



CHISOLM TRAIL METROPOLITAN PLANNING ORGANIZATION'S TITLE VI PLAN

Non-Discrimination Policy

It is the policy of the Chisholm Trail Metropolitan Planning Organization, under Title VI of the Civil Rights Act of 1964; Title VII of the Civil Rights Act of 1968; 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; and other related authorities and regulations, that no person in the United States shall, on the basis of race, color, national origin, religion, sex, disability, age, 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 Chisholm Trail MPO or its subrecipients. An individual has a right to file a complaint against the Chisholm Trail MPO if they believe the agency did not provide necessary services as appropriate. These complaints include those available under Title VI and the ADA. The Title VI Compliant form is available on the Chisholm Trail MPO website or by contacting the CDBG Coordinator at 580-616-7211 or kristen.day@enid.org. The ADA Complaint form is available on the Chisholm Trail MPO website or by contacting the ADA Coordinator at arasmuson@enid.org or 580-616-7242.

Adopted November, 2024

Title VI Plan

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I. INTRODUCTION

Background:

Title VI of the Civil Rights Act of 1964 states:

“No person in the United States shall, on the grounds of race, color, or national origin, be excluded from participation in, be denied the benefits of, or be subjected to discrimination under any program or activity receiving Federal financial assistance.”

The Chisholm Trail Metropolitan Area Planning Organization (“CTMPO”) is an organization that advocates for regional transportation planning and cooperation that receives Federal financial assistance and annually certifies that "no person shall on the grounds of race, color, or national origin, as provided by Title VI of the Civil Rights Act of 1964, as amended, and the Civil Rights Restoration Act of 1987 (P.L. 100.259) be excluded from participation in, be denied the benefits of, or otherwise be subjected to discrimination under any program or activity receiving Federal financial assistance from the Oklahoma Department of Transportation.”

Purpose:

The purpose of this document is to ensure that the CTMPO complies with Title VI of the Civil Rights Act of 1964 and related statutes regarding nondiscrimination and environmental justice.

Enforcement of the latter statutes is covered by this document to the extent that they relate to prohibiting discrimination on the grounds of race, color, and national origin in programs receiving Federal financial assistance. Responsibility for enforcing Title VI and nondiscrimination rests with the federal agencies that extend financial assistance. CTMPO’s actions in enforcing nondiscrimination will include:

1. Considering all individual input;
2. Ensuring that the level and quality of transportation planning and products is provided equitably and without regard to race, color, national origin, disability or income;
3. Recognizing specific and prominent community issues and circumstances;
4. Identifying mechanisms for eliciting involvement from low-income, minority, and other residents and representatives as outlined in the Public Participation Plan;
5. Providing access to information for all individuals and other interested parties;
6. Avoiding, minimizing, or mitigating disproportionately high and adverse human health and environmental effects, including social and economic effects of transportation planning programs and activities on minority populations, persons with disabilities, and low-income populations;

7. Ensuring the full and fair participation of all affected populations to transportation planning programs and activities that affect minority populations, Limited English Proficiency (LEP) individuals, persons with disabilities, and low-income populations;
8. Preventing the denial, reduction, or delay in assistance related to transportation planning programs and activities that benefit minority populations, LEP residents, elderly people, persons with disabilities, and low-income populations;
9. Documenting all outreach, research, planning, project and program development and other activities;
10. Ensuring meaningful access to programs and activities by LEP residents.

II. NON-DISCRIMINATION STATEMENT

Statement:

The CTMPO will comply with guidelines for recipients to include having written procedures for investigating Title VI complaints, investigations and lawsuits. The CTMPO shall inform the Federal Transit Administration (FTA) regional office of the filing of any such complaint within 60 days of the complaint. The CTMPO shall identify each complaint; the date the complaint was filed, and investigation completed; the disposition; and other pertinent information. The CTMPO shall include Title VI language in written agreements and shall monitor for compliance. The CTMPO further assures that every effort will be made to ensure nondiscrimination in all of its programs and activities, whether those programs and activities are federally funded or not.

Publication:

The CTMPO's Title VI Non-Discrimination Statement, in English and Spanish, is posted on CTMPO website, at the CTMPO Office, located at 401 W. Owen K. Garriott, Enid, OK 73701, and posted in the interior of every Enid Public Transit Authority bus.

III. ORGANIZATION AND RESPONSIBILITIES

CTMPO Staff:

CTMPO staff are trained to recognize Title VI discrimination issues as defined by applicable state and federal law and how to process complaints received. They are aware of the CTMPO's responsibilities under Title VI and other nondiscrimination legislation, and if discrimination is discovered, they know to refer to the complaint procedures. All aspects of the compliance and complaint process are overseen by the Title VI Coordinator, Kristen Day, kristen.day@enid.org 580-616-7211.

As appropriate, CTMPO staff will coordinate efforts with Oklahoma's Department of Transportation (ODOT), the Federal Highway Administration (FHWA), and the Federal Transit Authority (FTA), especially during nondiscrimination plan reviews and revisions. If appropriate,

individuals who need more information on Title VI regulations and responsibilities or other nondiscrimination issues will be referred to:

Katrina Fire
Title VI Coordinator
Contract Compliance Division
Oklahoma Department of Transportation
200 N. E. 21st Street, Oklahoma City, OK 73105-3204
Phone: 405.522.8000 – odot-ada-titlevi@odot.org
<https://Oklahoma.gov/odot/business-center/contract-compliance/title-vi.html>

CTMPO Transportation Technical Committee and Transportation Policy Board:

The CTMPO's decisions and work are done by the Transportation Technical Committee and the Transportation Policy Board.

The Transportation Technical Committee, (TTC), provides technical analysis and recommendations to the governing body of the CTMPO, which is the Transportation Policy Board, (TPB), for its consideration and approval. The TTC provides technical advice and guidance for transportation planning. The TTC assists in providing planning and coordination with local governments, ODOT, FHWA, the Federal Aviation Administration (FAA), and the FTA. The TTC reviews all issues related to comprehensive transportation planning processes such as the Unified Planning Work Program, (UPWP), the Transportation Improvement Program, (TIP), transportation plans and policies prior to making a recommendation to the TPB. The TPB reviews, and adopts all policies, plans and processes of the CTMPO.

IV. PUBLIC PARTICIPATION AND ACCESS TO INFORMATION

Engagement Strategies:

At the heart of CTMPO's nondiscrimination efforts, including compliance with Title VI, is to encourage and receive public engagement and participation in the transportation-planning process. The CTMPO encourages and supports active public participation throughout the planning and decision-making process related to the development of proposed transportation plans, programs, and projects so that a safe, efficient transportation system, reflecting the needs and interests of all stakeholders, can be provided. CTMPO aspires to operate many outreach strategies to attain the greatest public participation possible. The following guidelines were developed reflecting federal requirements with the purpose of facilitating this process:

1. Build awareness, interest, and support in the public through the use of local media, publications, and direct public participation techniques;
2. Provide and encourage opportunities for direct resident attendance and involvement in the early stages of the planning process;
3. Develop alternative methods to collect input from residents who do not attend meetings, through direct mail, targeted surveys and web-based input strategies to allow for public comment on the proposed plans or programs;

4. Periodically review and revise the Public Participation Plan in terms of effectiveness to assure that the process provides full and open access to all;
5. Provide the public with timely notice and reasonable access to technical and policy information used in the development of plans or programs;
6. Require a public comment period of 45 days prior to the adoption or amendment of the Public Participation Plan;
7. Develop and tailor public participation plans according to the complexities of particular plans, programs or projects;
8. Ensure compliance with Title VI of the Civil Rights Act of 1964 and subsequent federal legislation, which requires that no person in the United States shall, on the ground of race, color, and national origin be excluded from participation in, be denied the benefits of, or be subjected to discrimination under any program or activity receiving federal financial assistance;
9. Adopt policies with specific plans and programs, consistent with Environmental Justice principles, to ensure that the needs of those traditionally underserved by existing transportation systems, are fully integrated in the planning process;
10. Engage the public in a proactive effort by going to civic and cultural groups, churches, and neighborhood organizations to promote public involvement in transportation planning; and
11. Show due consideration to comments from public participants, and respond to public input received during the planning and program development processes.

Accessibility for Limited English Proficiency (LEP) Residents:

State and federal policies and regulations reinforce the need of the CTMPO to focus attention on reaching low-income and minority households. Furthermore, there are individuals inside the Chisholm Trail Metropolitan Planning Area (MPA) whose primary language is not English. Individuals who do not speak English as their primary language or who have a limited ability to read, write, or understand English may need assistance in overcoming a language barrier that could prevent individuals from accessing services and benefits. To include traditionally underserved communities in the decision-making process, it is necessary to identify key stakeholders that have low or no participation in the process and determine what is preventing them from participating, and what can be done to overcome barriers and increase the levels of participation.

The CTMPO seeks to overcome hurdles to enhance participation by LEP residents in the transportation-planning process, including cultural and language barriers, disabilities, economic constraints, and lack of participation opportunities. Within the Chisholm Trail MPA, there are residents that speak Spanish as their primary language. To ensure these residents have access to and are able to provide input towards the CTMPO's transportation planning products, the CTMPO's website is bilingual and the CTMPO will determine what other strategies will effectively reach these residents and increase their participation, including the following platforms:

Print-newspaper and other periodicals;

Radio Stations;

Informational public meetings; and

Social Media.

V. TITLE VI COMPLAINT PROCESS:

Any person who feels that he or she, individually or as a member of any class of persons, on the basis of race, color, or national origin, has been excluded from or denied the benefits of, or subjected to discrimination by CTMPO or any of their recipients may file a written complaint by completing and submitting CTMPO's Title VI Complaint Form. A sample complaint form is available as Appendix A. It is also available on CTMPO's website. Such complaints should be filed within 180 days of the date the person believes the discrimination occurred or when there has been a continuing course of conduct, the period of time for which it occurred. If assistance is needed in completing the complaint form or for the preparation of any other complaint material, the CTMPO will assist in preparing the complaint.

An individual may file a signed, dated complaint no more than 180 days from the date of the alleged incident. The complaint should include:

1. Your name, address and telephone number;
2. Specific, detailed information (how, why, and when) about the alleged act of discrimination; and
3. Any other relevant information, including the names of any persons, if known, the agency should contact for clarity of the allegations.

Please submit your complaint form to Title VI Coordinator, Kristen Day at 401 W. Garriott Road, 73701 or kristen.day@enid.org, 580-616-7211.

Acceptance of the Complaint: The CTMPO will process complaints that are completed and submitted to the CTMPO. Once a completed Complaint Form is received, CTMPO will review it to determine if the CTMPO is the appropriate agency to investigate the complaint of discrimination. The complainant will receive an acknowledgement letter informing them whether or not the complaint will be investigated by the CTMPO.

Investigation of the Complaint: If the CTMPO is the appropriate agency to investigate the discrimination complaint, the CTMPO will investigate the complaint, which will generally be completed within 90 days from receipt of a completed complaint form. If more information is needed to resolve the case, the CTMPO investigator may contact the complainant. Unless a longer period is specified by CTMPO investigator, the complainant will be asked to respond within ten (10) days from the date the CTMPO investigator requested the additional information. If the requested information is not received within a reasonable time following the request of necessary additional information, the complainant's case may be closed. If a complainant wishes their case be close, a case may be administratively closed at that complainant's request.

Closing or Findings of the Complaint: After the CTMPO investigator fully investigates the complaint, the investigator will issue a letter to the complainant, informing the complainant that either the complaint has been investigated and closed with no finding of a violation or a Letter of Finding that summarizes the allegations substantiated and provides an explanation of the corrective action taken.

Appeal of the Complaint Closure or Findings: If the complainant disagrees with CTMPO investigator's determination, the complainant may request reconsideration by submitting the request in writing to the investigator within ten (10) days after the date of the letter of closure or letter of finding, stating with specificity the basis for the reconsideration. The CTMPO will notify the complainant of the decision either to accept or reject the request for reconsideration within ten (10) days. In cases where reconsideration is granted, the CTMPO will issue a determination letter to the complainant upon completion of the reconsideration review.

VI. DATA COLLECTION AND ANALYSIS

The CTMPO utilizes data provided by the United States Census Bureau to identify potential LEPE populations located within the Chisholm Trail MPA to ensure meaningful opportunities for participation were provided for those minority groups. The CTMPO will continue utilizing the Census to ensure it provides information to the minority population groups in accessible ways, including literature printed in their primary language, the CTMPO website allows all information to be translated into Spanish.

The CTMPO will also utilize data collected from the Enid Public Transit Authority ("EPTA"), which is the public transportation provider for the City of Enid, and the only public transportation provider within the Chisholm Trail MPA. The EPTA operates a para transit service with a call center that dispatches drivers to the residents in need of a ride from the public transportation system. Because the EPTA drivers are dispatched to the individuals utilizing EPTA's service, the EPTA call center has data that can be utilized by the CTMPO to identify the neighborhoods and areas within the Chisholm Trail Metropolitan Planning Area which may have limited access to transportation.

This data will assist the CTMPO in following state and federal policies and regulations, including Environmental Justice initiatives, that reinforce the need of agencies such as the CTMPO to focus attention on reaching low-income and minority households. There are individuals whose primary language is not English and may be LEP residents. This language barrier may prevent

individuals from accessing services and benefits. To include traditionally underserved communities in the decision-making process, the CTMPO will utilize the Census data and EPTA data to identify the locations of populations with mobility needs and LPE populations within the Chisholm Trail Metropolitan Planning Area. The EPTA data will provide a real time account for the populations with limited access to transportation within the Chisholm Trail MPA and can be used for bi-annual reviews of the efforts and strategies implemented by the CTMPO. The census will provide in greater detail the location and population of minority and LEP residents, but is only updated once every decade. The CTMPO will also be able to utilize data collected to ensure compliance with Environmental Justice initiatives, which includes minority populations, disabled populations, people in poverty, and the elderly.

VII. MONITORING AND REPORTING

The CTMPO will bi-annually review the success of its efforts to reach minority, elderly, low income, and LEP residents. This bi-annual review will provide the CTMPO with the opportunity to augment its efforts to increase the public participation, which in turn, will ensure compliance with Title VI, including Environmental Justice initiatives. Examples of the CTMPO review would include the following:

1. Effectiveness of publications– the CTMPO can analyze the number of responses that occurred from publications that focus on minority, youth, elderly, low-income, or LEP residents.
2. Participation in Meetings– the CTMPO can review the public participation at its TTC and TPB meetings to determine how time, place and accessibility effect participation.
3. Determination of Communication Effectiveness– the CTMPO will determine whether the individuals receiving the information understand it, and if certain mediums of distribution work better than others.
4. Reviewing Environmental Justice Progress– t he CTMPO will review its strategies for engaging minority, youth, elderly, low-income, and LEP residents in the decision-making process to determine effectiveness.

The CTMPO's efforts to involve public participation are dynamic and must remain so to address the needs of the community. As techniques are proven effective and institutionalized, the CTMPO's processes will evolve to reflect those advancements. Participating stakeholders and CTMPO staff will assess the effectiveness of each public participation activity. The CTMPO will review possible revisions after consultation with stakeholders and a thorough opportunity for public comment. To ensure the process is periodically evaluated, the CTMPO will, at a minimum, review and assess the process and results every two years and recommend any revisions that may be appropriate. The CTMPO will update the Plan every three years as required by the Federal Government.

In accordance with federal regulations, the CTMPO documents all aspects of the public participation process, and makes available for public review these documents during normal business hours at the CTMPO offices. This information includes sign-in sheets, meeting minutes, outreach materials, and various other essential meeting details and data.

VIII. PLAN DISTRIBUTION

The CTMPO, in all activities, will seek out and consider the viewpoints of LEP residents, the elderly, minority and low-income populations. The CTMPO will translate this plan into Spanish and post it on the CTMPO website and providing copies of the plan at public access areas such as the city and town halls, county offices, public school systems, Autry Technology Center, and institutions of higher education. CTMPO will prioritize reaching out and corresponding with organizations that represent LEP residents, minority, youth, elderly, and low-income residents, such as minority places of worship, elder care providers, Our Daily Bread, Salvation Army, Hope Outreach, Community Development Support Organization, other nonprofit organizations, and after-school programs.

IX. ADOPTION

The Chisholm Trail Metropolitan Planning Organization through its Transportation Policy Board has reviewed and approved its Title VI Plan on the ___ day of _____, 2024.

Chairman of Chisholm Trail MPO
Transportation Policy Board

David M. Mason, Chairman

ATTEST:
Secretary of Chisholm Trail MPO

Summer Anderson, Secretary

X. APPENDICE

TITLE VI COMPLAINT FORM

The CHISHOLM TRAIL METROPOLITAN PLANNING ORGANIZATION 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 the Title VI of the Civil Rights Act of 1964, as amended. The Title VI complaints must be filed within 180 calendar days from the date of the alleged discrimination.



Submit Complaints to:
**CHISHOLM TRAIL METROPOLITAN
PLANNING ORGANIZATION**
C/O CDBG Coordinator
401 Owen K Garriott
Enid, OK 73701
Phone: 580-616-7211
Email: kristen.day@enid.org
<https://www.chisholmtrailmpo.org/title-vi-civil-rights>

Date of Filing:	
Name:	
Address:	
City, State, Zip Code:	
Work Phone:	
Home Phone:	
E-mail Address:	

Indicate on what ground(s) you believe you have been discriminated against (check all that apply):

- Race Color Sex Religion National Origin
- Age Retaliation Genetic Information

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:	
E-mail Address:	

Explain why you believe discrimination has occurred. If there are witnesses, please provide names, addresses and telephone numbers. Be sure to include how other persons were treated differently than you. 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:	
E-mail 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 CHISHOLM TRAIL METROPOLITAN PLANNING ORGANIZATION. If you require any assistance in filling out this form, please contact the Community Development Director at 580-616-7225.

The CHISHOLM TRAIL METROPOLITAN PLANNING ORGANIZATION ensures that no person or groups of persons shall, on the grounds of race, color, sex, religion, national origin, age, disability, retaliation or genetic information, be excluded from participation in, be denied the benefits of, or be otherwise subjected to discrimination under any and all programs, services, or activities administered by CHISHOLM TRAIL METROPOLITAN PLANNING ORGANIZATION, its recipients, sub-recipients, and contractors. To request an accommodation please contact the CDBG Coordinator at 580-616-7211. If you have any Title VI questions, please contact the CDBG Coordinator at kristen.day@enid.org

