



# Title VI Program

Oct. 1, 2021, through Sept. 30, 2024  
Prepared for Federal Transit Administration

September 2022



## METRO RESPECTS CIVIL RIGHTS

Metro fully complies with Title VI of the Civil Rights Act of 1964 that requires that no person be excluded from the participation in, be denied the benefits of, or be otherwise subjected to discrimination on the basis of race, color or national origin under any program or activity for which Metro receives federal financial assistance.

Metro fully complies with Title II of the Americans with Disabilities Act and Section 504 of the Rehabilitation Act that requires that no otherwise qualified individual with a disability be excluded from the participation in, be denied the benefits of, or be subjected to discrimination solely by reason of their disability under any program or activity for which Metro receives federal financial assistance.

If any person believes they have been discriminated against regarding the receipt of benefits or services because of race, color, national origin, sex, age or disability, they have the right to file a complaint with Metro. For information on Metro's civil rights program, or to obtain a discrimination complaint form, visit [oregonmetro.gov/civilrights](http://oregonmetro.gov/civilrights) or call 503-813-7514.

Metro provides services or accommodations upon request to persons with disabilities and people who need an interpreter at public meetings. If you need a sign language interpreter, communication aid or language assistance, call 503-797-1700 or TDD/TTY 503-797-1804 (8 a.m. to 5 p.m. weekdays) 5 business days before the meeting. All Metro meetings are wheelchair accessible. For up-to-date public transportation information, visit TriMet's website at [trimet.org](http://trimet.org).

**Metro is the federally mandated metropolitan planning organization (MPO)** designated by the governor to develop an overall transportation plan and to allocate federal funds for the greater Portland region.

The Joint Policy Advisory Committee on Transportation (JPACT) is a 17-member committee that provides a forum for elected officials and representatives of agencies involved in transportation to evaluate transportation needs in the region and to make recommendations to the Metro Council. The established decision-making process strives for a well-balanced regional transportation system and involves local elected officials directly in decisions that help the Metro Council develop regional transportation policies, including allocating transportation funds. JPACT serves as the MPO board for the region in a unique partnership that requires joint action with the Metro Council on all MPO decisions.

**Project web site:** [oregonmetro.gov/civilrights](http://oregonmetro.gov/civilrights)

The preparation of this report was financed in part by the U.S. Department of Transportation, Federal Highway Administration and Federal Transit Administration. The opinions, findings and conclusions expressed in this report are not necessarily those of the U.S. Department of Transportation, Federal Highway Administration and Federal Transit Administration.



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## INTRODUCTION AND SUBMISSION

This is the Metro's Title VI program for submission to the Federal Transit Administration (FTA) on Metro's Title VI compliance activities as required by FTA Circular 4702.1B. This report demonstrates Metro's compliance with Title VI regulations (49 CFR part 21); Executive Orders 12250 and 12898; FTA C 4702.1B; and the Moving Ahead for Progress in the 21st Century Act (MAP-21) as well as other applicable laws.

Metro submits this report as the federally- and state-designated metropolitan planning organization (MPO) for the greater Portland, Oregon metropolitan region that receives grant funding directly from the FTA for regional transit planning and travel options programming. Metro is a directly elected regional government serving 1.8 million people living in the urbanized areas of the Portland metropolitan region. Metro's Title VI Coordinator and Office of Citizen Involvement are responsible for initiating and monitoring Title VI activities and for preparing these reports.

This report covers the period from Oct. 1, 2018 through March 1, 2022. It includes the following information specified in FTA C 4702.1B III.2.a (program content requirements) and VI.2 (requirements for metropolitan planning organizations).

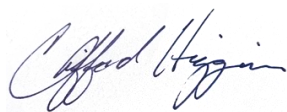
As required by FTA C 4702.1B III.2.a:

1. **Title VI notice** A copy of Metro's Title VI notice to the public that indicates Metro complies with Title VI and informs members of the public of the protections against discrimination afforded to them by Title VI and a list of locations where the notice is posted.
2. **How to file a Title VI discrimination complaint** A copy of Metro's instructions to the public regarding how to file a Title VI discrimination complaint, including a copy of the complaint form.
3. **Title VI investigations, complaints or lawsuits** A list of any public transportation-related Title VI investigations, complaints or lawsuits filed with the recipient since the time of the last submission.
4. **Public participation plan** A public participation plan that includes an outreach plan to engage minority populations and people with limited English proficiency, as well as a summary of outreach efforts made since the last Title VI Program submission.
5. **Limited English proficiency plan** A copy of the Metro's plan for providing language assistance to persons with limited English proficiency, based on the DOT LEP Guidance.
6. **Transit-related advisory committee citizen representatives** A table depicting the racial breakdown of the membership of Metro's transit-related advisory committee citizen representatives, whom Metro selects, and a description of efforts made to encourage the participation of minorities.
7. **Efforts to ensure subrecipients compliance** A narrative or description of efforts that Metro, as primary recipient, uses to ensure subrecipients are complying with Title VI, as well as a schedule of subrecipient Title VI program submissions.



8. **[Facility construction: N/A]** If the recipient has constructed a facility, such as a vehicle storage facility, maintenance facility, operation center, etc., the recipient shall include a copy of the Title VI equity analysis conducted during the planning stage with regard to the location of the facility.]
9. **Additional information** as required by FTA C 4702.1B VI.2:
10. **Regional demographics** A demographic profile of the Portland metropolitan region that includes identification of minority populations in the aggregate. (VI.2.a.2)
11. **Identifying and considering mobility needs of minority populations** A description of the procedures by which the mobility needs of minority populations are identified and considered within the planning process. (VI.2.a.3)
12. **Demographic maps** Demographic maps that overlay the percent minority and non-minority populations and charts that analyze the impacts of the distribution of State and Federal funds in the aggregate for public transportation purposes, including Federal funds managed Metro as a designated recipient. (VI.2.a.4)
13. **Disparate impacts analysis** An analysis that identifies any disparate impacts on the basis of race, color or national origin, and, if so, determines whether there is a substantial legitimate justification for the policy that resulted in the disparate impacts, and if there are alternatives that could be employed that would have a less discriminatory impact. (VI.2.a.5)
14. **Subrecipient procedure** A description of the procedures Metro uses to pass through FTA financial assistance to subrecipients in a nondiscriminatory manner. (VI.2.c.2)
15. **Subrecipient application assistance** A description of the procedures Metro uses to provide assistance to potential subrecipients applying for funding, including its efforts to assist applicants that would serve predominantly minority populations. (VI.2.c.3)

Respectfully submitted,



Clifford Higgins  
Title VI program manager

September 20, 2022



## 1. TITLE VI NOTICE

*A copy of Metro's Title VI notice to the public that indicates Metro complies with Title VI and informs members of the public of the protections against discrimination afforded to them by Title VI and a list of locations where the notice is posted.*

### A. Title VI notices

The paragraph below is posted at Metro's office facility and inserted in publications that are distributed to the public, including reports and Metro Council and other meeting agendas:

Metro fully complies with Title VI of the Civil Rights Act of 1964, Title II of the Americans with Disabilities Act, Section 504 of the Rehabilitation Act and other statutes that ban discrimination. If any person believes they have been discriminated against regarding the receipt of benefits or services based on race, color, national origin, sex, age or disability they have a right to file a complaint with Metro. For information on Metro's civil rights program, or to obtain a discrimination complaint form, visit [oregonmetro.gov/civilrights](http://oregonmetro.gov/civilrights) or call 503-797-1790. Metro provides services or accommodations upon request to persons with disabilities and people who need an interpreter at public meetings. If you need a sign language interpreter, communication aid or language assistance, call 503-797-1790 or TDD/TTY 503-797-1894 (8 a.m. to 5 p.m. weekdays) 5 business days before the meeting. All Metro meetings are wheelchair accessible. Individuals with service animals are welcome at Metro facilities, even where pets are generally prohibited. For up-to-date public transportation information, visit TriMet's website at [trimet.org](http://trimet.org).

In addition, the posted notices and Metro Council and other meeting agendas include an abbreviated notice in languages that meet the Department of Justice Safe Harbor<sup>1</sup> guidance on accessibility for people with limited English proficiency.<sup>2</sup> This notice translates to:

Metro respects civil rights. For information on Metro's civil rights program or to obtain a discrimination complaint form, visit [regonmetro.gov/civilrights](http://regonmetro.gov/civilrights) or call 503-797-1790.<sup>3</sup> If you need language assistance, call 503-797-1790 (8 a.m. to 5 p.m. weekdays) 5 business days before the meeting.

### B. Posting locations

Metro publishes the longer version of its Title VI notice in all significant transportation planning documents, including but not limited to: metropolitan area long range transportation plan (most

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<sup>1</sup> Five percent of population or 1,000 persons of a language group and have limited English proficiency. U.S. Department of Justice, Guidance to Federal Financial Assistance Recipients Regarding Title VI Prohibition Against National Origin Discrimination Affecting Limited English Proficient Persons, 67 FR 41464, June 18, 2002.

<sup>2</sup> As of September 2015, this notice is translated into 13 languages: Spanish, Vietnamese, Chinese, Russian, Korean, Ukrainian, Japanese, Arabic, Romanian, Tagalog, Somali, Mon-Khmer and Hmong. Based on 2015 demographic analysis as part of Metro's updated Limited English Proficiency Plan, Metro will update these translated notices before July 2016 to include Nepali, Persian and Laotian. Hmong will be removed, since it was added due to an analysis error in the previous plan.

<sup>3</sup> The web page [www.oregonmetro.gov/civilrights](http://www.oregonmetro.gov/civilrights) has the information addressed in chapter 2, How to file a Title VI discrimination complaint, translated into the corresponding languages, including the discrimination complaint form.



recent update known as 2018 Regional Transportation Plan), Metropolitan Transportation Improvement Program, Draft Environmental Impact Statements, funding allocation reports and public comment reports.

Since Metro does not provide public transit service, the agency does not post the notice in vehicles.

Since Jan. 20, 2012, Metro's Title VI notice appears on a web page for the topic, [oregonmetro.gov/civilrights](http://oregonmetro.gov/civilrights). This web page makes the document more accessible because it can be found through searches on the agency's web page and on common internet search engines. It is also linked from the homepage through a "Know your rights" link and from all Metro website web pages through the "Diversity, equity and inclusion" link.

The physical notice is posted at three locations in the agency's headquarters, the Metro Regional Center: the entrance to the Metro council chamber, the main entrance to the building near the security check-in desk and the Human Resources Department. Metro began including the translated versions in the agency's headquarters on March 16, 2012. Since September 2014, Metro has included translated Civil Rights notices on Metro Council and other meeting agendas in September 2014.

Metro's posted Title VI notice is attached as Attachment A; the Title VI notice as included in Metro Council and other meeting agendas is attached as Attachment B.



## 2. HOW TO FILE A TITLE VI DISCRIMINATION COMPLAINT

*A copy of Metro's instructions to the public regarding how to file a Title VI discrimination complaint, including a copy of the complaint form.*

### A. Instructions

The civil rights web page, [www.oregonmetro.gov/civilrights](http://www.oregonmetro.gov/civilrights), states, "Metro is committed to ensuring its services and activities are accessible to every resident of the region." It also informs of the right to interpretive services and other accommodations to enable residents to participate in programs and decisions and describes key civil rights laws and orders, and their protections, of:

- Title VI of the Civil Rights Act of 1964 is federal law covering programs and services that receive federal money. It declares that no person shall be discriminated against or denied benefits on the basis of race, color or national origin. Under Title VI, people not proficient in English are entitled to assistance to access critical information about Metro.
- The Executive Order on Environmental Justice directs agencies to identify and address disproportionately high and adverse human health and environmental effects of their activities on minority populations and low-income populations.
- Title II of the Americans with Disabilities Act of 1990 and Section 504 of the Rehabilitation Act of 1973 prohibit discrimination based on disability.
- The Federal-Aid Highway Act of 1973 is federal law covering programs and services that receive federal transportation money, prohibiting discrimination based on sex.
- The Age Discrimination Act of 1975 is federal law covering programs and services that receive federal money, prohibiting discrimination based on age.

Under the heading, "Metro respects civil rights," it states:

Metro fully complies with Title VI of the Civil Rights Act of 1964 that requires that no person be excluded from the participation in, be denied the benefits of, or be otherwise subjected to discrimination on the basis of race, color or national origin under any program or activity for which Metro receives federal financial assistance.

Metro fully complies with Title II of the Americans with Disabilities Act and Section 504 of the Rehabilitation Act that requires that no otherwise qualified individual with a disability be excluded from the participation in, be denied the benefits of, or be subjected to discrimination solely by reason of their disability under any program or activity for which Metro receives federal financial assistance.



If you believe you have been discriminated against regarding the receipt of benefits or services because of race, color, national origin, sex, age, disability or income level, you have the right to file a complaint with Metro.<sup>4</sup>

This page also includes the instructions:

If you believe that you have been discriminated against, you may exercise your right to file a complaint with Metro. Every effort will be made to resolve complaints.

Submit a complaint via one of the following methods:

- fill out the discrimination complaint form
- for complaints of discrimination because of race, color, national origin, sex, age or income level:
  - email [clifford.higgins@oregonmetro.gov](mailto:clifford.higgins@oregonmetro.gov)
  - mail to Clifford Higgins, Title VI coordinator, Metro, 600 NE Grand Ave., Portland, OR 97232
  - call 503-813-7514
  - fax 503-797-1797
- for complaints of discrimination because of disability:
  - email [nathan.sykes@oregonmetro.gov](mailto:nathan.sykes@oregonmetro.gov)
  - mail to Nathan Sykes, ADA coordinator, Metro, 600 NE Grand Ave., Portland, OR 97232
  - call 503-797-1544
- visit Metro's administrative office at 600 NE Grand Ave. in Portland.

## **B. Complaint form**

The complaint form is available from the web page [www.oregonmetro.gov/civilrights](http://www.oregonmetro.gov/civilrights):

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<sup>4</sup> Metro is committed to ensuring access to every resident and compliance with all civil rights laws and orders and investigates complaints regarding discrimination on the basis of race, color and national origin (Civil Rights Act of 1964, 42 U.S.C. §2000d); sex (Federal-Aid Highway Act of 1973, 23 U.S.C. §324); age (Age Discrimination Act of 1975, as amended, 42 U.S.C. §6102); disability (Section 504 of Rehabilitation Act of 1973, 29 U.S.C §794 and Americans with Disabilities Act of 1990, as amended, 42 U.S.C. §12132); and income level (Executive Order 12898).



# Discrimination complaint form

We are asking for the following information to assist in processing your complaint. If you need help completing this form, call 503-813-7514.

First name

Last name

Street address

City, state and ZIP code

Home phone number

Work phone number

Person discriminated against (if someone other than you)

Which of the following best describes the reason you believe the discrimination took place?

☐ race/ethnicity ☐ gender ☐ disability ☐ other

If other, please specify:

On what date(s) did the alleged discrimination take place?

Describe the alleged discrimination. Explain what happened and who you believe is responsible:

## Supplemental materials

You may send any written materials or other information that you think is relevant to your complaint of discrimination because of race, color, national origin, sex, age or income level to:

### Clifford Higgins

Metro

600 NE Grand Ave.

Portland, OR 97232-2736

Phone: 503-797-1932

Fax: 503-797-1799

Email: clifford.higgins@oregonmetro.gov

You may send any written materials or other information that you think is relevant to your complaint of discrimination because of disability to:

### Nathan Sykes

Metro

600 NE Grand Ave.

Portland, OR 97232-2736

Phone: 503-797-1544

Fax: 503-797-1798

Email: nathan.sykes@oregonmetro.gov



The form asks for the following information:

- First name
- Last name
- Street address
- City, state and ZIP code
- Home phone number
- Work phone number
- Person discriminated against (if someone other than you)
- Which of the following best describes the reason you believe the discrimination took place?
  - race/ethnicity
  - gender
  - disability
  - other and, if other, please specify
- On what date(s) did the alleged discrimination take place?
- Describe the alleged discrimination. Explain what happened and who you believe is responsible.

The form uses an “electronic signature,” informing users:

By hitting submit, you agree that: (1) you have read, understand and accept the terms for procedures for tracking and investigating Title VI complaints and (2) you affirm that the information above is true to the best of your knowledge.

Complainants are also informed they may send written materials or other information they think is relevant to the complaint to the Title VI designee via post or email.

If a complainant chooses to file a complaint via email, by phone or in person, the Title VI Coordinator or designee will perform preliminary intake to answer these questions and fill out a version of this form that may be printed and then reviewed and signed by the complainant.



### 3. TITLE VI INVESTIGATIONS, COMPLAINTS OR LAWSUITS

*A list of any public transportation-related Title VI investigations, complaints or lawsuits filed with the recipient since the time of the last submission.*

#### A. Investigations, complaints or lawsuits

Metro had no Title VI investigations, complaints or lawsuits filed during the reporting period.

Metro has received other inquiries and non-Title VI complaints via its discrimination complaint process. One complaint regarding a subrecipient (City of Lake Oswego) on the basis of ADA was found to be without merit. There were a set of complaints based on ADA in December 2021, which were referred to the ADA Coordinator in regard to companion tickets to the zoo for child visitors with disabilities; the ADA Coordinator explained the process for obtaining discounted tickets in such circumstances. Beginning in 2020, Metro has received four complaints regarding private, non-related businesses and their practices and one complaint regarding behavior of a neighbor, all allegedly based on racism and racial bias. When possible, complainants were contacted to explain Metro's lack of authority in these areas.

#### B. Procedures for investigations and tracking complaints

FHWA and FTA have different processes for investigating and resolving Civil Rights complaints. Because Metro receives federal funds from FHWA through ODOT and directly from FTA, Metro has created the following decision and investigation processes to determine which agency has jurisdiction to investigate Title VI complaint. Additionally, not all complaints of discrimination will be considered a "Title VI" complaint, but because Metro wishes to recognize and respect a broad view of civil rights, information on how to proceed with complaints that may be outside the scope of specific federal protection is also included.

#### Questions to determine jurisdiction and investigative process

1. Does the complaint allege discrimination, against an individual or class of people, based on race, color, national origin, sex or age? If yes, this is a "Title VI" complaint; continue to number 7. If no, continue to number 2.
2. Does the complaint allege discrimination, against an individual or class of people, based on disability? If yes, this is a "Section 504/ADA" complaint, which is investigated by Metro's ADA Coordinator; refer to Metro's ADA coordinator. If no, continue to number 3.
3. Does the complaint allege discrimination of the nature of disproportionately high or adverse human health or environmental effects on minority or low-income populations? If yes, this is a "Environmental Justice" complaint, which is treated as a Title VI complaint for the purpose of Metro's procedure; continue to number 7. If no, continue to number 4.
4. If the complaint does not allege discrimination of the nature described in questions 1, 2 or 3, it is not treated as a Title VI complaint; continue to number 5.



5. Does the complaint relate to public accommodations at the Oregon Zoo, Oregon Convention Center or Portland Expo and allege discrimination, against an individual or group, based on religion, sexual orientation or marital status? If yes, this is an Oregon "659A.403" issue; refer the complaint to the Office of Metro Attorney. If no, continue to number 6.
6. If the complaint does not allege discrimination of the nature described in questions 1, 2, 3 or 5, it may not be related to a legally recognized civil rights protection; consult with the Office of Metro Attorney, Metro's equity program manager and the appropriate department director to determine the proper steps to resolve.
7. *[If the complaint relates to public accommodations at the Oregon Zoo, Oregon Convention Center or Portland Expo, this is also an Oregon "659A.403" issue; coordinate the investigation process with Office of Metro Attorney.]*  
Does the program related to the Title VI (or Environmental Justice) complaint funded solely by direct FTA-to-Metro funding (e.g., Regional Travel Options, corridor projects working solely under FTA grants)? If yes, continue to number 8. If no, continue to number 9.
8. For Title VI complaints **related direct FTA-to-Metro funded programs, Metro investigates Title VI complaints against Metro, its subrecipients, its consultants and its contractors**; refer to the notes on FTA considerations in the process below.
9. **For all Title VI complaints not related to direct FTA-to-Metro funded programs, Metro investigates complaints against its subrecipients, consultants and contractors only.** If the complaint is against Metro, refer the complaint to ODOT's Office of Civil Rights. If the complaint is against one of Metro's subrecipients, consultants or contractors, follow the process below.

### Accepting complaints in alternative languages and formats

Metro ensures that persons with limited English proficiency have meaningful access to its programs and activities, including its complaint procedures in accordance with EO 13166, Improving Access to Services for Persons with Limited English Proficiency. Complaints in languages other than English will be translated and responded to in the language in which they were sent.

Metro ensures that persons with disabilities have access to its programs and activities, including in its complaint procedure in accordance with Title II of the Americans with Disabilities Act of 1990. Reasonable accommodations should be made to facilitate the complaint process for a person with a disability, including transcribing a verbal complaint, translating and responding in Braille, and holding any meetings needed to resolve the issue at a location that would ease mobility challenges.

It is important to recognize the need to modify practices to serve complainants with limited English proficiency and those with disabilities may extend beyond the complaint intake stage. Throughout the complaint resolution process, Metro will ensure these individuals understand their rights and responsibilities as well as the status of their complaint.



## **Processing complaints**

The timeframes provided below are calculated to meet the FHWA requirement that investigative reports must be submitted to FHWA within 60 days of Metro's receipt of the complaint.

### **Reviewing complaints for completeness and jurisdiction**

The complaint should be reviewed within 5 calendars days of receipt to determine whether it contains all the necessary information required for acceptance.

- If the complaint is complete, no additional information is needed and Metro has jurisdiction, the complainant should be sent an acceptance letter along with the complainant consent/release form and a notice about investigatory uses of personal information form.
- If the complaint is incomplete, the complainant should be contacted in writing or by telephone to obtain the additional information. The complainant should be given 10 calendars days to respond to the request for additional information. To save time later, the complainant should also be sent a complainant consent/release form and the notice about investigatory uses of personal information form.
- If the complaint is in another language, the complainant should be sent a translated letter of receipt with information of potential next steps, including information needed to investigate a complaint and notification that if Metro lacks jurisdiction it will be referred. This letter should also include and consent/release form to move the process forward as Metro translates the complaint and a more specific response.
- If it becomes clear that Metro lacks jurisdiction over a complaint, the complaint should be referred to the appropriate agency. A referral letter should be sent to the agency along with the complaint and other documents. A letter should also be sent to the complainant stating that the complaint has been referred to another agency for investigation.

### **Notification of acceptance of complaints**

After determining the complaint will be accepted for investigation by Metro:

- the complainant should be sent an acceptance letter along with the complainant consent/release form and a notice about investigatory uses of personal information form
- the respondent should be sent a notification letter; if needed, the respondent should also be sent a request for information.

The notification and acceptance letters should contain the following information:

- the basis for the complaint
- a brief statement of the allegations
- a brief statement of jurisdiction over the respondent to investigate the complaint
- an indication of when parties will be contacted



- cautionary statement that respondents or other persons shall not intimidate, threaten coerce or discriminate against any person because he or she has made a complaint, testified, assisted or participated in any manner in an investigation, proceeding or hearing under Title VI or any other laws or regulations related to nondiscrimination
- notice of availability of availability of alternative dispute resolution and early resolution, if appropriate
- request for the respondent to submit a position statement responding to the allegations, if appropriate
- the Title VI Coordinator's (and, if different, the investigator's) contact information.

A request for information should be sent to the respondent. The investigator should contact the respondent to advise of the complaint and to determine the appropriate person to receive the request for information.

The respondent should be given 10 calendar days to respond to the allegations in writing.

#### **If the complainant is represented by an attorney**

Complainants represented by an attorney should provide a letter of representation.

#### **Investigation**

The investigator shall prepare an investigative plan, which is a working document intended to define the issues and lay out the blueprint to complete the investigation. The plan is an internal document to keep the investigation on track and focused on the issues and likely sources of evidence or corroboration. The investigative plan should include the following:

- Complainant's name and address
- Attorney for the complainant, name and address, if applicable
- Respondent's name and address
- Attorney for the respondent, name and address, if applicable
- Applicable laws
- Basis of the alleged discrimination (e.g., race, color, national origin, sex, age, disability)
- Description of the allegations and issues, including identification of the specific action, policy or practice responsible for the alleged discrimination



- Theories of discrimination (e.g., intentional discrimination/disparate treatment or disparate impact/effects; see below)

### Theories of discrimination

*USDOT, External Civil Rights Processing Manual, 4-4 Developing an investigative plan, DOT 1000.18, p. 23-24. September 2007.*

**Intentional Discrimination** Intentional discrimination may take many forms, but disparate treatment is one of the most common. Simply put, disparate treatment means that similarly situated persons are treated differently (i.e., less favorably) than others because of their race, color, national origin, sex, etc. Another type of intentional discrimination involves the use of policies or practices that explicitly classify individuals on the basis of their membership in a particular group. Such “classifications” may constitute unlawful discrimination if they are based on characteristics such as race, color, or sex.

To prove intentional discrimination, the investigator must show that a challenged action was motivated by an intent to discriminate. This requires a showing that the decision-maker was not only aware of the complainant’s race, color or national origin, but that the recipient acted, at least in part, because of the complainant’s race, color, or national origin.

If the record contains sufficient evidence to establish a prima facie case of discrimination, the investigating agency must then determine if the recipient can articulate a legitimate, nondiscriminatory reason for the challenged action. If the recipient can articulate a nondiscriminatory explanation for the alleged discriminatory action, the investigating agency must determine whether the record contains sufficient evidence to establish that the recipient’s stated reason was a pretext for discrimination. In other words, the evidence must support a finding that the reason articulated by the recipient was not the true reason for the challenged action, and that the real reason was discrimination based on race, color, or national origin.

**Disparate impact** The second primary theory for proving a Title VI violation is based on Title VI regulations and is known as the discriminatory “effects” or disparate impact theory. In contrast to disparate treatment, the disparate impact/effects theory does not require proof of discriminatory intent. Rather, disparate impact cases involve claims that a recipient is violating Title VI regulations by using a neutral policy or practice that has the effect of disproportionately excluding or adversely affecting members of a protected group, and the recipient’s policy or practice lacks a substantial legitimate justification.

In a disparate impact case, the focus of the investigation concerns the consequences of the recipient’s practices, rather than the recipient’s intent. To establish liability under disparate impact, the investigator must first ascertain whether the recipient used a facially neutral practice that had a disproportionate impact on a group protected by Title VI. If the evidence establishes a prima facie case, the investigating agency must then determine whether the recipient can articulate a substantial legitimate justification for the challenged practice.

To prove a substantial legitimate justification, the recipient must show that the challenged policy was necessary to meeting a goal that was legitimate, important, and integral to the recipient’s mission. If the recipient can make such a showing, the inquiry must focus on whether there are any equally effective alternative practices that would result in less adverse impact or whether the justification proffered by the recipient is actually a pretext for discrimination. If a substantial legitimate justification is identified, the third stage of the disparate impact analysis is the complainant’s demonstration of a less discriminatory alternative.

For a detailed discussion of Investigative Plans, including how to apply the appropriate legal theories and evidentiary standards, see the Department of Justice’s Investigation Procedures Manual.

- Background
- Name of persons to be interviewed



- Questions for the complainant
- Questions for the respondent
- Questions for witnesses
- Evidence to be obtained during the investigation
- Proposed activity schedule (including timeframes and anticipated sequence of on-site visits and interviews)

**Investigative log** An investigative log should be maintained which documents all activity related to the complaint.

**Interviews** Interviews should be conducted with the complainant, respondent and appropriate witnesses during the investigative process. The main objective during the interview is to obtain information from witnesses who can provide information that will either support or refute the allegations. A list of major questions should be prepared to address the issues involved in the complaint.

#### **Persons to be interviewed**

- Complainants are interviewed to gain a better understanding of the situation outlined in the complaint of discrimination. Complaints are often received through the web form, email or mail from complainants. The investigator should contact the complainant to ensure they understand the complainant's concerns. Sometimes the complainant's concerns may be totally different from what was written in the complaint.
- Respondents have the right to know the allegations raised in the complaint. Respondents are interviewed to provide an opportunity to respond to the issues raised by the complainant. The interview should include obtaining an understanding of the respondent's operation and policies relative to the allegations cited in the complaint.
- Witnesses: The complainant or respondent may have persons they wish the investigator to contact. Individuals who have information relevant to the allegations raised in the complaint of discrimination should be interviewed. The investigator will determine whether the testimony provided by a witness is relevant.

#### **Preparing the investigative report**

The investigator should prepare an investigative report setting forth all the relevant facts obtained during the investigation. The report should include a finding for each issue and recommendations for corrective action, where necessary. A copy of the investigative report should never be given to the respondent or complainant.

References should be used throughout the report to direct the reader to the appropriate supporting documentation in the investigative case file. For large case files, it is suggested that the report include an index of documents and a key referencing by tab the evidence in the file relied upon in making any recommendation or determination.



## Final resolution

In most cases, Metro will complete its investigation and submit its investigative report and the complaint to ODOT's Office of Civil Rights and FHWA's Headquarters Office of Civil Rights within 60 days of receiving the complaint. Metro will also supply summary investigative report and recommendation to the complainant and respondent. Metro may choose to brief both the complainant and respondent in person within 15 days of submitting its report and recommendation.

FHWA's Headquarters Office of Civil Rights reserves authority to determine final resolution of the complaint and may:

- request or pursue additional investigation
- make a final decision and issue a letter of finding of violation or no violation or dismissal letter
- for complaints regarding programs not funded by FHWA, refer the complaint and investigative report to USDOJ's Federal Coordination and Compliance (for Title VI and Environmental Justice complaints) or Disability Rights Section (for Section 504/ADA complaints).

**Direct FTA-to-Metro funded programs** In most cases, Metro will complete its investigation and submit its investigative report and the complaint to the FTA civil rights officer within 60 days of receiving the complaint. FTA guidance provides that Metro will provide final resolution by issuing one of two letters to the complainant: a closure letter or a letter of finding. A closure letter summarizes the allegations and states that there was not a Title VI violation and that the case will be closed. A letter of finding summarizes the allegations and the interviews regarding the alleged incident, and explains whether any disciplinary action, additional training of the staff member or other action will occur. Metro should consult with an FTA civil rights officer before issuing a final letter to the complainant and respondent.

**Dismissals** Except in relation to direct FTA-to-Metro funded programs, Metro may only recommend a dismissal of the complaint. FHWA will make all final decisions.

Metro may recommend a dismissal of the complaint (or dismiss a complaint related to a Direct FTA-to-Metro funded program) for the following reasons:

- the complaint is untimely filed
- the complainant fails to respond to repeated requests for additional information needed to process the complaint
- the complainant cannot be located after reasonable attempts
- there is no statutory or alleged basis for the complaint
- the complainant decides to withdraw the complaint.



Finding of violation or no violation Except in relation to direct FTA-to-Metro funded programs, Metro may only recommend a finding of violation or no violation. FHWA will make all final decisions and issue letters of findings.

## Appeals

Unless facts not previously considered come to light, Metro will not reconsider its investigative report and recommendation to ODOT and FHWA. If the complainant or respondent contests the presentation of facts in the investigative report or believes the recommended finding or corrective actions, as applicable, will not result in a satisfactory resolution, Metro should provide appropriate contact information for the party to submit its objections.

Letters of finding issued by the FHWA are administratively final; appeals must follow the agency's administrative appeals process.

Direct FTA-to-Metro funded programs FTA guidance provides for an opportunity for a complainant to appeal the closure letter or letter of finding, though it does not recommend a time frame to appeal. Absent other direction from an FTA civil rights officer:

- the complainant should have 10 days after Metro issues its closure letter or letter of finding to request reconsideration
- the complainant should state the specific reason for the reconsideration and be submit the request and statement to the Chief Operating Officer.
- the Chief Operating Officer should have 10 days to either accept or reject the request for reconsideration
- if accepted, the Chief Operating Officer should have 30 days from the receipt of the request to complete the reconsideration review and issue a determination letter.

## C. Procedures for recording and reporting investigations, complaints and lawsuits

### Recording complaints

Upon initial receipt, a complaint should always be date stamped, assigned a case number and recorded as part of list of active investigations, lawsuits and complaints related to Title VI. The date of receipt by the receiving office is crucial for determining jurisdiction and timeliness. Case numbers should follow the convention "Metro-ORYY-##" (YY= year; ##=complaint number for that year). The following is a sample of Metro's recording form, which is also used to track inquiries regarding possible Title VI complaints and other discrimination complaints.

Name of complainant	Name of affected person (if different)
Address	Address
City, State, ZIP Code	City, State, ZIP Code
Phone	



Basis of complaint (race, color, national origin, sex, age, disability, other (specify)):		
Nature of complaint:		
Complaint recipient		Complaint investigator
Date filed:	Dated investigation completed:	Date of disposition:
Key investigation steps and results:		
Disposition:		

### Notification of acceptance of complaints

After determining the complaint will be accepted for investigation by Metro, the Title VI Coordinator or designee will notify:

- the Chief Operating Officer
- the Office of Metro Attorney
- the civil rights officer of the appropriate jurisdiction (ODOT for FHWA funded programs, FTA for FTA funded programs).

### Creating the investigative case file

The investigative case file is a structured compilation of all documents and information, within Metro's possession, pertaining to the case. An investigative case file should be established for each complaint that Metro accepts for investigation.

Complaints that are administratively closed for lack of jurisdiction, because they are untimely filed or, for failure to exhaust local remedies, or for failure to state a claim over which Metro has jurisdiction do not require an investigative case file.

The purpose of the investigative case file is to establish a methodology for the systematic compilation and structured storage of all documents, records and information associated with the case. This is done in such a manner that the investigative case file: (a) provides the basis and supporting documentation for the investigative report and (b) allows a reader of the investigative report to easily verify the facts upon which they are based.

### Distribution of the investigative case files

FHWA Headquarters Office of Civil Rights, USDOT or FTA is responsible for all investigative case files regardless of the agency creating or possessing the physical documents. The appropriate federal office will provide copies of investigative case files in accordance with the Freedom of Information Act. Metro should consult with the ODOT's Office of Civil Rights, as appropriate, and the federal agency (FHWA or FTA) with authority over the complaint to determine distribution of physical and electronic copies of the investigative case file.



## 4. PUBLIC PARTICIPATION PLAN

*A public participation plan that includes an outreach plan to engage minority populations and people with limited English proficiency populations, as well as a summary of outreach efforts made since the last Title VI Program submission.*

### A. Public participation plan for transportation planning

The document titled Be involved in building a better system for getting around greater Portland is available at [oregonmetro.gov/public-engagement-guide](https://oregonmetro.gov/public-engagement-guide). This document has received feedback from FHWA and will be updated by June 30, 2023 as part of the update to Metro's Public Engagement Guide.

### B. Metro's Public Engagement Guide

Metro's Public Engagement Guide was adopted by the Metro Council in November 2013 and remains agency policy in 2015. The document presents policies and procedures for public involvement to ensure that Metro, as the federally mandated and the state designated metropolitan planning organization for the Portland metropolitan region, meets the spirit and intent of applicable federal and state public involvement laws, regulations and authorities contained in the Moving Ahead for Progress in the 21st Century Act (MAP-21) and the guidance in the State of Oregon's Statewide Planning Goal 1: Citizen involvement. It also ensures that Metro, as a recipient of federal dollars, promotes equity and environmental justice to meet the spirit and intent of Title VI of the Civil Rights Act of 1964, The Civil Rights Restoration ACT of 1987, Executive Order 12898 on Environmental Justice, Executive Order 13166 on Limited English Proficiency, the National Environmental Policy Act of 1969 (NEPA), and the Americans with Disabilities Act (ADA). Lastly, it ensures that regional transportation plans and projects reflect public priorities and values, that transparency and accountability are part of Metro's planning and decision-making and that Metro promotes excellence in regional planning.

The policies in the Public Engagement Guide apply to all development of and updates to these policies and to Metro administered transportation planning and investments, including updates to the Regional Transportation Plan (RTP), the Metropolitan Transportation Improvement Program (MTIP) and corridor planning. For jurisdictions and agencies to receive federal funding through Metro-administered programs or projects, they must certify that they have conducted appropriate demographic assessment and public involvement.

The document is available at [oregonmetro.gov/public-engagement-guide](https://oregonmetro.gov/public-engagement-guide). This will be updated by June 30, 2023.

### C. Summary of outreach efforts

The following is description of Metro's outreach efforts engage minority populations and people with limited English proficiency populations for Metro's transportation-related activities during the 2018-21 reporting period.



## **1) 2018 Regional Transportation Plan**

The 2018 Regional Transportation Plan initiated in 2015; adopted in December 2018. The public engagement plan supporting the 2018 RTP update guided the strategic direction, approach and desired outcomes for sharing information with and seeking input from residents of the region, local partners and stakeholders throughout the three-year process.

There were nearly 19,000 individual touch points from 2015-18 through public engagement activities for the plan. A high-level summary of activities is below.

- periodic County Coordinating Committee briefings
- two Community Leaders' Forums, focused on community leaders from historically marginalized communities
- five TPAC/MTAC workshops
- five online surveys
- 17 equity discussion groups
- 61 stakeholder interviews
- 64 technical work group meetings
- 76 regional advisory committee meetings
- 22 Metro Council meetings
- three public hearings
- four Regional Leadership Forums, including community leaders from historically marginalized communities alongside elected officials
- 10 community and business briefings
- four consultation meetings with tribes and resource agencies
- three Bi-State Coordination Committee briefings
- two Southwest Washington Regional Transportation Council briefings

### **2018 engagement activities**

- On Jan. 19, 2018, Metro hosted a community leaders' forum, bringing together community leaders focused on social equity, environmental justice, labor fairness and community engagement. Invitees included community representatives on MPAC, Committee on Racial Equity (CORE), Public Engagement Review Committee (PERC), MTAC and TPAC, as well as previous participants in RTP regional leadership forums and those involved in discussions about an affordable housing measure. More than 90 community leaders were invited, and 23 leaders participated to learn about the current status of the RTP update, engage on the analysis of the draft project lists, understand priorities and tradeoffs and work together to determine the most important messages to the Metro Council.



- In January 2018, Metro staff developed an online survey that asked participants how they would prioritize outcomes and rate strategies to achieve those outcomes. 2,900 people participated in the survey, providing over 10,000 comments.
- On March 2, 2018, the Metro Council hosted Regional Leadership Forum #4: Finalizing our shared plan for the region. The forum brought together over 100 city, county, and regional policymakers and business and community leaders to share their views on: priorities to address in the next 10 years and beyond; opportunities for aligning investments with priorities as draft project lists are refined by jurisdictions and building a shared path forward. Seven takeaways from the forum included:
- On June 27, 2018, Metro hosted a community leaders' forum, bringing together community leaders focused on social equity, environmental justice, labor fairness and community engagement. Invitees included community representatives on MPAC, Committee on Racial Equity (CORE), Public Engagement Review Committee (PERC), MTAC and TPAC, as well as previous participants in RTP regional leadership forums and those involved in discussions about an affordable housing measure. More than 90 community leaders were invited, and 24 leaders participated to learn about the current status of the RTP update, provide feedback on the public engagement guide, understand the draft process for developing the potential future funding measure and activate their communities to provide feedback during the last comment period.

### **Final public comment period, hearings and notifications**

A final 45-day public comment period was held from Friday, June 29 to Monday, August 13, 2018. Comments were received through September 6. A summary of engagement activities follows.

- *Notifications and notices* Public notices of the comment period were provided to local neighborhood involvement and community outreach offices and community planning organizations in Washington County. Notices were published in the Portland Tribune, Gresham Outlook, Beaverton Valley Times, Tigard Times, Clackamas Review and on the Metro website. Notifications were sent to the RTP interested persons list (nearly 1,900 people) in addition to Metro's four regional advisory committees, their respective interested parties and seven technical work groups that were convened to support development of the draft RTP and strategies. Partner agencies and community and business organizations engaged throughout the RTP update posted notifications of the comment period through e-newsletters and other methods to inform their members and interested parties of the comment opportunity.
- *Online survey and public review draft materials* An online survey, an interactive map of the draft projects and public review drafts of the 2018 RTP, project lists, appendices and four strategies were posted on the 2018 RTP web page at [oregonmetro.gov/rtp](http://oregonmetro.gov/rtp). Members of the public, regional advisory committees, partner agencies and other interested parties were invited to comment on the draft materials. More than 200 emails and 50 letters were received proposing specific changes to the draft RTP and strategies. Nearly 900 people responded to the online survey. The emails, letters and verbatim responses to the online survey are included in the final public comment report.



- *Public hearings* The Metro Council held a public hearing on August 2 and received testimony from 7 community members. The closed caption transcript of hearing testimony is included in the final public comment report. Two additional public hearings were held on November 6 and December.
- *Consultation* Metro staff invited four Native American Tribes and several federal, state and local resource, wildlife, land management and regulatory agencies to consult on the public review draft RTP and strategies in accordance with 23 CFR 450.316. Metro convened four separate consultation meetings on August 6, 14 and 21 and September 6. The consultation meetings were also used to seek feedback on timing and best practices for future consultation efforts. Summaries of all consultation meetings are included in the final public comment report.

A final public comment report and appendices to the public comment report documenting all comments received were provided to the Metro Council and regional advisory committees to inform their final deliberations.

## **2) 2021-24 Metropolitan Transportation Improvement Program**

Metro's process for the 2021-24 MTIP initiated in 2019 with the launch of the Regional Flexible Funds Allocation – Metro's allocation of federal funds distributed to the metropolitan planning organization – adopted in July 2020.

Besides the transit agencies' and ODOT's investments, one element of the MTIP is Metro's allocation of funds distributed specifically to metropolitan planning organizations through specific FTA and FHWA programs. Though not technically part of the MTIP process, proper, the Regional Flexible Funds Allocation decision leads into the MTIP development process.

### **Regional Flexible Funds Allocation**

From Sept. 6 through Oct. 7, 2019, residents of the greater Portland region were asked to help decide how an estimated \$43 million will be spent on projects to improve walking, biking and moving freight:

- Approximately \$32 million for active transportation/complete streets projects that make it safer and easier for people to walk, ride bicycles or get to transit.
- Approximately \$11 million for regional freight investments, projects that improve access to freight hubs and industrial areas and improve safety on freight routes.

During this public comment period, Metro received:

- 2895 submissions through the online comment tool, allowing participants to choose and comment on multiple projects, including four submissions through the Spanish version; participants were asked to rate their support level (one to five) for the project and for their comments, concerns or additional considerations for the project
- 51 emails, with 12 providing general, non-project specific comments such as recommending other uses for the funds or requesting solutions to other transportation needs



- 26 letters, with one from the Safe Routes Partnership offering comments on multiple projects and the prioritization process
- 13 testimonies at the public hearing
- eight phone calls, one providing a general, non-project specific comment and seven in support of the Brentwood-Darlington safe routes to school proposal.

Promotion of the online engagement tool and comment opportunity was published on Metro's website and social media channels and were sent to jurisdictional and community partners with a request to distribute through their channels.

### **2021-24 Metropolitan Transportation Improvement Program**

Public comment on the draft of the 2021-2024 Metropolitan Transportation Improvement Program was solicited from April 17 through May 18, 2020. Stakeholders were encouraged to review the draft document and comment:

- in writing to Metro Planning, 600 NE Grand Ave., Portland, OR 97232 or [transportation@oregonmetro.gov](mailto:transportation@oregonmetro.gov)
- by phone at 503-797-1750 or TDD 503-797-1804
- "in person" at a hearing held by Metro Council on Thursday, April 23, 2020, virtually on Zoom.
- through an online comment survey.

Notice of the public comment period was provided through Metro News and distributed to members of the Metro transportation committees interested persons list, Metro's list of committees for community involvement and Metro's Transportation Policy Alternatives Committee. As a result of these email notifications, the City of Portland posted the comment opportunity to its Community & Civic Life notice webpage. Print advertisements were placed local newspapers in the following places: Beaverton, Clackamas County, Hillsboro, Gresham, Lake Oswego, Portland, West Linn and Wilsonville.

The online comment survey received responses from 201 participants. The survey was designed to provide high level information about the 2021-2024 MTIP to allow for community members to comment without needing read the full document. The survey focused on the MTIP's performance in advancing the region's priorities established by the Regional Transportation Plan (RTP). Those priorities include equity, safety, climate and managing traffic congestion.

Metro received one comment by phone from a member of the public and two comment letters, one from TriMet and one from the Oregon Department of Transportation. No comments were received by mail. One comment was made at the public hearing.



## 5. LIMITED ENGLISH PROFICIENCY PLAN

A copy of the Metro's plan for providing language assistance to persons with limited English proficiency, based on the DOT LEP Guidance,

Metro's Limited English Proficiency Plan was published separately in March 2022; it is available at [oregonmetro.gov/civilrights](https://oregonmetro.gov/civilrights). This plan includes a Limited English Proficiency Implementation Plan schedule, documenting actions taken to provide language access and assistance to persons with limited English proficiency for fiscal years 2011-21 as well as expected efforts to be taken to monitor, refresh and improve the program for fiscal years 2022-2024.



## 6. TRANSIT-RELATED ADVISORY COMMITTEE CITIZEN REPRESENTATIVES

*A table depicting the racial breakdown of the membership of Metro's transit-related advisory committee community representatives, whom Metro selects, and a description of efforts made to encourage the participation of minorities.*

When appointments and confirmation to advisory committees do not require specific geographical or other expertise, Metro attempts to create committee membership reflective of the demographic profile of the region. Recruiting efforts by staff to contact community based organizations have brought greater diversity to the applicant pool in recent years and, consequently, to agency advisory committee membership.

Metro has three transit-related advisory committees that include non-elected, citizen representatives, the Transportation Policy Alternative Committee (typically six community representatives, currently one representative) and the Public Engagement Review Committee (typically up to nine community representatives, currently five representatives). Table 6-1 shows the racial breakdown of these committees in spring 2022.

**Table 6-1. Racial breakdown of Metro's transit-related advisory committee community representatives, spring 2022**

Committee	African-American/Black	American Indian/Native American	Asian/Asian-American	Hispanic/Latino/a/x	Native Hawaiian or other Pacific Islander	Middle Eastern or North African	White
TPAC						1	
PERC	1	2*		2*			1

\*One PERC member is part of two ethnic communities

### A. Transportation Policy Alternatives Committee

The Transportation Policy Alternatives Committee is comprised of 15 professional transportation staff, appointed by area cities, counties and government agencies, and six at-large community members, whom Metro selects. The committee advises the Joint Policy Advisory Committee on Transportation (JPACT), which serves as the policy board of Metro as metropolitan planning organization along with the Metro Council. JPACT is comprised of 17 elected officials and transportation and transit agency leaders from across the region and Southwest Washington, which has its own metropolitan planning organization, and are selected by those jurisdictions and agencies. The Metro Council, elected by regional citizens, must act on JPACT recommendations, but cannot amend them.

Transportation Policy Alternatives community representatives are recruited for a 2-year term, with rotating, annual recruitment. During the 2018 through 2019 recruitments, diversity was emphasized, asking for "the needs of underrepresented residents such as people of color, people with low income, people with disabilities, seniors and youth." For recruitments, Metro sent invites and requests to distribute the call for applications to organizations that serve and represent people of color and those with low income or disabilities. Due to the COVID pandemic



beginning in early 2020, recruitment and retention of community members was additionally challenging; currently, just one community member has been retained for the current cycle, a youth representative from a Mideast Muslim immigrant family.

## **B. Public Engagement Review Committee**

Convened in 2012, the Public Engagement Review Committee meets three times each year to provide support, guidance and oversight of Metro's public engagement activities at the program and project level. Members are committed to community involvement, possess experience and knowledge of public engagement principles and collectively represent the geographic and demographic diversity of the region. The committee consists of at-large community members and community organization representatives (nine), selected by Metro, and local jurisdiction representatives from Clackamas, Multnomah and Washington counties. At-large community members and community organization representatives are recruited for a 3-year term, with rotating, annual recruitment.

In its recruitment of at-large community members and community organization representatives, Metro has sought "a mix of representatives who demonstrate: a commitment to community involvement; skills, knowledge or experience that support the public engagement principles adopted by Metro; and the ability to represent the geographic and demographic diversity of the region." For past recruitments, Metro sent invites and requests to distribute the call for applications to organizations that serve and represent people of color. Due to the COVID pandemic beginning in early 2020, recruitment and retention of community members was additionally challenging. Of the five at-large community members retained, one represents the Native American community, one represents the Latinx community, one represents the African American community, and one represents the two-spirit Native American, Latinx and trans and non-binary communities.



## 7. EFFORTS TO ENSURE SUBRECIPIENTS COMPLIANCE

*A narrative or description of efforts that Metro, as primary recipient uses, to ensure subrecipients are complying with Title VI, as well as a schedule of subrecipient Title VI program submissions.*

### **A. Efforts to ensure subrecipients are complying with Title VI**

As a recipient of FTA funds who passes through that financial assistance to subrecipients, Metro is committed to ensuring subrecipients comply with Title VI and all related non-discrimination laws. Metro includes Title VI language in all written grant agreements in accord and in reference to the FTA Master Agreement<sup>5</sup> and monitors accordingly for compliance. Once chosen, Metro provides an orientation and training regarding subrecipient requirements, including Title VI compliance obligations.

Under its Title VI obligations, Metro requires all subrecipients to:

- name a Title VI coordinator
- proactively prevent discrimination as defined in Title VI and related authorities
- disseminate Title VI notifications and program information to the public
- include Title VI compliant language in all contracts to further subrecipients
- perform periodic self-assessments for Title VI compliance
- correct any deficiencies identified through self- assessment or complaint filed
- report quarterly to Metro on Title VI compliance.

Under its procedures to receive and investigate Title VI complaints, the subrecipient must:

- provide the public access to a defined complaint process and complaint form (subrecipient may use Metro's complaint form)
- maintain a complaint log with the:
  - filing date of any complaint
  - status of any investigation
  - response taken by the subrecipient to resolve the complaint.
- notify Metro when a complaint is lodged against the subrecipient or further subrecipient
- submit completed complaint investigation documentation to Metro.

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<sup>5</sup> Federal Transit Administration, U.S. Department of Transportation, Master Agreement For Federal Transit Administration Agreements authorized by 49 U.S.C. chapter 53, as amended, Title 23, United States Code (Highways), the Moving Ahead for Progress in the 21st Century Act (MAP-21), the Safe, Accountable, Flexible, Efficient Transportation Equity Act: A Legacy for Users (SAFETEA-LU), as amended by the SAFETEA-LU Technical Corrections Act of 2008, or other Federal laws that FTA administers, [fta.dot.gov/documents/21-Master.pdf](https://www.fta.dot.gov/documents/21-Master.pdf), Oct. 1, 2014.



If a subrecipient is found to be out of compliance, Metro will, in accord with the procedures and timeframes of FTA C 4702.1B VI.2 and 3:

- notify subrecipient of its noncompliance
- require, review and approve a remedial action plan from the subrecipient
- monitor action plan and perform a follow up review
- if voluntary compliance is not reached, place subrecipients on deficiency status and suspend federal payments.

Correction period for deficiency status is not to exceed 90 days.

#### **B. Schedule of subrecipient Title VI program submissions**

Metro requires subrecipients to report quarterly on their Title VI compliance, including a the status of any Title VI-related or other discrimination investigations, complaints or lawsuits.

### **8. FACILITY CONSTRUCTION: N/A**

*[If the recipient has constructed a facility, such as a vehicle storage facility, maintenance facility, operation center, etc., the recipient shall include a copy of the Title VI equity analysis conducted during the planning stage with regard to the location of the facility.]*

Metro constructed no transit-related facilities during this reporting period.



## 9. ADDITIONAL INFORMATION

### A. Regional demographics

*A demographic profile of the Portland metropolitan region that includes identification of minority populations in the aggregate. (FTA C 4702.1B VI.2.a.2)*

Metro has gathered demographic and statistical data on race and ethnicity, minority groups, income level, language spoken, and sex of participants and beneficiaries of federally funded programs through census data, public opinion surveys, and self-identification on questionnaires. The data gathered are reviewed to ensure that Metro continues to meet the requirements of the Title VI program. Metro uses this in transportation planning to:

- determine impacts and benefits of potential projects on minority and low-income communities
- ensure equity in evaluating project applications submitted for inclusion in the Regional Transportation Plan and the Metropolitan Transportation Improvement Program
- develop inclusive public outreach strategies.

**Table 9-1. Race and ethnicity, multiple identities allowed, Portland, Oregon metropolitan planning area**

Race/ethnicity	MPA estimate	Percent of population
African-American/ Black	92,501	5.3%
American Indian or Alaska Native	60,053	3.4%
Asian/Asian-American	197,867	11.3%
Hispanic/Latino/a/x	242,552	13.8%
Native Hawaiian or other Pacific Islander	19,591	1.1%
Other	203,843	11.6%
White alone, not Hispanic*	1,156,667	66.0%

Total (estimate): 1,751,305

Source: 2020 U.S. Census

\*All categories but White alone, not Hispanic are non-exclusive, combating erasure and allowing for assessment of outcomes for BIPOC communities – especially those with higher “mixed-race” populations – in comparison to White communities.



**Table 9-2. Race and ethnicity, exclusive, Portland, Oregon metropolitan planning area**

Race/ethnicity	MPA estimate	Percent of population
African-American/Black alone, not Hispanic	60,557	3.5%
American Indian or Alaska Native alone, not Hispanic	9,539	0.5%
Asian/Asian-American alone, not Hispanic	149,222	8.5%
Hispanic/Latino/a/x*	242,552	13.8%
Native Hawaiian or other Pacific Islander alone, not Hispanic	9,418	0.5%
Other	9,707	0.6%
White alone, not Hispanic	1,156,667	66.0%
Two or more races, not Hispanic	113,643	6.5%

Total (estimate): 1,751,305

Source: 2020 U.S. Census

\* The U.S. Census Bureau classifies Hispanic as an ethnicity and the other categories as races.

**Table 9-3. Household income, Portland, Oregon metropolitan planning area**

Income	MPA estimate	Percent of households
Less than \$10,000	32,322	4.7%
\$10,000 to \$19,999	39,930	5.8%
\$20,000 to \$29,999	46,320	6.7%
\$30,000 to \$49,999	95,236	13.9%
\$50,000 to \$74,999	114,717	16.7%
\$75,000 to \$99,999	90,603	13.2%
\$100,000 to \$149,999	128,084	18.6%
\$150,000 or more	139,850	20.4%

Total (estimate): 687,062

Source: 2020 U.S. Census



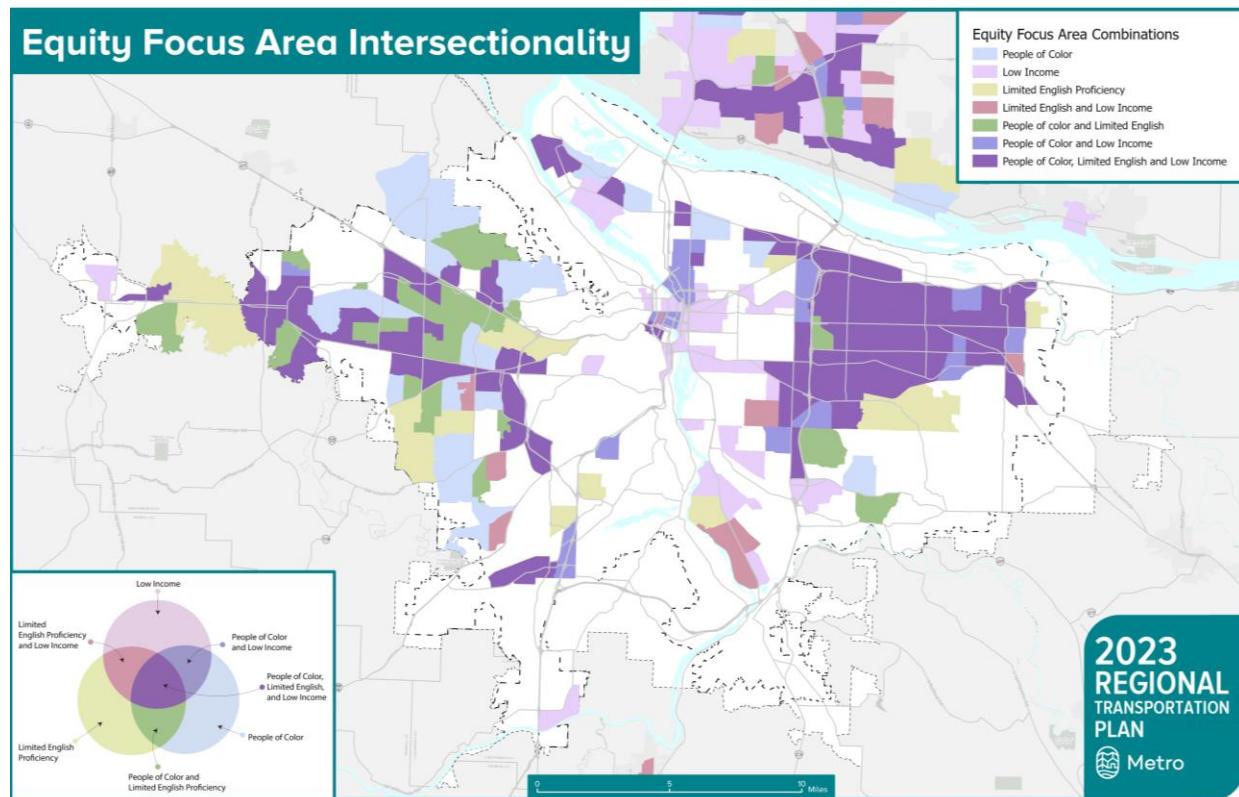
**Table 9.4. Population ages, Portland, Oregon metropolitan planning area**

Age	MPA estimate	Percent of population
Younger than 18 years of age	358,048	20.6%
18 to 24	137,762	7.9%
25 to 34	286,524	16.5%
35 to 44	268,284	15.4%
45 to 54	229,761	13.2%
55 to 64	208,193	12.0%
65 to 74	153,943	8.9%
75 years of age and over	95,228	5.5%

Total (estimate): 1,737,743

Source: 2020 U.S. Census

The following map is an initial draft for assessing census tracts with twice the density of the regional average of different historically marginalized communities (people of color, low incomes and people with limited English proficiency), including intersectional and overlapping populations. The map is used for the initial planning stages for the 2023 Regional Transportation Plan.





## B. Identifying and considering mobility needs of minority populations

*A description of the procedures by which the mobility needs of minority populations are identified and considered within the planning process. (FTA C 4702.1B VI.2.a.3)*

In 2016, the Metro Council adopted the strategic plan to advance racial equity, diversity and inclusion.<sup>6</sup> Metro identifies and considers the mobility needs of minority populations and works to increase equity in the regions transportation system by identifying minority communities, encouraging minority voices in the engagement and decision-making processes throughout plan development, understanding the transportation conditions of minority communities, gathering the perspectives of minority populations regarding their needs and community visions, and creating decision-making criteria that relate to those needs and visions.

**Identifying minority communities** Early in a planning process, whether it is at the regional- or corridor-level, Metro uses U.S. Census data and other information, including discussions with local jurisdictions and community leaders, to identify areas of communities of color and other historically marginalized communities (such as communities of people with limited English proficiency or with low incomes as well as older and young people).

**Encouraging minority voices in engagement and decision-making** Metro continuously seeks to better serve communities of color and other historically marginalized communities with its public engagement practices and to include more representation from communities of color and other historically marginalized communities in its decision-making, as addressed in other parts of this document. Metro understands that more inclusive engagement and better diversity at the decision-making table will lead to better, more sustainable decisions and stronger outcomes for all residents.

**Understanding the transportation conditions of communities** Early in corridor-planning processes, Metro analyzes existing conditions to understand the transportation conditions of all communities in the corridor. Where there are clear deficiencies and needs, this information is correlated with information on the location of communities of color and other historically marginalized communities. For regional plans, Metro encourages local partners to use regional data and local information on the transportation system to understand which communities are affected by deficiencies and needs.

**Gathering the perspective of minority populations** The identification of communities of color and other historically marginalized communities allows Metro to focus on gathering the perspective of specific, underserved or neglected communities. Metro also seeks to gather the perspective of community members and advocates that can speak to inequities faced by communities of color and other historically marginalized communities through stakeholder interviews, discussion groups or focus groups at multiple points in any planning process. Metro also compares what it hears from communities of color and other historically marginalized participants to what it hears from the general population when appropriate; for instance, with a

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<sup>6</sup> See [oregonmetro.gov/equitystrategy](https://oregonmetro.gov/equitystrategy).



statistically valid survey or with questionnaire with enough responses to offer a good sense of the region's perspective, results of respondents of color or specific communities of color will be compared to the overall results to determine any key differences in perspectives. Needs or preferences specific to communities of color and other historically marginalized communities that are identified through these processes are elevated for consideration at both the staff and decision-making level.

**Creating criteria related to the needs and visions of minority populations** For several years, Metro has included equity components to its criteria in its assessment of projects and plans to help decision-makers understand the benefits to or burdens on communities of color and other historically marginalized communities. These criteria have evolved and continue to evolve as Metro improves its equity analysis with greater assessment tools and better understanding of the needs of these populations. Metro also creates scoring systems for grants that offer higher scores for applications that demonstrate how their proposed projects will serve minority populations or otherwise improve equity outcomes.

### C. Demographic maps

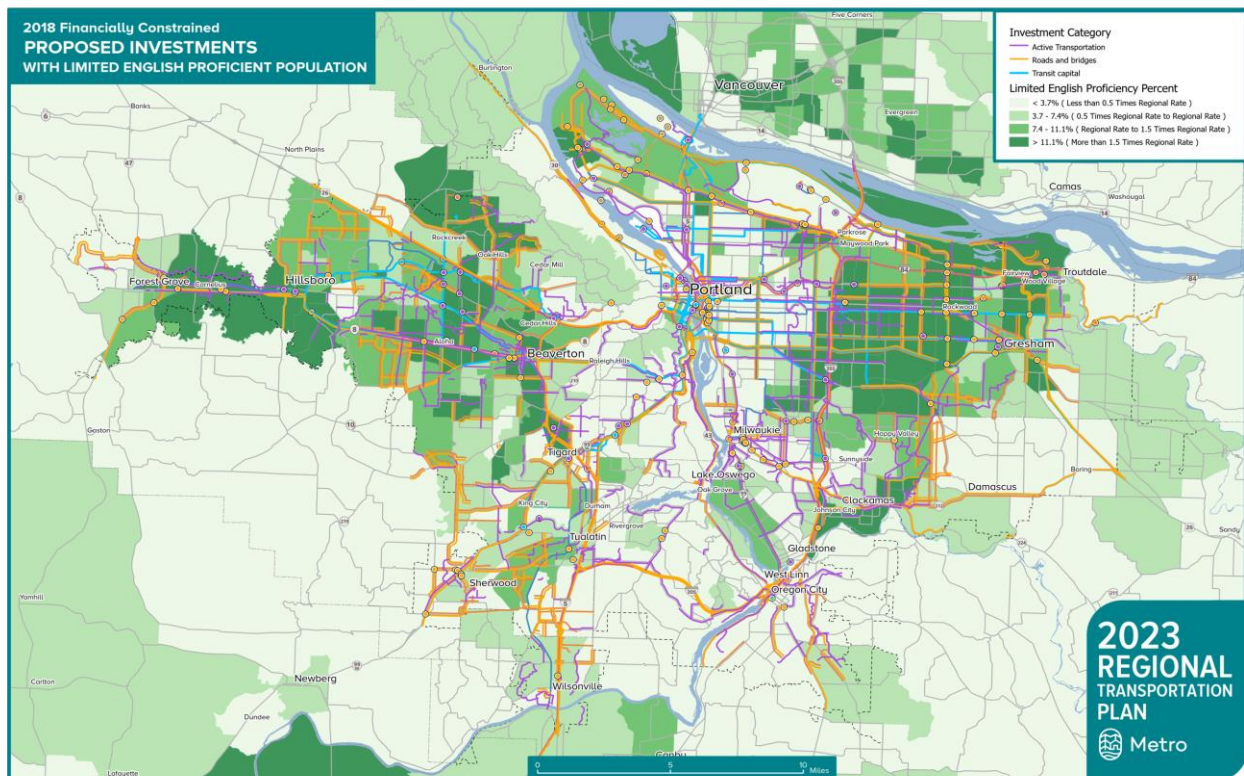
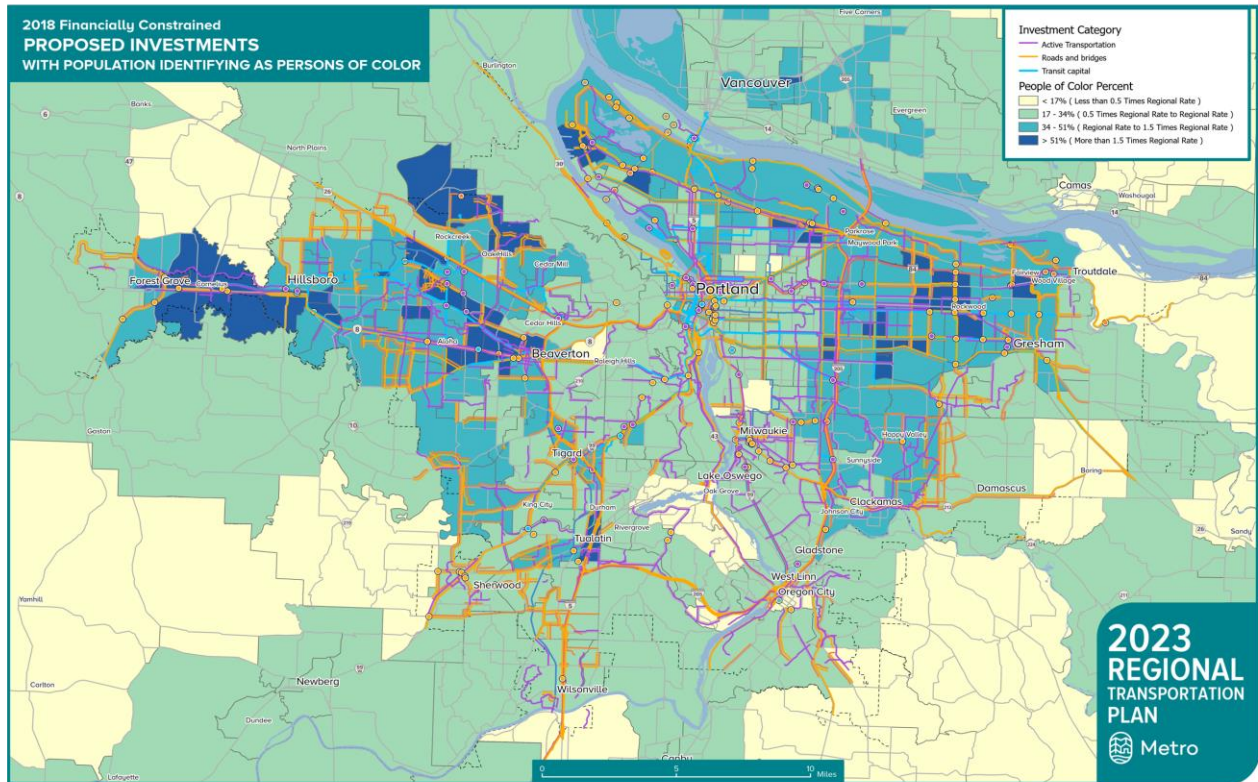
*Demographic maps that overlay the percent minority and non-minority populations and charts that analyze the impacts of the distribution of State and Federal funds in the aggregate for public transportation purposes, including Federal funds managed Metro as a designated recipient. (FTA C 4702.1B VI.2.a.4)*

The following maps are show the distribution of planned investments for the fiscally constrained list of the current Regional Transportation Plan in relation to current minority populations (2020 U.S. Census) and people with limited English proficiency (2015-2019 American Community Survey).<sup>7</sup>

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<sup>7</sup> Transportation investments in this analysis reflect only those investments in the project lists that had enough spatial information to be mapped.







### 2018 Regional Transportation Plan Projects with the Primary Purpose of Reducing Crashes

This map shows projects in the 2018 Regional Transportation Plan with the primary purpose of “reducing fatal and severe injury crashes” or “reducing crashes,” overlapped with regional high injury corridors and census tracts with higher than regional average concentrations and double the density of one or more of the following: people of color or English language learners, and/or people with low income.

**Updated draft 2018 RTP Projects**

- 2018-2027 FC
- 2028-2040 FC
- 2028-2040 Strategic

**Overlapping Demographics & Safety**

- POC or LEP, and/or Low Income
- High injury corridors

**2018 REGIONAL TRANSPORTATION PLAN**

Metro

Data Sources: ODOT, Census 2010 (POC), ACS 2011-2015 (Low Income, LEP) Date: 5/21/18

0 3 6 Miles



**Table 9-5. Profile of 2027 and 2040 Constrained Investments overlapping equity focus areas by mode**

	2018 RTP (2018-2027)		2018 RTP Constrained (2018-2040)	
	Number of Projects	Investment	Number of Projects	Investment
Active Transportation	132	\$ 696,842,229	248	\$ 1,461,206,646
Freight	13	\$ 73,716,667	19	\$ 112,783,667
Roads and Bridges	106	\$ 895,828,533	221	\$ 2,220,546,408
Throughways	13	\$ 834,500,000	18	\$ 4,217,866,000
Transit Capital	18	\$ 3,225,000,000	33	\$ 5,060,800,000
Transportation Demand Management	7	\$ 49,772,875	13	\$ 125,994,975
Transportation System Management (Technology)	18	\$ 68,808,400	36	\$ 184,217,888

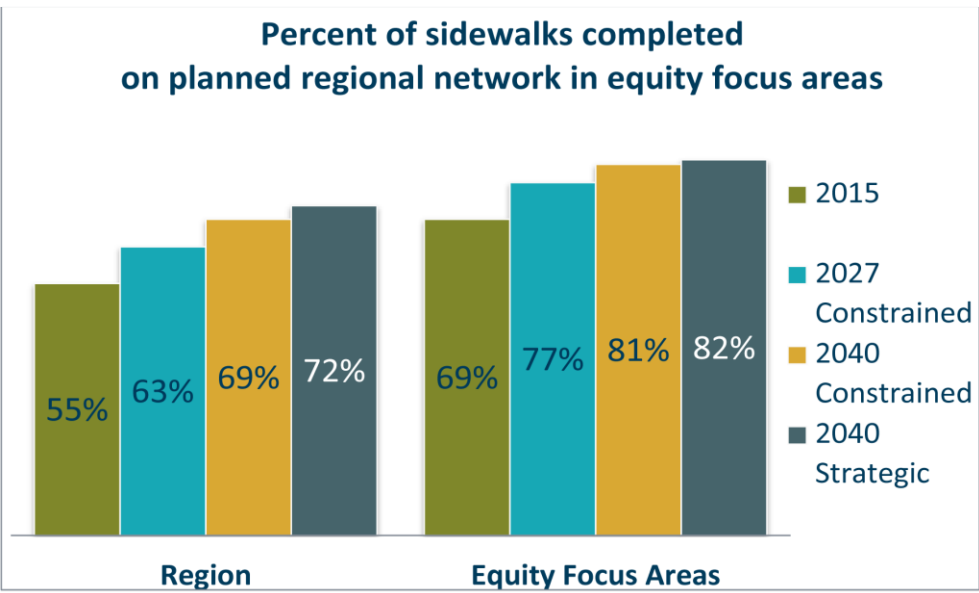
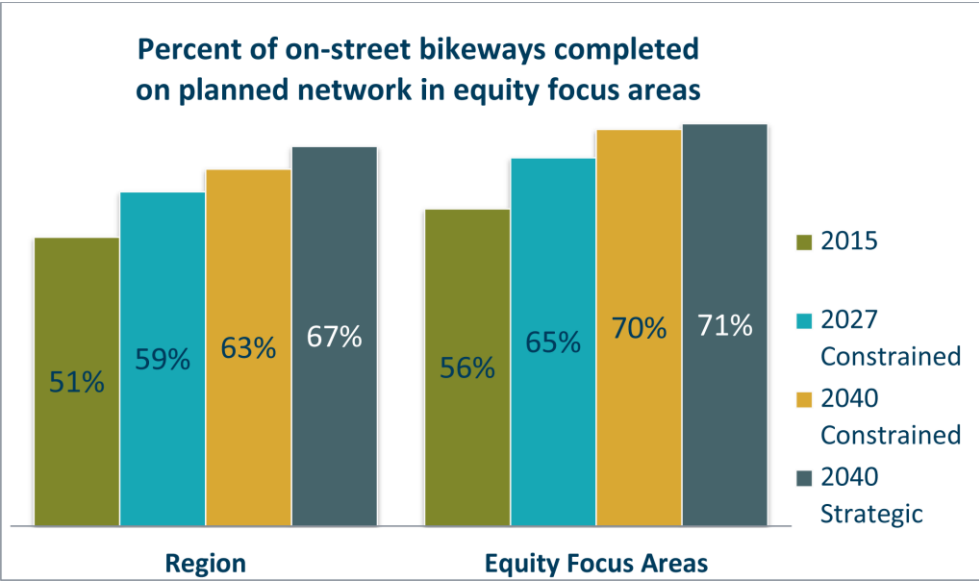
Source: Metro, 2018 RTP project hub

**Table 9-6. Summary of 2027 and 2040 Constrained Investment Strategy**

	2027 Constrained Investment Strategy	2040 Constrained Investment Strategy
Amount of Investment <sup>17</sup>	\$6.8 billion	\$15.4 billion
Amount of Investment in Equity Focus Areas	\$5.8 billion	\$13.3 billion
Percentage of Total 2018 RTP Investment*	43%	70%/100%
Percentage of Total 2018 RTP Investment in Equity Focus Areas	85%	86%
Number of Projects	416	814
Number of Projects in Equity Focus Areas	307	588

Source: Metro, 2018 RTP project hub







**Table 9-7. Change in the number of jobs accessible by wage profile within a typical commute time (adjusted by form of travel) for different communities from the 2027 and the 2040 Constrained Investment Strategy**

	All Jobs					
	<i>Auto – Rush Hour</i>	<i>Auto –</i>	<i>Transit – Rush Hour</i>	<i>Transit</i>	<i>Bike</i>	<i>Walk</i>
Region	15,169	8,460	21,448	19,371	907	18
Equity Focus Areas	13,210	7,534	24,155	21,549	365	11
Non-Equity Focus Areas	16,694	9,087	17,157	15,797	1,467	25
Low Wage Jobs						
	<i>Auto – Rush Hour</i>	<i>Auto –</i>	<i>Transit – Rush Hour</i>	<i>Transit</i>	<i>Bike</i>	<i>Walk</i>
Region	7,194	4,040	10,197	9,192	411	9
Equity Focus Areas	6,277	3,595	11,502	10,235	162	5
Non-Equity Focus Areas	7,906	4,343	8,138	7,486	667	13
Middle Wage Jobs						
	<i>Auto – Rush Hour</i>	<i>Auto –</i>	<i>Transit – Rush Hour</i>	<i>Transit</i>	<i>Bike</i>	<i>Walk</i>
Region	4,168	2,318	5,883	5,322	258	5
Equity Focus Areas	3,621	2,067	6,622	5,919	103	3
Non-Equity Focus Areas	4,596	2,488	4,711	4,341	417	6
Change in Total Number of Jobs Accessible in 2040 (2040 Constrained over 2040 NB)						
	All Jobs					
	<i>Auto – Rush Hour</i>	<i>Auto –</i>	<i>Transit – Rush Hour</i>	<i>Transit</i>	<i>Bike</i>	<i>Walk</i>
Region	36,300	37,097	39,665	39,241	-509	70
Equity Focus Areas	34,139	37,472	44,659	44,791	-1,242	65



Non-Equity Focus Areas	37,027	34,746	31,726	30,697	350	72
Low Wage Jobs						
	<i>Auto – Rush Hour</i>	<i>Auto –</i>	<i>Transit – Rush Hour</i>	<i>Transit</i>	<i>Bike</i>	<i>Walk</i>
Region	17,118	17,512	18,671	18,452	-255	32
Equity Focus Areas	17,508	16,480	14,897	14,415	130	35
Non-Equity Focus Areas	16,063	17,631	21,055	21,079	-583	28
Middle Wage Jobs						
	<i>Auto – Rush Hour</i>	<i>Auto –</i>	<i>Transit – Rush Hour</i>	<i>Transit</i>	<i>Bike</i>	<i>Walk</i>
Region	10,017	10,223	10,929	10,829	-131	20
Equity Focus Areas	9,433	10,334	12,290	12,360	-341	19
Non-Equity Focus Areas	10,202	9,563	8,758	8,473	115	19

#### D. Disparate impacts analysis

*An analysis that identifies any disparate impacts on the basis of race, color or national origin, and, if so, determines whether there is a substantial legitimate justification for the policy that resulted in the disparate impacts, and if there are alternatives that could be employed that would have a less discriminatory impact. (FTA C 4702.1B VI.2.a.5)*

As part of the 2018 Regional Transportation Plan (RTP), Metro conducted a transportation equity evaluation of the financially constrained 2018 RTP investment strategy. The evaluation of the plan's investment strategy stemmed from the region's elected leadership's desire to understand whether transportation investments make progress towards addressing inequities and disparities experienced by historically marginalized communities.

In providing this focus for the plan, the region undertook an outcomes-based approach to how it evaluates and considers transportation equity. In addition to informing the performance of the investment strategy, the evaluation also serves as part of the region's obligations, as a recipient of federal transportation funding, to ensure the package of investments in the plan are compliant with Title VI and not discriminating or disproportionately impacting historically marginalized communities.



Throughout the development of the 2018 RTP, the core tenant of the evaluation work was to bring in historically marginalized communities into the conversation and have them direct and guide the evaluation work. As a result, the development of the 2018 RTP transportation equity evaluation included representatives from community, human services, advocacy, public health as well as jurisdictional partners on the technical working group to bring together different perspectives to inform the development of the evaluation. In addition, through previous input and feedback from the 2014 Civil Rights Assessment, Metro undertook numerous engagement activities, many of which focused on gathering input from historically marginalized communities. These engagement activities ranged from online public comment surveys, with additional efforts to reach historically marginalized individuals to participate, to race-ethnicity specific focus groups to discuss transportation priorities, to holding a set of Community Leader Forums and featuring community leaders with elected leaders at the Regional Leadership Forums. The feedback provided through these engagement activities, while not always specific to the discussion of the transportation equity evaluation, provided focal direction to the evaluation. The 2018 RTP transportation equity evaluation looked at how well the region's planned long-range transportation investments performed relative to transportation priorities identified by historically marginalized communities. The identified transportation priorities included, but were not limited to: **accessibility, affordability, environmental and public health and safety**. Ultimately these are the outcomes in which the investment strategy was evaluated against, to the degree feasible. There was wide recognition of related inequities and disparities faced by historically marginalized communities, especially as it intersects the transportation system, such as housing, enforcement and public process. In significant efforts to revise the plan to have it better serve as a performance-based planning tool, these transportation priorities subsequently shaped transportation-related equity goals and objectives in the plan.

In the evaluation of the 2018 RTP investment strategy, two rounds of analysis were undertaken. The first round of analysis looked at the initial performance of the 2018 RTP investment strategy and tested performance measures that were new process for the plan. Several of the transportation equity evaluation measures were new, and the first round of analysis helped to sort out how well these measures worked and informed methodological refinements. The first-round analysis also served as a call to action to partners to make refinements to the 2018 RTP investment strategy to gain greater performance in areas regional leadership desire to see better addressed by the investment strategy, including transportation equity, safety, addressing climate change, providing travel options and managing congestion. The second round assessed the 2018 RTP investment strategy performance with the adjustments from partners, in response to the call-to-action.

Overall, the 2018 RTP investment strategy has 814 transportation projects comprising a little over \$15.4 billion investment by 2040. Of those 814 transportation projects, 588 transportation investments, or 72%, are located within or crossing through historically marginalized communities. A little over 52% of the projects in historically marginalized communities are scheduled to be open for service by 2027, which is positive sign that transportation investment in these communities are not being pushed out to the latter part of the plan. The investments in the equity focus areas represent a mix of multimodal investments from active transportation to transit capital to roadway and bridges to throughways (i.e., freeways and state highways).



The final results of the 2018 RTP transportation equity evaluation demonstrate that as it pertains to safety and accessibility, the region is further focusing transportation investment in historically marginalized communities to address active transportation infrastructure gaps and reduce crashes on facilities in historically marginalized communities. When looking at accessibility through the lens of whether the RTP investment strategy's effects the ability of the average households in historically marginalized communities to get to a greater number of jobs and community places (e.g., libraries, grocery stores, credit unions, medical facilities) in a reasonable trip time, the results show the plan will increase job and community place accessibility, particularly by transit. However, aside from transit, a greater increase in the number of jobs and community places are accessible to the region's average household and households in the communities with lesser concentrations of historically marginalized communities result from the plan's investments.

The transportation equity evaluation result demonstrates that despite the region's efforts to focus investments to support further access to jobs and community places for historically marginalized communities, other potential strategies are needed in conjunction with further investment to be able to advance accessibility for historically marginalized communities. Additionally, further investigation is needed to understand whether there is a disproportionate or disparate impact.

Overall, the 2018 RTP transportation equity evaluation illustrates that for some of the outcomes historically marginalized communities identified as a priorities for the system, the investment strategy is making progress and bring positive benefits to these communities. The evaluation also illustrated for some priorities, the region has more work to do to address these areas to support historically marginalized communities and not further exacerbating existing disparities. The mixed results of 2018 RTP transportation equity evaluation means that though there isn't a finding of disproportionate or disparate impact, the region must work collectively and deploy a wide range of strategies to address the accessibility disparities historically marginalized communities experience. These strategies include further investment, to better monitoring and research, to complementary land use strategies. Metro knows it has more work to do to address any potential disproportionate impact emerging from the implementation of the Regional Transportation Plan Investment Strategy. But closing the disparities gap and advancing transportation equity cannot be done by one agency; it requires collaboration and partnership.

The full equity evaluation is available at [oregonmetro.gov/regional-transportation-plan](https://oregonmetro.gov/regional-transportation-plan) as Appendix E to the 2018 Regional Transportation Plan.

Metro recognizes three limitations of the evaluation methodology:

1. it presumes an even distribution of minority populations across census blocks or people with limited English proficiency across census tracts
2. it presumes that each investment in different transportation categories are equally beneficial to the individuals within and across census blocks and tracts
3. it accepts that calculating the rate of investment in census blocks and tracts with a *higher* rate of minority populations and people with limited English proficiency and comparing those to



the rate of investment in census blocks and tracts with a *lower* rate of minority populations and people with limited English proficiency would reveal, on a program scale, disparate investment in minority communities and communities of people with limited English proficiency even though there are such communities and individuals within other census blocks and tracts.

Even with these limitations, the methodology allows for a consistent programmatic and regional analysis of the distribution and effects of multiple projects. In addition, each project receiving federal funding must comply with the National Environmental Policy Act, its required analysis Title VI, the Executive Order on Environmental Justice and others during project development and implementation, which allows for a more specific assessment of the impacts on and benefits to minority populations and people with limited English proficiency.

### **E. Subrecipient procedure**

*A description of the procedures Metro uses to pass through FTA financial assistance to subrecipients in a nondiscriminatory manner. (FTA C 4702.1B VI.2.c.2)*

Any local jurisdictions, community groups, non-profit organizations and federally allowed “for profit” agencies are invited to submit applications to Metro for assistance. To the greatest extent allowed by law, Metro ensures nondiscrimination in its procedures to pass-through federal financial assistance using standard requests for applications that:

- contain all relevant screening criteria
- incorporates the statutes and guidelines of the federal program
- contains all relevant federal statutes and regulations, administrative requirements and internal policies.

In addition, requests for applications are published through methods that reach the largest eligible audience, including but not limited to:

- the Metro website
- regional newspaper(s)
- minority-focused newspapers
- internally generated list of potential applicants.

All applicants must:

- provide all required information and follow the application procedures identified in the request for application
- submit application by the published date and time.

Metro maintains in an official file all documentation on the process of deciding whom to award or not award. Grants using FTA funds are awarded based on highest scores per the stated criteria in the request for application.



Other programs, such as the regional flexible funds allocation process using funds from the Congestion Mitigation Air Quality program and the Surface Transportation Program administered by FHWA, may include other considerations in the decision-making process. Metro staff recommends grant awards based on highest scores per the stated criteria in the request for applications, with advisory committee and Metro Council making the final determination based on the staff recommendation and relevant considerations stated in the request for applications.

#### **F. Subrecipient application assistance**

*A description of the procedures Metro uses to provide assistance to potential subrecipients applying for funding, including its efforts to assist applicants that would serve predominantly minority populations. (FTA C 4702.1B VI.2.c.3)*

To assist applicants that would serve predominantly minority populations, Metro:

- publishes requests for applications broadly, including in minority-focused newspapers and to a list of potential applicants that includes those that would serve predominantly minority populations
- invites potential applicants to a pre-application meeting to answer questions from potential applicants and discusses the types of programs eligible for funding, including aiding potential applicants in identifying and framing qualified programming
- answers questions and provides pre-review of application materials throughout the application process to aid applicants in providing all required information and following the application procedures.



## ATTACHMENT A. POSTED CIVIL RIGHTS NOTICE (18X24)



こんにちは。Hola

# Здравствуйте

၎င်းတို့သည် လူမှုရေးနှင့် နိုင်ငံရေး အဖွဲ့အစည်းများ၏ အသံအသွယ်များကို ဖြန့်ချိပေးသော အခွင့်အလမ်းများကို ပေးအပ်ခဲ့သည်။

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नमस्कार DITdR

## Metro respects civil rights

Metro fully complies with Title VI of the Civil Rights Act of 1964, Title II of the Americans with Disabilities Act, Section 504 of the Rehabilitation Act and other statutes that ban discrimination. If any person believes they have been discriminated against regarding the receipt of benefits or services because of race, color, national origin, sex, age or disability, they have the right to file a complaint with Metro. For information on Metro's civil rights program, or to obtain a discrimination complaint form, visit [oregonmetro.gov/civilrights](http://oregonmetro.gov/civilrights). Metro also provides services or accommodations upon request to persons with disabilities and people who are unable to interpret or understand public meeting notices. To request an interpreter, communication aid or language assistance, call 503-797-1790 or TDD/TTY 503-797-1804 (8 a.m. to 5 p.m., weekdays) 5 business days before the meeting. All Metro meetings are wheelchair accessible. Individuals with service animals are welcome at Metro facilities, even where pets are generally prohibited. For up-to-date public transportation information, visit [TriMet's website at trimet.org](http://TriMet's website at trimet.org).

Thông báo về sự không kỳ thị của Metro | Vietnamese

Metro tôn trọng dân quyền. Muốn biết thêm thông tin về chương trình dân quyền của Metro, hoặc muốn lấy đơn khiếu nại về sự kỳ thị, xin xem [www.oregonmetro.gov/civilrights](http://www.oregonmetro.gov/civilrights) hoặc gọi số 503-797-1790. Nếu quý vị cần thông dịch viên ra dấu bằng tay, trợ giúp về tiếp xúc hay ngôn ngữ, xin gọi số 503-797-1790 hay TDD/TTY 503-797-1804 (từ 8 giờ sáng đến 5 giờ chiều vào những ngày thường) trước buổi họp 5 ngày làm việc.

## Повідомлення Metro про заборону дискримінації | Ukrainian

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## Metro的不歧視公告 | Chinese

Metro尊重民權。欲瞭解Metro民權計畫的詳情，或獲取歧視投訴表，請瀏覽網站 [oregonmetro.gov/civilrights](http://oregonmetro.gov/civilrights) 或撥打 503-797-1790。如果您需要口譯方可參加公共會議，請在會議召開前5個營業日撥打503-797-1790（工作日上午8點至下午5點），以便我們滿足您的要求。

## Ogeysiiska takooris la'aanta ee Metro | Somali

Metro waxay ixtiraamtaa xuquuqda madaniga. Haddii aad u baahan gargaar ah luqadda, wac 503-797-1790 (8 gallinka hore illaa 5 gallinka dambe maalmaha shaqada) 5 maalmo shaqo ka hor kullanka. Haddii aad u baahan tahay turjubaan si aad uga qaybqaadatiid kullan dadweyne, wac 503-797-1790 (8 gallinka hore illaa 5 gallinka dambe maalmaha shaqada) shan maalmo shaqo ka hor kullanka si loo tixgaliyo codsashadaada.

## Metro의 차별 금지 관련 통지서 | Korean

Metro는 시민권을 존중합니다. Metro의 시민권 프로그램에 대한 정보 또는 차별 형의서 양식을 얻으려면, [oregonmetro.gov/civilrights](http://oregonmetro.gov/civilrights). 당신의 언어 지원이 필요한 경우, 회의에 앞서 5 영업일 (오후 5시 주중에 오전 8시) 503-797-1790를 호출합니다. 또는 차별에 대한 불만을 신고 할 수.

## Metroの差別禁止通知 | Japanese

Metroでは公民権を尊重しています。Metroの公民権プログラムに関する情報について、または差別苦情フォームを入手するには、[oregonmetro.gov/civilrights](http://oregonmetro.gov/civilrights)をご覧ください。503-797-1790までお電話ください。公開会議で言語通訳を必要とされる方は、Metroがご要望に対応できるよう、公開会議の5営業日前までに503-797-1790(平日午前8時〜午後5時)までお電話ください。

## Paunawa ng Metro sa kawalan ng diskriminasyon | Tagalog

Iginagalang ng Metro ang mga karapatang sibil. Para sa impormasyon tungkol sa programa ng Metro sa mga karapatang sibil, o upang makakuha ng porma ng reklamo sa diskriminasyon, bisitahin ang [oregonmetro.gov/civilrights](http://oregonmetro.gov/civilrights) o tumawag sa 503-797-1790. Kung kailangan ninyo ng interpreter ng wika sa isang pampublikong pulong, tumawag sa 503-797-1790 (8 a.m. hanggang 5 p.m. Lunes hanggang Biyernes) lima araw ng trabaho bago ang pulong upang mapagbigyan ang inyong kahalilingan.

## Notificación de no discriminación de Metro | Spanish

Metro respeta los derechos civiles. Para obtener información sobre el programa de derechos civiles de Metro o para obtener un formulario de reclamo por discriminación, ingrese a [oregonmetro.gov/civilrights](http://oregonmetro.gov/civilrights) o llame al 503-797-1790. Si necesita asistencia con el idioma, llame al 503-797-1790 (de 8:00 a. m. a 5:00 p. m. los días de semana) 7 días laborales antes de la asamblea.

## Уведомление о недопущении дискриминации от Metro | Russian

Metro уважает гражданские права. Узнать о программе Metro по соблюдению гражданских прав и получить форму жалобы о дискриминации можно на веб-сайте [oregonmetro.gov/civilrights](http://oregonmetro.gov/civilrights) или по телефону 503-797-1790. Если вам нужен переводчик на общественном собрании, оставьте свой запрос, позвонив по номеру 503-797-1790 в рабочие дни с 8:00 до 17:00 и за пять рабочих дней до даты собрания.

## Avizul Metro privind nediscriminarea | Romanian

Metro respectă drepturile civile. Pentru informații cu privire la programul Metro pentru drepturi civile sau pentru a obține un formular de reclamație împotriva discriminării, vizitați [oregonmetro.gov/civilrights](http://oregonmetro.gov/civilrights) sau sunați la 503-797-1790. Dacă aveți nevoie de un interpret de limbă la o ședință publică, sunați la 503-797-1790 (între orele 8 și 5, în timpul zilelor lucrătoare) cu cinci zile lucrătoare înainte de ședință, pentru a putea să vă răspunde în mod favorabil la cerere.

## Metro txoj kev ntxub ntxaug daim ntawv ceeb toom | Hmong

Metro tributes cai. Rau cov lus qhia txog Metro txoj cai kev pab, los yog kom sau ib daim ntawv tsis txaus siab, mus saib [oregonmetro.gov/civilrights](http://oregonmetro.gov/civilrights). Yog hais tias koj xav tau lus kev pab, hu rau 503-797-1790 (8 teev sawv ntrov txog 5 teev tsaus ntuj weekdays) 5 hnub ua hauj lwj ua ntej ntawm lub rooj sib tham.

សម្បជូនដំណឹងស្តីអំពីការមិនរើសអើង របស់ Metro | Khmer Cambodian

Metro អាចជាដំណោះស្រាយមួយ ។ ដំណាក់កាលដំបូងនៃការប្រើប្រាស់ដំណោះស្រាយ Metro ប្រឆាំងការប្រឈមនឹងជំងឺរាងកាយ ត្រូវបានបង្កើតឡើងនៅឆ្នាំ ២០១២ ។ ប្រសិនបើអ្នកត្រូវការការប្រយោជន៍បន្ថែមទៀត ឬ ប្រសិនបើលេខ ៥០៣-៧៩៧-១៧៩០ (ពីថ្ងៃទី ៨ កើត រហូតដល់ថ្ងៃទី ៥ ធ្នូ) ក្នុងត្រីមាស ឆ្នាំ ២០១៥ ត្រូវបានប្រើប្រាស់ ។

मेट्रो नागरिक अधिकारहरूको सम्मान गर्दछ | Nepali

[illegible]

Metro ឥណទានបំណុលបង់ប្រាក់ប្រចាំខែ | Laotian

[illegible]

## Arabic | Metro إشعار بعدم التمييز من

تحتج Metro الحقوق المدنية، للضغط من أجل المزيد من المعلومات حول برنامج Metro للحقوق المدنية أو لإبداء شكوى ضد التمييز، يُرجى زيارة الموقع الإلكتروني [oregonmetro.gov/civilrights](http://oregonmetro.gov/civilrights) إن كنت بحاجة إلى مساعدة في اللغة، يجب عليك الاتصال مقدماً برقم الهاتف 503-797-1790 (من الساعة ٨ صباحاً حتى الساعة ٥ مساءً، أيام الاثنين إلى الجمعة) قبل سبعة (٧) أيام عمل من موعد الاجتماع.

Persian | مترو به حقوق مدنی احترام می‌گذارد

از حقوق خود آگاه باشید شما حق دارید از خدمات مترجم شفاهی و سایر تسهیلاتی که جهت شرکت در برنامه ها و تصمیمات مترو به شما کمک می کنند استفاده نمایید. مترو تمامی قوانین مربوط به عدم تبعیض فزلال را رعایت می کند. اگر در یک جلسه عمومی نیز به یک مترجم شفاهی داشتید، پنج روز قبل از برگزاری جلسه جهت پاسخگویی به درخواست نان، با شماره 503-797-1790 (از 8 صبح تا 5 بعد از ظهر یک روز هر هفته) تماس بگیرید. برای اطلاعات در مورد برنامه حقوق مدنی مترو یا برای دریافت فرم تبعیض، به وبسایت [oregonmetro.gov/civilrights](http://oregonmetro.gov/civilrights) مراجعه نمایید یا با شماره 503-797-1790 تماس بگیرید.



ATTACHMENT B. CIVIL RIGHTS NOTICE, METRO COUNCIL AND COMMITTEE AGENDAS

Metro respects civil rights

Metro fully complies with Title VI of the Civil Rights Act of 1964, Title II of the Americans with Disabilities Act, Section 504 of the Rehabilitation Act and other statutes that ban discrimination. If any person believes they have been discriminated against regarding the receipt of benefits or services because of race, color, national origin, sex, age or disability, they have the right to file a complaint with Metro. For information on Metro's civil rights program, or to obtain a discrimination complaint form, visit [oregonmetro.gov/civilrights](http://oregonmetro.gov/civilrights) or call 503-797-1700. Metro provides services or accommodations upon request to persons with disabilities and people who need an interpreter at public meetings. If you need a sign language interpreter, communication aid or language assistance, call 503-797-1790 or TDD/TTY 503-797-1804 (8 a.m. to 5 p.m. weekdays) 5 business days before the meeting. All Metro meetings are wheelchair accessible. Individuals with service animals are welcome at Metro facilities, even where pets are generally prohibited. For up-to-date public transportation information, visit TriMet's website at [trimet.org](http://trimet.org)

Thông báo về sự Metro không kỳ thị của

Metro tôn trọng dân quyền. Muốn biết thêm thông tin về chương trình dân quyền của Metro, hoặc muốn lấy đơn khiếu nại về sự kỳ thị, xin xem trong [www.oregonmetro.gov/civilrights](http://www.oregonmetro.gov/civilrights). Nếu quý vị cần thông dịch viên ra dấu bằng tay, trợ giúp về tiếp xúc hay ngôn ngữ, xin gọi số 503-797-1700 (từ 8 giờ sáng đến 5 giờ chiều vào những ngày thường) trước buổi họp 5 ngày làm việc.

Повідомлення Metro про заборону дискримінації

Metro з повагою ставиться до громадянських прав. Для отримання інформації про програму Metro із захисту громадянських прав або форми скарги про дискримінацію відвідайте сайт [www.oregonmetro.gov/civilrights](http://www.oregonmetro.gov/civilrights). або Якщо вам потрібен перекладач на зборах, для задоволення вашого запиту зателефонуйте за номером 503-797-1700 з 8.00 до 17.00 у робочі дні за п'ять робочих днів до зборів.

Metro 的不歧視公告

尊重民權。欲瞭解Metro民權計畫的詳情，或獲取歧視投訴表，請瀏覽網站 [www.oregonmetro.gov/civilrights](http://www.oregonmetro.gov/civilrights)。如果您需要口譯方可參加公共會議，請在會議召開前5個營業日撥打503-797-1700（工作日上午8點至下午5點），以便我們滿足您的要求。

Ogeysiiska takooris la'aanta ee Metro

Metro waxay ixtiraamtaa xuquuqda madaniga. Si aad u heshid macluumaad ku saabsan barnaamijka xuquuqda madaniga ee Metro, ama aad u heshid warqadda ka cabashada takoorista, booqo [www.oregonmetro.gov/civilrights](http://www.oregonmetro.gov/civilrights). Haddii aad u baahan tahay turjubaan si aad uga qaybqaadatid kullan dadweyne, wac 503-797-1700 (8 gallinka hore illaa 5 gallinka dambe maalmaha shaqada) shan maalmo shaqa ka hor kullanka si loo tixgaliyo codsashadaada.

Metro의 차별 금지 관련 통지서

Metro의 시민권 프로그램에 대한 정보 또는 차별 항의서 양식을 얻으려면, 또는 차별에 대한 불만을 신고 할 수 [www.oregonmetro.gov/civilrights](http://www.oregonmetro.gov/civilrights). 당신의 언어 지원이 필요한 경우, 회의에 앞서 5 영업일 (오후 5시 주중에 오전 8시) 503-797-1700를 호출합니다.

Metroの差別禁止通知

Metroでは公民権を尊重しています。Metroの公民権プログラムに関する情報については、または差別苦情フォームを入手するには、[www.oregonmetro.gov/civilrights](http://www.oregonmetro.gov/civilrights)。までお電話ください公開会議で言語通訳を必要とされる方は、Metroがご要望に対応できるよう、公開会議の5営業日前までに503-797-1700（平日午前8時～午後5時）までお電話ください。

សេចក្តីជូនដំណឹងអំពីការមិនរើសអើងរបស់ Metro

ការគោរពសិទ្ធិពលរដ្ឋរបស់ ។ សំរាប់ព័ត៌មានអំពីកម្មវិធីសិទ្ធិពលរដ្ឋរបស់ Metro ឬដើម្បីទទួលបានការបណ្តឹងរើសអើងសូមចូលទស្សនាគេហទំព័រ [www.oregonmetro.gov/civilrights](http://www.oregonmetro.gov/civilrights)។  
បើលោកអ្នកត្រូវការអ្នកបកប្រែភាសានៅពេលអង្គប្រជុំសាធារណៈ សូមទូរស័ព្ទមកលេខ 503-797-1700 (ម៉ោង 8 ព្រឹកដល់ម៉ោង 5 ល្ងាច ថ្ងៃធ្វើការ) ប្រាំពីរថ្ងៃ មុនថ្ងៃប្រជុំដើម្បីអាចឲ្យគេសម្រួលតាមសំណើរបស់លោកអ្នក។

إشعار بعدم التمييز من Metro

تحتزم Metro الحقوق المدنية. للمزيد من المعلومات حول برنامج Metro للحقوق المدنية أو لإيداع شكوى ضد التمييز، يُرجى زيارة الموقع الإلكتروني [www.oregonmetro.gov/civilrights](http://www.oregonmetro.gov/civilrights). إن كنت بحاجة إلى مساعدة في اللغة، يجب عليك الاتصال مقدماً برقم الهاتف 503-797-1700 (من الساعة 8 صباحاً حتى الساعة 5 مساءً، أيام الاثنين إلى الجمعة) قبل خمسة (5) أيام عمل من موعد الاجتماع.

Paunawa ng Metro sa kawalan ng diskriminasyon

Iginagalang ng Metro ang mga karapatang sibil. Para sa impormasyon tungkol sa programa ng Metro sa mga karapatang sibil, o upang makakuha ng porma ng reklamo sa diskriminasyon, bisitahin ang [www.oregonmetro.gov/civilrights](http://www.oregonmetro.gov/civilrights). Kung kailangan ninyo ng interpreter ng wika sa isang pampublikong pulong, tumawag sa 503-797-1700 (8 a.m. hanggang 5 p.m. Lunes hanggang Biyernes) lima araw ng trabaho bago ang pulong upang mapagbigyan ang inyong kahilingan.

Notificación de no discriminación de Metro

Metro respeta los derechos civiles. Para obtener información sobre el programa de derechos civiles de Metro o para obtener un formulario de reclamo por discriminación, ingrese a [www.oregonmetro.gov/civilrights](http://www.oregonmetro.gov/civilrights). Si necesita asistencia con el idioma, llame al 503-797-1700 (de 8:00 a. m. a 5:00 p. m. los días de semana) 5 días laborales antes de la asamblea.

Уведомление о недопущении дискриминации от Metro

Metro уважает гражданские права. Узнать о программе Metro по соблюдению гражданских прав и получить форму жалобы о дискриминации можно на веб-сайте [www.oregonmetro.gov/civilrights](http://www.oregonmetro.gov/civilrights). Если вам нужен переводчик на общественном собрании, оставьте свой запрос, позвонив по номеру 503-797-1700 в рабочие дни с 8:00 до 17:00 и за пять рабочих дней до даты собрания.

Avizul Metro privind nediscriminare

Metro respectă drepturile civile. Pentru informații cu privire la programul Metro pentru drepturi civile sau pentru a obține un formular de reclamație împotriva discriminării, vizitați [www.oregonmetro.gov/civilrights](http://www.oregonmetro.gov/civilrights). Dacă aveți nevoie de un interpret de limbă la o ședință publică, sunați la 503-797-1700 (între orele 8 și 5, în timpul zilelor lucrătoare) cu cinci zile lucrătoare înainte de ședință, pentru a putea să vă răspunde în mod favorabil la cerere.

Metro txoj kev ntxub ntxaug daim ntawv ceeb toom

Metro tributes cai. Rau cov lus qhia txog Metro txoj cai kev pab, los yog kom sau ib daim ntawv tsis txaus siab, mus saib [www.oregonmetro.gov/civilrights](http://www.oregonmetro.gov/civilrights). Yog hais tias koj xav tau lus kev pab, hu rau 503-797-1700 (8 teev sawv ntxov txog 5 teev tsaus ntuj weekdays) 5 hnub ua hauj lwj ua ntej ntawm lub rooj sib tham.







If you picnic at Blue Lake or take your kids to the Oregon Zoo, enjoy symphonies at the Schnitz or auto shows at the convention center, put out your trash or drive your car – we’ve already crossed paths.

**So, hello. We’re Metro – nice to meet you.**

In a metropolitan area as big as Portland, we can do a lot of things better together. Join us to help the region prepare for a happy, healthy future.

**Stay in touch with news, stories and things to do.**

[oregonmetro.gov/news](http://oregonmetro.gov/news)

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