



**Title VI / LEP / Nondiscrimination Program**  
**March 2020**

Prepared by  
The Columbus-Phenix City Transportation Study (C-PCTS)  
Metropolitan Planning Organization (MPO)  
P.O. Box 1340, 420 10<sup>th</sup> Street  
Columbus, Georgia 31902  
Phone: (706) 653-4421  
[www.columbusga.gov/planning](http://www.columbusga.gov/planning)

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**COLUMBUS-PHENIX CITY TRANSPORTATION STUDY (C-PCTS)  
METROPOLITAN PLANNING ORGANIZATION (MPO)**

**FY 2020  
TITLE VI PLAN**

View this document at <http://www.columbusga.org/Planning>

For Information regarding this document, please contact  
Lynda R. Temples, Principal Transportation Planner  
Columbus-Phenix City Transportation Study  
420 10<sup>th</sup> Street, 2<sup>nd</sup> Floor  
P.O. Box 1340  
Columbus, Georgia 31902  
Telephone: 706-225-3938  
Email: [ltemples@columbusga.org](mailto:ltemples@columbusga.org)

Date Adopted: March 24, 2020

The Columbus-Phenix City Transportation Study / Metropolitan Planning Organization (C-PCTS MPO) are committed to the principle of affirmative action and prohibit discrimination against otherwise qualified persons on the basis of race, color, religion, national origin, age, physical or mental disability, and where applicable, sex (including gender identify and expression), marital status, familial status, parental status, religion, sexual orientation, political beliefs, genetic information, reprisal, or because all or part of an individual's income is derived from any public assistance program in its recruitment, employment, facility and program accessibility or services.

The opinions, findings, and conclusions in this publication are those of the author, those individuals are responsible for the facts, and the accuracy of the data presented herein. The contents of this report do not necessarily reflect the views or policies of the Department of Transportation, State of Georgia, the Federal Highway Administration, or the Federal Transit Administration. This report does not constitute a standard, specification or regulation.



## RESOLUTION

### MPO POLICY COMMITTEE

**WHEREAS**, the Columbus-Phenix City Transportation Study (C-PCTS) has been designated by the Governors of Georgia and Alabama as the Metropolitan Planning Organization for the Columbus-Phenix City Metropolitan area; and

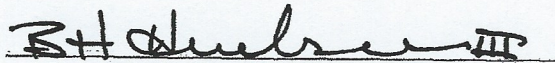
**WHEREAS**, C-PCTS MPO conducts the federally required transportation planning activities that will improve the transportation system of the Columbus-Phenix City area and help coordinate the area's future growth; and

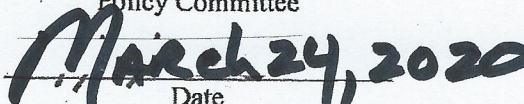
**WHEREAS**, C-PCTS MPO is a recipient of federal funding and as required in accordance with the Title VI of the Civil Rights Act of 1964 and other nondiscrimination statutes, executive orders and regulations to develop a Draft Title VI Program; and

**WHEREAS**, on April 17, 2012 the Governor of Georgia signed HB 397 into law that amends the Georgia Open Meetings and Open Records Laws; and


**WHEREAS**, for all federal funding recipients (including sub-recipients), the Title VI Program must be approved by the recipient's policy decision officials.

**NOW, THEREFORE BE IT RESOLVED**, that the C-PCTS Policy Committee adopts the MPO's Title VI / Nondiscrimination Program as required by Title 23 (USC 134 Section 450.308) and pursuant to the Safe, Accountable, Flexible, Efficient Transportation Equity Act – A Legacy for Users (SAFETE-LU), Moving Ahead for Progress in the 21<sup>st</sup> Century (MAP-21), the Fixing America's Surface Transportation Act (FAST Act), Title VI of the Civil Rights Act of 1964, and Executive Order 13166; Title 50 OCGA; and other nondiscrimination statutes, executive orders and regulations.

  
Mayor B.H. "Skip" Henderson, III, Chairman  
Policy Committee

  
Date

Attest:

  
Rick Jones, MPO/Planning Director

## **Introduction**

In 1964, the State Governors of Georgia and Alabama appointed the Columbus Department of Planning as the Metropolitan Planning Organization (MPO) for the Columbus-Phenix City Metropolitan Area. The Columbus-Phenix City MPO is a Transportation Management Area (TMA) with a population of greater than 200,000 based on Census Information. C-PCTS MPO is a comprehensive, cooperative, and continuing process and is the forum for decision-making on transportation issues in the Columbus-Phenix City area.

As the Metropolitan Planning Organization (MPO) for the Columbus-Phenix City Metropolitan Area, Columbus-Phenix City Transportation Study (C-PCTS) is the lead agency responsible for administering and coordinating the activities of participants carrying out the required tasks of the transportation planning process. Participants in the transportation planning process include the C-PCTS, the Policy Coordinating Committee (PCC), the Technical Coordinating Committee (TCC), the Citizens Advisory Committee (CAC), public transit operators including METRA, and PEX, counties, local officials, private citizens, Georgia Department of Transportation (GDOT), Alabama Department of Transportation (ALDOT), and the U.S. Department of Transportation (U.S. DOT).

As a sub-recipient of federal funds, the C-PCTS MPO's transportation planning program is required to comply with Title VI of the 1964 Civil Rights Act, the President's Executive Order on Environmental Justice, and related nondiscrimination statutes, executive orders, and federal regulations (see Appendix A). The primary function of the C-PCTS MPO's Title VI/Nondiscrimination is to address Title VI and Environmental Justice principles and requirements as they apply to the C-PCTS MPO's transportation planning process.

## **Background and Governance**

The C-PCTS MPO's Metropolitan Planning Area (MPA) includes all of Muscogee and Chattahoochee Counties and a portion of Harris County in Georgia, the City of Phenix City, and part of Russell and Lee Counties in Alabama. As the designated MPO for the Columbus-Phenix City area, C-PCTS MPO coordinates the regional transportation planning process and investments for the area including:

- Development and adoption of an annual Unified Planning Work Program (UPWP), which identifies transportation planning activities, major regional planning and operational studies, transit-system planning tasks, and interagency coordination between C-PCTS MPO and state and local jurisdictions;
- Development and maintenance of the Metropolitan Transportation Plan (MTP), a 20-year plan for transportation systems and investments;
- Development and maintenance of the Transportation Improvement Program (TIP), a four-year schedule of federally funded projects;
- Development and maintenance of the Congestion Management Process (CMP), which identifies congestion areas in the region and develops strategies to relieve congestion; and



- Providing opportunities for public involvement in the transportation planning and decision-making process following the adopted guidelines in the C-PCTS MPO's Public Participation Plan (PPP – see Appendix 1).

C-PCTS MPO is governed by a policy committee (C-PCTS MPO Board) made up of elected officials from the jurisdictions within the Columbus-Phenix City area, as well as representatives of the Georgia Department of Transportation (GDOT) and the Alabama Department of Transportation (ALDOT) and the model agencies.

### **Title VI / Nondiscrimination Program Development**

C-PCTS MPO developed its Title VI / Nondiscrimination program based on the federal and state guidance and the templates outlined in the circulars. The specific components include the Title VI /Nondiscrimination policy statement; principals, policies, approaches and strategies to address Title VI; Title VI/Nondiscrimination complaint procedures and process; and Title VI/Nondiscrimination evaluation and reporting among others.

### **Title VI / Nondiscrimination Policy Statement**

The Columbus-Phenix City Transportation Study Metropolitan Planning Organization (C-PCTS-MPO) is committed to complying with Title VI of the Civil Rights Act of 1964 and all related regulations and directives. C-PCTS MPO is committed to the principal of affirmative action and prohibit discrimination against otherwise qualified persons on the basis of race, color, religion, national origin, age, physical or mental disability, and where applicable, sex (including gender identify and expression), marital status, familial status, parental status, religion, sexual orientation, political beliefs, genetic information, reprisal, or because all or part of an individual's income is derived from any public assistance program in its recruitment, employment, facility and program accessibility or services.

In the event the C-PCTS distributes federal-aid funds to another entity, C-PCTS will include Title VI language in all written agreements and will monitor for compliance. For better information dissemination, C-PCTS MPO has made it a policy to include the nondiscrimination Title VI statement as a part of all of the plans, programs, studies, and reports that the MPO produces. These include the Metropolitan Transportation Plan (MTP), the Transportation Improvement Program (TIP), the Unified Planning Work Program (UPWP), the Public Participation Plan (PPP), the Congestion Management Process (CMP), and all of the final reports of special studies. These documents are not only available on the C-PCTS MPO's website, but also available at the public libraries and in the offices of the public review agencies.

Title VI compliance is a condition of receipt of federal funds. The Staff of the Columbus-Phenix City MPO are authorized to ensure compliance with provisions of this policy and with the law, including the requirements of 23 Code of Federal Regulations (CFR) 200 and 49 CFR Part 21.

## **Title VI of the Civil Rights Act of 1964**

Section 604 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, denied the benefit of, or be subjected to discrimination under any program or activity receiving Federal financial assistance.”*

Subsequent legislation has extended the protections under Title VI to prohibit discrimination based on gender, disability, age, and income status. The Civil Rights Restoration Act of 1987 established that Title VI applies to all programs and activities of Federal-aid recipients, sub-recipients, and contractors whether those programs and activities are federally funded or not. Title VI bars intentional discrimination as well as disparate impact discrimination (i.e., a neutral policy or practice that has a disparate impact on protected groups).

### **Authorities**

The Federal-Aid Highway Act of 1973 added sex to the list of prohibitive factors. The Rehabilitation Act of 1973 added disability. The Age Discrimination Act of 1975 added age. The Civil Rights Restoration Act of 1987 broadened the scope of Title VI coverage by expanding the definition of terms “programs or activities” to include all programs or activities of federal-aid recipients, sub-recipients, and contractors, whether such programs and activities are federally assisted or not.

### **Environmental Justice**

In 1994, President Clinton issued Executive Order 12898, Federal Actions to Address Environmental Justice in Minority Populations and Low-Income Populations. The Executive Order focused attention on Title VI by providing that “each Federal agency shall make achieving environmental justice a part of its mission by identifying and addressing, as appropriate, disproportionately high and adverse human health or environmental effects of its programs, policies, and activities on minority populations and low-income populations.”

A series of orders have been issued by federal agencies requiring the incorporation of Environmental Justice principles into federal programs and policies. Additional clarifying materials have also been issued. The following materials are applicable to transportation planning issues.

- The United States Department of Transportation (USDOT) issued an Order on Environmental Justice (USDOT Order 5610.2a) in 1997.
- The Federal Highway Administration (FHWA) issued an Order on Environmental Justice (FHWA Order 6640.23) in 1998.
- On October 7, 1999, FHWA and the Federal Transit Administration (FTA) issued a memorandum to their respective field administrative offices clarifying Title VI requirements in metropolitan and statewide planning. The memorandum identifies a series of actions that can be taken to support Title VI compliance and Environmental Justice



goals, improve planning performance, and minimize the potential for subsequent corrective action and complaint.

- In addition, the FTA has issued a Circular in 2007 (FTA 4702.1A – updated in 2012) which contains requirements and guidelines for Metropolitan Planning Organizations.

These are three fundamental Environmental Justice principles:

1. To avoid, minimize, or mitigate disproportionately high and adverse human health or environmental effects including social and economic effects on minority populations and low-income populations.
2. To ensure the full and fair participation by all potentially affected communities in the transportation decision-making process.
3. To prevent the denial of, reduction in, or significant delay in the receipt of benefits by minority populations and low-income populations.

Environmental Justice must be considered in all phases of planning focuses on enhanced public involvement and an analysis of the distribution of benefits and impacts. Although Environmental Justice concerns are more frequently raised during project development, Environmental Justice applies equally to the process and products of planning, which are the primary activities of C-PCTS MPO.

### **Relationship between Environmental Justice and Title VI**

The need to consider environmental justice is embodied in many laws and regulations including Title VI of the Civil Rights Act of 1964. The federal actions on Environmental Justice serve to reaffirm Title VI responsibilities by directing every Federal agency to make environmental justice part of its mission by identifying and addressing the effects of all programs, policies, and activities on “minority populations and low-income populations.”

Environmental Justice and Title VI concepts, which focus on understanding and properly addressing the unique needs to different socioeconomic groups, are vital components to effective transportation decision-making.

### **C-PCTS MPO’s Role in Nondiscrimination and Environmental Justice**

As a recipient of federal and state funds, C-PCTS MPO is subject to the provisions of Title VI including environmental justice. The MPO serves as the primary forum where the Georgia Department of Transportation (GDOT), the Alabama Department of Transportation (ALDOT) and transit providers (METRA & PEX), local governments, modal agencies, and transportation plans, studies, and programs that address regional transportation planning issues. In this role, the MPO can help local public officials understand how Title VI and Environmental requirements improve planning and decision-making. To certify compliance with Title VI and address environmental justice, C-PCTS MPO needs to:

- Evaluate and if necessary, improve the public involvement processes to eliminate participation barriers and engage these traditionally underserved populations (minority, low-income, LEP, elderly, disabled, etc.) in transportation decision-making.
- Develop and maintain transportation plans / programs that comply with Title VI and EJ.
- Utilize Census data to develop a demographic profile of the C-PCTS MPO's metropolitan planning area that includes identification of the locations of socio-economic groups including low-income, minority, elderly, disabled, and LEP populations. In addition, as much as possible, identify the transportation patterns of these socio-economic groups so that their transportation needs can be identified and addressed and to determine if the benefits and burdens of transportation investments are being fairly distributed.

MPOs act as coordinators with many agencies involved in transportation planning. C-PCTS MPO creates a Metropolitan Transportation Plan (MTP) that follows federal guidelines for financial constraint. The MTP contains a list of programs and projects on the regional system that address safety, mobility, and multi-modal transportation needs over a 20-year timeframe. The Transportation Improvement Program (TIP) distributes surface transportation program (STP) and other federal transportation funds to local agency partners for construction of infrastructure projects, transit and multi-modal travel, traffic operations management, data collection, and planning activities.

As the agency responsible for coordinating the regional transportation planning process, C-PCTS MPO make sure that all segments of the population have the opportunity to be involved with the planning process. In compiling the projects that make up the MTP and TIP, C-PCTS MPO is responsible for evaluating the proposed transportation investments on population groups that may be traditionally under-served or under-represented.

### **C-PCTS MPO's approach on Title VI and Environmental Justice**

As a recipient of federal funds, C-PCTS MPO is required to annually certify its commitment to nondiscrimination under Title VI and EJ as part of the MPO's Transportation Improvement Program. Based on the Census data, C-PCTS MPO will create reports that identify low-income and minority populations, as well as elderly, mobility-limited, and non-English speaking populations and update as needed. These reports are used by the MPO to evaluate and report on the benefits and impacts of proposed and final transportation plan and program.

### **C-PCTS MPO's goals with regard to Title VI and Environmental Justice**

C-PCTS MPO is committed to preventing discrimination and recognizes the key role that transportation services provide to the community. C-PCTS MPO establishes the following basic principles to serve as overall objectives in implementing this Title VI program;

- Provide the community with opportunities to learn about and improve the quality and usefulness of transportation in their lives;
- Make transportation decisions that strive to meet the needs of people throughout the Columbus-Phenix City urbanized area;

- Enhance the public involvement process to reach all segments of the population and ensure that all groups have the opportunity to have a voice in the transportation planning process regardless of race, color, national origin, gender, age, disability, and income status;
- Comply with the requirements of Title VI, Environmental Justice, and related nondiscrimination statutes, regulations, and federal directives;
- Avoid disproportionately high and adverse impacts on Title VI protected populations; and
- Improve data collection, monitoring, and analysis tools that assess the needs of, and analyze the potential impacts of, transportation plans and programs on Title VI protected populations;

### **Addressing Environmental Justice (EJ) in Planning Efforts**

C-PCTS MPO is committed to ensuring that its transportation planning process meets the transportation accessibility, mobility, and safety needs of all people throughout the Columbus-Phenix City urbanized area and avoids disproportionately high and adverse human health or environmental effects, including social and economic effects, on Title VI protected populations.

Though it is recognized that much of the evaluation for environmental justice issues will occur at the specific project level (which is the responsibility of the project sponsor) rather than the overall transportation planning process, C-PCTS MPO can use a variety of measures to identify the risk of discrimination so that positive corrective action can be taken during the planning phases and to serve as a building block in subsequent decision making and analysis of project developments. These measures include early engagement with Title VI protected populations, data collection efforts, and using Census and GIS and other techniques to identify the benefits and impacts of projects identified in the Metropolitan Transportation Plan (MTP) and the Transportation Improvement Program (TIP).

### **Engaging Individuals with Limited English Proficiency (LEP)**

The inability to communicate in English may result in individuals being un-informed of transportation issues and being unable to participate in the transportation planning process and / or impact decisions. Of the people that are linguistically isolated, the majority are Spanish-speaking persons. The current estimated population for the MPO Urbanized Area is 220,698. According the American Community Survey data about 7.4 percent of the urbanized area population speaks Spanish as their primary language. C-PCTS MPO does not have financial resources to translate all vital documents into Spanish; however, the MPO does have access to staff members from other departments within the Columbus Consolidated Government who speak the language. The C-PCTS MPO will arrange to provide such services as resources allow. C-PCTS MPO has a Transportation Planner on staff that speaks fluent German.

### **Requirement to Provide Meaningful Access to Limited English Persons (LEP)**

The Columbus-Phenix City Transportation Study (C-PCTS) MPO takes an active and decisive role in insuring that programs are consistent with Title VI of the Civil Rights Act of 1964, DOT's implementing regulations, and Executive Order 13166, "Improving Access to Services for Persons with Limited English Proficiency" (August 11, 2000). We will further take reasonable steps to

ensure meaningful access to benefits, services, information, and other important portions of program and activities for individuals who are Limited English Proficient. LEP persons will be afforded every opportunity to participate in transportation planning programs, decision-making, and activities. The C-PCTS MPO will develop a Language Assistance Plan.

#### Four Factor Analysis

- Factor 1 - Determining the Number and Proportion of LEP Persons Served or Encountered
  - ◊ Identify LEP communities, and assess the number or proportion of LEP persons from each language group to determine the appropriate language services for each language group;
  - ◊ The literacy skills of LEP populations in their native languages in order to determine whether translation of documents will be an effective practice.
- Factor 2 - Determine the Frequency with Which LEP Individuals Come into Contact with NRCS Programs, Activities, and Services.
  - ◊ Participation in public meetings
  - ◊ Customer service interactions
- Factor 3 - Determine the Importance to LEP Persons of Your Program Activities and Services.
- Determine the Resource Available to the Recipient and Costs.

#### Safe Harbor Provision

The C-PCTS MPO will use the Department of Justice's Safe Harbor provisions for determining circumstances for 'safe harbor' for translations of written materials for LEP populations. LEP populations that constitute 5% or 1,000 persons whichever is less of the total population of persons eligible to be serviced or likely to be affected or encountered, then such action will be considered strong evidence to warrant LEP specific translation services. Translation of non-vital documents, will be provided orally if needed. If there are fewer than 50 persons in the language group that does not reach the 5% trigger, C-PCTS MPO will provide translation services as needed.

#### Addressing Title VI in Public Participation Activities

C-PCTS MPO is committed to early and continuing public participation in transportation planning, programming, and implementation, which is one of the requirements of the federal legislation. The MPO will make a concerted effort to reach all segments of the population including Title VI protected populations.

C-PCTS MPO has developed and updated a Public Participation Plan (PPP) for 2019-2022 that addressed the need to communicate with communities that may be traditionally underserved - <https://www.columbusga.gov/Planning/pdfs/PPP>. As a part of this effort, C-PCTS MPO maintains contact information that includes members of communities that may be traditionally underserved / under-represented and agencies that serve these communities. The C-PCTS MPO developed a brochure to describe to the public what a MPO is, its role and relation to GDOT and ALDOT and transportation functions of local jurisdictions, as well as information on why and how citizens should get involved. The MPO provides these materials to the public at presentations, public meetings, and open house events. C-PCTS MPO will continue to evaluate its approach and techniques for public involvement.

- C-PCTS MPO's website can be located at <http://www.columbusga.gov/Planning/trans.htm>. The IT Department with the City of Columbus maintains the website and all MPO activities and documents can be located here, including the following:
  - ◊ Staff contract information;
  - ◊ C-PCTS MPO's planning documents, Metropolitan Transportation Planning (MTP), the Transportation Improvement Program (TIP), the Unified Planning Work Program (UPWP), Congestion Management Process (CMP);
  - ◊ Public participation documents such as the Public Participation Plan, Title VI related reports, etc.;
  - ◊ Links to other websites that contain information of ongoing transportation studies and projects in the Columbus-Phenix City area;
  - ◊ Listing of the MPO's committee members (Policy Coordinating Committee, Technical Coordinating Committee, Citizens Advisory Committee);
 Upon its adoption, C-PCTS MPO will post the updated Title VI Program on the website along with the complaint process and form in an easily accessible location.
- Described in the MPO's Public Participation Plan are strategies to inform and involve the public with regional transportation planning.
- The C-PCTS/MPO creates and distributes press releases and public notices, as needed, to an extensive list of media contacts, consultation agencies, local groups and organizations, individuals, Facebook, Instagram, and the Planning Department/MPO Website.
- C-PCTS MPO will continue to identify traditionally under-involved populations within the region including minority, LEP, low income, and senior citizen populations through Decennial Census and American Community Survey census data. Public outreach efforts will be designed to fully include these populations in the transportation planning process.
- Meetings are open to the public at ADA-accessible locations and publicized advance notification is given through a variety of media and other outlets. Public comment and participation is encouraged.
- The MPO will develop a list of translator/translation contacts and services available to provide service when working with those with Limited English Proficiency (LEP).

### **Organization and Plan Administration**

An organizational chart for the Columbus-Phenix City MPO and the Columbus Consolidated Government is shown in APPENDIX A. The Director of Planning is responsible for the overall management of the Title VI program. The day-to-day administration of the program lies with the Title VI Coordinator.

The Director of Planning shall act as the Title VI Administrator to implement the Columbus-Phenix City MPO Title VI Plan and ensure compliance with provisions of C-PCTS MPO's policy and with the law, including the requirements of 23 CFR Part 200 and 49 CFR Part 21. Grants compliance and Title VI coordination shall be performed under the authority of the Administrator.

The Principal Transportation Planner shall act as the Title VI Coordinator to administer the Plan. The Coordinator reports directly to the Administrator. The Coordinator's duties and responsibilities are as follows:

- **Program Administration** – Administer the Title VI program and coordinate implementation of the plan. Ensure compliance with the assurances, policy, and program objectives. Perform Title VI program reviews to assess administrative procedures, staffing, and resources; provide recommendations, as required, to the Administrator.
- **Title VI Plan Update** – Review and update the Title VI Plan as needed or required for approval by the Administrator. Submit and amended Plan to the Georgia Department of Transportation (GDOT) and the Alabama Department of Transportation (ALDOT).
- **Public Dissemination** – Work with MPO / City Staff to develop and disseminate Title VI program information to staff, recipients, sub-recipients, including contractors, sub-contractors, consultants, and sub-consultants, and beneficiaries, as well as the public. Public dissemination may include postings of official statements, inclusion of Title VI language in contracts or other agreements, website postings, and annual publication of the MPO's Title VI Policy Statement in newspapers having a general circulation, and informational brochures.
- **Environmental Impact Statements** – Ensure that available census data are included as part of all Environmental Impact Statements / Assessments (EIS/EA) when the City / MPO administer the design phase of any projects receiving Federal Highway Administration or other federal assistance.
- **Elimination of Discrimination** – Establish procedures for promptly resolving deficiencies, as needed.
- **Complaints** – Review written Title VI complaints that may be received by the MPO following the procedural guidelines in Section 5 ("Complaint Procedures"). Ensure every effort is made to resolve informally at the local or regional level. MPO staff will forward any transit complaints to the Transit Providers.
- **Legislative and Procedural Information** – Maintain and update the Plan and Annual Accomplishment and Goal Report as necessary to comply with federal laws, rules, and regulations, guidelines, and other resource information pertaining to implementation and administration of Title VI. The MPO will make information available to other city departments or the public as requested or required.
- **Annual Accomplishment and Goal Report** – Prepare a Title VI Annual Accomplishment and Goal Report for the preceding fiscal year.



### **Title VI and Environmental Justice Training**

C-PCTS MPO staff members will attend FHWA, FTA, or GDOT/ALDOT sponsored Title VI and Environmental Justice Trainings as opportunities arise. These trainings include on-site classes and webinars. The training materials will be made available to new C-PCTS MPO staff, the C-PCTS MPO Board and advisory committee members, and sub-recipients, consultants, and contractors via various methods. The MPO will keep track of trainings/attendees and use these records as part of the MPO's goals/accomplishments report.

### **Title VI Data Collection and Reporting**

The MPO is required to consider the impacts of its MTP and TIP, and other plans and programs have on Title VI protected populations. It is important to evaluate issues regarding the equity of both service provision and distribution of impacts related to alternatives on various population groups within the region. To this end, C-PCTS MPO will continue to update information on minority and low-income population groups and use this information in its planning and development of the MTP and TIP. In addition, C-PCTS MPO will collect demographic information on public participation and document all instances of Title VI complaints.

Outlined below are procedures for data collection and reporting:

- *Transportation Disadvantaged Reports and ACS Data*  
MPO staff will identify the transportation-disadvantaged populations in the C-PCTS MPO's planning area using data from the decennial census and American Community Survey in the EJ and LEP reports.

For planning purposes, these reports identify the potential transportation disadvantaged populations as including one of the following:

- ◇ Non-white and white/Hispanic persons
- ◇ Elderly persons
- ◇ Persons in households with income below the poverty level
- ◇ Linguistically isolated persons
- ◇ Persons with go-outside-home disabilities

Census data is analyzed and concentrations of the various transportation-disadvantaged populations are identified with tables and maps.

For transportation planning purposes, the size and location of the transportation disadvantaged population groups is useful in evaluating whether or not recommended improvements adequately address their unique needs and whether any negative aspects of a recommended action will disproportionately affect these members of the community. In addition, the geographic profile of the Columbus-Phenix City region is a useful tool in designing public involvement efforts and activities to meet the needs of the communities within the Columbus-Phenix City urbanized area.

The American Community Survey is an on-going nation-wide sample survey of the population conducted by the Census Bureau. Beginning in 2010, data reported at the census tract and block group levels are averaged over a five-year sample. Though the ACS data has high margins of error that can lead to incorrect information, this data will be a valuable

source (in some instances the only source) for updating the demographic profile of the Columbus-Phenix City region.

- *Collect Demographic Information on Public Participation*  
MPO staff will strive to collect demographic information on persons attending public participation events by summarizing results from comment/feedback forms, which request demographic information from participants at public meetings and workshops and public opinion polls. The submittal of demographic information will be voluntary.
- *Maintain Records of Title VI complaints*  
The C-PCTS MPO will maintain records of complaints that it receives, as well as materials related to the investigation, final determination, and if any corrective actions.

#### **Title VI Activities Related to Transportation**

- Invite participation of cross sections of the populace from social, economic, and ethnic groups in the planning process by providing public service announcements for all local media.
- Provide access to public meetings concerning transportation projects to populations affected by the transportation project. Ensure translation services are available upon request.
- Gather and maintain necessary data and documentation required for completion of the MPO's Title VI Update Annual Report.
- C-PCTS MPO executes intergovernmental agreements with the Georgia Department of Transportation, the Alabama Department of Transportation, the local area transit agencies, and other MPO partners for the performance of specific projects or activities. The standard language incorporated into these intergovernmental agreements requires that the partners comply with all applicable federal, state, and local laws, rules, ordinance, and regulations at all times and in the performance of the work. This provision would include the nondiscrimination and environmental justice provisions contained under Title VI of the Civil Rights Act and accompanying rules and orders.

#### **Disadvantaged Business Enterprises**

As it relates to Title VI compliance, C-PCTS MPO encourages participation by disadvantaged business enterprises (DBEs) in procurement of consultant services. C-PCTS MPO reviews and monitors the DBE participation in the following ways.

- Request for Proposals (RFP) or Request for Qualifications (RFQ). The GDOT's pre-qualification is a pre-determinant for C-PCTS MPO's consultant selection.
- C-PCTS MPO will require that all contracts will include the Nondiscrimination clause "the contractor, with regard to the work performed by it after award and prior to completion of contract work, will not discriminate on the ground of race, color

## **Sub-Recipient Review and Remedial Action Procedures**

All Sub-Recipients are required to post this notice

*“Agencies shall inform the public of their rights under Title VI through such measures as posting the Title VI notice on posters, comment cards, or flyers placed at stations, bus shelters, and in transit vehicles. The type, timing, and frequency of these measures are at the recipient’s discretion, as long as the type, timing, and frequency are sufficient to notify passengers and other interested persons of their rights under DOT’s Title VI regulations with regard to the recipient’s program”.*

The notice will be translated into languages other than English consistent with the sub-recipient’s LEP program.

- **Title VI Review of Sub-recipients of Federal-Aid Highway Funds**

Agencies shall inform the public of their rights under Title VI through such measures as posting the Title VI notice on posters, comment cards, or flyers placed at stations, bus shelters, and in transit vehicles. The Coordinator will assist GDOT to periodically conduct Title VI compliance reviews. The coordinator will review select sub-recipients of federal-aid highway or other federal funds to ensure adherence to Title VI requirements. The Columbus-Phenix City MPO and City staff will work cooperatively to periodically confirm operational guidelines provided to consultants, contractors, and sub-recipients, including Title VI language, provisions, and related requirements, as applicable.

- **Post-Grant Review**

The Coordinator will conduct periodic post-grant reviews of select sub-recipients of federal highway funds or other federal funds, for roads, sidewalks, bridges, construction, etc. to ensure adherence to Title VI requirements. The Coordinator will periodically confirm that operational guidelines provided to consultants, contractors, and sub-recipients include Title VI language, and provisions and related requirements, where applicable.

- **Remedial Action**

When irregularities occur in the administration of federal-aid highway programs at either the Columbus-Phenix City MPO or sub-recipient levels, corrective action will be taken to resolve identified Title VI issues. The MPO will seek cooperation of the consultant, contractor, or other sub-recipient in correcting deficiencies found during periodic reviews. The MPO will provide technical assistance and guidance, upon request, to support voluntarily compliance by the sub-recipient. When conducting Title VI compliance reviews, the MPO will document and provide to GDOT any recommended remedial action agreed upon by the MPO and the sub-recipient within a period not to exceed forty-five (45) calendar days.

Sub-recipients placed in a deficiency status will be given a reasonable time, but not to exceed ninety-days (90) after receipt of the deficiency letter, to voluntarily correct deficiencies. When a sub-recipient fails or refuses to voluntarily comply with requirements within the allotted period, the MPO will submit to GDOT copies of the case file and a recommendation that the sub-recipient be found in non-compliance.

A follow-up review will be conducted within 180 days of the initial review to ascertain if the sub-recipient has complied with Title VI requirements in correcting deficiencies previously identified. If the sub-recipient refuses to comply, the MPO and GDOT may, with FHWA's concurrence, initiate sanctions per 49 CFR Part 21 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.

## **Complaint Procedures**

- **Overview**

These procedures apply to all complaints filed under Title VI of the Civil Rights Act of 1964 and all related regulations and directives, relating to any program or activity administered by the MPO, as well as to sub-recipients, consultants, and contractors. Law prohibits any type of intimidation or retaliation. All transit complaints will be forwarded to the transit agencies within the MPO urbanized area.

- **Right of File Formal Complaints**

These procedures do not deny the right of complaint to file formal complaints with other state or federal agencies or to seek private counsel for complaints alleging discrimination. These procedures are part of an administrative process that does not provide for remedies that include punitive damages or compensatory remuneration for the complaint. Citizens can file complaints directly with the Federal Transit Administration and Federal Highway Administration Washington D.C. Office. 1200 New Jersey Avenue, SE, Washington, DC 20590 – 202-366-4040. Complaint procedures will be made available to the public on the Columbus Planning Department (Transportation Planning – C-PCTS MPO) website.

- **Complaint Resolution**

Initial interviews with the complainant and the respondent will obtain information regarding specifically for relief and settlement opportunities. The option of informal mediation meetings(s) between the affected parties and the Coordinator may be utilized for resolution, at any state of the process. The Coordinator will make every reasonable effort to pursue a resolution to the complaint.

## **Procedures**

- Any individual, group of individuals, or entity that believes they have been subjected to discrimination prohibited by nondiscrimination requirements may file a written formal complaint with the Coordinator using the Title VI Complaint Form found in Appendix C. A formal complaint must be filed within 60 calendar days of the alleged occurrence. The MPO will not officially act or respond to complaints made verbally. The complaint procedures and complaint form will be available in the languages that meet the Safe Harbor Provision threshold. All transit complaints will be handled by the transit agencies.

- Upon receiving the written complaint, the MPO will determine its jurisdiction, acceptability, need for additional information, and the investigative merit of the complaint. The complainant will receive an acknowledgement letter informing him/her whether the complaint will be investigated by our office. In some situations, the MPO may request GDOT's Office of Equal Employment Opportunity (EEO) to conduct the investigation. In the event GDOT handles the investigation, GDOT will follow its adopted procedures for investigating discrimination complaints, per its current Title VI Plan.
- If the complaint is against a sub-recipient, consultant, or contractor, under contract with the MPO/City, the appropriate sub-recipient shall be notified of the complaint, within 15 calendar days.
- Once the investigator reviews the complaint and MPO decides its course of action, he/she will issue one of two letters to the complainant: a closure letter or a letter of finding (LOF) within five calendar days. A closure letter summarizes the allegations and states that there was not a Title VI violation and that the case will be closed. A LOF summarizes the allegations and the interviews regarding the alleged incident, and explains whether any disciplinary action, additional training of the staff member or other action will occur. The complaint will be logged into the records of the Coordinator, and the basis for the allegation identified including race, color, sex, national origin, disability, or age.
- In cases where the MPO/City assumes investigation of the complaint, the MPO will provide the respondent with the opportunity to respond to the allegations in writing. The respondent will have ten calendar days upon receipt, to furnish the MPO with his or her response to the allegations.
- Within 60 calendar days of receipt of the complaint, the Coordinator (or GDOT investigator) will prepare a written investigative report for the Administrator. The report shall include a narrative description of the incident, identification of persons interviewed, findings, and recommendations for disposition.
- The City Attorney's office (Columbus Consolidated Government) will review the investigative report. The Attorney may discuss the report and its recommendations with the Coordinator and other staff as appropriate. The report will be modified as needed and made final for its release to the parties.
- Once the investigative report becomes final, briefings will be scheduled with each party within 60 calendar days. Both the complainant and the respondent shall receive a copy of the investigative report during the briefings and will be notified of their respective appeal rights.
- A copy of the complaint and the MPO's investigative report will be issued to GDOT's EEO within 60 calendar days of the completion of the briefings.
- If the complainant or respondent is not satisfied with the results of the investigation of the alleged discriminatory practice(s), he or she shall be advised of their rights to appeal the

MPO's decision to GDOT, United States Department of Transportation (USDOT) or U.S. Department of Justice. The complainant has 30 calendar days after the MPO's briefing to appeal to USDOT. Unless new facts not previously considered come to light, reconsideration for the final determination by the MPO will not be available.

**Record of Title VI Investigations, Complaint, and Lawsuits**

A Complaints Log shall be maintained by the MPO. The Complaints Log shall contain the following information for each complaint filed:

- ◇ The name and address of the person filing the complaint.
- ◇ The date of the complaint.
- ◇ The basis of the complaint.
- ◇ The disposition of the complaint.
- ◇ The status of the complaint.



## Title VI Notice to the Public

The Columbus-Phenix City Transportation Study Metropolitan Planning Organization (C-PCTS MPO) hereby gives public notice that it is its policy to assure full compliance with Title VI of the Civil Rights Act of 1964 and all related regulations and directives. The MPO assures that no person shall on the grounds of race, color, sex, national origin, disability, or age as provided by Title VI of the Civil Rights Act of 1964, the Federal-Aid Highway Act of 1973, the Rehabilitation Act of 1973, the Age Discrimination Act of 1975, and the Civil Rights Restoration Act of 1987 be excluded from participation in, be denied the benefits of, or be otherwise subjected to discrimination under any program or activity, whether such programs and activities are federally assisted or not.

Any person who believes they have been aggrieved by an unlawful discriminatory practice under Title VI has a right to file a formal complaint with the MPO. Any such complaint must be in writing and files with the MPO's Title VI Coordinator within 180 calendar days following the date of the alleged discriminatory occurrence. Title VI Complaint Forms may be obtained from the Title VI Coordinator's office at no cost to the complainant by calling (706) 653-4421.

A complaint can also be filed directly with the Federal Transit Administration and Federal Highway Administration Washington D.C. Office. 1200 New Jersey Avenue, SE, Washington, DC 20590 – 202-366-4040. Transit complaints will the responsibility of the transit agencies.

## **GDOT Title VI Assurances**

The Columbus-Phenix City Transportation Study MPO (hereinafter referred to as the “Recipient”), HEREBY AGREES THAT as a condition to receiving any federal financial assistance from the U.S. Department of Transportation, it will comply with Title VI of the Civil Rights Act of 1964, 78 Stat. 252, 42 USC 2000d – 42 USC 2000d – 4 (hereinafter referred to as the Act), and all requirements imposed by or pursuant to Title 49, Code of Federal Regulations, Department of Transportation, Subtitle A, Office of the Secretary Part 21, Nondiscrimination in Federally Assisted Programs of the Department of Transportation – Effectuation of Title VI of the Civil Rights Act of 1964 (hereinafter referred to as the Regulations), and other pertinent directives, to the end that in accordance with the Act, Regulations, and other pertinent directives, no person in the United States shall, on the grounds of race, color, sex, or national origin be excluded from participation in, be denied the benefits of , or be otherwise subjected to discrimination under any program or activity for which the Recipient receives federal financial assistance from the Department of Transportation, including the Federal Highway Administration, and HEREBY GIVES ASSURANCE THAT is will promptly take any measures necessary to effectuate this agreement. This Assurance is required by Subsection 21.7(a)(1) of the Regulations.

More specifically and without limited the above general assurance, the Recipient hereby gives the following specific assurances to its Federal Aid Highway Program.

1. That the Recipient agrees that each “program” and each “facility” as defined in Subsection 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 Recipient shall insert the following notification in all solicitations for bids for work or material subject to the Regulations made in connection with Federal Aid Highway and in adapted form in all proposals for negotiated agreements.

*“The Georgia Department of Transportation in accordance with Title VI of the Civil Rights Act of 1964 and 78 Stat. 252, 42 USC 2000d – 42 and Title 49, Code of Federal Regulations, Department of Transportation, Subtitle A, Office of the Secretary, part 21, Nondiscrimination in federally assisted programs of the Department of Transportation issued pursuant to such Act, hereby notifies all bidders that it will affirmatively ensure that any contract entered into pursuant to this advertisement, minority business enterprises will be afforded full opportunity to submit bids in response to this invitation and will not be discriminated against on the grounds of race, color, sex, or national origin in consideration for an award.”*

3. That the Recipient shall insert the clauses of Appendix A of this Assurance in every contract subject to the Act and the Regulations.
4. That the Recipient shall insert the clauses of Appendix B of this Assurance, as a covenant running with the land, in any deed from the United States effecting a transfer of real property, structures, or improvements thereon, or interest therein.
5. That where the Recipient receives federal financial assistance to construct a facility, or part of a facility, the Assurance shall extend to the entire facility and facilities operated in connection therewith.

6. That where the Recipient received federal financial assistance in the form, or for the acquisition of real property, or an interest in real property, the Assurance shall extend rights of space on, over, or under such property.
7. That the recipient shall include the appropriate clauses set forth in Appendix C for 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, 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 is 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 State Secretary of Transportation or the official to who she/he delegates specific authority, to give reasonable guarantee that is, other recipients, sub-grantees, contractors, subcontractors, transferees, successors in interest, and other participants of federal financial assistance under such program will comply with all requirements imposed or pursuant to the Act, the Regulations, and this Assurance.
10. The Recipient agrees that the United States has a right to seek judicial endorsement 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, sub-grantees, 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.

March 20, 2020

Date

Columbus-Phenix City MPO

Recipient

By:

B. H. Hensler  
Chairman, Policy Coordinating Committee

Attest:

[Signature]  
Planning Director

Attachments: Appendices A, B, and C

## APPENDIX A

The text below, in its entirety, is in all contracts entered into by GDOT. All of the text except the final section, entitled “Incorporation of Provisions,” should be included in any contract entered into by any GDOT contractor.

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

**1. Compliance with Regulations**

The Contractor shall comply with the Regulations relative to nondiscrimination in federally-assisted programs of the Department of Transportation (hereinafter referred to as DOT), 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. Nondiscrimination**

The Contractor, with regard to the work performed by it during the contract, shall not discriminate on the grounds of race, color, sex, or national origin in the selection and retention of subcontractors, including procurement of materials and leases of equipment. The Contractor shall not participate either directly or indirectly in discrimination prohibited by Section 21.5 of the Regulations, including employment practices when the contract covers a program set forth in Appendix B of the Regulations.

**3. Solicitations for Subcontractors, Including Procurement of Materials and Equipment**

In all solicitations either by competitive bidding or negotiations made by the Contractor for work to be performed under a subcontractor, including procurement 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 with the Regulations relative to nondiscrimination on the ground of race, color, sex, or national origin.

**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 (Recipient) or the Federal Highway Administration to be pertinent to ascertain compliance with such Regulations, orders, and instructions. 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 (Recipient), 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 nondiscrimination provisions of this contract, the (Recipient) shall impose such contract sanctions as it or the Federal Highway Administration may determine to be appropriate, including, but not limited to:

- a. Withholding of payments to the Contractor under the contract until the Contractor complies:  
and/or
- b. 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 (5) in every subcontract, including procurement 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 subcontractor or procurement as the (Recipient) of 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 with a subcontractor or supplier as a result of such direction, the Contractor may request the (Recipient) enter into such litigation to protect the interest of the state and, in addition, the Contractor may request the United State to enter into such litigation to protect the interest of the United States.

## **APPENDIX B**

**The following clauses shall be included in all deeds affecting or recording the transfer of real property, structures, or improvements thereon, or interest therein from the United States.**

### **Granting Clause**

NOW, THEREFORE, the Georgia Department of Transportation (GDOT) – as authorized by law, and upon the condition that the state of Georgia will accept title to the lands and maintain the project constructed thereon, in accordance with and in compliance with Title 23, United States Code, the Regulations for the Administration of Federal Aid for Highways; the policies and procedures prescribed by the Federal Highway Administration of the Department of Transportation; and all requirements imposed by or pursuant to Title 49, Code of Federal Regulations, Department of Transportation, Subtitle A, Office of the Secretary, part 21, Nondiscrimination in Federally Assisted Programs of the Department of Transportation (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 USC 2000d to 2000d-4) – does hereby remise, release, quitclaim, and convey unto the state of Georgia all the right, title, and interest of the GDOT in and to said land described in Exhibit A attached hereto and made a part of thereof.

### **Habendum Clause**

TO HAVE AND TO HOLD said lands and interest therein unto the state of Georgia, and its successors forever, subject, however, to the covenants, 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 the federal financial assistance is extended or for another purpose involving the provision of similar services or benefits and shall be binding on the state of Georgia, its successors, and assigns.

The state of Georgia, 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 successors and assigns, that (1) no person shall, on the grounds of race, color, sex, disability, national origin, age, or religion, 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\*, (2) that the state of Georgia 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, Nondiscrimination of Federally Assisted Programs of the Department of Transportation – Effectuation of Title VI of the Civil Rights Act of 1964, and as said Regulations may be amended, (3) that in the event of breach of any of the above mentioned nondiscrimination conditions, the agency shall have the right to reenter 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, GDOT and its assigns as such interest existed prior to this instruction. <sup>1</sup>

<sup>1</sup> 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 Civil Rights Act of 1964.



## APPENDIX C

**The following clauses shall be included in all deeds, licenses, leases, permits, or similar instruments entered into by GDOT pursuant to the provisions of Assurance 7.**

The LESSEE, for himself or herself, his or her heirs, personal representatives, successors in interest, and assigns, as a part of the consideration hereof, does hereby covenant and agree 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 lease, for a purpose of which a GDOT program or activity is extended, or for another purpose involving the provision of similar services or benefits, the LESSEE shall maintain and operate such facilities and services in compliance with all other requirements imposed pursuant to Title 49, Code of Federal Regulations, Department of Transportation, Subtitle A, Office of the Secretary, part 21, Nondiscrimination in Federally Assisted Programs of the Department of Transportation – Effectuation of Title VI of the Civil Rights Act of 1964, as said regulations may amended.

That in the event of breach of any of the above nondiscrimination covenants, the STATE shall have the right to terminate the lease, and to reenter and repossess said land and the facilities thereon, and hold the same as if said lease had never been made or issued.

**The following shall be included in all deeds, licenses, leases, permits, or similar agreements entered into by GDOT pursuant to the provisions of Assurance 7.**

The LESSEE, for himself or herself, his or her personal representatives, successors in interest, and assigns, as a part of the consideration hereof, does hereby covenant, and agree as a covenant running with the land, that (1) no person, on the grounds of race, color, sex, or national origin, 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 furnishings of services thereon, no person on the grounds of race, color, sex, and national origin shall be excluded from participation in, denied the benefits of, or otherwise be subjected to discrimination, (3) that the LESSEE shall use the premises 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, Nondiscrimination in Federally Assisted Programs of the Department of Transportation – Effectuation of Title VI of the Civil Rights Act of 1964, and as said Regulations may be amended.

That in the event of reach of any of the above discrimination covenants, the STATE shall have the right to terminate the (license, lease, permit, etc.) and to reenter 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.

\*(Include in deeds subject to a reverter clause)

That in the event of breach of any of the above nondiscrimination covenants, the STATE shall have the right to reenter said land and facilities there-on, and the above described lands and

facilities shall thereupon revert to and vest in and become the absolute property of the STATE and its assigns.

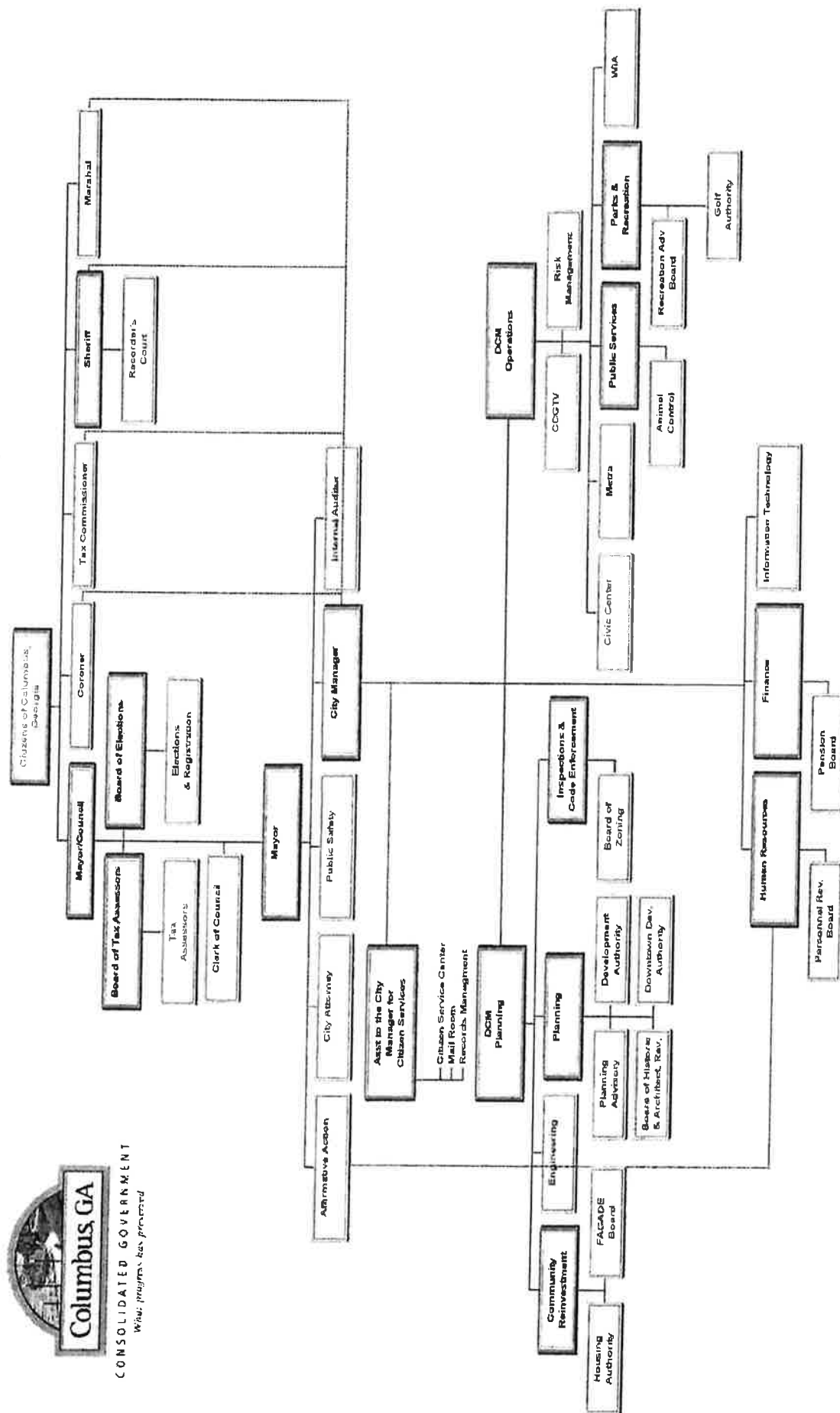
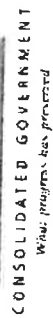
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\* Reverter Clause and related language to be used only when it is determined that such a clause is necessary in order to effectuate the purpose of Title VI of Civil Rights Act of 1964.

Exhibit 1

Columbus Consolidated Government Organizational Chart

The Columbus-Phenix City Transportation Study (MPO) Organizational Chart



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***COLUMBUS-PHENIX CITY TRANSPORTATION STUDY  
METROPOLITAN PLANNING ORGANIZATION  
ORGANIZATIONAL CHART***

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**CITIZENS OF MUSCOGEE, CHATTAHOOCHEE, AND HARRIS COUNTIES  
(GEORGIA) & CITIZENS OF LEE AND RUSSELL COUNTIES (ALABAMA)**

**MPO Boards**

**POLICY COORDINATING COMMITTEE (PCC)  
TECHNICAL COORDINATING COMMITTEE (TCC)  
CITIZENS ADVISORY COMMITTEE (CAC)**

**WILL JOHNSON, DIRECTOR OF  
PLANNING / MPO**

**FELTON GRANT  
RIGHT-OF-WAY ACQUISITION  
COORDINATOR**

**LAGRINTA DAVIS  
ADMINISTRATIVE ASSISTANT**

**DAVID COOPER, GIS TECHNICIAN**

**VACANT  
PRINCIPAL TRANSPORTATION  
PLANNER**

**MIKE MIXEN  
TRANSPORTATION PLANNER**

Exhibit 2

The Columbus-Phenix City Transportation Study (MPO) Title VI Complaint Form



THE COLUMBUS-PHENIX CITY TRANSPORTATION STUDY (MPO)  
TITLE VI COMPLAINT FORM

Title VI of the 1964 Civil Rights Act requires that “No person in the United States shall, on the ground of race, color, or national origin, be excluded from participation in, be denied the benefits of, or be subjected to discrimination under any program or activity receiving federal financial assistance.”

Note: The following information is necessary to assist us in processing your complaint. Should you require any assistance in completing this form, please let us know. Complete and return this form to Columbus-Phenix City MPO: Mr. Mike Mixen, Senior Transportation Planner / Title VI Coordinator, Columbus Consolidated Government, P.O. Box 1340, Columbus, GA 31902

1. Complainant's Name \_\_\_\_\_
2. Address \_\_\_\_\_
3. City, State and Zip Code \_\_\_\_\_
4. Telephone Number (home) \_\_\_\_\_ (business) \_\_\_\_\_
5. Person discriminated against (if someone other than the complainant)  
Name \_\_\_\_\_  
Address \_\_\_\_\_  
City, State and Zip Code \_\_\_\_\_
6. Which of the following best describes the reason you believe the discrimination took place?  
Was it because of your:  
a. Race / Color \_\_\_\_\_  
b. National Origin \_\_\_\_\_  
c. Other \_\_\_\_\_
7. What date did the alleged discrimination take place? \_\_\_\_\_
8. In your own words, describe the alleged discrimination. Explain what happened and whom you believe was responsible. Please use the back of this form if additional space is required.  
\_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_
9. Have you filed this complaint with any other federal, state, or local agency; or with any federal or state court? Yes \_\_\_\_\_ No \_\_\_\_\_  
If yes, check all that apply:  
\_\_\_\_\_ Federal agency \_\_\_\_\_ Federal court \_\_\_\_\_ State agency  
\_\_\_\_\_ State court \_\_\_\_\_ Local agency

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

Name \_\_\_\_\_

Address \_\_\_\_\_

City, State, and Zip Code \_\_\_\_\_

Telephone Number \_\_\_\_\_

11. Please sign below. You may attach any written materials or other information that you think is relevant to your complaint.

\_\_\_\_\_  
Complaint's Signature

\_\_\_\_\_  
Date