



**Miami Valley Regional Planning Commission**

**Title VI Program Procedures Description**

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**A RESOLUTION BY THE MIAMI VALLEY REGIONAL PLANNING COMMISSION  
APPROVING MVRPC's TITLE VI PROGRAM**

**WHEREAS**, the Miami Valley Regional Planning Commission is designated as the Metropolitan Planning Organization (MPO) by the Governor acting through the Ohio Department of Transportation in cooperation with locally elected officials for Greene, Miami and Montgomery Counties including the jurisdictions of Carlisle, Franklin and Springboro in Warren County; and

**WHEREAS**, the MVRPC's Board of Directors serves as the policy and decision making body through which local governments guide the MPO's transportation planning process for the Dayton Metropolitan Area; and

**WHEREAS**, federally funded programs require Title VI programs and assurances; and

**WHEREAS**, MVRPC has developed and used a Title VI program for many years and has periodically submitted a program description to FTA and ODOT/FHWA as required; and

**WHEREAS**, a change was made to FTA Title VI regulations that requires Board approval of the MPO's Title VI program; and

**NOW, THEREFORE BE IT RESOLVED** that the Commission approves the Miami Valley Regional Planning Commission Title VI program.

**BY ACTION OF THE** Miami Valley Regional Planning Commission's Board of Directors.

**Brian O. Martin, AICP**  
Executive Director

January 9, 2014

**Michael Beamish**  
Chairperson  
Board of Directors of the  
**MIAMI VALLEY REGIONAL  
PLANNING COMMISSION**

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## **Miami Valley Regional Planning Commission Title VI Program Procedures Description**

This document is a compilation of the Miami Valley Regional Planning Commission's (MVRPC) Title VI program procedures for all agency planning activities, consultant contracting and agency administration.

1. Designation of Agency Title VI and DBE Program Coordinator

MVRPC has assigned a staff member, Director of Finance and Administration, to monitor and review Title VI issues. This staff member is part of MVRPC's planning team and attends all meeting of the Board of Directors and Executive Committee. The job description of this position includes responsibilities for monitoring compliance, consultant contracts and MVRPC employee policies.

2. Agency Nondiscrimination Policy statement and Public notice of compliance with Title VI

MVRPC's website (<http://www.mvrpc.org/region/administration/policies>) and a posted public copy in MVRPC's office all include a public notice of compliance and information about how to file a complaint as follows:

**ASSURANCE OF COMPLIANCE WITH EQUAL OPPORTUNITY NON-DISCRIMINATION, INCLUDING TITLES VI AND VII OF THE CIVIL RIGHTS ACT OF 1964, THE AGE DISCRIMINATION IN EMPLOYMENT ACT, THE REHABILITATION ACT, THE AMERICANS WITH DISABILITIES ACT and Other FEDERAL NON-DISCRIMINATION LAWS \***

**The Miami Valley Regional Planning Commission agrees that it will comply with regulations to the end that no person in the United States shall, on the ground of race, color, sex, age, disability, religion, military status, genetic information, sexual orientation or national origin, be excluded from participation in, be denied the benefits of, or be otherwise subjected to discrimination under any program from recruitment, employment, employee training or activity for which it receives federal financial assistance either directly or indirectly from the federal departments, and other federal, state and local government sources as well as any and all national, regional, and local private funds; and hereby gives assurance that it will in all phases and levels of program and activities, act affirmatively to achieve equal opportunities for participation by actively seeking out qualified people for due consideration for availability and job opportunities and encouraging the involvement of the socially and/or physically disadvantaged population in all phases of the program.**

**In all cases, this assurance shall obligate this agency, the Miami Valley Regional Planning Commission, for the period during which the federal, state and local financial assistance are extended to it.**

**This assurance is given in consideration of and for the purpose of obtaining either directly or indirectly any and all federal grants, loans, contracts, property, or discounts, or other federal financial assistance extended after the date hereof to Miami Valley Regional Planning**

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Commission by the United States federal departments and any and all other governmental agencies — including installment payments after such date on account of applications for financial assistance which were approved before such date; and any and all sources of private funding. Miami Valley Regional Planning Commission recognizes and agrees that such financial assistance will be extended in reliance on the representations and agreements made in this assurance, and that the United States Government as well as state and local Civil Rights Commissions duly recognized shall have the right to seek judicial enforcement of this assurance. This assurance is binding on Miami Valley Regional Planning Commission, its successors, transferees, and assignees.

Any person who believes that they have been discriminated against by reason of race, color, sex, age, disability, religion, military status, genetic information, sexual orientation or national origin, be excluded from participation in, be denied the benefits of, or be otherwise subjected to discrimination under any program from recruitment, employment, employee training or activity for which it receives federal financial assistance either directly or indirectly from the federal departments, and other federal, state and local government sources as well as any and all national, regional, and local private funds may contact the Executive Director of MVRPC who will advise the complainant of their rights for filing a complaint. The complainant shall within 180 days submit a written complaint to the Executive Director.

**Non-Discrimination Authorities \***

- Title VI of the Civil Rights Act of 1964 (42 U.S.C. § 2000d *et seq.*, 78 stat. 252) (prohibits discrimination on the basis of race, color, national origin); 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 U.S.C. § 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 Federal-Aid recipients, sub-recipients, and contractors,

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whether such programs or activities are Federally funded or not)

- **Titles II and III of the Americans with Disabilities Act (42 U.S.C. §§ 12131-12189), as implemented by Department of Transportation regulations at 49 CFR parts 37 and 38 (prohibits 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)**
- **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 (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 People 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, you must take reasonable steps to ensure that LEP persons have meaningful access to your programs (70 Fed. Reg. at 74087 to 74100)**
- **Title VIII of the Civil Rights Act of 1968 (Fair Housing Act), as amended (prohibits discrimination in the sale, rental, and financing of dwellings on the basis of race, color, religion, sex, national origin, disability, or familial status (presence of child under the age of 18 and pregnant women)**
- **Title IX of the Education Amendments Act of 1972, as amended (20 U.S.C. 1681 et seq.) (prohibits discrimination on the basis of sex in education programs or activities)**

MVRPC's website includes our public participation policy, which includes federal requirements for MPO planning activities and Title VI assurances:

(see page 6 of <http://www.mvrpc.org/services/public-information-office/mvrpc-public-participation-policy>)

MVRPC planning and administration procedures reflect both this nondiscrimination policy and include consideration use of small business where appropriate and of Disadvantaged Business Enterprises (DBE) in all hiring decisions, purchasing and provisions of internal administrative services. In addition, outreach efforts are made to inform neighborhood and citizen's groups, particularly those in minority areas, of MVRPC's functions and opportunities for citizen participation in its planning process. The MVRPC web site ([www.mvrpc.org](http://www.mvrpc.org)) also includes a Spanish translation option. This policy has been particularly emphasized in the TIP and Long Range Plan processes.

A Title VI assurance is included in the MPO self-certification approved annually by the MVRPC Board of Directors.

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3. Title VI Complaint Process (Also see section 7 for procedure and form)

All complaints will be logged and FHWA, Headquarters Civil Rights (FHWA, HCR) as well as ODOT's Division of Equal Opportunity will be promptly notified.

Complaints filed with MVRPC in which MVRPC is named as the Respondent shall be forwarded to ODOT: ATTN: Title VI Coordinator for processing.

Complaints received by ODOT or FHWA, HCR filed against Federal-aid sub-recipients of MVRPC may be sent to MVRPC for investigation.

Complaints filed with MVRPC against its recipients shall be processed by MVRPC in accordance with FHWA approved procedures as required pursuant to 23 CFR 200.

Final determination of Title VI complaints will be made by the Federal Highway Administration in coordination with Ohio Division of Equal Opportunity - ODOT and MVRPC.

4. Transportation Planning Processes

A. Public Participation Summary

MVRPC's Long Range Transportation Plan includes extensive public participation efforts. The public participation efforts are made in the form of special public participation meetings in all MPO counties (Miami, Montgomery, Greene and northern Warren); presentations in various media; placing ads with minority-focused radio stations and newspapers. As well as less traditional methods such as placing surveys on RTA buses are used in an effort to insure the broadest range of public input possible into the process. For Plan updates, TV advertising and social media outreach were also utilized in an effort to reach new audiences. Similar efforts are utilized in seeking input for the TIP. Also in accordance with MAP-21 and Executive Order 12898 on Environmental Justice requirements, an updated public participation policy with very detailed requirements and procedures, entitled "Public Participation Policy for Transportation Planning", has been adopted and implemented by the MVRPC Board of Directors. For example, MVRPC planning processes include enhanced ways to further seek input from traditionally disadvantaged populations or otherwise EJ-target groups and to include them in the public participation process. These efforts include:

- Expanding the mailing list to include EJ-target populations (low-income, minority, elderly and disabled);
- Adapting advertising for ease of understanding, including special articles and flyers; this includes translation into Spanish;
- Adapting public meeting times and locations for accessibility;
- Advertising at GDRTA Hubs;
- Advertising directed toward minority-marketed newspapers and radio stations.

MVRPC's public participation efforts encourage the involvement of the public and socially

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and/or physically disadvantaged populations in all phases of our programs, including assurances that no person in the United States shall, on the ground of race, color, sex, age, creed, handicap, or national origin, be excluded from participation in, be denied the benefits of, or be otherwise subjected to discrimination under any program.

This policy is reviewed annually and revised as necessary, with a comprehensive update completed in FY2016. (<http://www.mvrpc.org/services/public-information-office/mvrpc-public-participation-policy>)

### **B. Public Outreach and Language Assistance**

Posters advertising public participation meetings are displayed at Greater Dayton Regional Transit Authority hubs, and Greene CATS and Miami County Transit offices. Posters (translated into Spanish) are also distributed to the Latino Connection, a local Hispanic community-based outreach organization. Public notice newspaper ads are printed in both Spanish and English in La Jornada Latina, a free newspaper distributed throughout the region. Translation services for the hearing-impaired are provided via the Family Services Association. C-print translations are provided upon request. In SFY2013 MVRPC completed a Limited English Proficiency (LEP) analysis for the MPO area. The analysis indicates that less than 1 percent of the population 5 years or older (approximately 5,400 individuals) is not proficient in English. Approximately 50 percent of the LEP individuals speak Spanish as their primary language with the remainder speaking other Indo-Euro, Asian Pacific, or other languages. As a Result, MVRPC is focusing its outreach efforts in the Spanish speaking population. English (95.2%) and Spanish (1.7% second highest population) represent 97% of the population of our three county region. (see section 8 - detail table). The complete LEP documentation can be found at our web link:

<http://www.mvrpc.org/sites/default/files/LimitedEnglishProficiencyAnalysis.pdf>

### **C. MPO Transportation Planning Process**

MVRPC uses extensive outreach processes to inform neighborhood and citizen's groups, particularly those in minority areas, of MVRPC's functions and opportunities for citizen participation in its planning process. The MVRPC web site ([www.mvrpc.org](http://www.mvrpc.org)) also includes a Spanish translation option. As noted above, this has been particularly emphasized in the TIP (<http://www.mvrpc.org/transportation/short-range/current/>) and Long Range Plan (<http://www.mvrpc.org/transportation/long-range>) processes.

Data relative to minority persons, neighborhoods, income levels, physical environments, travel habits is provided in the profiles of the urbanized area in our State of the Region Report and more detailed subsequent reports on topics such as Economics and Housing. These reports, coupled with the more specific types of data generated through such activities as the Long Range Transportation Plan (particularly the section on Environmental Justice and the associated adverse impact analyses), the Long Range Plan and TIP public participation processes, origin/destination studies, traffic volume studies, household travel surveys, travel time studies, and surveys of the elderly and handicapped, are used as tools



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to guide policy and plan development.

This data is used at all levels of plan development, as well as throughout the decision-making process: planners utilize the data to develop various alternatives from which the system with the least negative impacts will be chosen; the various task forces and committees consider this data in making their recommendations to the MVRPC Board of Directors (the policy board); and the Board of Directors is made aware of the data as a factor that is weighed prior to making a final decision.

MVRPC's Long Range Transportation Plan (the Plan) and Transportation Improvement Program (TIP) include an assessment of the impacts that planned transportation improvements have on environmental justice populations. The approach known as Community Impact Assessment is documented in Chapter 9 of the 2040 Plan. Community Impact Assessment was originally developed for the June 2001 update of the transportation Plan and has subsequently been updated based on 2000 and 2010 Census/ACS data and the most current transportation plan projects. The identification of target areas has been updated based on 2010 Census population and 2008-2012 ACS socio-economic data (see table under question 21) and is used to analyze the impact of the SFY 2016-2019 TIP.

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**Socio Demographic Profile - 2000-2010 Target Population Thresholds**

Data Set	County	2000 Total	2010 Total	2010 Universe	2000 Threshold	2010 Threshold	2000-2010 Change %
<b>Minority Population</b>	Gre	15,911	21,903	161,573	10.80%	13.56%	+20.33%
	Mia	4,174	5,784	102,506	4.20%	5.64%	+25.57%
	Mot	130,978	139,881	535,153	23.40%	26.14%	+10.48%
	War	8,464	20,262	212,693	5.30%	9.53%	+44.39%
<b>Persons in Poverty</b>	Gre	10,937	20,714	153,075	7.40%	13.53%	+45.31%
	Mia	5,912	12,366	101,709	5.98%	12.16%	+50.82%
	Mot	54,650	87,503	523,164	9.77%	16.73%	+41.49%
	War	5,822	13,096	207,043	3.68%	6.33%	+41.86%
<b>Disabled Population*</b>	Gre	20,875	16,647	117,780	17.90%	14.13%	-26.65%
	Mia	15,500	11,897	76,759	20.30%	15.50%	-30.97%
	Mot	102,901	73,416	398,033	23.60%	18.44%	-27.95%
	War	21,939	16,941	148,311	18.40%	11.42%	-61.47%
<b>Elderly Population</b>	Gre	17,492	21,998	161,573	11.80%	13.61%	+13.33%
	Mia	13,096	15,731	102,506	13.20%	15.35%	+13.99%
	Mot	76,679	81,041	535,153	13.70%	15.14%	+9.53%
	War	14,858	22,936	212,693	9.40%	10.78%	+12.06%
<b>Hispanic Population</b>	Gre	1,813	3,439	161,573	1.20%	2.12%	+43.62%
	Mia	721	1,341	102,506	0.70%	1.31%	+46.49%
	Mot	7,096	12,177	535,153	1.30%	2.28%	+42.87%
	War	1,633	4,784	212,693	1.00%	2.25%	+55.55%
<b>Zero-Car Households</b>	Gre	2,838	3,033	62,770	5.13%	4.83%	-6.17%
	Mia	1,891	2,114	40,917	4.91%	5.17%	+4.97%
	Mot	22,257	21,305	223,943	9.71%	9.51%	-2.06%
	War	1,925	2,047	76,424	3.44%	2.68%	-28.36%

Note: \* Because of the changes to the definition, the 2010 ACS disability data should not be compared to the previous 2000 disability data. (see Section C).

Source: 2000, 2010 Census; 2008-2012 American Community Survey

MVRPC's approach to Community Impact Assessment includes:

- Defining target populations. MVRPC's target population groups include minorities, persons in poverty, disabled, elderly, Hispanic, and zero-car households.
- Identifying target areas. MVRPC defines areas of high concentration at the Traffic Analysis Zone (TAZ) level to utilize the travel demand model in conducting tests for adverse impacts. County average percentages for each selected environmental justice population are used to determine if a given TAZ falls above or below the county's threshold for each target population.
- Conducting tests for adverse impacts. Using data from the regional travel demand model and the results of step 2 above, MVRPC studied the impact that

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the proposed plan projects have on work commuting times, accessibility to major facilities, and transit availability for both targeted and non-targeted population groups. When possible the impact of two build scenarios (projects in the TIP only and all projects in the Plan) were compared to existing conditions. The results of the analysis indicated no disproportionate adverse impacts in areas of high environmental justice population concentrations as a result of projects in the Plan or TIP.

- Additional public participation efforts to fully engage diverse population groups.

The TIP also includes an assessment, by funding amount, of the aggregate impact the short-range transportation projects have on the various target populations.

### 5. DBE Participation Process

MVRPC uses the following race-neutral means to help increase DBE participation:

- Arranging solicitations and specifications in ways that facilitate DBE and small business participation, including encouraging prime contractors to subcontract portions of work that they might otherwise perform with their own forces.
- Providing information about RFPs directly to DBEs and other small businesses via the Ohio DOT RFP Bulletin Board.
- Placing bid notices in and through minority-focused media, journals, and associations, as appropriate and available.
- Providing technical assistance and other services, including assistance in developing acceptable bid packages, addressing cash flow, and scheduling problems, etc.
- Communicating information on specific contracting opportunities (e.g., including DBEs and small businesses on bidder mailing lists)
- Distributing DBE information to potential prime contractors, strongly encouraging them to utilize minority subcontractors when submitting their proposal packages, and evaluating them on their efforts to do so.

### 6. Agency Consultant Contracting

MVRPC provides assistance for minority contractors as part of the consultant selection process for planning work. Examples are:

- The Agency's standard benchmark when reviewing contract proposals is 10% in order for the proposal to receive points for DBE participation.

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- MVRPC utilizes DBE Directories from Ohio DOT.
- Information about RFPs is made available directly to DBEs via the Ohio DOT Bulletin Board.
- Notices for both Bids and RFPs are placed in and through minority owned media, journals, and associations as appropriate and available.
- Both Requests for Bids and RFPs are posted on MVRPC's web site.
- All proposers are strongly encouraged to utilize minority subcontractors when submitting their proposal packages and are evaluated on their efforts to do so. For some contracts, a specific DBE goal is established and included as part of the RFP. In addition, award contracts also contain clauses encouraging the use of DBE contractors, vendors, and suppliers. MVRPC has actively implemented the use of small and minority business as subcontractors in awarded contracts.
- Title VI assurances and provisions are included on all consultant contracts.

MVRPC attempts to assure that all consultants comply with Title VI provisions by incorporating the ODOT-prescribed language requirements for contractors and subcontractors into its contractual agreements. Subcontracts with minority vendors are monitored through contractor invoices to insure that the vendors are being utilized as stated in the contract and also to insure that they are being paid in a timely fashion.

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7. Title VI Complaint Procedure

- A. 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 MVRPC Executive Director. A formal complaint must be filed within 180 calendar days of the alleged occurrence. However, the complainant has the right to also file a complaint with state division of Equal Opportunity and with the appropriate federal agency.
- B. Upon receipt of the complaint, MVRPC will determine MVRPC's jurisdiction, acceptability of the complaint, and need for additional information. MVRPC will also acknowledge receipt of the complaint by notifying the complainant.
- C. If the complaint is determined to be within MVRPC's jurisdiction, then MVRPC will log the complaint and assign or designate a staff person to investigate the merit of the complaint.
- D. MVRPC's investigator will prepare an investigative report for MVRPC Executive Director's review.
- E. The investigative report and its findings shall be sent to MVRPC's legal counsel for review.
- F. MVRPC's investigator will review any comments or recommendations from MVRPC's legal counsel. The investigator will discuss the report and recommendations with the Executive Director. The report will be modified as needed.
- G. MVRPC's investigative report and a copy of the complaint will be forwarded to the appropriate oversight agency (for example, the Ohio Department of Transportation Division of Equal Opportunity (DoEO) and FHWA), providing the federally funded assistance.
- H. FHWA is responsible for making the final determination in coordination with DoEO regarding Title VI complaints.
- I. Once complaint determination becomes final, the parties will be properly notified of the resolution of the complaint, including recommendations to remedy any discriminatory practice – if such practice is identified, and any appeal rights.

For more information regarding the MVRPC Title VI complaint process, please contact:

Director of Finance and Administration  
MVRPC  
1-937-223-6323

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<b>Miami Valley Regional Planning Commission Title VI Complaint Form</b>	
NAME (Complainant):	PHONE: (     )
HOME ADDRESS (Include City, State and ZIP):	E-MAIL (If Applicable):
Basis of Discriminatory Action(s): <input type="checkbox"/> Race <input type="checkbox"/> Color <input type="checkbox"/> National Origin <input type="checkbox"/> Sex <input type="checkbox"/> Age <input type="checkbox"/> Disability	
Date of Alleged incident:	Location and position of person(s) who alleged discriminated against you if known:
Explain briefly and clearly as possible what happened and how you believe you were discriminated against. Indicate who was involved. Be sure to include how you feel other persons were treated differently than you. Please attach additional pages as needed or any additional written material about your complaint.	

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What other information do you think is relevant to this complaint?

How can this issue or issues be resolved to your satisfaction?

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Please list below the names, addresses, phone numbers and job titles of person(s) we may contact for additional information about your complaint (witnesses, fellow employees, supervisors, others):

NAME	ADDRESS	PHONE NUMBER	JOB TITLE

Signature:

Date:



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8. Limited English Proficiency (LEP) Analysis Framework

A. Number and proportion of LEP in the service population for programs

As part of an ongoing update process, MVRPC examined the Limited English Proficiency (LEP) populations within its Metropolitan Planning Organization (MPO) boundaries using *2010 American Community Survey: Language Spoken at Home by the Ability to Speak English* datasets.

Of the 37,919 individuals who do not speak English as their primary language in the household, approximately 86% speak English well with 14% being Limited English Proficiency individuals, who do not speak English well or do not speak English at all. When comparing LEP individuals to the total general population, less than 1% of the total population 5 years or older in the Miami Valley are not proficient in English.

The largest percentages of individuals who do not speak English as the primary language in the household in the Miami Valley speak Spanish. Approximately 13,800 speak Spanish, comprising 36.4% of all LEP individuals in the Region. Other languages include Other Indo-Euro, Asian/ Pacific Isles, and all Other.

Overall, our region has primarily English (95.2%) and the largest non-English is Spanish (1.75%) that together represent 97% of the region population. As a result, MVRPC provides Spanish translation services and advertising in Spanish.

**Limited English Proficient (LEP) Persons in the Miami Valley**

County	Speaks English "Well"	Percent Speaks English Well	Total LEP: Speaks English "Not Well"	Percent LEP: Speaks English "Not Well"
<b>Greene</b>	7,948	90.8%	805	9.2%
<b>Miami</b>	2,098	84.7%	380	15.3%
<b>Montgomery</b>	21,241	84.1%	4,017	15.9%
<b>Warren*</b>	1,263	88.4%	167	11.6%
<b>Total:</b>	32,550	85.8%	5,369	14.2%

Source: 2006-2010 American Community Survey 5-Year Estimates

\* Warren Count includes Census block groups in the vicinity of the cities of Carlisle, Franklin, and Springboro.

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**B. Frequency with which LEP individuals come into contact with your programs**

MVRPC programs are primarily transportation planning grants and LEP contact is limited to public participation outreach conducted by MVRPC. MVRPC has an ongoing public participation process that engages our region's population. Individuals do not apply for the transportation projects but will have an interest because of potential transportation projects in their community or region.

MVRPC only provides a FTA grant administration service that publicizes availability of funding for FTA grants and MVRPC performs all application reviews and ranking. MVRPC does not provide any FTA program services or equipment purchases or transit operations. MVRPC is not a transit agency.

Individuals do not apply for the FTA grants. Because of the nature of the FTA grant requirements, these grants are typically awarded to transit agencies that operate and provide all transit services.

**C. Your programs importance to LEP persons**

Because LEP persons do not directly receive project funding, the impact of our programs to LEP persons would be limited to the potential improvement or changes to transportation projects in the next few years or even as far in the future as several decades. MVRPC administration of the FTA grant process has no direct importance to LEP persons, because individuals can not apply for these grants per FTA requirements.

**D. Resources available to the recipient**

MVRPC provides a language translation feature for our web site and we advertise in both English and in Spanish for all public involvement using public posters, regional news media and a Spanish community publication. As part of periodic public advertising, MVRPC invites all eligible applicants to apply for these grants, review and make comments and provide MVRPC contact information. A translation service is available for all public meetings upon request. MVRPC has a written public participation plan that includes these notices of language services assistance, advertising notices in Spanish, as well as specific methods of communications, participation plan elements and responsibilities for conducting an effective public participation process.