



METROPOLITAN PLANNING ORGANIZATION

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TITLE VI
RACIAL EQUITY
ENVIRONMENTAL JUSTICE
LIMITED ENGLISH PROFICIENCY

DRAFT

Corpus Christi MPO
2023 Program for
Addressing Discrimination
(PAD)

ADOPTED BY THE TRANSPORTATION POLICY COMMITTEE ON AUGUST 3, 2023

CORPUS CHRISTI MPO 202~~31~~ PROGRAM FOR ADDRESSING DISCRIMINATION (PAD)

ADOPTED BY THE TRANSPORTATION POLICY COMMITTEE ON ~~JULY~~AUGUST ~~16~~3, 202~~31~~

In cooperation with:

The U.S. Department of Transportation

The Federal Highway Administration

The Federal Transit Administration

The Texas Department of Transportation

The Corpus Christi Regional Transportation Authority



U.S. Department
of Transportation



CORPUS CHRISTI REGIONAL
TRANSPORTATION AUTHORITY

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CONTACT INFORMATION

Citizens, stakeholders, and interested parties may contact the following for information regarding:

Title VI Plan, Limited English Proficiency Plan (LEP), Environmental Justice, Racial Equity, or other Corpus Christi MPO documents.

Submit oral and/or written comments about any advertised plan, and/or about the Corpus Christi MPO and its planning efforts to:

Address: 602 N. Staples Street, Suite 300
Corpus Christi, Texas 78401

Phone: (361) 884-0687 Ext. 103

E-mail: ccmpo@cctxmpo.us

Website: www.corpuschristi-mpo.org

Title VI Coordinator and Additional Assistance

Please submit any inquiries or comments for the Corpus Christi MPO Title VI Coordinator to Corpus Christi MPO staff at the above contact information. Hearing and voice assistance are available upon request.

Corpus Christi Metropolitan Planning Organization Non-Discrimination Program

Adopted Date

~~July~~[August 6~~1~~3](#), 202~~31~~

Granting/Sponsoring Agencies

Federal Highway Administration
Federal Transit Administration
Texas Department of Transportation

TRANSPORTATION POLICY COMMITTEE (TPC)

RESOLUTION ~~231~~-0407

APPROVING THE ~~2021 PUBLIC PARTICIPATION PLAN (PPP) AND THE 20231~~ PROGRAM FOR ADDRESSING DISCRIMINATION, COMPRISED OF: THE TITLE VI PLAN, ACHIEVING RACIAL EQUITY (ARE), ENVIRONMENTAL JUSTICE (EJ), AND THE LIMITED ENGLISH PROFICIENCY (LEP) PLAN, FOR THE CORPUS CHRISTI METROPOLITAN PLANNING ORGANIZATION

WHEREAS, the Corpus Christi Metropolitan Planning Organization (MPO) is the designated MPO for the Corpus Christi Metropolitan Area with responsibilities to perform regional transportation planning and programming, in cooperation with the Texas Department of Transportation (TxDOT) and the Corpus Christi Regional Transportation Authority (CCRTA); and

WHEREAS, Title VI of the Civil Rights Act of 1964 and U.S. Department of Transportation (USDOT) regulations to implement the law (49 CFR, Part 21) require all recipients and sub-recipients of Federal transportation funds, such as the Corpus Christi MPO, to establish and maintain a Title VI Program that carries out the regulations and integrates the activities and considerations outlined in the USDOT's Policy Guidance; and

WHEREAS, the Federal Transit Administration (FTA) issued Circular FTA 4702.1B, Title VI Requirements and Guidelines for FTA Recipients, on October 12, 2012 providing further guidance and instructions necessary to carry the USDOT Title VI regulations and policy guidance; and

WHEREAS, the Corpus Christi MPO intends that no person shall, on the grounds of race, color, and/or national origin be excluded from participation in, be denied the benefits of, or be otherwise subjected to discrimination under any MPO program or activity; and

WHEREAS, the Corpus Christi MPO developed the Public Participation Plan (PPP) to ensure an open transportation planning process that supports early and continued involvement, timely public notice, and full public access to information regarding key transportation decisions; and

WHEREAS, the PPP guides the public, policymakers and staff to ensure the full and fair participation by all potentially affected communities in the transportation decision-making process; and

WHEREAS, the Corpus Christi MPO intends 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; and

WHEREAS, the Corpus Christi MPO intends to prevent the denial of, reduction in, or significant delay in the receipt of benefits by minority populations and low-income populations; and

WHEREAS, the Corpus Christi MPO intends that persons with Limited English Proficiency (LEP) shall not be discriminated against nor denied meaningful access to, and participation in, the programs and services provided by the MPO; and

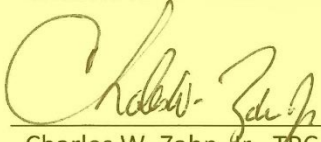
WHEREAS, the Corpus Christi MPO will pursue a comprehensive approach to advancing equity for all, including people of color and others who have been historically underserved, marginalized and adversely affected by persistent poverty and inequality; and

WHEREAS, the Corpus Christi MPO initiated a 45-day public comment period for the updated draft of the PPP from May 6, 2021 through June 21, 2021 and held a public meeting on July 1, 2021; and

WHEREAS, the Corpus Christi MPO initiated a one month public comment period for the updated draft of the Program Against Discrimination from June ~~13~~, 2021~~3~~ through ~~July~~August ~~16~~3, 202~~31~~ and held a public meeting on ~~July 1, 2021~~;

NOW, THEREFORE, BE IT HEREBY RESOLVED, The Transportation Policy Committee (TPC) of the Corpus Christi MPO, as the designated Metropolitan Planning Organization (MPO) for the Corpus Christi Metropolitan Area, approves the ~~2021 Public Participation Plan (PPP) and the 20231~~ Program for Addressing Discrimination (PAD) dated ~~July~~August 6~~13~~, 202~~31~~;

Witnessed, adopted, and signed on this ~~3rd6th1st~~ of ~~July~~August 202~~31~~ by:



Charles W. Zahn, Jr., TPC Vice-Chair
Corpus Christi Metropolitan Planning Organization

Charles W. Zahn, Jr.

Print Name

ATTEST:



Robert F. MacDonald, MPA, P.E.
Transportation Planning Director
Corpus Christi Metropolitan Planning Organization

INTRODUCTION

This Program provides an overview of Environmental Justice (EJ), Limited English Proficiency (LEP) and Achieving Racial Equity (ARE) concepts, definitions of Title VI and associated nondiscrimination acts, and how Title VI, EJ, LEP and ARE - are incorporated into the metropolitan transportation planning process. Public outreach strategies for minority, low-income, and LEP populations are included in the Corpus Christi MPO 2021 Public Participation Plan (PPP), amended on July 1, 2021. This plan is found here: https://www.corpuschristi-mpo.org/02_about_ppp.html.

ACKNOWLEDGEMENTS

The preparation and publication of this document was financed in part through grant(s) provided by the United States Department of Transportation, Federal Highway Administration, and Federal Transit Administration. The provision of federal financial assistance should not be construed as denoted as U.S. Government approval of plans, policies, programs, or projects contained herein.

PURPOSE

MPOs exist throughout the United States in all urbanized areas of more than 50,000 people and have the authority to plan, prioritize, and program federal funding for transportation projects in urban/metropolitan areas. As federally funded agencies, MPOs are responsible for providing information on nondiscrimination requirements to local public officials and reporting these requirements within their local communities. This document describes how the Corpus Christi MPO addresses federal requirements, including Title VI, Executive Orders 12898 on Environmental Justice, Executive Order 13166 on Limited English Proficiency (LEP), and Executive Order 13985 on Advancing Racial Equity. This Nondiscrimination Program, when paired with the adopted Public Participation Plan (PPP) describes the measures Corpus Christi MPO uses to encourage and utilize participation by disadvantaged communities and addresses how to avoid continuing the disparate outcomes that resulted from previous laws and public policies and denied equitable outcomes to individuals and communities.

The Corpus Christi MPO is committed to ensuring that plans and programs equitably meet the needs of people and avoid disproportionately high and adverse human health or environmental effects on disadvantaged populations. The Corpus Christi MPO will identify those areas that contain higher than average concentrations of disadvantaged or underserved populations. The public participation process will ensure that these communities within the MPO have ample opportunity to participate in the decision-making process through an effective and thorough public participation effort. The Corpus Christi MPO will analyze investments for disparity for disadvantaged or underserved groups by comparing the estimated positive and negative impacts against other populations.

The Corpus Christi Metropolitan Planning Organization (Corpus Christi MPO), as the designated MPO for the Corpus Christi Urban Area, complies with Title VI and all other relevant nondiscrimination laws and orders. The Corpus Christi MPO Transportation Policy Committee (TPC) is the designated forum for municipalities, counties, transit agencies, tribal governments, state and private agencies to address regional transportation issues. The U.S. Department of Transportation (USDOT) has established policy guidelines to improve regional transportation planning and give local communities a stronger voice in achieving their transportation goals while avoiding duplication of planning efforts. As the designated metropolitan planning organization Corpus Christi MPO is responsible for carrying out the:

“...continuing, cooperative and comprehensive (3C)multimodal transportation planning process, including the development of a metropolitan transportation plan and a transportation improvement program (TIP), that encourages and promotes the safe and efficient development, management, and operation of surface transportation systems to serve the mobility needs of people and freight (including accessible pedestrian walkways and bicycle transportation facilities) and foster economic

growth and development, while minimizing transportation-related fuel consumption and air pollution” (23 CFR 450.300).”

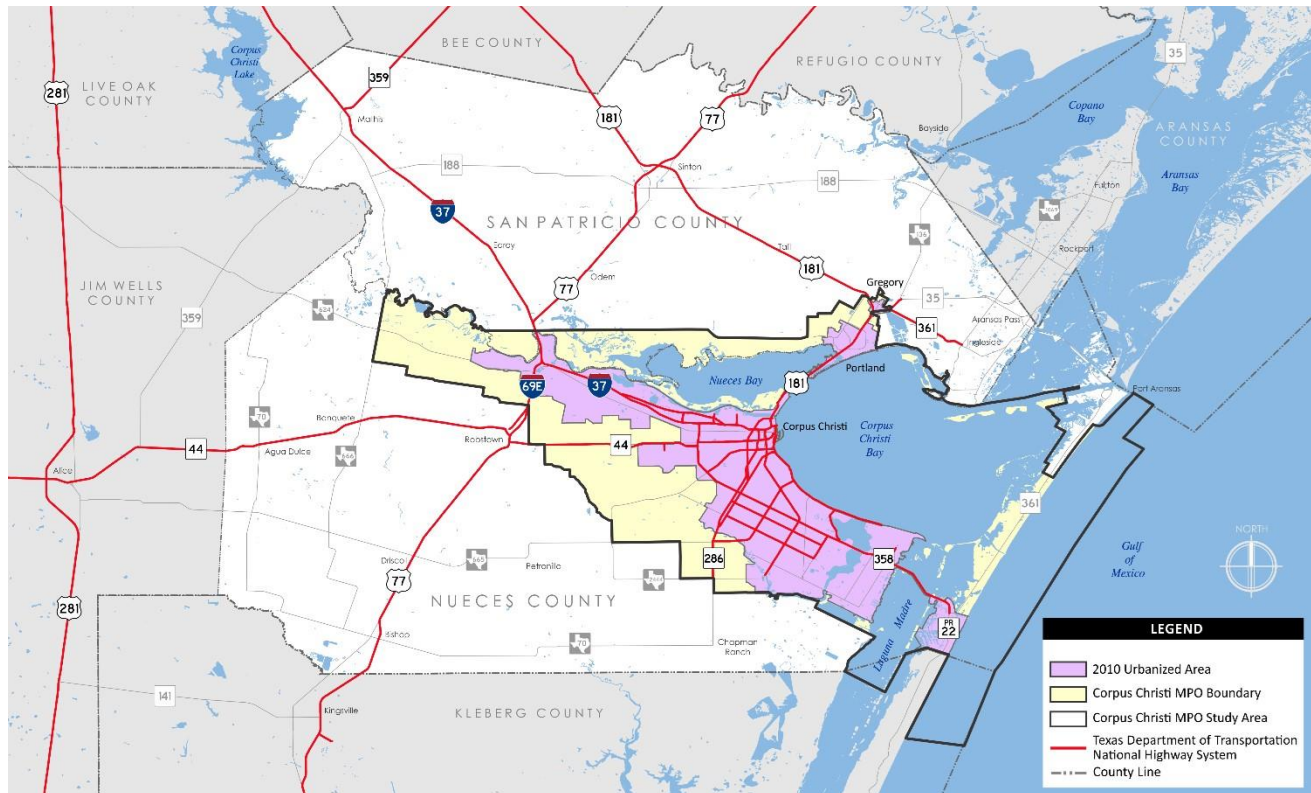
Questions

For questions on the Corpus Christi MPO Non-discrimination Program, Title VI Plan and procedures, or other items related to public outreach please contact the Corpus Christi MPO at (361) 884-0687 or by email at ccmpo@cctxmpo.us. For information on the Corpus Christi MPO's work programs or publications, please see the Corpus Christi MPO website at www.corpuschristi-mpo.org

Corpus Christi Metropolitan Planning Organization

The Corpus Christi Metropolitan Planning Organization (Corpus Christi MPO) and its Transportation Policy Committee (TPC) have been responsible for the 3C transportation planning process since 1973. First, as the Corpus Christi Urban Transportation Study, then in Year 2000, as the Corpus Christi Metropolitan Planning Organization. The Corpus Christi MPO's Metropolitan Planning Area (MPA) includes portions of Nueces County and San Patricio County (see Exhibit 1). The MPO is comprised of the Transportation Policy Committee, the Technical Advisory Committee, and MPO staff. Members of both bodies are appointed by their respective agencies or localities, not by the MPO itself. Any significant transportation project or program to be constructed or conducted within the Corpus Christi MPO's MPA must receive approval by the Corpus Christi MPO before any Federal funds can be expended.

Exhibit 1: Map of the Corpus Christi MPO's Metropolitan Planning Area (MPA) on July 6, 2023



IMPORTANT DEFINITIONS AND CONCEPTS

Disadvantaged Groups: 13CFR124 defines them as peoples who have been subjected to cultural bias due to race, ethnic origin, gender, physical handicap, or diminished capital and credit opportunities.

Disparity: the amount of separation between a group identified as in need and the group identified as the most favored group. This is done using measures expressed in terms of a rate, proportion, mean, or some other quantitative measure.

Equality: Is an even or equal distribution of resources; each individual is provided to without any consideration of their attributes; people with different or less attributes are treated the same as those with more or differing attributes.

Equity: Adjusts the level and type of resources distributed so that solutions are appropriate to each groups' unique needs and preferences. It means that social and economic benefits are equitable only if they result in equally desirable outcomes for everyone, particularly the least advantaged members of society.

Low-Income: A person whose median household income is at or less than 100% of the Department of Health and Human Services poverty guidelines.

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

Minority: A person who is:

1. Black: a person having origins in any of the black racial groups of Africa.
2. Hispanic or Latino: a person of Mexican, Puerto Rican, Cuban, Central or South American, or other Spanish culture or origin, regardless of race.
3. Asian American: a person having origins in the Far East, Southeast Asia or the Indian subcontinent.
4. American Indian and Alaskan Native: a person having origins in North America, South America (including Central America), and who maintains cultural identification through tribal affiliation or community recognition; or
5. Native Hawaiian and Other Pacific Islander: a person having origins in any of the original peoples of Hawaii, Guam, Samoa or other Pacific Islands.

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

Adverse Effects: The totality of significant individual or cumulative human health or environmental effects, including interrelated social and economic effects; ~~which may include, but are not limited to: bodily impairment, infirmity, illness or death; air, noise, and water pollution and soil contamination; destruction or disruption of human-made or natural resources; destruction or diminution of aesthetic values; destruction or disruption of community cohesion or a community's economic vitality; destruction or disruption of the availability of public and private facilities and services; vibration; adverse employment effects; displacement of persons, businesses, farms, or nonprofit organizations; increased traffic congestion, isolation, exclusion or separation of minority or low-income individuals~~ within a given community or from the broader community; and the denial of, reduction in, or significant delay in the receipt of, benefits of FHWA programs, policies, or activities.

Disproportionately High and Adverse Effect on Minority and Low-Income Populations: An adverse effect that is predominately borne by a minority population or will be suffered by a minority population and/or low-income population and is appreciably more severe or greater in magnitude than the adverse effect suffered by the nonminority population and/or non-low-income population.

Elderly Population: Those people who have reached 65 years of age or older.

Justice40: A government-wide initiative that aims to deliver 40 percent of the overall benefits of relevant federal investments to disadvantaged communities.

Overburdened Communities: Overburdened communities are minority, low-income, or Indigenous populations or locations that potentially experience disproportionate environmental and/or safety harms and risks. This disproportionality can be a result of greater vulnerability to environmental hazards, heightened safety risks, lack of opportunity for public participation, or other factors.

Disabled: An individual with a physical or mental impairment that substantially limits one or more major life activities, such as; seeing, hearing, eating, sleeping, walking, standing, lifting, bending, speaking, breathing, learning, reading, concentrating, thinking, communicating, working, and caring for oneself.

Underserved Communities: Refers to populations sharing a particular characteristic, such as race, ethnicity, religion, income, geography, gender identity, sexual orientation, or disability. It also refers to Individuals with limited English proficiency (LEP), young adults without health coverage, new mothers and women with children, Individuals with disabilities, Medicaid-eligible consumers and geographic communities that have been systematically denied an opportunity to participate in aspects of economic, social, and civic life.

~~**Disadvantaged Groups:** 13CFR124 defines them as peoples who have been subjected to cultural bias due to race, ethnic origin, gender, physical handicap, or diminished capital and credit opportunities.~~

~~**Disparity:** the amount of separation between a group identified as in need and the group identified as the most favored group. This is done using measures expressed in terms of a rate, proportion, mean, or some other quantitative measure.~~

LAWS AND REGULATIONS REGARDING DISCRIMINATION

The legal principle of equity in the United States was confirmed in 1868 by the Equal Protection Clause of the Fourteenth Amendment to the U.S. Constitution, which states “...nor shall any State [...] deny to any person within its jurisdiction the equal protection of the laws.” A modern application of the Equal Protection Clause is the Supreme Court’s unanimous 1954 decision in the landmark case of Brown vs. Board of Education, which declared that separate but equal schools for African American and white children were inherently inequitable and thus unconstitutional. The ruling led to the racial integration of America’s public schools and paved the way for the enactment of other equity laws, such as the Civil Rights Act of 1964.

The primary anti-discrimination law is the Civil Rights Act of 1964. Title VI of the Civil Rights Act of 1964 prohibits federal agencies and sub-recipients of federal funds from discriminating, on the basis of race, color or national origin, against participants or clients of programs that receive Federal funding. Title VI of the Civil Rights Act of 1964 states that: “No person in the United States shall, on the ground of race, color, or national origin, be excluded from participation in, be denied the benefits of, or be subjected to discrimination under any program or activity receiving Federal financial assistance.” Subsequent laws and Presidential Executive Orders added other categories, including handicap, gender, age, and income status to the criteria for which discrimination is prohibited. The Corpus Christi Metropolitan Planning Organization (Corpus Christi MPO) Title VI Plan and other anti-discrimination documents were developed to ensure the Corpus Christi MPO and all subgrantees comply with the nondiscrimination requirements as outlined in Executive Orders, Acts of Congress, along with Title 23 CFR and 49 CFR and related laws. It also provides specific information on how to file a nondiscrimination complaint.

The relevant federal laws are described below.

- **The Civil Rights Act of 1964** is the primary Anti-discrimination Law. Title VI is one of eleven titles included in the Civil Rights Act of 1964. The following are the Civil Rights Act titles:

CORPUS CHRISTI MPO 2023~~31~~ PROGRAM FOR ADDRESSING DISCRIMINATION (PAD)

1. Voting Rights
2. Public Accommodation
3. Desegregation of Public Facilities IV
4. Desegregation of Public Education
5. Commission on Civil Rights
6. Nondiscrimination in Federally Assisted Programs and Activities
7. Equal Employment Opportunity
8. Registration and Voting Statistics
9. Intervention and Procedure after Removal in Civil Rights Cases
10. Establishment of Community Relations Service
11. Miscellaneous

Title VI of the Civil Rights Act states:

This title declares it to be the policy of the United States that discrimination on the grounds of race, color, or national origin shall not occur in connection with programs and activities receiving federal financial assistance and authorizes and directs the appropriate federal departments and agencies to take action to carry out this policy. This title is not intended to apply to foreign assistance programs.

Section 601 – states the general principle that no person in the United States shall be excluded from participation in or otherwise discriminated against on the grounds of race, color, or national origin under any program or activity receiving federal financial assistance.

Section 602 – directs each federal agency administering a program of federal financial assistance by way of grant, contract, or loan to take action pursuant to rule, regulation, or order of general applicability to effectuate the principle of section 601 in a manner consistent with the achievement of the objectives of the statute authorizing the assistance. In seeking the effect compliance with its requirements imposed under this section, an agency is authorized to terminate or to refuse to grant or to continue assistance under a program to any recipient as to whom there has been an express finding pursuant to hearing of a failure to comply with the requirements under that program, and it may also employ any other means authorized by law. However, each agency is directed first to seek compliance with its requirements by voluntary means.

Section 603 - provides that any agency action taken pursuant to section 602 shall be subject to such judicial review as would be available for similar actions by that agency on other grounds. Where the agency action consists of terminating or refusing to grant or to continue financial assistance because of a finding of a failure of the recipient to comply with the agency's judicial review under existing law, judicial review shall nevertheless be available to any person aggrieved as provided in section 10 of the Administrative Procedure Act (5USC 1009). The section also states explicitly that in the latter situation such agency action shall not be deemed committed to unreviewable agency discretion within the meaning of section 10. The purpose of this provision is to obviate the possible argument that although section 603 provides for review in accordance with section 10, section 10, itself has an exception for action "committed to agency discretion," which might otherwise be carried over into section 603. It is not the purpose of this provision of section 603, however, otherwise to alter the scope of judicial review as presently provided in section 10 (e) of the Administrative Procedure Act.

- **National Environmental Policy Act (NEPA) of 1969** As stated in this Act, it recognizes "the profound impact of man's activity on the interrelations of all components of the natural environment, particularly the profound influences of population growth, high-density urbanization, industrial expansion, resource exploitation, and new and expanding technological advances and recognizing further the critical importance of restoring and maintaining environmental quality to the overall welfare and development of man, declares that it is the continuing policy of the Federal Government, in cooperation with State and local governments, and other concerned public and private organizations, to use all practicable means and measures, including financial and technical assistance, in a manner calculated to foster and promote the general welfare, to create and maintain conditions under which man and nature can exist in productive harmony, and fulfill the social, economic, and other requirements of present and future generations of Americans.

It is the continuing responsibility of the Federal Government to use all practicable means, consistent with other essential considerations of national policy, to improve and coordinate Federal plans, functions, programs, and resources to the end that the Nation may –

1. *fulfill the responsibilities of each generation as trustee of the environment for succeeding generations;*
 2. *assure for all Americans safe, healthful, productive, and aesthetically and culturally pleasing surroundings;*
 3. *attain the widest range of beneficial uses of the environment without degradation, risk to health or safety, or other undesirable and unintended consequences;*
 4. *preserve important historic, cultural, and natural aspects of our national heritage, and maintain, wherever possible, an environment which supports diversity, and variety of individual choice;*
 5. *achieve a balance between population and resource use which will permit high standards of living and a wide sharing of life's amenities; and*
 6. *enhance the quality of renewable resources and approach the maximum attainable recycling of depletable resources."*
- The **Uniform Relocation Assistance and Real Property Acquisition Policies Act of 1970** prohibits unfair and inequitable treatment of persons displaced or whose property is acquired as a result of federal-aid programs and projects.
 - The **Federal-Aid Highway Act of 1973** stated that no person shall, on the grounds of gender, be excluded from participation in, denied the benefits of, or be subjected to discrimination under any program or activity receiving federal assistance under this title or carried on under this title.
 - **Section 504 of the Rehabilitation Act of 1973** stated that no qualified handicapped person shall, solely by reason of their handicap, be excluded from participation in, be denied the benefits of, or be subjected to discrimination under any program or activity that receives or benefits from federal financial assistance. This Act protects qualified individuals from discrimination based on their disability.
 - The **Age Discrimination Act of 1975** states that no person shall, on the basis of age, be excluded from participation in, be denied the benefits of, or be subjected to discrimination under any program or activity receiving federal financial assistance. This act prohibits age discrimination in Federally Assisted Programs.
 - The **Civil Rights Restoration Act of 1987, P.L.100-209** amends Title VI of the 1964 Civil Rights Act to make it clear that discrimination is prohibited throughout an entire agency if any part of the agency receives federal assistance.
 - The **Americans with Disabilities Act (ADA) of 1990** prohibits discrimination against people with disabilities in employment, transportation, public accommodation, communications, and governmental activities.
 - **Executive Order 12898 – Environmental Justice (February 11, 1994)**, This presidential mandate addresses equity and fairness toward low-income and minority persons/population. Executive Order 12898 requires each Federal agency, to the greatest extent practicable and permitted by law, and consistent with the principles set forth in the report on the National Performance Review, to achieve environmental justice as part of its mission by identifying and addressing, as appropriate, disproportionately high and adverse human health or environmental effects, including interrelated social and economic effects, of its programs, policies, and activities on minority populations and low-income populations in the United States.
 - **Executive Order 13166 – Limited English Proficiency (August 11, 2000)**, a presidential directive to federal agencies to ensure people who have limited English proficiency have meaningful access to services. Executive Order 13166 ensures federal agencies and their recipients to improve access for persons with Limited English Proficiency to federally conducted and federally assisted programs and activities.

- **Executive Order 13985 – Advancing Racial Equity (January 20, 2021)**, this presidential directive to the Federal Government is for pursuing a comprehensive approach to advancing equity for all, including people of color and others who have been historically underserved, marginalized, and adversely affected by persistent poverty and inequality. Affirmatively advancing equity, civil rights, racial justice, and equal opportunity requires a systematic approach to embedding fairness in decision-making processes, executive departments and agencies (agencies) to redress inequities in past policies and programs that serve as barriers to equal opportunity.
- **Executive Order 14008 – Tackling the Climate Crisis at Home and Abroad (January 27, 2021), Section 219** describes securing environmental justice and spurring economic opportunity for disadvantaged communities that have historically been marginalized and overburdened by pollution and underinvestment in housing, transportation, water and wastewater infrastructure, and health care as key considerations. To do this it amended Executive Order 12898 to create clear performance metrics that ensure accountability, and a requirement to publish an annual public performance scorecard on its implementation. Finally, it required publishing “...recommendations on how certain Federal investments might be made toward a goal that 40 percent of the overall benefits flow to disadvantaged communities.”
- **Executive Order 14091 – Further Advancing Racial Equity and Support for Underserved Communities (February 16, 2023)**, is a presidential directive to federal agencies and their funding recipients to “...meaningfully engage with underserved communities, including through accessible, culturally and linguistically appropriate outreach, and the incorporation of the perspectives of those with lived experiences into agency policies, programs, and activities.” Executive Order 14091 ensures federal agencies assess the barriers underserved communities face and offer solutions, investigate and address any algorithmic discrimination, and improve the frequency of community engagement.
- **23 CFR Part 200 – Federal Highway Administration regulations:** Title VI Program and Related Statutes – Implementation and Review Procedures provides guidelines for implementing the FHWA Title VI compliance program under Title VI of the Civil Rights Act of 1964 and related civil rights laws and regulations and conducting Title VI program compliance reviews relative to the Federal-aid highway program.
- **49 CFR Part 21 – Nondiscrimination in Federally-Assisted Programs.** The purpose of this Part is to establish the provisions of Title VI of the Civil Rights Act of 1964 (hereafter referred to as the Act) so that no person in the United States is, on the grounds of race, color, or national origin, excluded from participation in, denied the benefits of, or be otherwise subjected to discrimination under any program or activity receiving Federal financial assistance from the Department of Transportation.
- **23 CFR Part 450 – Federal Highway Administration planning regulations.** The purpose of this Part is implementing the provisions of 23 U.S.C. 134, 23 U.S.C. 150, and 49 U.S.C. 5303, as amended, which:
 - (a) (Set forth the national policy that the MPO designated for each urbanized area will carry out a continuing, cooperative, and comprehensive performance-based multimodal transportation planning process, including the development of a metropolitan transportation plan and a TIP, that encourages and promotes the safe and efficient development, management, and operation of surface transportation systems to serve the mobility needs of people and freight (including accessible pedestrian walkways, bicycle transportation facilities, and intermodal facilities that support intercity transportation, including intercity buses and intercity bus facilities and commuter vanpool providers) fosters economic growth and development and takes into consideration resiliency needs while minimizing transportation-related fuel consumption and air pollution; and
 - (b) Encourages continued development and improvement of metropolitan transportation planning processes guided by the planning factors set forth in 23 U.S.C. 134(h) and 49 U.S.C. 5303(h).

- **23 CFR Part 771 – Federal Highway Administration regulations**, this prescribes the policies and procedures of the Federal Highway Administration (FHWA), the Federal Railroad Administration (FRA), and the Federal Transit Administration (FTA) for implementing the National Environmental Policy Act of 1969 as amended (NEPA) and supplements the NEPA regulations of the Council on Environmental Quality (CEQ), 40 CFR parts 1500 through 1508 (CEQ regulations). Together these regulations set forth all FHWA, FRA, FTA, and U.S. Department of Transportation (DOT) requirements under NEPA for the processing of highway, public transportation, and railroad actions.
- **DOT Order 5610.2 on Environmental Justice (April 15, 1997)** The Order sets forth steps to prevent disproportionately high and adverse effects to minority or low-income populations through Title VI analyses and environmental justice analyses conducted as part of Federal transportation planning and NEPA provisions. It establishes DOT policy to promote the principles of environmental justice (as embodied in the Executive Order) through the incorporation of those principles in all DOT programs, policies, and activities. This is done by fully considering environmental justice principles throughout planning and decision-making processes in the development of programs, policies, and activities.
 1. Environmental justice principles apply to planning and programming activities, and early planning activities are a critical means to avoid disproportionately high and adverse effects in future programs, policies, and activities. Planning and programming activities for policies, programs, and activities that have the potential to have a disproportionately high and adverse effect on human health or the environment shall include explicit consideration of the effects on minority populations and low-income populations. Procedures shall be established or expanded, as necessary, to provide meaningful opportunities for public involvement by members of minority populations and low-income populations during the planning and development of programs, policies, and activities (including the identification of potential effects, alternatives, and mitigation measures).
 2. Steps shall be taken to provide the public, including members of minority populations and low-income populations, access to public information concerning the human health or environmental impacts of programs, policies, and activities, including information that will address the concerns of minority and low-income populations regarding the health and environmental impacts of the proposed action.
- **FHWA Order 6640.23~~a~~ (June 14, 2012December 2, 1998)** – FHWA Actions to Address Environmental Justice in Minority Populations and Low-Income Populations. It is FHWA's longstanding policy to actively ensure nondiscrimination in federally funded activities. Furthermore, it is FHWA's continuing policy to identify and prevent discriminatory effects by actively administering its programs, policies, and activities to ensure that social impacts to communities and people are recognized early and continually throughout the transportation decision-making process--from early planning through implementation. Should the potential for discrimination be discovered, action to eliminate the potential shall be taken. The FHWA will administer its governing statutes to identify and avoid discrimination and disproportionately high and adverse effects on minority populations and low-income populations by:
 1. identifying and evaluating environmental, public health, and interrelated social and economic effects of FHWA programs, policies, and activities.
 2. proposing measures to avoid, minimize, and/or mitigate disproportionately high and adverse environmental or public health effects and interrelated social and economic effects, and providing offsetting benefits and opportunities to enhance communities, neighborhoods, and individuals affected by FHWA programs, policies, and activities, where permitted by law and consistent with EO 12898.
 3. considering alternatives to proposed programs, policies, and activities where such alternatives would result in avoiding and/or minimizing disproportionately high and adverse human health or environmental impacts, where permitted by law and consistent with EO 12898; and

4. providing public involvement opportunities and considering the results thereof, including providing meaningful access to public information concerning the human health or environmental impacts and soliciting input from affected minority populations and low-income populations in considering alternatives during the planning and development of alternatives and decisions.
- **FHWA/FTA Memorandum Implementing Title VI Requirements in Metropolitan and Statewide Planning:** This memorandum provides clarification for field officers on how to ensure that environmental justice is considered during current and future planning certification reviews. The intent of this memorandum was for planning officials to understand that environmental justice is equally as important during the planning stages as it is during the project development stages.

CORPUS CHRISTI MPO RESPONSIBILITIES

As a recipient of federal funds, the Corpus Christi MPO is subject to the federal anti-discrimination rules listed above. MPOs were created as the forum where local agencies, state DOTs, transit providers, and the public develop the transportation plans and programs that will address the metropolitan area's needs. In this role, MPOs must ensure the full and fair participation by all potentially affected communities in the transportation decision-making process and verify that minority populations and low-income populations (disadvantaged populations) have not had benefits from federal investments denied, reduced, or delayed. The Corpus Christi MPO strives to use proactive or collaborative engagement to reach disadvantaged or underserved communities when possible. To certify compliance with Title VI and to address environmental justice, the Corpus Christi MPO must:

- a. Evaluate and improve the public involvement processes to eliminate participation barriers and engage disadvantaged populations in transportation decision-making.
- b. Identify the residential and employment locations and transportation needs of disadvantaged communities.
- c. Determine if the needs of the disadvantaged communities are addressed equitably and that the benefits and burdens of transportation investments are fairly distributed.
- d. Perform analyses that ensure that the Metropolitan Transportation Plan (MTP) and the Transportation Improvement Program (TIP) comply with federal discrimination laws and regulations.

Although it is recognized that much of the detailed evaluation of discrimination will occur at the project level (which is the responsibility of the project sponsor) rather than during regional transportation planning or programming, the Corpus Christi MPO can use a variety of techniques to identify discrimination caused by flaws in policy or decision processes and at a regional scale earlier in project development so that positive corrective actions can be taken and serve as a building block for subsequent interventions.

Metropolitan planning and programming emphasize enhanced public outreach and communication and an analysis of the programmatic distribution of benefits and impacts. Discrimination issues arise most frequently when:

- a. Disadvantaged communities are less represented than others when policymaking bodies debate and decide what should be done with transportation resources, or
- b. Some communities get more benefits of improved accessibility, faster trips, and congestion relief, while others experience fewer benefits, or
- c. Disadvantaged communities suffer disproportionate negative impacts, such as noise, decreased safety or higher air pollution, or
- d. Some communities pay regressive transportation taxes or fares for the services that they receive.

Equity in Public Outreach and Communication

In order to meet public communication requirements, the Corpus Christi MPO team will:

- Ensure that all communications and public participation efforts comply with nondiscrimination authorities.
- Develop and distribute information on nondiscrimination and Corpus Christi MPO programs to the general public.
- Provide services for individuals with special needs – Upon advance notice, deaf interpreters, translators, and Braille documents can be provided for public meetings. Notifications of opportunities for public participation will include contact information for people needing these or other special accommodations.
- Include confirmation of availability for people needing these or other special accommodations.
- Include the following statement in all of the Corpus Christi MPO public notices, press releases and on the Corpus Christi MPO website:

- “The Corpus Christi MPO ensures nondiscrimination and equal employment in all programs and activities in accordance with Title VI of the Civil Rights Act of 1964. If you have questions or concerns about your civil rights in regard to this project or special assistance for persons with disabilities or limited English proficiency, please contact the Corpus Christi MPO. Sign language or non- English language interpreters will be provided if needed and requested in advance of this meeting. Please contact the Corpus Christi MPO at 361-884-0687 or ccmpo@cctxmpo.us to request an interpreter no later than *<enter date at least seven calendar days prior to meeting>*.”

Procedures for Ensuring Equity in Service Provision

The Corpus Christi MPO is responsible for incorporating local long- and short-range transit, maintenance, and traffic operational plans and programs into the regional Metropolitan Transportation Plan to provide efficient and effective transportation services across the Corpus Christi region. This effort requires acquiring and evaluating various data, especially as they related to disadvantaged or underserved populations. The Corpus Christi MPO will solicit these communities for their transportation needs and conduct analyses to determine if there are disparities in benefits or impacts when compared against other communities. The Corpus Christi MPO coordinates with the CCRTA, TxDOT, and the cities and counties in the region and provides technical support when needed. Corpus Christi MPO staff will:

- Prepare and update a demographic profile of the region using the most current and appropriate statistical information available on race, income, and other pertinent data.
- Make the document available to the public and member agencies on the Corpus Christi MPO website or in hard copy format, if requested.
- Continue to ensure that local agencies and providers makes concerted efforts to involve members of disadvantaged groups in project and policy development processes.
- Ensure that all aspects of the planning and programming process operation comply with nondiscrimination authorities.

Consultant Contracts

The Corpus Christi MPO may utilize consultant contracts. When this occurs the Corpus Christi MPO operates under Nueces County contract procedures complying with all relevant federal and state laws. Corpus Christi MPO staff is responsible for ensuring that all consultants verify their compliance with nondiscrimination authorities, procedures, and requirements. If a recipient or sub-recipient is found to be not in compliance with nondiscrimination authorities, the Title VI Coordinator and relevant staff will work with the recipient or sub-recipient to resolve the deficiency status and write a remedial action if necessary.

Education and Training

In an effort to continuously improve the Corpus Christi MPO's overall compliance posture, nondiscrimination training is coordinated with FHWA, TXDOT, and the CCRTA, and made available to Corpus Christi MPO staff to ensure up-to-date knowledge of Title VI and other nondiscrimination statutes.

Responsibilities During the MTP

The Metropolitan Transportation Plan contains all federally funded projects along with significant projects from the state DOT, local governments and transit providers. In compiling these lists, the MPO should document and estimate total positive and negative impacts of transportation funding toward achieving the regionally adopted goals. As the agency responsible for coordinating the regional transportation process, the Corpus Christi MPO ensures that all segments of the population have been involved in the planning process and is responsible for evaluating the impact of proposed transportation investments on traditionally underserved or disadvantaged populations. During development of the Metropolitan Transportation Plan (MTP) the Corpus Christi MPO will:

- Ensure equitable public involvement by eliminating barriers to participation and using tools that actively seek out and engage minority and low-income populations in transportation decision-making,
- Disseminate information related to projects and processes to the public, with an emphasis on at-risk populations,
- Solicit and consider input from all groups and citizens concerned with, interested in, and/or affected by MPO transportation plans or programs, in particular the needs of traditionally underserved populations,
- Document the input from, and changes occurred as a result of, public involvement, highlighting the involvement of underserved or disadvantaged populations,
- Identify the locations and needs of at-risk populations and verify that both the benefits of interventions and impacts from interventions are equitably distributed,
- Include an environmental justice evaluation criterion when determining which projects to include in the MTP. Potential criteria could include impact on accessibility, impact on travel times to jobs, or transit service provision.
- Use appropriate analytical tools to assess levels and distribution of regional benefits and burdens of transportation system interventions,
- Ensure the MTP process conforms with Title VI and related regulations,
- Document compliance with Title VI and other anti-discrimination programs for certification and annual reviews,
- Develop and employ a process to resolve complaints from the public especially related to Title VI or other discrimination issues. Any individual may exercise the right to file a complaint with the MPO if a person believes that his or her rights have been exposed to unfair treatment or discrimination.

Responsibilities During the TIP

During development of the Transportation Investment Program (TIP) the Corpus Christi MPO will:

- Ensure equitable public involvement by eliminating barriers to participation and using tools that actively seek out and engage minority and low-income populations in transportation decision-making,
- Disseminate information related to projects and processes to the public, with an emphasis on at-risk populations,
- Solicit and consider input from all groups and citizens concerned with, interested in, and/or affected by MPO transportation plans or programs, in particular the needs of traditionally underserved populations,
- Document the input from, and changes occurred as a result of, public involvement, highlighting the involvement of underserved or disadvantaged populations,
- Identify the locations and needs of at-risk populations and verify that both the benefits of interventions and impacts from interventions are distributed equitably,
- Include an environmental justice evaluation criterion when determining which projects to include in the TIP. Potential criteria could include impact on accessibility, impact on travel times to jobs, transit service provision, or....
- Use appropriate analytical tools to assess levels and distribution of regional benefits and burdens of transportation system interventions,
- Ensure the TIP process conforms with Title VI and related regulations,
- Document compliance with Title VI and other anti-discrimination programs for certification and annual reviews,
- Develop and employ a process to resolve complaints from the public especially related to Title VI or other discrimination issues. Any individual may exercise the right to file a complaint with the MPO if a person believes that his or her rights have been exposed to unfair treatment or discrimination.

CORPUS CHRISTI MPO REGIONAL COMMUNITY PROFILE

Data from the US Census Bureau's 2017~~5~~-2021~~19~~ American Community Survey (ACS) 5-Year Estimates was used to develop a demographic profile of the Corpus Christi MPO's two county study area planning area and identify the locations and needs of socioeconomic groups, including low-income, minority, and LEP populations. These demographic groups (aka indicators) were used to develop the Areas of Disadvantaged Populations (ADP) analysis.

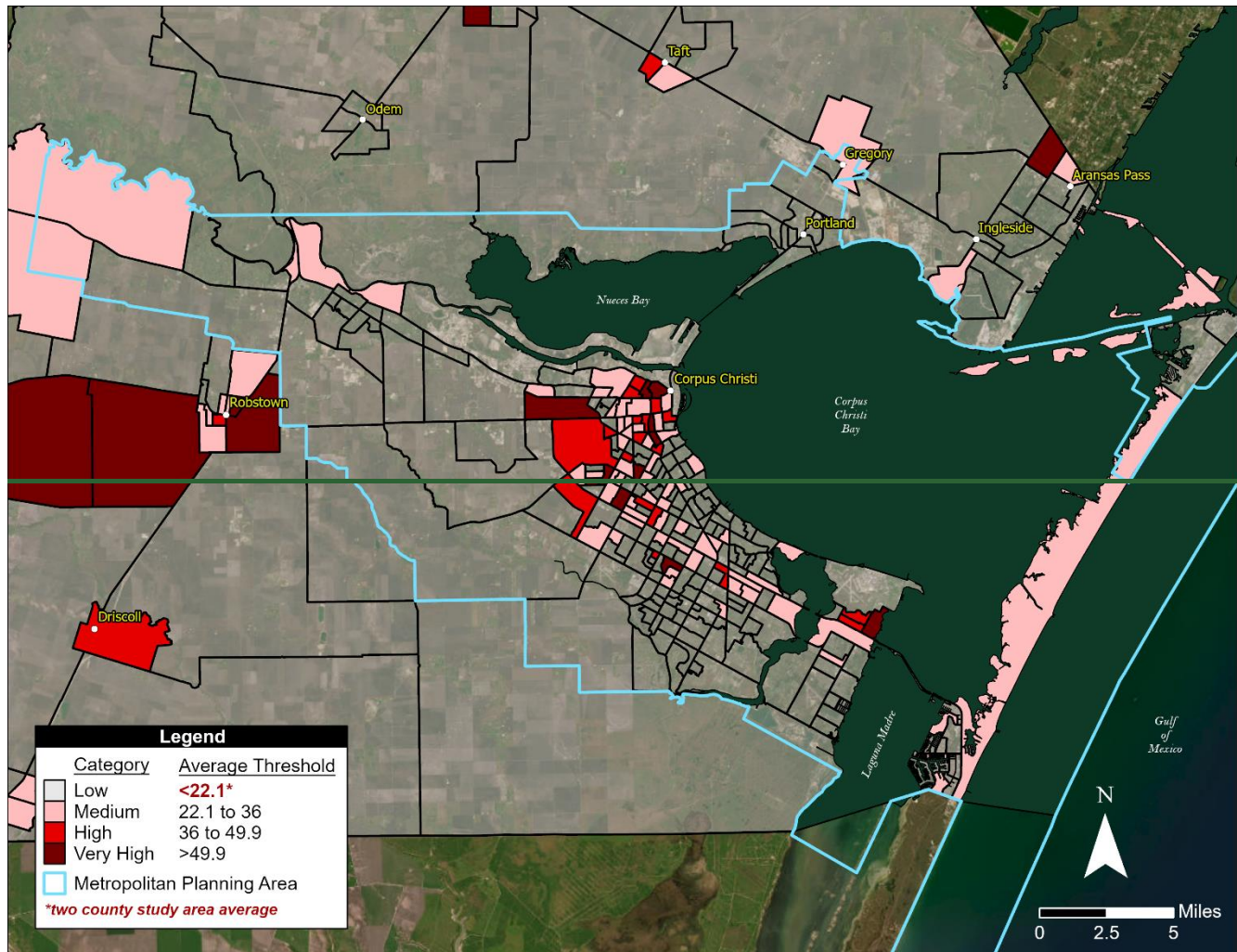
This methodology is not intended to definitively identify areas of concern or satisfy Title VI, Environmental Justice, or other similar Federal or State requirements; it is intended to be an initial method to identify such areas as part of a broader non-discriminatory assessment process.

The ADP analysis is comprised of an ADP score which is a part of Corpus Christi MPO's Title VI compliance program, analyzing of the agency's programs, policies, and activities. The scoring methodology calculates the percentage of each of the population groups present in every census block group in the two-county region (study area); compares that percentage to the regional average; and gives that concentration a score. The score is determined by the concentration of that population group compared to the regional average: well below average (0 points); below average (0.5 point); slightly below average (1 points); slightly above average (1.5 points); above average (2 points); and well above average (2.5 points). The ADP score for each census block group is the sum of the scores for each of the indicators in that block group. Populations groups mapped at the tract level are excluded from the ADP composite scoring process. The results of the ADP analysis can be seen in Exhibit 2 illustrates the areas of disadvantaged populations produced from this process.

As a matter of Corpus Christi MPO policy and a requirement of federal law, the transportation planning process must make special efforts to consider the concerns of traditionally underserved communities, including low-income and minority communities and people with disabilities.

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

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

Exhibit 2: Map of Areas of Disadvantaged Populations (ADP) by Block Group

As a matter of Corpus Christi MPO policy and a requirement of federal law, the transportation planning process must make special efforts to consider the concerns of traditionally underserved communities, including low-income and minority communities and people with disabilities. These communities are mapped by block group (tract where noted) within the Corpus Christi MPO's study area.

To reach the largest number of minority and low-income, as well as other underserved communities throughout the Corpus Christi Metropolitan Area, a community focused public participation program will achieve the

~~outcomes described in this plan. In addition to traditional methods of communication, Corpus Christi MPO will utilize strategies recommended by community members for a specific neighborhood or population group. By partnering with community groups, Corpus Christi MPO can cost effectively extend its reach and help partner organizations provide information that is of interest to groups they represent.~~

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Exhibit 2: Map of Areas of Disadvantaged Populations (ADP) by Block Group

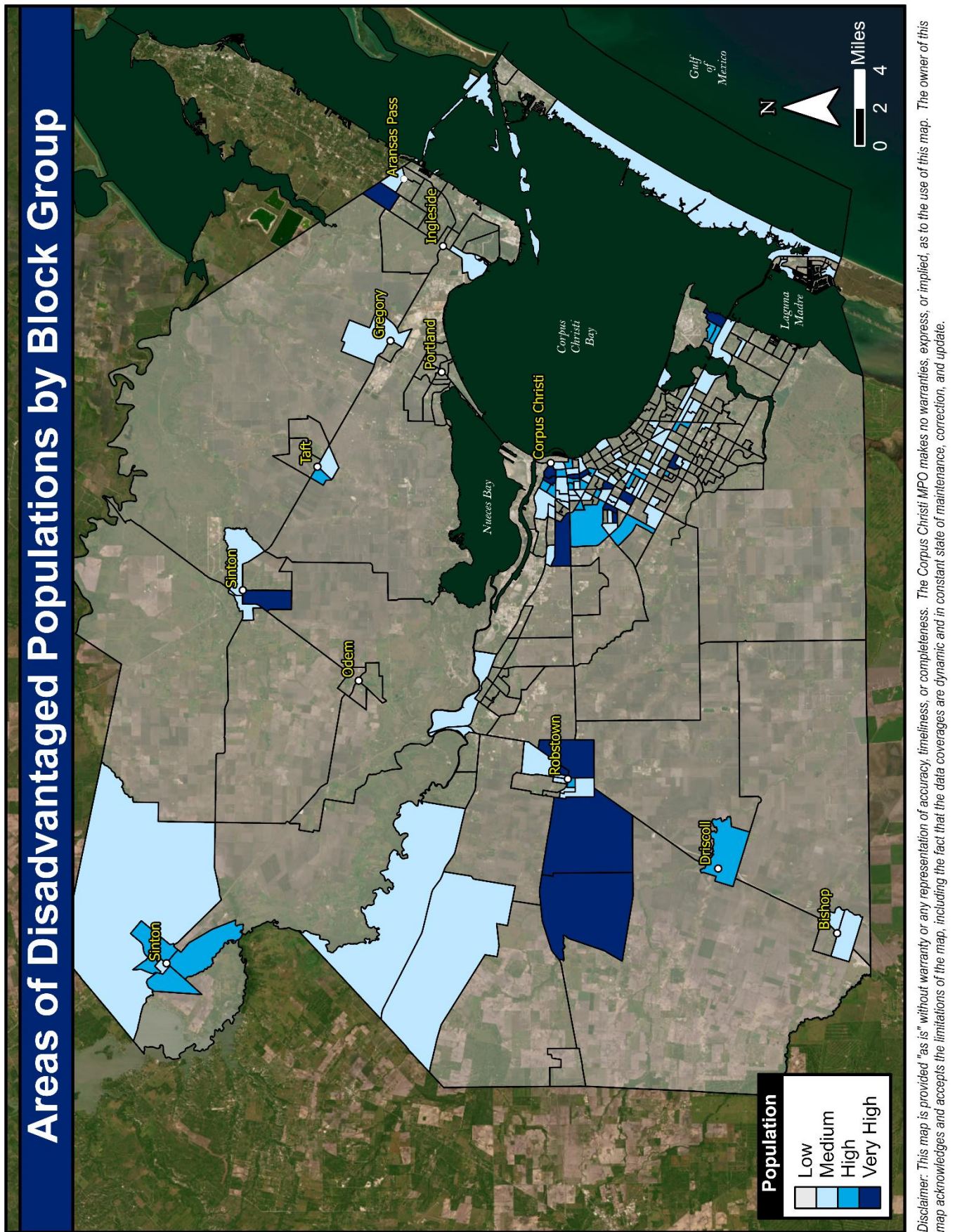
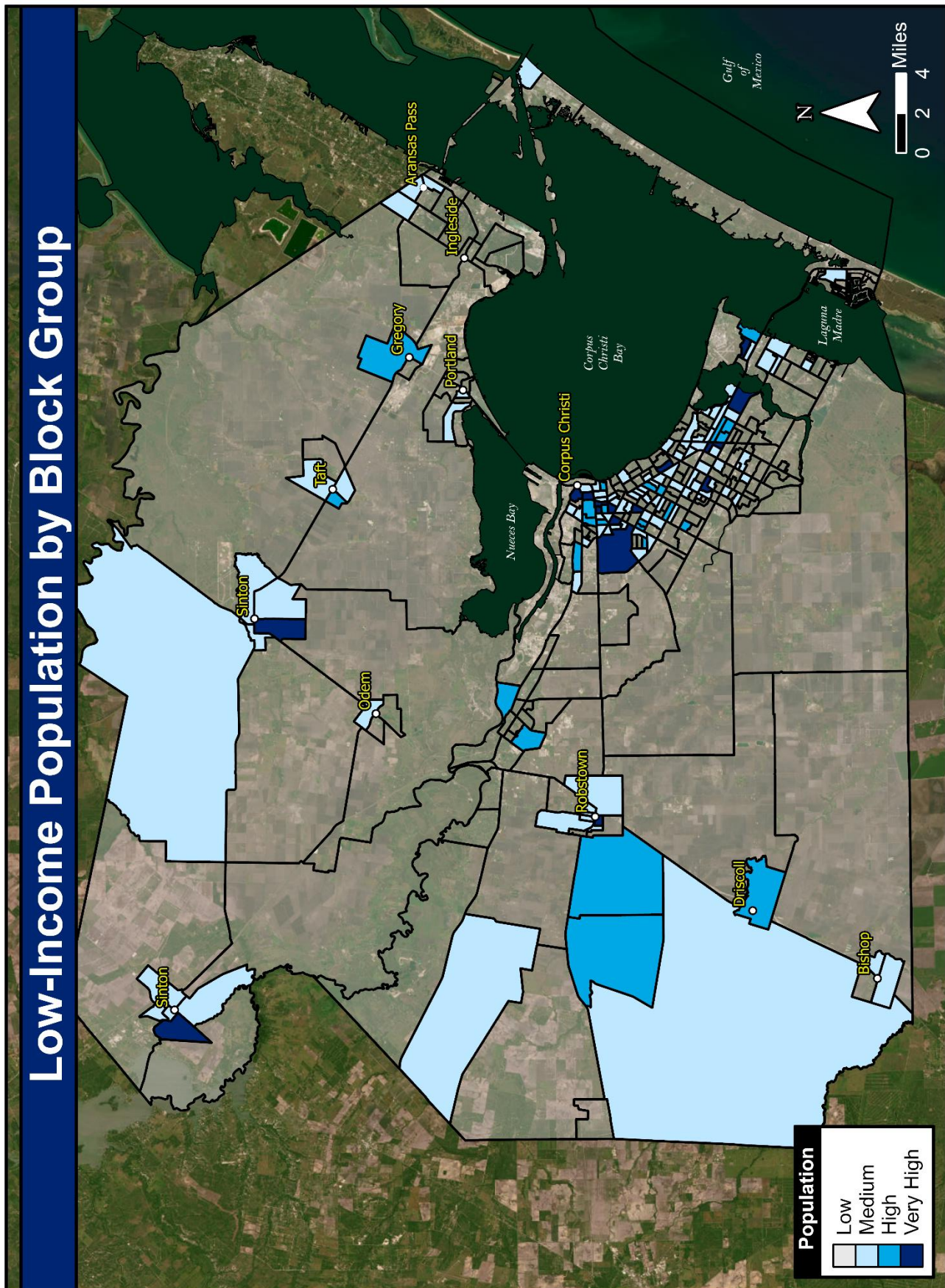
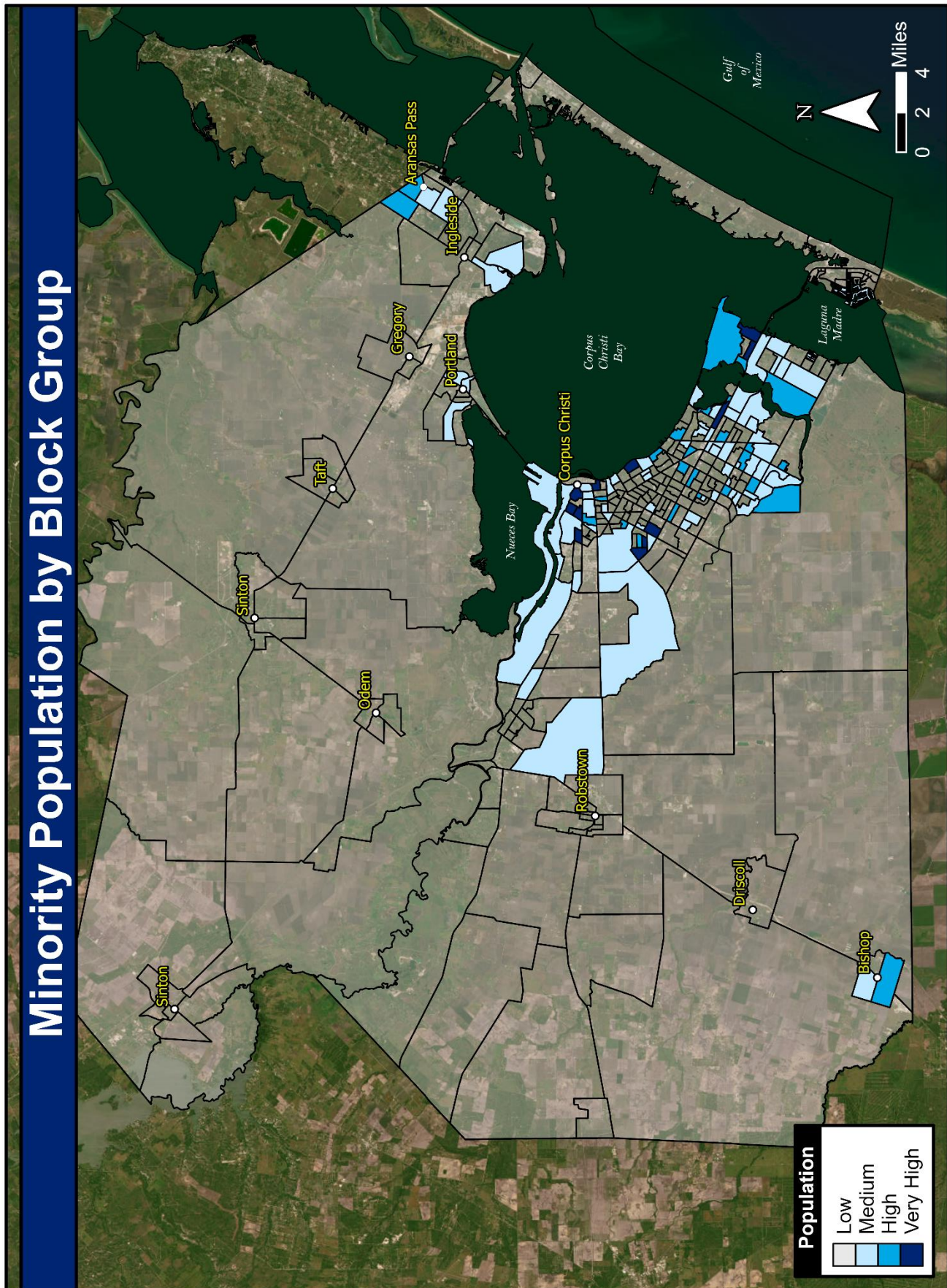


Exhibit 3: Map of Low-Income Population by Block Group



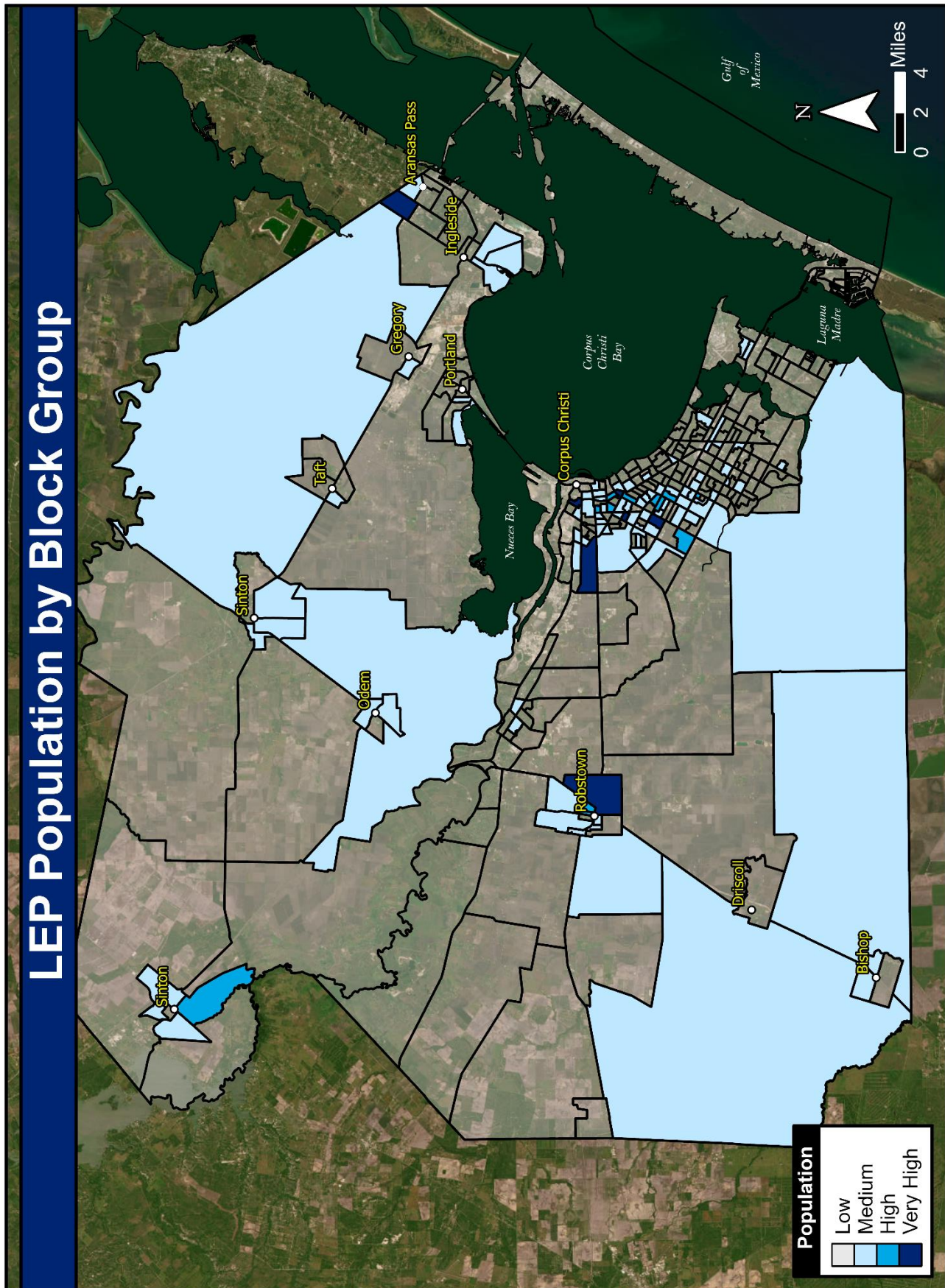
Disclaimer: This map is provided "as is" without warranty or any representation of accuracy, timeliness, or completeness. The Corpus Christi MPO makes no warranties, express, or implied, as to the use of this map. The owner of this map acknowledges and accepts the limitations of the map, including the fact that the data coverages are dynamic and in constant state of maintenance, correction, and update.

Exhibit 4: Map of Minority Population by Block Group



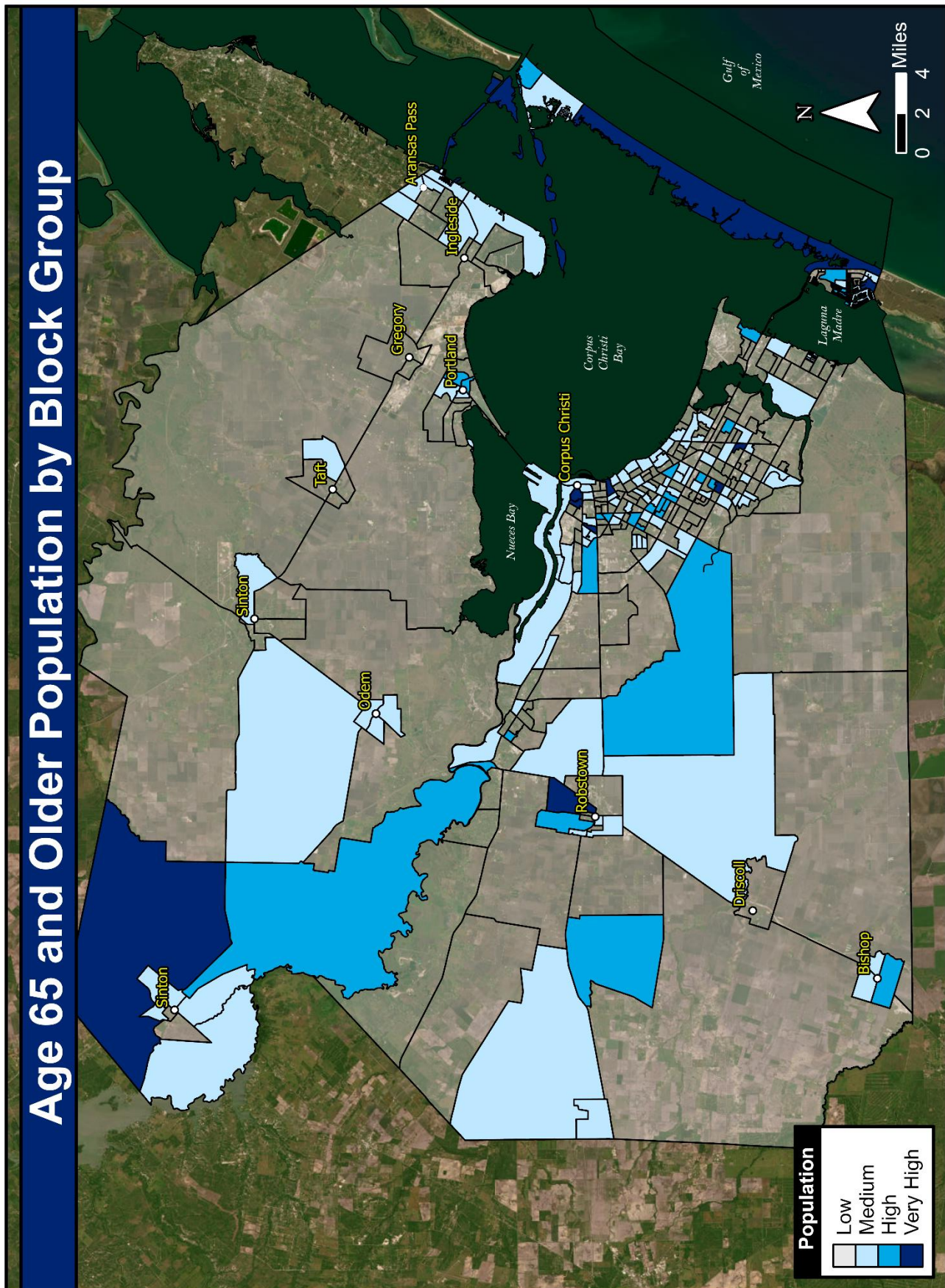
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Exhibit 5: Map of Limited English Proficiency (LEP) Population by Block Group



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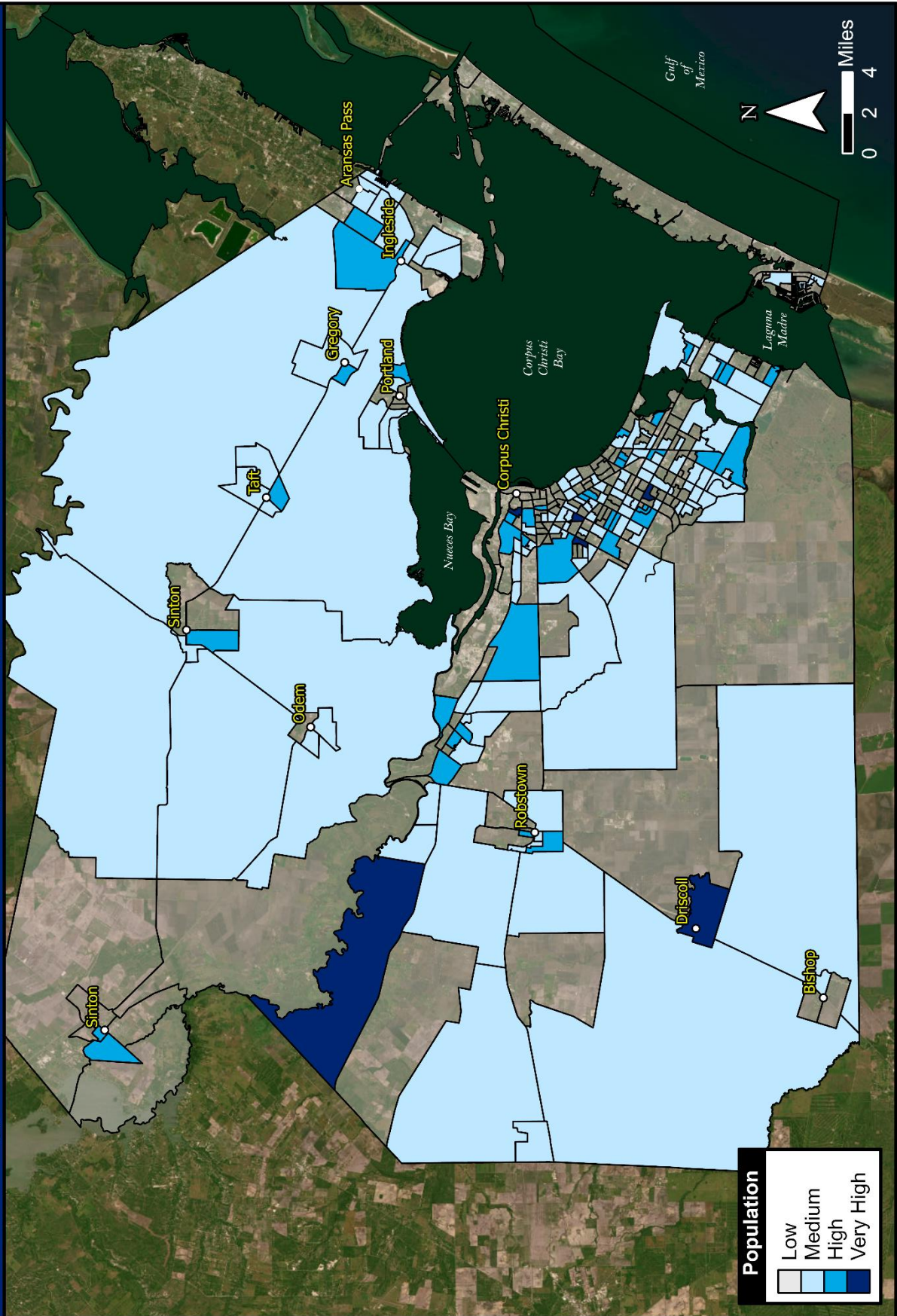
Exhibit 6a: Map of Age 65 and Older Population by Block Group



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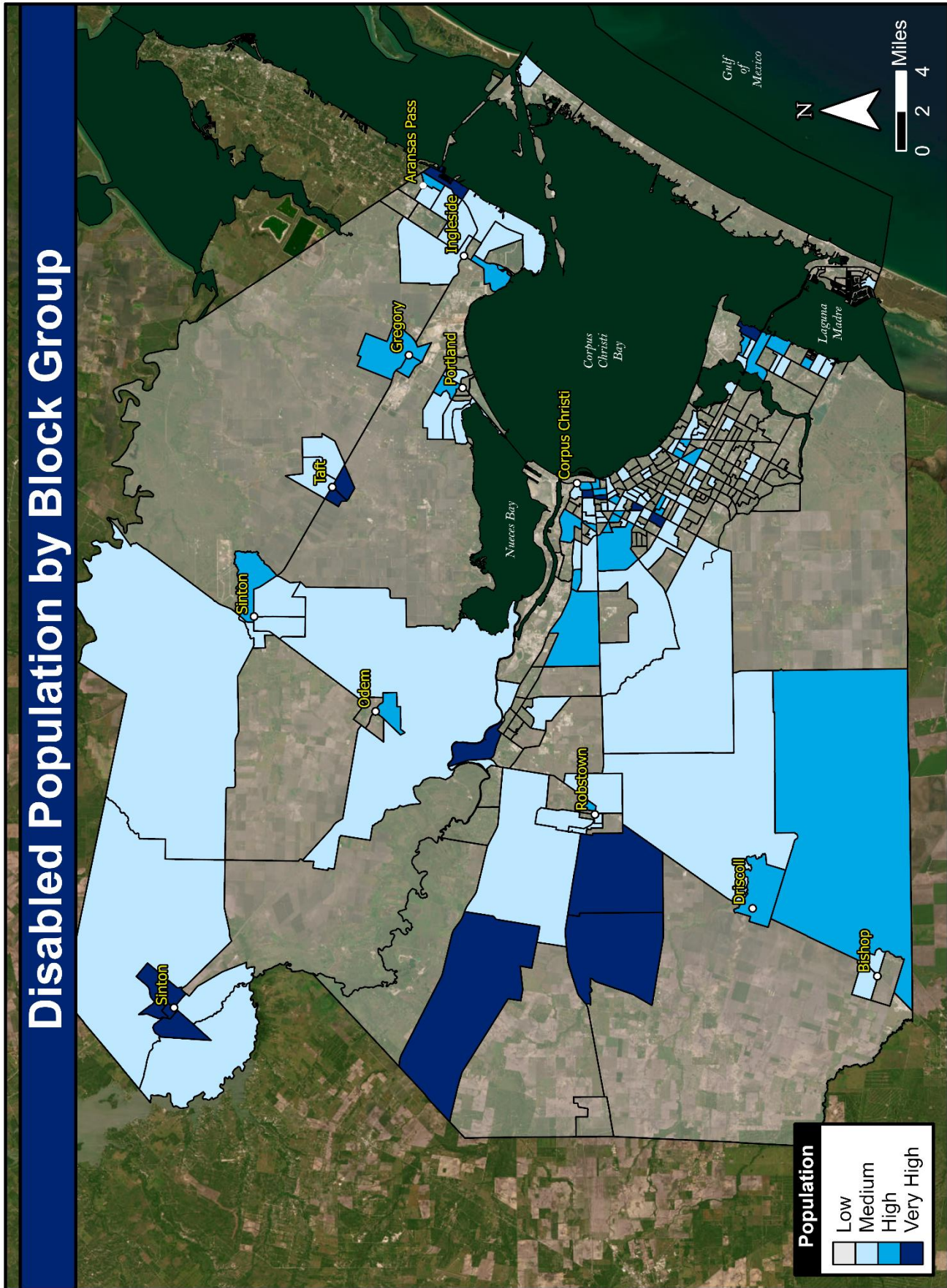
Exhibit 6b: Map of Age 17 and Younger Population by Block Group

Age 17 and Younger Population by Block Group



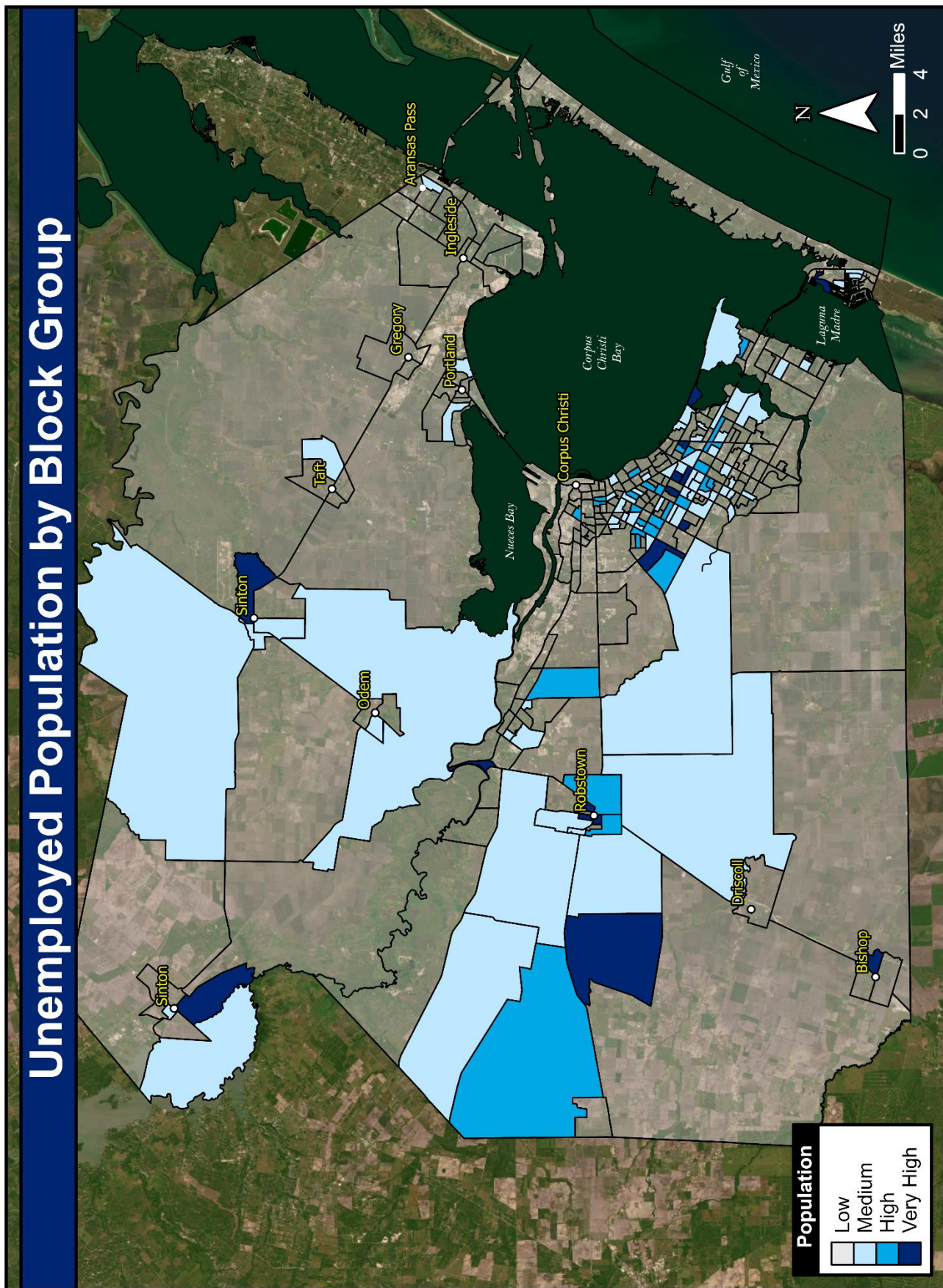
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Exhibit 7: Map of Disabled Population by Block Group



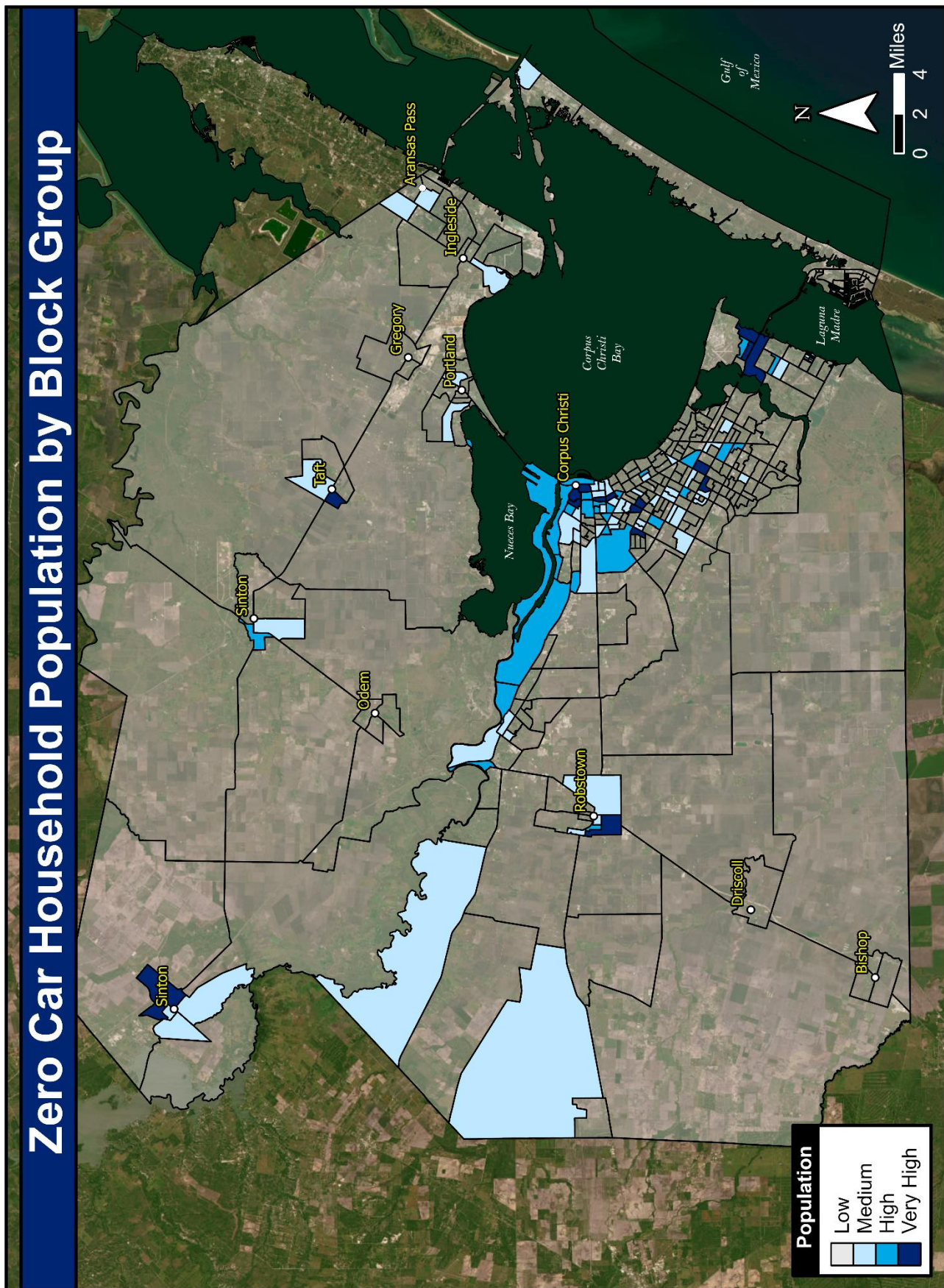
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Exhibit 8: Map of Unemployed Population by Block Group



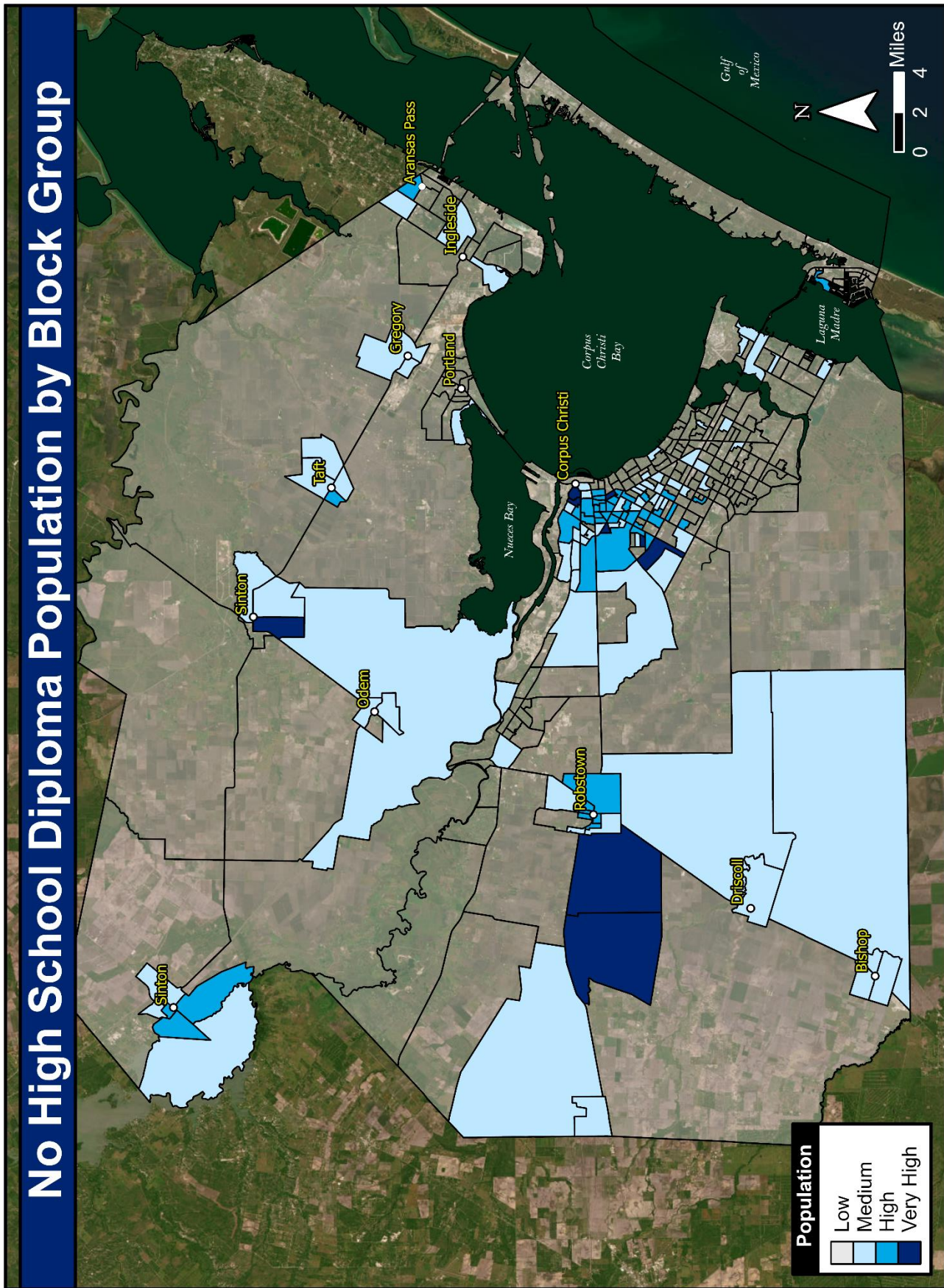
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Exhibit 9: Zero Car Household Population by Block Group



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Exhibit 10: Map of No High School Diploma Population by Block Group



2021 Public Participation Plan (PPP)

The Corpus Christi MPO 2021 Public Participation Plan adopted July 1, 2021, and found here https://www.corpuschristi-mpo.org/02_about_ppp.html, includes specific information regarding outreach and communication strategies, with emphasis on outreach to minority, low-income, elderly, disabled, (LIST) zero car households, (list) and LEP populations.

Engaging the public has gotten increasingly difficult for the Corpus Christi MPO and most other transportation agencies. Across many public involvement efforts, low levels of participation can be traced to a lack of awareness about the importance of participation, as well as an increase in interests and obligations which compete for people's time. Additional challenges include time and mobility constraints, social isolation, and distrust and cynicism towards government. These challenges are magnified when trying to engage traditionally hard to reach populations such as people with limited English language proficiency, low-income, and minority communities.

Public participation is a process, not a single event. It is a series of activities over the full lifespan of a planning process, to both inform the public and obtain input from them. Conducting meaningful public participation involves seeking public input at key decision points where input shapes the decision or action. The concept the Corpus Christi MPO will utilize is to take the message directly to other existing meetings and broaden the number and diversity of people reached by using established local communication and formal and informal leadership networks. These efforts are particularly effective at targeting the disabled community, minorities, and those with limited English proficiency.

There is no standard or prescribed method of conducting outreach. What works for one community for a certain type of project or process may not work in another region or even for the same agency in a different community or for a different process. This lack of consistency requires flexibility from the Corpus Christi MPO to tailor outreach to match the unique set of circumstances around the region. The specific public involvement techniques and the methods used to perform public involvement strategies are constantly evolving and are bounded only by the needs of each community.

Also, it is necessary to understand that there is no "general public". Rather, the various communities consist of a range of stakeholders holding often diametric views and conflicting concerns on many issues. When conducting meaningful public participation, the Corpus Christi MPO needs to gather input from the full spectrum of stakeholder interests. This produces a wide range of views and concerns some of which will be unhappy no matter what the decision made entails. Giving fair treatment and meaningful involvement to all people regardless of race, color, national origin or income, with respect to the development, implementation, and decisions made through the transportation planning process is paramount.

At the heart of all public outreach approaches is building trust and a reputation for being open and transparent. Research indicates that it is better to perform limited stakeholder input efforts well rather than to do large-scale efforts poorly. A well-designed and sincere participation process will not fulfill its potential if the public lacks the necessary participation skills. Therefore, it is crucial for Public Participation Plans to include methods to improve the public's participation capacity.

The Corpus Christi MPO 2021 PPP provides policies and principles outlining communications and coordination with interested parties. Each method is part of a larger overall strategy that relies on multiple outreach approaches and techniques. As technology evolves and changes the ways our society communicates and interacts, so too will the application of these techniques. By offering information in a variety of formats and being easily available to attend other community meetings, the Corpus Christi MPO will include more people in the planning process rather than relying on a limited number of strategies and opportunities where people are expected to come to us. The job of the Corpus Christi MPO is becoming a two-way conduit of information between the Transportation Policy Committee and the multitude of communities that comprise the metropolitan area.

This PPP identifies the outreach and involvement activities for the 2050 Metropolitan Transportation Planning process and updates to the 2021-2024 Transportation Improvement Program process beginning July 1, 2021, and ending September 30, 2025. The policies put forth in this document are:

- The Corpus Christi MPO shall actively engage the public in the transportation planning process according to State and Federal law and the policies outlined in this plan.
- The Corpus Christi MPO shall keep the public informed of ongoing transportation-related activities on a continuous basis.
- The Corpus Christi MPO shall encourage the involvement of all area citizens in the transportation planning process.
- The Corpus Christi MPO shall strive to continuously improve public participation.
- The Corpus Christi MPO as a recipient of federal assistance and under Title VI of the Civil Rights Act of 1964, shall ensure that no person, on the grounds of race, religion, color, national origin, sex, age, or disability be excluded from participation in, be denied the benefits of, or otherwise be subjected to discrimination under any agency programs or activities. These prohibitions extend from the MPO to its sub- recipients (i.e., contractors, consultants, local governments, colleges, universities, etc.). All programs funded in whole or in part from federal financial assistance are subject to Title requirements.

Title VI

Appendix A of this document contains the signed Corpus Christi MPO Title VI Non-discrimination Statement. This policy was adopted on August 2, 2018, and reaffirmed **on July 1, 2021**. It is stated below.

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

The Corpus Christi MPO Title VI Coordinator is responsible for initiating and monitoring Title VI activities, preparing required reports, and other responsibilities as required by Title 23 Code of Federal Regulations (CFR) Part 200, and Title 49 CFR Part 21. A full description of these responsibilities is stated below.

Responsibilities of the Title VI Coordinator

The role of Corpus Christi MPO Title VI Coordinator is the responsibility of the Corpus Christi MPO Senior Transportation Coordinator and is generally responsible for:

- Creating an implementation plan for Title VI compliance.
- Directing Title VI implementation, coordination, and monitoring.
- Monitoring Title VI activities that include data collection, identifying of Title VI population, assessment tools, submitting documentation, and assuring public involvement.
- Overseeing compliance with applicable nondiscrimination authorities in each of the metropolitan transportation planning and programming areas.

Other staff members are expected to provide information and support to assist this staff member in performing his or her tasks. The Title VI Coordinator is responsible for supervising staff activities pertaining to nondiscrimination regulations and procedures set forth in federal guidance and in accordance with the Corpus Christi MPO Title VI Plan. In support of this, the Title VI Coordinator will:

- Identify, investigate, and work to eliminate discrimination when found to exist.

- Process discrimination complaints received by the Corpus Christi MPO. The Corpus Christi MPO will resolve complaints in accordance with Discrimination Complaint Procedures.
- Meet with appropriate staff members to monitor and discuss progress, implementation, and compliance issues related to the Corpus Christi MPO Title VI Plan.
- Periodically review Corpus Christi MPO Title VI Plan to assess whether administrative procedures are effective, staffing is appropriate, and adequate resources are available to ensure compliance.
- Work with staff involved with Consultant Contracts and the sub-recipient found to not comply, to resolve the deficiency status and write a remedial action if necessary.
- Review important issues related to nondiscrimination with the Corpus Christi MPO Transportation Policy Committee Chairperson, as needed.
- Maintain a list of Interpretation Service Providers.
- Assess communication strategies and address additional language needs when needed.
- Disseminate information related to the nondiscrimination authorities. The Corpus Christi MPO Title VI Plan is disseminated to Corpus Christi MPO employees, contractors, and the general public.
- Coordinate with appropriate federal, state, and regional entities to periodically provide Corpus Christi MPO employees with training opportunities regarding nondiscrimination.
- Ensure that all new Corpus Christi MPO employees receive education and training regarding nondiscrimination regulations and procedures as set forth in this plan and in accordance with federal guidance.

Title VI Complaint Overview

As a recipient of federal financial assistance, the Corpus Christi MPO ensures that no person shall, on the grounds of race, religion, color, national origin, sex, age, or disability be excluded from participation in, be denied the benefits of, or otherwise be subjected to discrimination under any agency programs or activities. All programs funded in whole or in part from federal financial assistance are subject to Title VI requirements.

Who can File

Complaints alleging discrimination in Corpus Christi MPO's provisions, services, or Corpus Christi MPO activities can be made by persons who are not employees of Corpus Christi MPO. Any person who believes Corpus Christi MPO, or any entity who receives federal financial assistance from or through Corpus Christi MPO (i.e., sub-recipients, sub-contractors, or sub-grantees), has subjected them or any specific class of individuals to unlawful discrimination may file a complaint of discrimination. The Corpus Christi MPO will follow timelines set forth in guidance from the Department of Transportation, the Federal Highway Administration, Federal Transit Administration and the Department of Justice for processing Title VI discrimination complaints.

When to File

A complaint of discrimination must be filed within 180 calendar days of the alleged act of Discrimination, or discovery thereof; or where there has been a continuing course of conduct, the date on which that conduct was discontinued. Filing means a written complaint must be postmarked before the expiration of the 180 calendar-day period. The filing date is the day you complete, sign, and mail the complaint form. The complaint form and consent/release form must be dated and signed for acceptance. Complaints received more than 180 calendar days after the alleged discrimination will not be processed and will be returned to the complainant with a letter explaining why the complaint could not be processed and alternative agencies to which a report may be made.

Where to File

In order to be processed, signed original complaint forms must be mailed to:

Corpus Christi Metropolitan Planning Organization
Transportation Planning Director
602 N. Staples Street, Suite 300
Corpus Christi, TX 78401

Upon request, reasonable accommodations will be made for persons who are unable to complete the complaint form due to disability or limited English proficiency. A complaint may also be filed by a representative on behalf of a complainant. Persons who are not satisfied with the findings of the Corpus Christi MPO may seek remedy from other applicable state or federal agencies.

-What to File

In order to be processed, a complaint must be complete and submitted in writing and contain the following information:

- Name, address, and phone number of the complainant.
- Name(s) and address(es) and business(es)/organization(s) of person(s) who allegedly discriminated.
- Date of alleged discriminatory act(s).
- Basis of complaint (i.e. race, color, national origin, sex, age, religion, or disability).
- A statement of complaint.
- A signed consent release form.

Complaint Process Overview

A copy of the Title VI forms are located in Appendix D. The following is a description of how a discrimination complaint will be handled once received by the Corpus Christi MPO.

- I. A complaint is received by the Corpus Christi MPO: Complaints must be in writing and signed by the complainant or their designated representative. If the complainant is unable to complete the form in writing due to disability or limited English proficiency, upon request reasonable accommodations will be made to ensure the complaint is received and processed in a timely manner. Complainants wishing to file a complaint that do not have access to the Internet or the ability to pick up a form will be mailed a complaint form to complete. The complainant will be notified if the complaint form is incomplete and asked to furnish the missing information.
- II. Complaint is logged into tracking database: Completed complaint forms will be logged into the complaint tracking database; basic data will be maintained on each complaint received.
- III. Determine jurisdiction: The Corpus Christi MPO Transportation Planning Director will complete an initial review of the complaint. The purpose of this review is to determine if the complaint meets basic criteria. Criteria required for a complete complaint:
 - (a) Basis of alleged discrimination (i.e. race, religion, color, national origin, sex, age or disability).
 - (b) Determination of timeliness will also be made to ensure that the complaint was filed within the 180-day period requirement.
 - (c) The program in which the alleged discrimination occurred will be examined to ensure that the complaint was filed with the appropriate agency. During this process, if a determination was made in which the program or activity that the alleged discrimination occurred is not related to the Corpus Christi MPO program or activity, every attempt will be made to establish the correct agency. Whenever possible and assuming consent was granted on the Consent/Release form, the complaint will be forwarded to the appropriate agency.

If the complaint is a transportation related discrimination complaint and the Corpus Christi MPO or its sub-recipients are named as the respondent, then the complaint shall be forwarded to:

TxDOT Civil Rights Division
125 E. 11th Street
Austin, Texas, 78701

- IV. Initial written notice to complainant: Within 10 working days of the receipt of the complaint, the Corpus Christi MPO will send notice to the complainant confirming receipt of the complaint; if needed the notice will request additional information, notify complainant that the activity is not related to a Corpus Christi MPO program or activity, or does not meet deadline requirements. Conclusions made in step three will determine the appropriate response to the complaint. If any additional information is needed from the complainant, it will be communicated at this point in the process. A copy of the written response, as well as the complaint form, will be forwarded to the Texas Department of Transportation, Office of Civil Rights, Contract Compliance Section for informational purposes only.
- V. Investigation of complaint: The Corpus Christi MPO Transportation Planning Director will confer with the program Coordinator to determine the most appropriate fact-finding process to ensure that all available information is collected in an effort to reach the most informed conclusion and resolution of the complaint. The type of investigation techniques used may vary depending on the nature and circumstances of the alleged discrimination. An investigation may include but is not limited to:
 - (a) Internal meetings with Corpus Christi MPO staff and legal counsel.
 - (b) Consultation with state and federal agencies.
 - (c) Interviews of complainant(s).
 - (d) Review of documentation (i.e. planning, public involvement, and technical program activities).
 - (e) Interviews and review of documentation with other agencies involved.
 - (f) Review of technical analysis method (if applicable).
 - (g) Review of demographic data.
- VI. Determination of investigation: An investigation must be completed within 60 days of receiving the complete complaint, unless the facts and circumstances warrant otherwise. A determination will be made based on information obtained. The Corpus Christi MPO Transportation Planning Director and/or designee will render a recommendation for action, including formal and/or informal resolution strategies in a report of findings to the Corpus Christi MPO Transportation Planning Director.
- VII. Notification of determination: Within 10 days of completion of an investigation, the complainant must be notified by the Corpus Christi MPO Transportation Planning Director of the final decision. The notification will advise the complainant of his/her appeal rights with state and federal agencies if he/she is dissatisfied with the final decision. A copy of this letter, along with the report of findings, will be forwarded to the Texas Department of Transportation, Office of Civil Rights, Contract Compliance Section for information purposes.

Environmental Justice

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

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

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

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

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

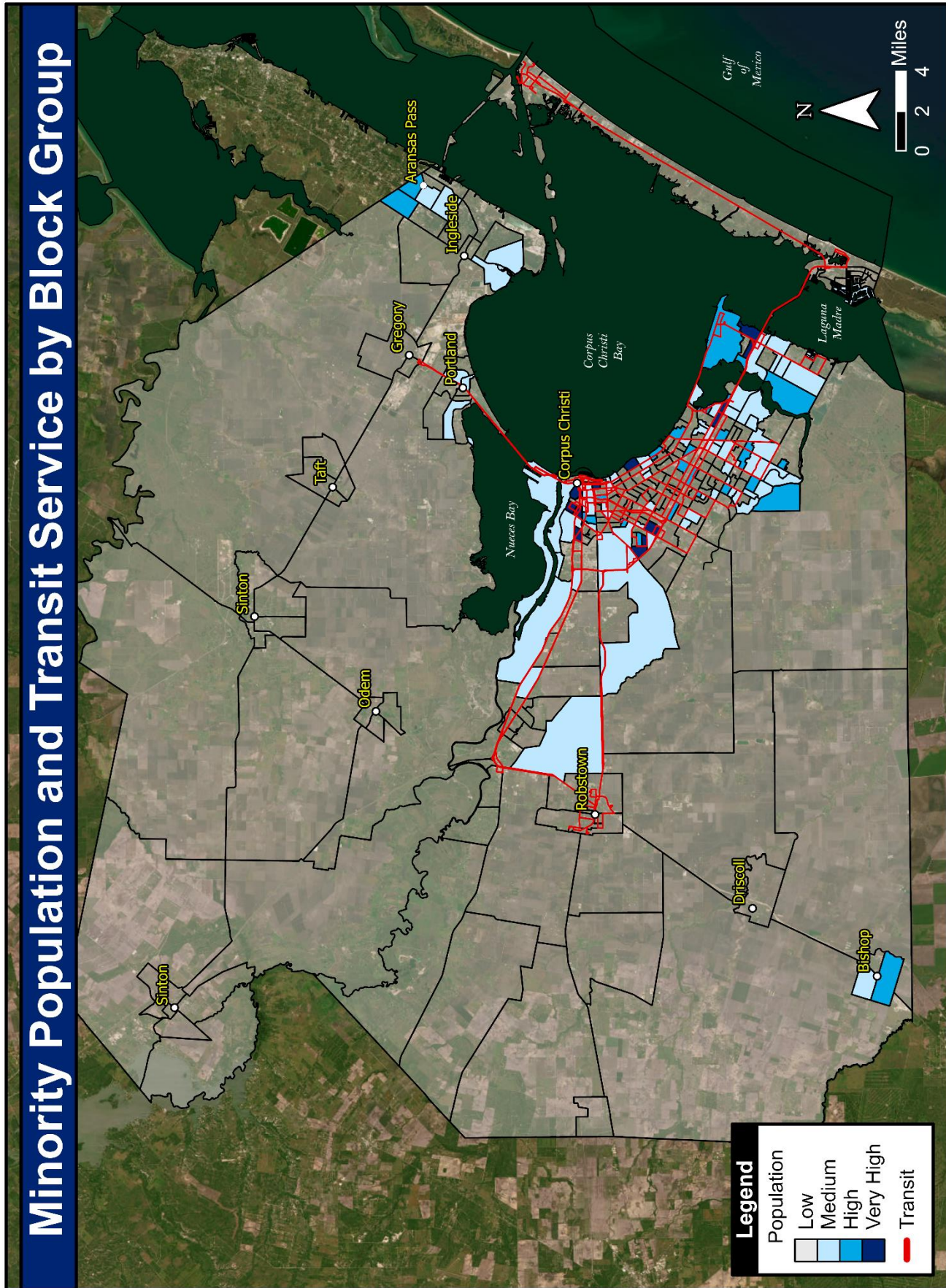
- **Minority** – a person who is Black, Hispanic, American Indian and Alaskan Native, or Asian American:
 - Black – a person having origins in any of the black racial groups of Africa.
 - Hispanic – a person of Mexican, Puerto Rican, Cuban, Central or South American, or other Spanish culture or origin, regardless of race.
 - American Indian and Alaskan Native – a person having origins in any of the original people of North America and who maintains cultural identification through tribal affiliation or community recognition.
 - Asian American – a person having origins in any of the original peoples of the Far East, Southeast Asia, the Indian subcontinent, or the Pacific islands.
- **Minority Population** – any readily identifiable groups of minority persons who live in geographic proximity, and if circumstances warrant, geographically dispersed/transient persons (such as migrant workers or Native Americans) who will be similarly affected by a proposed program, policy or activity.
- **Low-Income** – a person whose household income is at or below the United States Department of Health and Human Services poverty guidelines.

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

Environmental Justice is incorporated through all phases of the transportation planning and programming process. Environmental Justice is a main goal of the Corpus Christi MPO 2021 Public Participation Plan (PPP) and future work includes analyses of the positive and negative impacts that the transportation investments are forecast to have on at-risk population groups compared to the rest of the population.

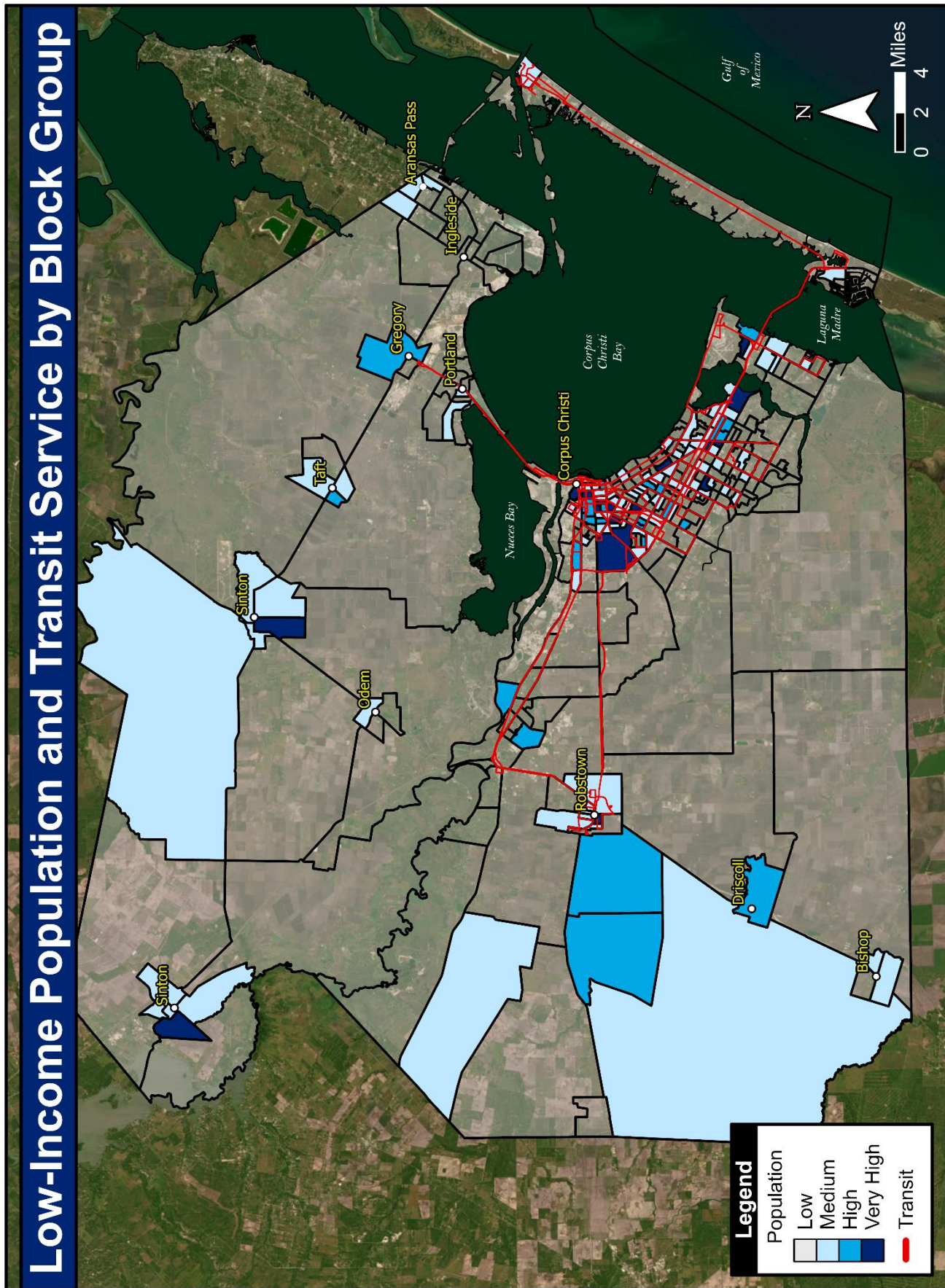
The FTA requires an analysis of how current transit service serves minority and low-income populations. Exhibits 11-13 below depict current CCRTA Transit service in the Corpus Christi MPO area with U.S. Census data by block group to indicate how transit routes directly serve these at-risk populations.

Exhibit 11: Map of Minority Population and Transit Service by Block Group



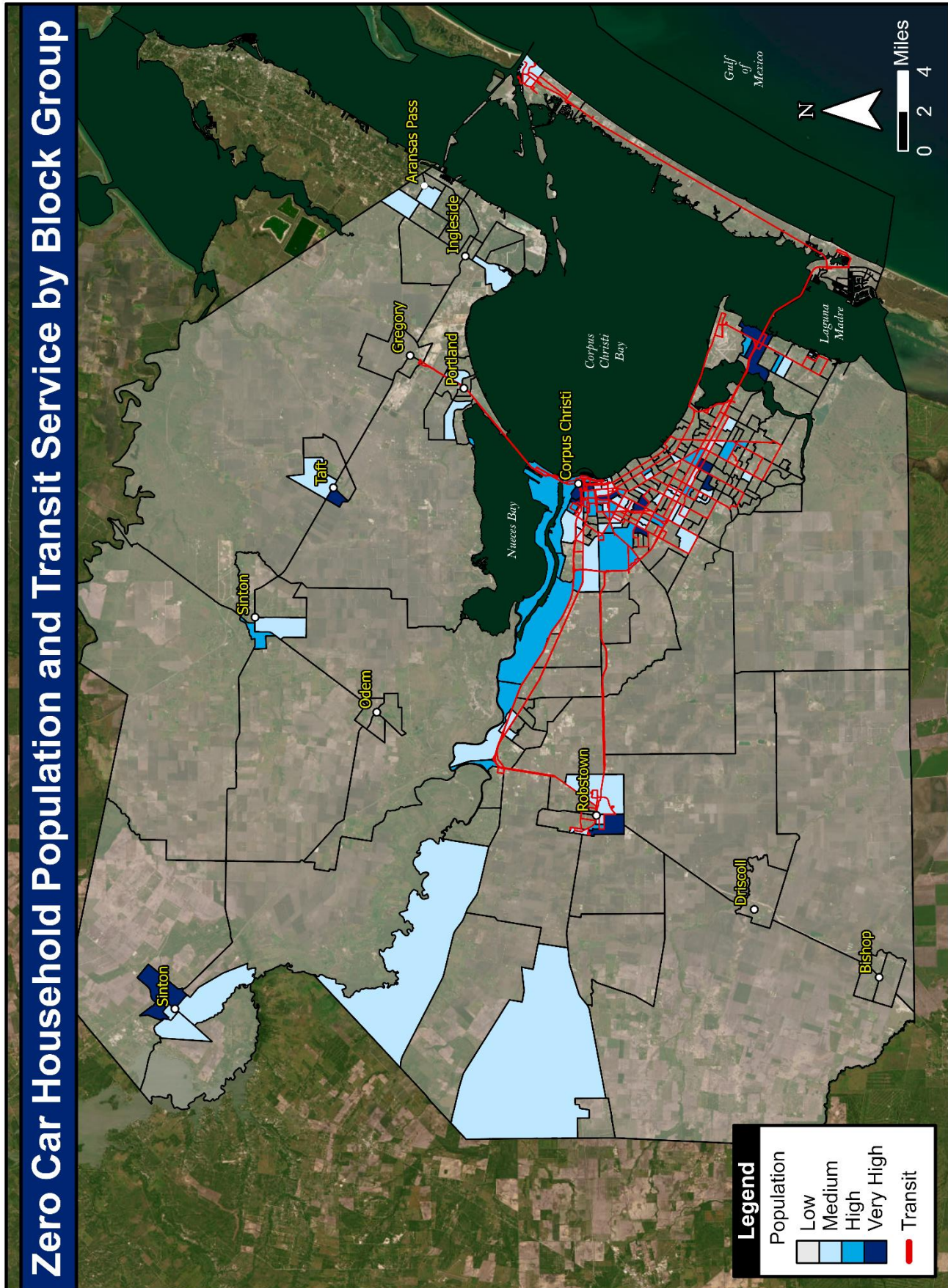
Disclaimer: This map is provided "as is" without warranty or any representation of accuracy, timeliness, or completeness. The Corpus Christi MPO makes no warranties, express, or implied, as to the use of this map. The owner of this map acknowledges and accepts the limitations of the map, including the fact that the data coverages are dynamic and in constant state of maintenance, correction, and update.

Exhibit 12: Map of Low-Income Population and Transit Service by Block Group



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Exhibit 13: Map of Zero Car Household Population and Transit Service by Block Group



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Limited English Proficiency

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

Individuals who do not speak English as their primary language and who have a limited ability to read, speak, write or understand English can be limited English proficient, or “LEP.” For an LEP individual, language can present a barrier to accessing benefits and services, understanding and exercising important rights, complying with applicable responsibilities, or understanding other information provided by federally funded programs and activities. In order to avoid linguistically isolating these individuals, federally funded agencies should provide language assistance to known population concentrations at no cost when seeking their input.

The United States Department of Transportation (USDOT) guidelines require that recipients of federal financial assistance provide “meaningful access to programs and activities” by giving LEP persons adequate and understandable information and allowing them to participate in programs and activities, where appropriate. Recipients of federal funds must take reasonable steps to remove barriers for LEP individuals. The intent of DOT’s guidance is to suggest a balance that ensures meaningful access by LEP persons to critical services while not imposing undue burdens on small organizations and local governments. Smaller recipients with more limited budgets are typically not expected to provide the same level of language service as larger recipients with larger budgets. The DOT guidance is modeled after the Department of Justice’s guidance and requires recipients and subrecipients to take steps to ensure meaningful access to their programs and activities to LEP persons. While designed to be a flexible and fact-dependent standard, the starting point is an individualized assessment that balances the following four factors:

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

The four-factor analysis should be used to determine which language assistance services are appropriate to address the identified needs of the LEP population. Public outreach strategies and language assistance pertaining to LEP individuals are included in the Corpus Christi MPO 2021 Public Participation Plan (PPP).

Assessment of Needs and Resources

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

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

The agency has reviewed Census data on the number of individuals in its service area that have LEP, as well as the languages they speak.

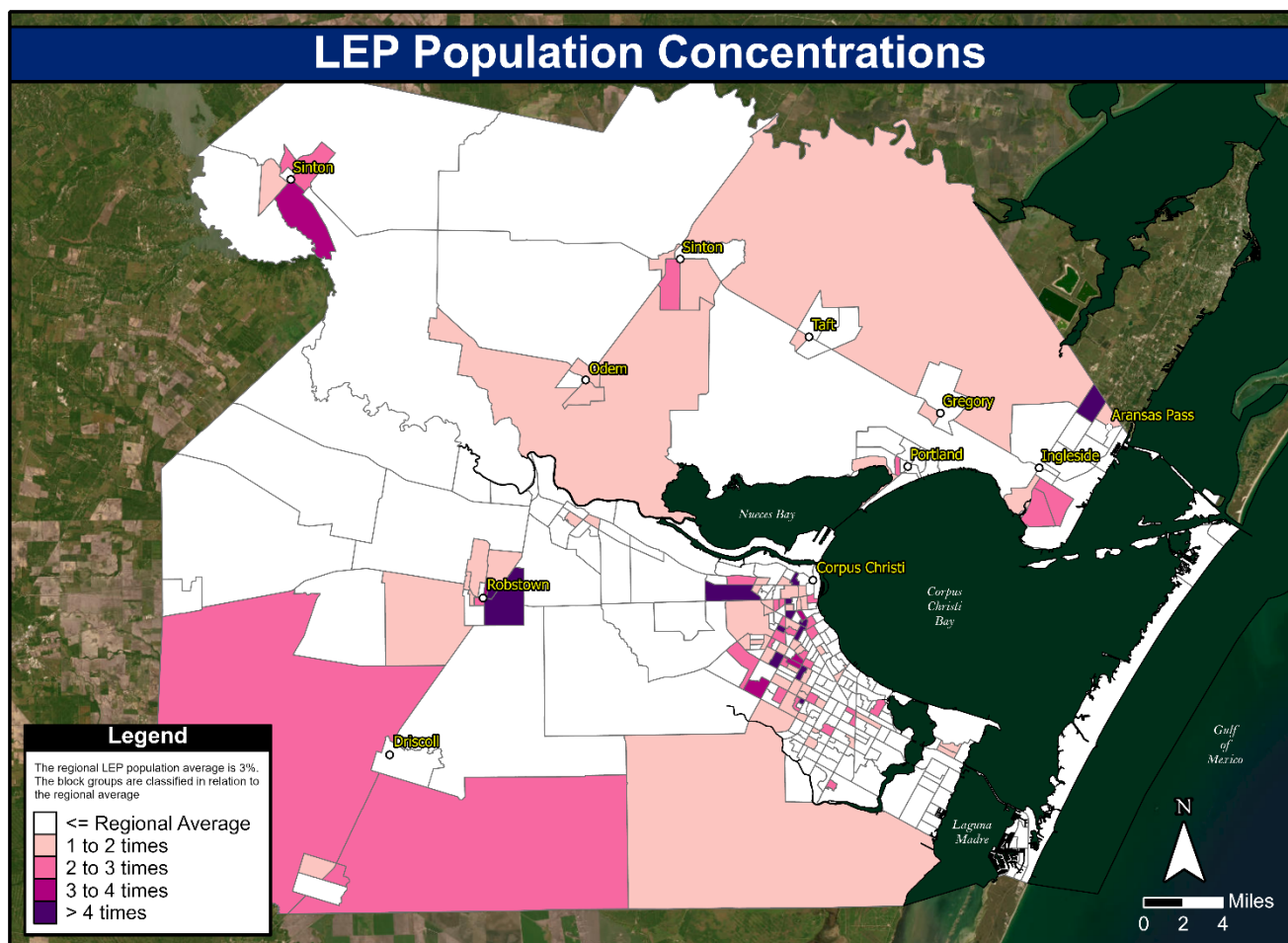
Data from the U.S. Census Bureau’s 201~~75~~-20~~21~~¹⁹ American Community Survey (ACS) 5-Year Estimates were obtained through www.census.gov for the Nueces and San Patricio Counties, ~~and the cities of Corpus Christi and Portland.~~ Information from the ACS also provides more detail on the specific languages that are spoken by those who report that they speak English less than well. Languages spoken at home by those with LEP are presented in the previously listed [Exhibit 56a](#). These data indicate the extent to which translations into other language are needed to meet the needs of LEP persons.

This data will be used to determine how best to disseminate information that is accessible to persons with LEP. According to the U.S. Census 20175-202119 ACS 5-Year Estimates, there were approximately 261,153219,238 people, or 66.185.48% of the total population, who spoke English only within the Corpus Christi MPO study area.metropolitan planning area. Furthermore, there were approximately 41,0968,060 people, or 15.742.41% of the total population, who speak English “not well” or “not at all.” Based on this percentage, the need to address the LEP population is somewhat limited.

The Spanish speaking classification makes up approximately 93.8632.05% of the population that speaks a language other than English at home, making it by far, the largest LEP group in the region. Therefore, the Corpus Christi MPO’s focus will be on targeting this community. Language assistance will be made available to other limited English-speaking individuals in the community as the need arises.

The regional LEP population average is 32.89% among the 320287 census block groups within the 2-county study area, 236 of which comprise of the Metropolitan Planning Area. Exhibit 6b above display the LEP populations by US Census block groups for the MPO’s 2-county study area. Of these, 10675 census block groups within the MPA contain a LEP population concentration greater than regional average of 32.89%. Of these block groups that are greater than the regional average, 13 block groups that have concentrations that are more than quadruple the regional average, 12 of which are located within the city of Corpus Christi, generally Several other census block groups, generally found along the SH 286 (Crosst-Town Expressway), have concentrations more than quadruple the regional average. These areas will be a focus of LEP language assistance programs, as necessary.

Exhibit 14: Map of LEP Population Concentrations compared to the Regional Average



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Factor 2: Assessment of the Frequency with which LEP Individuals Come into Contact with the Transit Services or System

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

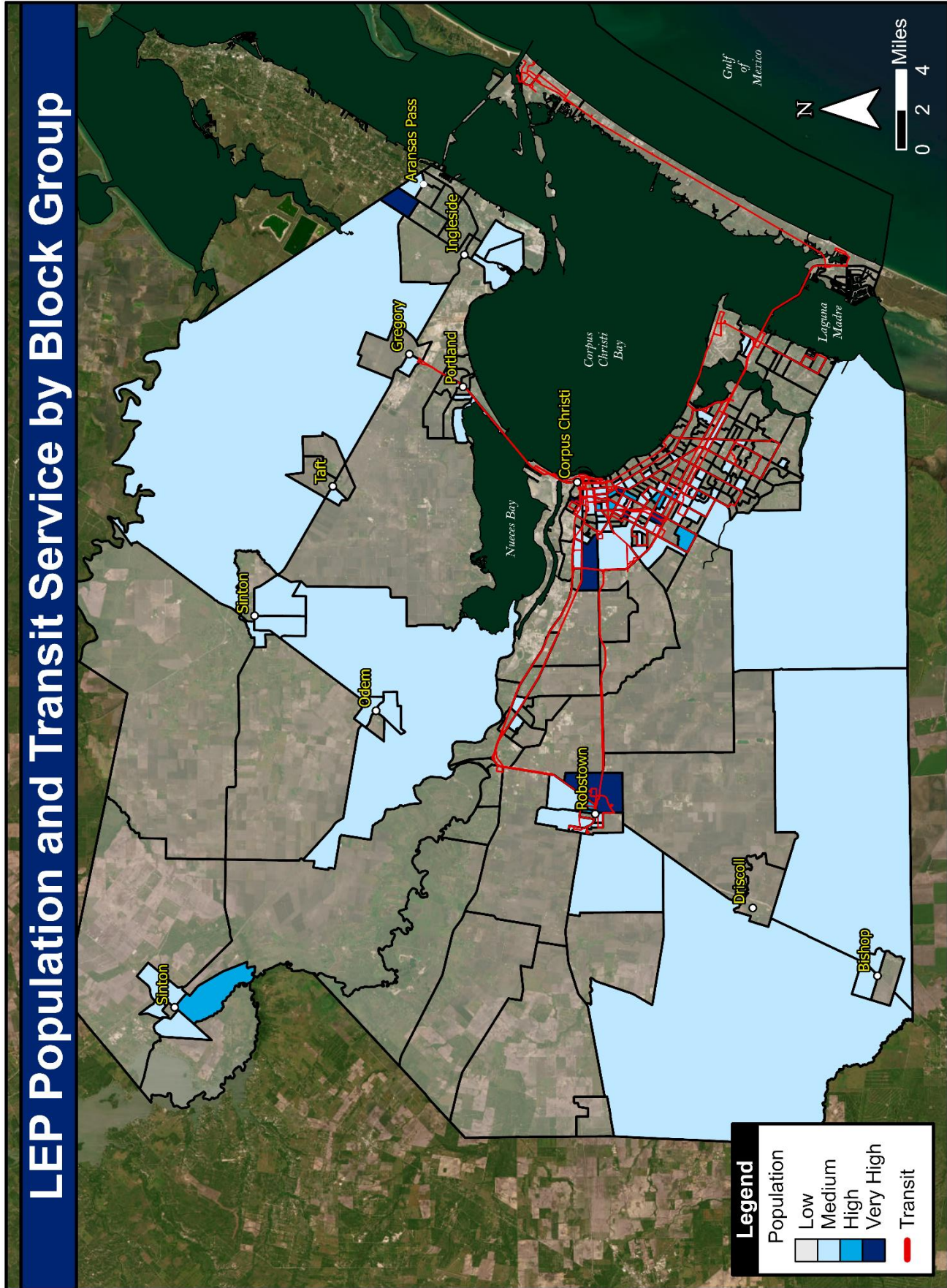
- Calls to the Corpus Christi MPO's offices.
- Visits to the Corpus Christi MPO's office.
- Access to the Corpus Christi MPO's website.
- Attendance at community meetings or public hearings hosted by the Corpus Christi MPO.
- Public involvement and public engagement meetings/hearings for projects affecting LEP communities or individuals; and
- Internet access: Corpus Christi MPO [w](#)Website must be accessible to LEP persons.

The Corpus Christi MPO, at the time of this document, has never been contacted by any LEP individuals regarding projects or programs the Corpus Christi MPO administers. However, it will continue to work to identify underserved populations. The Corpus Christi MPO will continue to identify emerging populations as updated Census and American Community Survey data become available for our service area. In addition, when LEP persons contact our agency, we attempt to identify their language and keep records on contacts to accurately assess the frequency of contact. To assist in language identification, we use a language identification flashcard based on that which was developed by the U.S. Census. (<http://www.lep.gov/ISpeakCards2004.pdf>)

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

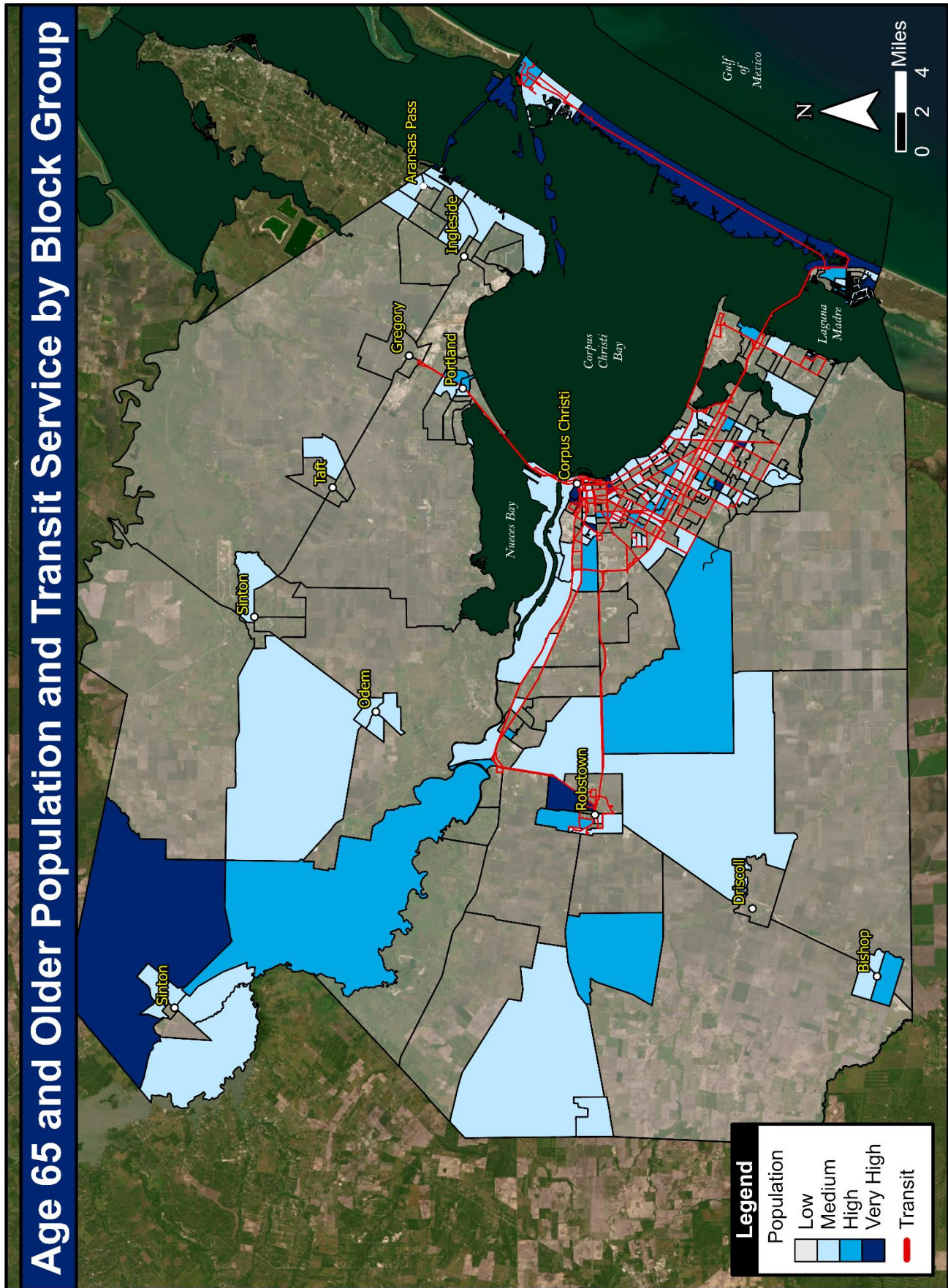
The Corpus Christi MPO main function is to provide cooperative, comprehensive, and continuing transportation planning for the Corpus Christi MPA. To this end, the Corpus Christi MPO develops the regional Transportation Improvement Program (TIP), the Metropolitan Transportation Plan, assists the member jurisdictions with development of their transportation planning documents, assist the local public transportation provider with planning needs, promote multi-modal transportation options for the region, and provides other services as needed. Exhibits 15 and 16 below also depict how current specialized transit service serves LEP and Older populations in the Corpus Christi MPO area. These maps illustrate that current transit service across the MPO area provides adequate service to current LEP populations. The Corpus Christi MPO will continue to monitor which areas of the MPO host the largest concentrations of LEP persons to ensure that they continue to be served by transit.

Exhibit 15: Map of LEP Population and Transit Service by Block Group



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Exhibit 16: Map of Older Populations and Transit Service by Block Group



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Based on experience serving and communicating with LEP persons and discussions with community agencies, we understand that our support of public transportation programs in the Corpus Christi metropolitan area is critical. These include the RTA transit system, as well as the local Coordinated Human Services Mobility providers such as REAL, the Coastal Bend Program for Aging Services, and others. Additionally, the Corpus Christi MPO public involvement program including public information and planning meetings is extremely important to LEP persons. LEP persons, low-income populations, minority populations, the elderly, and the disabled must be considered in these processes. The Corpus Christi MPO will continue assessing this area by communicating with community organizations that serve LEP persons, as well as contact with LEP persons themselves.

Factor 4: Assessment of the Resources Available to the Agency and Costs

Costs

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

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

Resources

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

In addition, assistance may be available through community organizations, city or county departments, or other agencies who may be able to partner for language assistance services. The Corpus Christi MPO also has access to free language assistance products available through the web such as Google Translate™ that may be used to translate written phrases, documents, and websites for free.

LEP Implementation Plan

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

- Provide, if requested within seven calendar days, interpreter services at any meeting or public hearing. This will include foreign language and hearing-impaired interpreter services.
- Include with 14 calendar days in advance, statements in notices and publications that interpreter services are available for meetings.
- Place notices of Corpus Christi MPO's non-discrimination policies and information on the local and federal complaint process on the website in English and other languages via Google Translate and make the notices available at public meetings.

- Translate vital documents in languages other than English when there is potential for impact to LEP communities.
- Provide training to Corpus Christi MPO staff on the requirements for providing meaningful access to services for LEP persons.
- Include an LEP policy in the Corpus Christi MPO 2021 Public Participation Plan (PPP) that details, 1) statements and notices that interpreters will be provided upon prior request for language assistance as well as for sign language, and 2) maintenance of a contact list for interpretation and translation providers.
- Utilize the TxDOT 's LEP Guidelines and Public Participation Plan in conjunction with the DRPT's LEP Plan to identify low-income populations, minority populations, the elderly, and the disabled, who may be part of the LEP population.

ADVANCING RACIAL EQUITY

ARE Implementation Plan

“Equality” and “equity” have the same root, but there is a significant difference in meanings. Equality is the equal distribution of resources regardless of the situation. Equity focuses instead on what people need to achieve an equal outcome. There is a growing belief within disadvantaged communities that the route to achieving equity in the United States cannot be accomplished by treating everyone equally. Instead, it will be achieved by adjusting policies and procedures to account for the differences in people’s situations and goals. There is an increasing amount of evidence that existing disparities within the United States are ingrained within and perpetuated by the established processes and that the inequity cannot be addressed using after-the-fact mitigation. The emerging opinion is that equity must instead be a principal input into decisions on where and how to invest federal resources.

On January 20, 2021, President Joseph R. Biden Jr. signed Executive Order 13985: Advancing Racial Equity and Support for Underserved Communities through the Federal Government. The Executive Order requires federal agencies to pursue a comprehensive approach to advancing equity for all, including people of color and others who have been historically underserved, marginalized and adversely affected by persistent poverty and inequality. The Executive Order states that executive departments and agencies must recognize and work to redress inequities in their policies and programs that serve as barriers to equal opportunity.

Executive Order 13985 requires that, consistent with applicable law, federal resources be allocated to address the historic failure of agencies to invest sufficiently, justly, and equally in underserved communities. Previous studies to assess changes in equity of opportunity or equity of outcome may require that disadvantaged groups are provided with disproportionate resources in the form of transport projects or policies in order for any investment to be considered equitable. However, lacking a composite index for overall transportation equity means that portions of Corpus Christi MPO policy will need to be revisited as further guidance from federal agencies is released.

The Order further states that federally funded agencies (such as the US Department of Transportation along with the FHWA and FTA) must assess whether, and to what extent, its programs and policies perpetuate systemic barriers to opportunities and benefits for people of color and other underserved groups. These disadvantaged groups include Black, Latino, and Indigenous and Native American persons, Asian Americans and Pacific Islanders and other persons of color; members of religious minorities; lesbian, gay, bisexual, transgender, and queer (LGBTQ+) persons; persons with disabilities; persons who live in rural areas; and persons otherwise adversely affected by persistent poverty or inequality. This will include efforts to remove systemic barriers to and provide equal access to opportunities and benefits, identify communities the federal government has underserved, and develop policies designed to advance equity for those communities.

Initial examination of proposals has revealed the need for collaboration between transportation planning efforts and other federally funded efforts of local jurisdictions. One such effort is meeting the requirements for Affirmatively Furthering Fair Housing (AFFH) from the Fair Housing Act. The AFFH rule requires recipients of HUD funding (CDBG and Section 8) to identify and mitigate past patterns of segregation and exclusion from opportunity. A specific “community asset” that the rule identifies as having excluded people from opportunity is access to transportation. While targeting funds to meet the transportation needs of disadvantaged communities has not occurred in the past, there is precedent in the allocation of different types of public funds.

Four commonly discussed needs of transportation equity are:

- Participation. Transportation infrastructure projects and transportation plans must incorporate the needs and interests of those members of the public they are most likely to affect. Opportunities to participate should be provided at convenient times, in convenient locations, and in culturally appropriate ways. To

reach particular populations, efforts beyond traditional public meetings should be undertaken. To be most effective, participation should be undertaken before major decisions have been made, so that the outcomes of deliberation can affect important decisions. Achieving truly meaningful participation, where individual members of the public and advocacy organizations from the grassroots to the national level feel their voices have been heard and acted upon is difficult. This difficulty occurs in other areas of planning as well, including economic development and land use planning.

- **Benefits.** Investments in transportation systems should benefit the populations that most depend on them. Traditionally measured benefits are travel time savings, crash reduction, opportunities for physical activity, local hiring and job training for construction, maintenance, and operation, and accessibility. The benefit most associated with equity is transportation accessibility. Accessibility is the ease of reaching desired destinations. This can be accomplished by faster travel or by having destinations closer.
- **Environmental and quality-of-life burdens.** The environmental burdens associated with transportation systems—especially those arising from the automobile—are well documented. These include noise, air pollution, vulnerability to extreme weather, water quality, and secondary effects on public health. Transportation infrastructure also physically divides communities, destroys neighborhood cohesion, and degrades community vitality. Conversely, a lack of transportation connectivity results in de facto segregation of people of color and low-income people within cities and regions. It is also necessary to understand that while walking and cycling for transportation can bring health benefits, continued automobile dependence creates a range of health impacts from a sedentary lifestyle. This especially impacts people exposed to poor air quality.
- **Financial burdens/affordability.** The costs to own and operate a vehicle is climbing faster than wages are increasing. This is also true of the costs of housing. Combining transportation and housing costs is necessary to understand the magnitude of these burdens. A common occurrence is households enduring long commutes in an effort to reduce costs. These households are effectively trading off money and time. This is an inequitable outcome when there are barriers such as zoning practices that hinder the development of affordable, or high-density housing. Affordable housing can bring health and economic benefits to families that can reduce transportation costs and still meet their transportation needs.

Exhibit 17: Illustrations of Equality Versus Equity



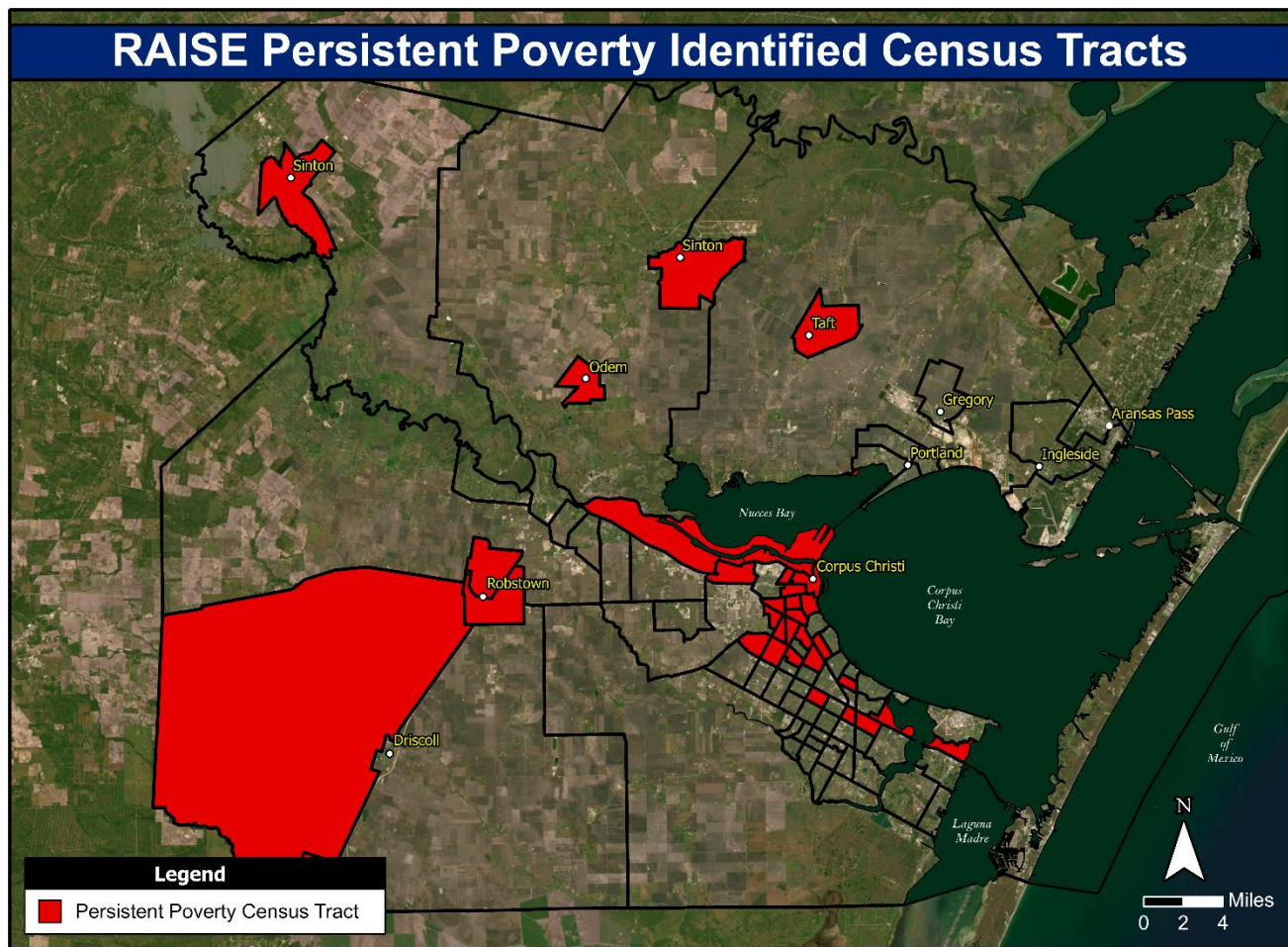
In the first image, it is assumed that everyone will benefit from the same supports. They are being treated equally.

In the second image, individuals are given different supports to make it possible for them to have equal access to the game. They are being treated equitably.

In the third image, all three can see the game without any supports or accommodations because the cause of the inequity was addressed. The systemic barrier has been removed.

For purposes of complying with Executive Order 13985, the term Underserved Communities refers to populations sharing a particular characteristic, such as race, ethnicity, religion, income, geography, gender identity, sexual orientation, or disability. It can also refer to geographic communities that have been systematically denied a full opportunity to participate in aspects of economic, social, and civic life. One notable type of geographic community that will be examined is areas with persistent poverty. As part of the 2021 RAISE Grant, these areas were identified at both the county and the Census Tract level. Exhibit 18 below shows those census tracts with over 20% of their population identified as in Persistent Poverty within the Corpus Christi Metropolitan Planning Area.

Exhibit 18: Map of RAISE Persistent Poverty Identified Census Tracts



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Executive Order 13985 defines Equity as the consistent and systematic fair, just, and impartial treatment of all individuals, including individuals who belong to underserved communities that have been denied such treatment, such as Black, Latino, and Indigenous and Native American persons, Asian Americans and Pacific Islanders and other persons of color; members of religious minorities; lesbian, gay, bisexual, transgender, and queer (LGBTQ+) persons; persons with disabilities; persons who live in rural areas; and persons otherwise adversely affected by persistent poverty or inequality.

Transportation equity is the fair distribution of benefits, outcomes, and resources within and between segments of the population, regardless of situation or social standing. Examining projects with an equity analysis enables transportation planners and designers to enhance outcomes for everyone, including seniors, people with disabilities and low income, people of color, and individuals living in underserved areas. The definition of Disparity is the amount of separation between a group identified as in need and the group identified as the most favored

group. This is done using specific measures and expressed in terms of a rate, proportion, mean, or some other quantitative measure.

An equitable transportation system is one achieved using public participation that is meaningful and effective. It is a system where the benefits and burdens created by projects, policies, and plans are shared so that no groups are unduly burdened by a lack of access to adequate transportation nor by the negative impacts resulting from proximity to transportation infrastructure. Key considerations to achieving Transportation Equity are:

1. Race, ethnicity, and income beyond traditional Environmental Justice analyses must be incorporated into planning and programming of transportation interventions.
2. Are there significant disparities in the distribution of transportation benefits such as access to jobs, goods and services and opportunities for physical activity, healthy food, and health care. The availability of these benefits also varies greatly depending on whether a traveler has access to a car or is reliant on public transit.
3. Are there also significant disparities in exposure to transportation burdens, such as exposure to noise, air pollution or the risk of collision.
4. The distribution of benefits and burdens varies within the region and among the different populations. In addition to race, ethnicity, and income-related disparities, transportation analyses must also look for disparate impacts among other groups, such as transit-dependent and elderly populations.

APPENDIX A

CORPUS CHRISTI MPO

Title VI Non-Discrimination Statement

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

Please contact the Corpus Christi MPO to request a copy of the Title VI Plan.

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

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

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

For complainants who may be unable to file a written complaint, verbal information will be accepted by the Corpus Christi MPO at 602 N. Staples Street, Suite 300, Corpus Christi TX 78401, phone 361.884.0687 Ext 103, email ccasper@cctxmpo.us, as well as by the individual service providers.

To submit a formal complaint or to request additional information on Title VI obligations, contact Craig T. Casper, Title VI Coordinator, Corpus Christi MPO; phone 361.884.0687 Ext 103; email ccasper@cctxmpo.us.



Charles W. Zahn, Jr.
Transportation Policy Committee Vice-Chair
Corpus Christi Metropolitan Planning Organization

July 1, 2021

Date

APPENDIX B

NOTICE UNDER THE AMERICANS WITH DISABILITIES ACT

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

Employment: the Corpus Christi Metropolitan Planning Organization (Corpus Christi MPO) does not discriminate on the basis of disability in its hiring or employment practices and complies with all regulations promulgated by the U.S. Equal Employment Opportunity Commission under Title I of the ADA.

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

Modifications to Policies and Procedures: the Corpus Christi Metropolitan Planning Organization (Corpus Christi MPO) will make all reasonable modifications to policies and programs to ensure that people with disabilities have an equal opportunity to enjoy all of its programs, services and activities.

Anyone who requires an auxiliary aid or service for effective communication, or a modification of policies or procedures to participate in a Corpus Christi Metropolitan Planning Organization (Corpus Christi MPO) program, service or activity, should contact Craig T. Casper, Title VI Coordinator, 602 N. Staples Street, Suite 300, Corpus Christi TX 78401; phone 361.884.0687 Ext. 103; email ccasper@cctxmpo.us as soon as possible but no later than 48 hours before the scheduled event.

The ADA does not require the Corpus Christi Metropolitan Planning Organization (Corpus Christi MPO) to take any action that would fundamentally alter the nature of its programs or services; or impose any undue financial or administrative burden.

Complaints that a Corpus Christi Metropolitan Planning Organization (CORPUS CHRISTI MPO) program, service or activity is not accessible to persons with disabilities should be directed to Craig T. Casper, Title VI Coordinator, 602 N. Staples Street, Suite 300, Corpus Christi TX 78401; phone 361.884.0687 Ext 103; email ccasper@cctxmpo.us.

The Corpus Christi Metropolitan Planning Organization (Corpus Christi MPO) will not place a surcharge on a particular individual with a disability or any group of individuals with disabilities to cover the cost of providing auxiliary aids/services or reasonable modifications of policy.

APPENDIX C

CORPUS CHRISTI MPO TITLE VI CERTIFICATIONS AND ASSURANCES

The Corpus Christi Metropolitan Planning Organization (herein referred to as the "Recipient"), HEREBY AGREES THAT, as a condition to receiving any Federal financial assistance from the U.S. Department of Transportation (DOT), through the Federal Highway Administration, is subject to and will comply with the following:

STATUTORY / REGULATION AUTHORITIES

- Title VI of the Civil Rights Act of 1964 {42 U.S.C. § 2000d et seq., 78 stat. 252}, (prohibits discrimination on the basis of race, color, national origin);
- 49 C.F.R. Part 21 {entitled *Nondiscrimination In Federally-Assisted Programs of the Department of Transportation-Effectuation of Title VI of The Civil Rights Act of 1964*};
- 28 C.F.R. section 50.3 {U.S. Department of Justice Guidelines for Enforcement of Title VI of the Civil Rights Act of 1964};

The preceding statutory and regulatory cites hereinafter are referred to as the "Acts" and "Regulations," respectively.

GENERAL ASSURANCES

In accordance with the Acts, the Regulations, and other pertinent directives, circulars, policy, memoranda, and/or guidance, the Recipient hereby gives assurance that it will promptly take any measures necessary to ensure that:

"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 otherwise subjected to discrimination under any program or activity," for which the Recipient receives Federal financial assistance from DOT, including the Federal Highway Administration.

The Civil Rights Restoration Act of 1987 clarified the original intent of Congress, with respect to Title VI and other Nondiscrimination requirements {The Age Discrimination Act of 1975, and Section 504 of the Rehabilitation Act of 1973}, by restoring the broad, institutional-wide scope and coverage of these nondiscrimination statutes and requirements to include all programs and activities of the Recipient, so long as any portion of the program is Federally-assisted.

SPECIFIC ASSURANCES

More specifically, and without limiting the above general Assurance, the Recipient agrees with and gives the following Assurances with respect to its Federally-assisted Department of Transportation programs:

1. The Recipient agrees that each "activity," "facility," or "program," as defined in §§ 21.23 (b) and 21.23 (e) of 49 C.F.R. § 21 will be (with regard to an "activity") facilitated, or will be (with regard to a "facility") operated, or will be (with regard to a "program") conducted in compliance with all requirements imposed by, or pursuant to the Acts and the Regulations.
2. The Recipient will insert the following notification in all solicitations for bids, Requests for Proposals for work, or material subject to the Acts and the Regulations made in connection with all Department of Transportation programs and, in adapted form, in all proposals for negotiated agreements regardless of funding source:

"The {Corpus Christi Metropolitan Planning Organization}, in accordance with the provisions of Title VI of the Civil Rights Act of 1964 {78 Stat. 252, 42 U.S.C. §§ 2000d to 2000d-4} and the Regulations, hereby notifies all bidders that it will affirmatively ensure that any contract entered into pursuant to this advertisement, disadvantaged business enterprises will be afforded full and fair opportunity to submit bids in response to this invitation and will not be discriminated against on the grounds of race, color, or national origin in consideration for an award."

3. The Recipient will insert the clauses of Appendix A and E of this Assurance in every contract or agreement subject to the Acts and the Regulations.
4. The Recipient will insert the clauses of Appendix B of this Assurance, as a covenant running with the land, in any deed from the United States effecting or recording a transfer of real property, structures, use, or improvements thereon or interest therein to a Recipient.
5. That where the Recipient receives Federal financial assistance to construct a facility or part of a facility, the Assurance will extend to the entire facility and facilities operated in connection therewith.
6. That where the Recipient receives Federal financial assistance in the form, or for the acquisition of real property or an interest in real property, the Assurance will extend to rights to space on, over, or under such property.
7. The Recipient will include the clauses set forth in Appendix C and Appendix D of this Assurance, as a covenant running with the land, in any future deeds, leases, licenses, permits, or similar instruments entered into by the Recipient with other parties:
 - a. for the subsequent transfer of real property acquired or improved under the applicable activity, project, or program; and
 - b. for the construction or use of, or access to, space on, over, or under real property acquired or improved under the applicable activity, project, or program.
8. That this Assurance obligates the Recipient for the period during which Federal financial assistance is extended to the program, except where the Federal financial assistance is to provide, or is in the form of, personal property, or real property, or interest therein, or structures or improvements thereon, in which case the Assurance obligates the Recipient, or any transferee for the longer of the following periods:
 - a. the period during which the property 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 will provide for such methods of administration for the program as are found by the Secretary of Transportation or the official to whom he/she delegates specific authority to give reasonable guarantee that it, other recipients, subrecipients, subgrantees, contractors, subcontractors, consultants, transferees, successors in interest, and other participants of Federal.

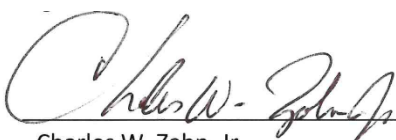
During the performance of this contract, the contractor, for itself, its assignees, and successors in interest (hereinafter referred to as the "contractor") agrees as follows:

1. **Compliance with Regulations:** The contractor (hereinafter includes consultants) will comply with the Acts and the Regulations relative to Nondiscrimination in Federally-assisted programs of the U.S. Department of Transportation, the Federal Highway Administration, as they may be amended from time to time, 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, will not discriminate on the grounds of race, color, or national origin in the selection and retention of subcontractors, including procurements of materials and leases of equipment. The contractor will not participate directly or indirectly in the discrimination prohibited by the Acts and the Regulations, including employment practices when the contract covers any activity, project, or program set forth in Appendix B of 49 CFR Part 21.
3. **Solicitations for Subcontracts, Including Procurements of Materials and Equipment:** In all solicitations, either by competitive bidding, or negotiation made by the contractor for work to be performed under a subcontract, including procurements of materials, or leases of equipment, each potential subcontractor or supplier will be notified by the contractor of the contractor's obligations under this contract and the Acts and the Regulations relative to Nondiscrimination on the grounds of race, color, or national origin.

4. **Information and Reports:** The contractor will provide all information and reports required by the Acts, the Regulations, and directives issued pursuant thereto and will 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 Acts, Regulations, and instructions. Where any information required of a contractor is in the exclusive possession of another who fails or refuses to furnish the information, the contractor will so certify to the Recipient or the Federal Highway Administration, as appropriate, and will set forth what efforts it has made to obtain the information.
5. **Sanctions for Noncompliance:** In the event of a contractor's noncompliance with the Nondiscrimination provisions of this contract, the Recipient will impose such contract sanctions as it or the Federal Highway Administration may determine to be appropriate, including, but not limited to:
 - a. withholding payments to the contractor under the contract until the contractor complies; and/or
 - b. cancelling, terminating, or suspending a contract, in whole or in part.
6. **Incorporation of Provisions:** The contractor will include the provisions of paragraphs one through six in every subcontract, including procurements of materials and leases of equipment, unless exempt by the Acts, the Regulations and directives issued pursuant thereto. The contractor will take action with respect to any subcontract or procurement as the Recipient or the Federal Highway Administration may direct as a means of enforcing such provisions including sanctions for noncompliance. Provided, that if the contractor becomes involved in, or is threatened with litigation by a subcontractor, or supplier because of such direction, the contractor may request the Recipient to enter into any litigation to protect the interests of the Recipient. In addition, the contractor may request the United States to enter into the litigation to protect the interests of the United States.
 - a. financial assistance under such program will comply with all requirements imposed or pursuant to the Acts, the Regulations, and this Assurance.
7. The Recipient agrees that the United States has a right to seek judicial enforcement with regard to any matter arising under the Acts, the Regulations, and this Assurance.

By signing this ASSURANCE, the **Corpus Christi Metropolitan Planning Organization** also agrees to comply (and require any subrecipients, subgrantees, contractors, successors, transferees, and/or assignees to comply) with all applicable provisions governing the USDOT access to records, accounts, documents, information, facilities, and staff. You also recognize that you must comply with any program or compliance reviews, and/or complaint investigations conducted by the USDOT. You must keep records, reports, and submit the material for review upon request to USDOT, or its designee in a timely, complete, and accurate way. Additionally, you must comply with all other reporting, data collection, and evaluation requirements, as prescribed by law or detailed in program guidance.

The **Corpus Christi Metropolitan Planning Organization** gives this ASSURANCE in consideration of and for obtaining any Federal grants, loans, contracts, agreements, property, and/or discounts, or other Federal-aid and Federal financial assistance extended after the date hereof to the recipients by the U.S. Department of Transportation under all Department of Transportation programs. This ASSURANCE is binding on Texas, other recipients, subrecipients, subgrantees, contractors, subcontractors and their subcontractors', transferees, successors in interest, and any other participants in all Department of Transportation programs. The person(s) signing below is authorized to sign this ASSURANCE on behalf of the Recipient.



Charles W. Zahn, Jr.
Transportation Policy Committee Vice-Chair
Corpus Christi Metropolitan Planning Organization

July 1, 2021

Date

APPENDIX D

DISCRIMINATION COMPLAINT PROCEDURES

TITLE VI COMPLAINT PROCERDURES

INTRODUCTION

As a recipient of federal financial assistance and under Title VI of the Civil Rights Act of 1964 and related Title VI statutes, The Corpus Christi MPO ensures that no person shall, on the grounds of race, religion, color, national origin, sex, age, or disability be excluded from participation in, be denied the benefits of, or otherwise be subjected to discrimination under any agency programs or activities. All programs funded in whole or in part from federal financial assistance are subject to Title VI requirements. The Civil Rights Restoration Act of 1987 extended this to all programs within an agency that receives federal assistance regardless of the funding source for individual programs.

This policy is intended to establish a procedure under which complaints alleging discrimination in Corpus Christi MPO's provisions, services, or Corpus Christi MPO activities can be made by persons who are not employees of Corpus Christi MPO. Any person who believes Corpus Christi MPO, or any entity who receives federal financial assistance from or through Corpus Christi MPO (i.e., sub-recipients, sub-contractors, or sub-grantees), has subjected them or any specific class of individuals to unlawful discrimination may file a complaint of discrimination. The Corpus Christi MPO will follow timelines set forth in guidance from the Department of Transportation, the Federal Highway Administration, Federal Transit Administration and the Department of Justice for processing Title VI discrimination complaints.

WHEN TO FILE

A complaint of discrimination must be filed within 180 calendar days of the alleged act of Discrimination, or discovery thereof; or where there has been a continuing course of conduct, the date on which that conduct was discontinued. Filing means a written complaint must be postmarked before the expiration of the 180-calendar day period. The filing date is the day you complete, sign, and mail the complaint form. The complaint form and consent/release form must be dated and signed for acceptance. Complaints received more than 180 calendar days after the alleged discrimination will not be processed and will be returned to the complainant with a letter explaining why the complaint could not be processed and alternative agencies to which a report may be made.

WHERE TO FILE

In order to be processed, signed original complaint forms must be mailed to:

Corpus Christi Metropolitan Planning Organization
Transportation Planning Director
602 N. Staples Street, Suite 300, Corpus Christi, TX 78401

Upon request, reasonable accommodations will be made for persons who are unable to complete the complaint form due to disability or limited English proficiency. A complaint may also be filed by a representative on behalf of a complainant.

Persons who are not satisfied with the findings of the Corpus Christi MPO may seek remedy from other applicable state or federal agencies.

REQUIRED ELEMENTS OF A COMPLAINT

In order to be processed, a complaint must be complete and submitted in writing and contain the following information:

- Name, address, and phone number of the complainant.
- Name(s) and address(es) and business(es)/organization(s) of person(s) who allegedly discriminated.
- Date of alleged discriminatory act(s).
- Basis of complaint (i.e. race, color, national origin, sex, age, religion, or disability).
- A statement of complaint.
- A signed consent release form.

COMPLAINT PROCESS OVERVIEW

The following is a description of how a discrimination complaint will be handled once received by the Corpus Christi MPO.

- I. **A complaint is received by the Corpus Christi MPO:** Complaints must be in writing and signed by the complainant or their designated representative. If the complainant is unable to complete the form in writing due to disability or limited English proficiency, upon request reasonable accommodations will be made to ensure the complaint is received and processed in a timely manner. Complainants wishing to file a complaint that do not have access to the Internet or the ability to pick up a form will be mailed a complaint form to complete. The complainant will be notified if the complaint form is incomplete and asked to furnish the missing information.
- II. **Complaint is logged into tracking database:** Completed complaint forms will be logged into the complaint tracking database; basic data will be maintained on each complaint received.
- III. **Determine jurisdiction:** The Corpus Christi MPO Transportation Planning Director will complete an initial review of the complaint. The purpose of this review is to determine if the complaint meets basic criteria.

Criteria required for a complete complaint:

- Basis of alleged discrimination (i.e. race, religion, color, national origin, gender, age or disability).
- Determination of timeliness will also be made to ensure that the complaint was filed within the 180-day period requirement.
- The program in which the alleged discrimination occurred will be examined to ensure that the complaint was filed with the appropriate agency. During this process, if a determination was made in which the program or activity that the alleged discrimination occurred is not related to the Corpus Christi MPO program or activity, every attempt will be made to establish the correct agency. Whenever possible and assuming consent was granted on the Consent/Release form, the complaint will be forwarded to the appropriate agency.

If the complaint is a transportation-related discrimination complaint and the Corpus Christi MPO or its sub-recipients are named as the respondent, then the complaint shall be forwarded to TxDOT Civil Rights Division, 125 E. 11th Street, Austin, Texas, 78701.

Thereafter, the procedures will follow through as indicated here.

- IV. **Initial written notice to complainant:** Within 10 working days of the receipt of the complaint, the Corpus Christi MPO will send notice to the complainant confirming receipt of the complaint; if needed the notice will request additional information, notify complainant that the activity is not related to a Corpus Christi MPO program or activity, or does not meet deadline requirements. Conclusions made in step three will determine the appropriate response to the complaint. If any additional information is needed from the

complainant, it will be communicated at this point in the process. A copy of the written response, as well as the complaint form, will be forwarded to the Texas Department of Transportation, Office of Civil Rights, Contract Compliance Section for informational purposes only.

- V. **Investigation of complaint:** The Corpus Christi MPO Transportation Planning Director will confer with the Program Coordinator to determine the most appropriate fact-finding process to ensure that all available information is collected in an effort to reach the most informed conclusion and resolution of the complaint. The type of investigation techniques used may vary depending on the nature and circumstances of the alleged discrimination. An investigation may include but is not limited to:
- Internal meetings with Corpus Christi MPO staff and legal counsel.
 - Consultation with state and federal agencies.
 - Interviews of complainant(s).
 - Review of documentation (i.e. planning, public involvement, and technical program activities).
 - Interviews and review of documentation with other agencies involved.
 - Review of technical analysis method (if applicable).
 - Review of demographic data.
- VI. **Determination of investigation:** An investigation must be completed within 60 days of receiving the complete complaint unless the facts and circumstances warrant otherwise. A determination will be made based on information obtained. The Corpus Christi MPO Transportation Planning Director and/or designee will render a recommendation for action, including formal and/or informal resolution strategies in a report of findings to the Corpus Christi MPO Transportation Planning Director.
- VII. **Notification of determination:** Within 10 days of completion of an investigation, the complainant must be notified by the Corpus Christi MPO Transportation Planning Director of the final decision. The notification will advise the complainant of his/her appeal rights with state and federal agencies if he/she is dissatisfied with the final decision. A copy of this letter, along with the report of findings, will be forwarded to the Texas Department of Transportation, Office of Civil Rights, Contract Compliance Section for information purposes.

TITLE VI DISCRIMINATION COMPLAINT FORM**CORPUS CHRISTI METROPOLITAN PLANNING ORGANIZATION (CORPUS CHRISTI MPO)**

Section I:				
Name:				
Address:				
Telephone (Home):			Telephone (Work):	
Electronic Mail Address:				
Accessible Format Requirements?	Large Print		Audio Tape	
	TDD		Other	
Section II:				
Are you filing this complaint on your own behalf?			<input type="checkbox"/> Yes*	<input type="checkbox"/> No
*If you answered "yes" to this question, go to Section III.				
If not, please supply the name and relationship of the person for whom you are complaining:				
Please explain why you have filed for a third party:				
Please confirm that you have obtained the permission of the aggrieved party if you are filing on behalf of a third party.			<input type="checkbox"/> Yes	<input type="checkbox"/> No
Section III:				
I believe the discrimination I experienced was based on (check all that apply):				
<input type="checkbox"/> Race <input type="checkbox"/> Color <input type="checkbox"/> National Origin				
Date of Alleged Discrimination (Month, Day, Year): _____				
Explain as clearly as possible what happened and why you believe you were discriminated against. Describe all persons who were involved. Include the name and contact information of the person(s) who discriminated against you (if known) as well as names and contact information of any witnesses. If more space is needed, please use the back of this form.				
Section IV:				
Have you previously filed a Title VI complaint with this agency?			<input type="checkbox"/> Yes	<input type="checkbox"/> No

Section V:
Have you filed this complaint with any other Federal, State, or local agency, or with any Federal or State court?
<input type="checkbox"/> Yes <input type="checkbox"/> No
If yes, check all that apply:
<input type="checkbox"/> Federal Agency: _____
<input type="checkbox"/> Federal Court: _____ <input type="checkbox"/> State Agency: _____
<input type="checkbox"/> State Court: _____ <input type="checkbox"/> Local Agency: _____
Please provide information about a contact person at the agency/court where the complaint was filed.
Name:
Title:
Agency:
Address:
Telephone:
Section VI:
Name of agency complaint is against:
Contact person:
Title:
Telephone number:

You may attach any written materials or other information that you think is relevant to your complaint. Signature and date required below:

Signature

Date

Please submit this form in person at the address below, or mail this form to:

Craig T. Casper, Title VI Coordinator
602 N Staples St, Suite 300
Corpus Christi, TX, 78401

Phone 361.884.0687 Ext 103

Email: ccasper@cctxmpo.us

APPENDIX E

DISCRIMINACIÓN PROCEDIMIENTOS COMPALINT MANEJO, SEGUIMIENTO, RESOLUCIÓN Y REPORTE DE INVESTIGACIONES/QUEJAS

TÍTULO VI DENUNCIA PROCEDURES

INTRODUCCIÓN

Como receptor de asistencia financiera federal y bajo el Título VI de la Ley de Derechos Civiles de 1964 y los estatutos relacionados del Título VI, la MPO de Corpus Christi garantiza que ninguna persona, por motivos de raza, religión, color, origen nacional, sexo, edad o discapacidad, será excluida de la participación, se le nieguen los beneficios de, o de otra manera sea objeto de discriminación bajo cualquier programa o actividad de la agencia. Todos los programas financiados en su totalidad o en parte con asistencia financiera federal están sujetos a los requisitos del Título VI. La Ley de Restauración de los Derechos Civiles de 1987 extendió esto a todos los programas dentro de una agencia que recibe asistencia federal, independientemente de la fuente de financiamiento para los programas individuales.

Esta política tiene la intención de establecer un procedimiento bajo el cual las quejas que alegan discriminación en las disposiciones, servicios o actividades de Corpus Christi MPO pueden ser hechas por personas que no son empleados de Corpus Christi MPO. Cualquier persona que crea que Corpus Christi MPO, o cualquier entidad que recibe asistencia financiera federal de o a través de Corpus Christi MPO (es decir, sub-receptores, subcontratistas o sub-concesionarios), los ha sometido a ellos o a cualquier clase específica de individuos a discriminación ilegal puede presentar una queja de discriminación. La MPO de Corpus Christi seguirá los plazos establecidos en la guía del Departamento de Transporte, la Administración Federal de Carreteras, la Administración Federal de Tránsito y el Departamento de Justicia para procesar las quejas de discriminación del Título VI.

CUÁNDO PRESENTAR

Una queja de discriminación debe ser presentada dentro de los 180 días calendario del presunto acto de discriminación, o el descubrimiento del mismo; o, en caso de que haya habido un curso de conducta continuo, la fecha en que se suspendió dicho comportamiento. Presentación significa que una queja por escrito debe tener el matasellos antes de la expiración del período de 180 días calendario. La fecha de presentación es el día en que completa, firma y envía por correo el formulario de queja. El formulario de queja y el formulario de consentimiento / liberación deben estar fechados y firmados para su aceptación. Las quejas recibidas más de 180 días naturales después de la presunta discriminación no se procesarán y se devolverán a la denunciante con una carta explicando por qué no se pudo procesar la queja y agencias alternativas a las que se puede hacer un informe.

DÓNDE PRESENTAR

Para ser procesados, los formularios de queja originales firmados deben enviarse por correo a:

Organización de Planificación Metropolitana de Corpus Christi
Director de Planificación de Transporte
602 N. Staples Street, Suite 300, Corpus Christi, TX 78401

Previa solicitud, se harán adaptaciones razonables para las personas que no puedan completar el formulario de queja debido a una discapacidad o dominio limitado del inglés. Una queja también puede ser presentada por un representante en nombre de un denunciante.

Las personas que no están satisfechas con los hallazgos de la MPO de Corpus Christi pueden buscar reparación de otras agencias estatales o federales aplicables.

ELEMENTOS REQUERIDOS DE UNA QUEJA

Para ser procesada, una queja debe estar completa y presentada por escrito y contener la siguiente información:

- Nombre, dirección y número de teléfono del denunciante.
- Nombre(s) y dirección(es) y empresa(s)/organización(es) de la(s) persona(s) que presuntamente discriminaron.
- Fecha de los presuntos actos discriminatorios.
- Fundamento de la queja(es decir, raza, color, origen nacional, sexo, edad, religión o discapacidad).
- Una declaración de queja.
- Un formulario de liberación de consentimiento firmado.

DESCRIPCIÓN GENERAL DEL PROCESO DE QUEJAS

La siguiente es una descripción de cómo se manejará una queja por discriminación una vez recibida por la MPO de Corpus Christi.

- VIII. **La MPO de Corpus Christi recibe una queja:** Las quejas deben ser por escrito y firmadas por el denunciante o su representante designado. Si el denunciante no puede completar el formulario por escrito debido a una discapacidad o dominio limitado del inglés, a petición se harán adaptaciones razonables para garantizar que la queja se reciba y procese de manera oportuna. Los denunciantes que deseen presentar una queja que no tengan acceso a Internet o la posibilidad de recoger un formulario recibirán por correo un formulario de queja para completarlo. Se notificará al reclamante si el formulario de reclamación está incompleto y se le pedirá que proporcione la información que falta.
- IX. **Las reclamaciones se registran en la base de datos de seguimiento:** los formularios de reclamación completados se registrarán en la base de datos de seguimiento de reclamaciones; se mantendrán datos básicos sobre cada reclamación recibida.
- X. **Determinar la jurisdicción:** El Director de Planificación de Transporte de Corpus Christi MPO completará una revisión inicial de la queja. El propósito de esta revisión es determinar si la queja cumple con los criterios básicos.

Criterios requeridos para una queja completa:

- Fundamento de la supuesta discriminación(es decir, raza, religión, color, origen nacional, género, edad o discapacidad).
- También se determinará la puntualidad para garantizar que la queja se haya presentado dentro del requisito de plazo de 180 días.
- El programa en el que ocurrió la presunta discriminación será examinado para asegurarse de que la queja fue presentada ante la agencia correspondiente. Durante este proceso, si se tomó una determinación en la que el programa o actividad en la que se produjo la supuesta discriminación no está relacionado con el programa o actividad de la MPO de Corpus Christi, se hará todo lo posible para establecer la agencia correcta. Siempre que sea posible y suponiendo que se haya otorgado el consentimiento en el formulario de consentimiento/liberación, la queja se enviará a la agencia correspondiente.

Si la queja es una queja de discriminación relacionada con el transporte y la MPO de Corpus Christi o sus sub-destinatarios son nombrados como el demandado, entonces la queja será enviada a la División de Derechos Civiles de TxDOT, 125 E. 11th Street, Austin, Texas, 78701.

A partir de entonces, los procedimientos seguirán adelante como se indica aquí.

- XI. **Notificación inicial por escrito al reclamante:** Dentro de los 10 días hábiles posteriores a la recepción de la queja, la MPO de Corpus Christi enviará una notificación al reclamante confirmando la recepción de la queja; si es necesario, el aviso solicitará información adicional, notificará al reclamante que la actividad no está relacionada con un programa o actividad de La MPO de Corpus Christi, o no cumple con los requisitos de plazo. Las conclusiones del tercer paso determinarán la respuesta adecuada a la queja. Si se necesita alguna información adicional del reclamante, se comunicará en este momento del proceso. Una copia de la respuesta escrita, así como el formulario de queja, se enviarán al Departamento de Transporte de Texas, Oficina de Derechos Civiles, Sección de Cumplimiento de Contratos solo con fines informativos.
- XII. **Investigación de la queja: El Director de Planificación de Transporte de la MPO de Corpus Christi** consultará con el Coordinador del Programa para determinar el proceso de investigación más apropiado para garantizar que se recopile toda la información disponible en un esfuerzo por llegar a la conclusión y resolución más informadas de la queja. El tipo de técnicas de investigación utilizadas puede variar en función de la naturaleza y las circunstancias de la presunta discriminación. Una investigación puede incluir pero no se limita a:
- Reuniones internas con el personal de corpus Christi MPO y asesor legal.
 - Consulta con agencias estatales y federales.
 - Entrevistas a los denunciantes.
 - Revisión de la documentación(es decir, planificación, participación pública y actividades técnicas del programa).
 - Entrevistas y revisión de documentación con otras agencias involucradas.
 - Revisión del método de análisis técnico (si corresponde).
 - Revisión de datos demográficos.
- XIII. **Determinación de la investigación:** Una investigación debe completarse dentro de los 60 días posteriores a la recepción de la queja completa, a menos que los hechos y circunstancias justifiquen lo contrario. Se tomará una determinación basada en la información obtenida. El Director de Planificación de Transporte de Corpus Christi MPO y/o la designados harán una recomendación para la acción, incluyendo estrategias de resolución formales y/o informales en un informe de hallazgos al Director de Planificación de Transporte de Corpus Christi MPO.
- XIV. **Notificación de la determinación:** Dentro de los 10 días posteriores a la finalización de una investigación, el denunciante debe ser notificado por el Director de Planificación de Transporte de la MPO de Corpus Christi de la decisión final. La notificación informará al denunciante de sus derechos de apelación ante las agencias estatales y federales si no está satisfecho con la decisión final. Una copia de esta carta, junto con el informe de los hallazgos, se enviará al Departamento de Transporte de Texas, Oficina de Derechos Civiles, Sección de Cumplimiento de Contratos para fines informativos.

FORMULARIO DE QUEJA TÍTULO VI DISCRIMINACIÓN
ORGANIZACIÓN DE PLANIFICACIÓN METROPOLITANA (CORPUS CHRISTI MPO)

Sección I:				
Nombre:				
Dirección:				
Teléfono (Casa):			Teléfono (Trabajo):	
Dirección de Correo Electrónico:				
Requisitos formato accesible?	Letra Grande		Cinta de audio	
	TDD		Otros	
Sección II:				
¿Está presentando esta queja en su propio nombre?			[] Si*	[] No
* Si su respuesta es "sí" a esta pregunta, vaya a la Sección III.				
Si no es así, sírvase proporcionar el nombre y la relación de la persona para quien se queja:				
Por favor, explique por qué usted ha presentado para un tercero:				
Por favor, confirma que ha obtenido el permiso de la parte perjudicada, si usted está presentando en nombre de un tercero.			[] Si	[] No
Sección III:				
Creo que la discriminación que experimenté fue basado en (marque todo lo que corresponda): [] Carrera [] Color [] Origen Nacional Fecha de la Discriminación Presunta (mes, día, año): _____ Explique lo más claramente posible lo que pasó y por qué cree que fue discriminado. Describir todas las personas que estuvieron involucradas. Incluya el nombre y la información de contacto de la persona (s) que lo discriminó (si se conoce), así como los nombres y la información de los testigos en contacto. Si se necesita más espacio, por favor use la parte de atrás de este formulario.				

Sección V:

¿Ha presentado previamente una queja del Título VI con esta agencia?

☐ Si ☐ No

En caso afirmativo, marque todo lo que corresponda:

☐ Agencia Federal: _____

☐ Tribunal Federal: _____

☐ Tribunal Estatal: _____

☐ Agencia Estatal: _____

☐ Agencia Local: _____

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

Nombre: _____

Título: _____

Agencia: _____

Dirección: _____

Teléfono: _____

Sección VI:

Teléfono: _____

Persona de contacto: _____

Título: _____

Número de teléfono: _____

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

Firma

Fecha

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

Craig T. Casper, Título VI Oficial de Cumplimiento
602 N Staples St, Suite 300
Corpus Christi, TX, 78401

Teléfono: 361.884.0687 Ext 103

Correo electrónico: ccasper@cctxmpo.us