1975, as amended, (42 U.S.C. § 6101 et seq.), (prohibits discrimination on the basis of age)
- Airport and Airway Improvement Act of 1982, (49 USC § 471, Section 47123), as amended, (prohibits discrimination based on race, creed, color, national origin, or sex)
- The Civil Rights Restoration Act of 1987, (PL 100-209), (Broadened the scope, coverage and applicability of Title VI of the Civil Rights Act of 1964, The Age Discrimination Act of 1975 and Section 504 of the Rehabilitation Act of 1973, by expanding the definition of the terms “programs or activities” to include all of the programs or activities of the Federal-aid recipients, sub-recipients and contractors, whether such programs or activities are Federally funded or not)
- Titles II and III of the Americans with Disabilities Act, which prohibit discrimination on the basis of disability in the operation of public entities, public and private transportation systems, places of public accommodation, and certain testing entities (42 U.S.C. §§ 12131-12189) as implemented by Department of Transportation regulations at 49 C.F.R. parts 37 and 38.
- The Federal Aviation Administration’s Non-discrimination statute (49 U.S.C. § 47123) (prohibits discrimination on the basis of race, color, national origin, and sex).
- Executive Order 12898, Federal Actions to Address Environmental Justice in Minority Populations and Low-Income Populations, which ensures Non-discrimination against minority populations by discouraging programs, policies, and activities with disproportionately high and adverse human health or environmental effects on minority and low-income populations.
- Executive Order 13166, Improving Access to Services for Persons with Limited English Proficiency, and resulting agency guidance, national origin discrimination includes discrimination because of Limited English proficiency (LEP). To ensure compliance with Title VI, reasonable steps must be taken to ensure that LEP persons have meaningful access to programs (70 Fed. Reg. at 74087 to 74100).
- Title IX of the Education Amendments of 1972, as amended, which prohibits discrimination because of sex in education programs or activities (20 U.S.C. 1681 et seq).

APPENDIX III

REPORTING: WORK PLAN AND ACCOMPLISHMENT REPORT

Accomplishments Made Since Last Plan Revision

- Updates and revision of ACOG's Civil Rights webpage
- Title VI complaint log created (no complaints received)
- Updated Limited English Proficiency (LEP) Plan
- Updated Environmental Justice Plan
- Created web mapping applications displaying demographic data utilized in the Environmental Justice and LEP Plans for use by member agencies
- Developed and maintained database of ACOG staff who can translate, interpret, or are bilingual
- Developed internal Employee Guide for Assisting LEP Individuals
- Provided updated Employee Guide for Assisting LEP Individuals and Interpreter-Translator Database to ACOG staff most likely to interact with LEP individuals
- Employed translation and accessibility assistance on the ACOG webpage to translate written and digital documentation
- Updated Public Participation Plan
- Updated ACOG's Title VI complaint form and process
- Updated Title VI Plan
- Created a separate email address for all Title VI communications (title.vi@acogok.org)

Issues Identified and Addressed

- No Title VI or non-discrimination issues were identified

Reviews Conducted

- No reviews were conducted

Summary and Status of Title VI Complaints Filed

- No complaints were filed or logged between CY 2011 - CY 2021

Work Plan

- Have Title VI Assurances signed by Executive Director
- Continue maintaining current Title VI information on the Civil Rights section of ACOG's webpage
- Continue maintaining database of ACOG staff who can translate, interpret, or are bilingual
- Provide demographic data on ACOG's ArcGIS Online page for download by member entities and the public
- Use Title VI sign-in sheets at public meetings and make Title VI brochures available at public meetings and at ACOG's front reception desk
- Seek out training opportunities for ACOG staff on Title VI and ADA/504 issues. The Title VI Coordinator will complete the following courses as recommended by the FHWA and FTA:

Title VI Plan

- Title VI and Public Transit (NTI)
- Title VI Essentials (FHWA)
- [Local Public Agency \(LPA\) Title VI Training Modules](#) (Nevada DOT)
- [Annual FHWA Title VI Training](#) (Arizona DOT)

APPENDIX IV

TITLE VI COMPLAINT FORM

TITLE VI COMPLAINT FORM



The Association of Central Oklahoma Governments 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, or national origin, as provided by Title VI of the Civil Rights Act of 1964, as amended. Title VI complaints must be filed within 180 calendar days from the date of the alleged discrimination.

OFFICE USE ONLY
DATE RECEIVED:

DATE OF FILING:

NAME: _____
ADDRESS: _____
CITY, STATE, ZIP: _____
PHONE NUMBER: _____
EMAIL ADDRESS: _____

INDICATE ON WHAT GROUND(S) YOU BELIEVE YOU HAVE BEEN DISCRIMINATED AGAINST (CHECK ALL THAT APPLY):

RACE
 COLOR
NATIONAL ORIGIN

INDICATE THE PERSON(S) WHO YOU BELIEVE DISCRIMINATED AGAINST YOU:

NAME(S): _____
WORK LOCATION (IF KNOWN): _____
WORK PHONE: _____
DATE OF ALLEGED INCIDENT: _____

IF YOU HAVE AN ATTORNEY REPRESENTING YOU CONCERNING THE MATTERS RAISED IN THIS COMPLAINT, PLEASE PROVIDE THE FOLLOWING:

NAME: _____
ADDRESS: _____
WORK PHONE: _____
EMAIL ADDRESS: _____

EXPLAIN WHY YOU BELIEVE DISCRIMINATION HAS OCCURRED. BE SURE TO INCLUDE HOW OTHER PERSONS WERE TREATED DIFFERENTLY THAN YOU. IF THERE ARE WITNESSES, PLEASE PROVIDE NAMES, ADDRESSES, AND TELEPHONE NUMBERS. ATTACH ADDITIONAL PAGES AS NECESSARY AND ANY WRITTEN MATERIAL PERTAINING TO YOUR CASE.

WHAT REMEDY ARE YOU REQUESTING? PLEASE BE SPECIFIC:

HAVE YOU FILED OR DO YOU INTEND TO FILE A CHARGE OR COMPLAINT CONCERNING THE MATTERS RAISED IN THIS COMPLAINT WITH ANY OTHER AGENCIES (FEDERAL, STATE, OR LOCAL): YES NO

IF SO, PLEASE PROVIDE THE FOLLOWING INFORMATION:

AGENCY: _____

ADDRESS: _____

NAME OF INVESTIGATOR (IF KNOWN): _____

PHONE NUMBER: _____

EMAIL ADDRESS: _____

DATE FILED: _____

STATUS OF CASE: _____

I CONFIRM THAT I HAVE READ THE ABOVE CHARGE(S) AND IT IS TRUE TO THE BEST OF MY KNOWLEDGE.

PRINT OR TYPED NAME OF COMPLAINANT:

SIGNATURE: _____ DATE: _____

COMPLETED FORMS MUST BE SUBMITTED TO THE ASSOCIATION OF CENTRAL OKLAHOMA GOVERNMENTS. IF YOU REQUIRE ANY ASSISTANCE, PLEASE CONTACT THE TITLE VI COORDINATOR AT 405-234-2264 or title.vi@acogok.org

[association of central oklahoma governments](http://associationofcentraloklahomagovernments.org)

4205 N. Lincoln Blvd. | Oklahoma City, OK 73105 | 405.234.2264 | acogok.org



All Title VI requests and complaints should be directed to:

Association of Central Oklahoma Governments
Attention: Title VI Coordinator
4205 North Lincoln Blvd
Oklahoma City, OK 73105
(405) 234-2264
title.vi@acogok.org