



# Title VI Program

Oct. 1, 2024, through Sept. 30, 2027  
Prepared for Federal Transit Administration

September 2024

## **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 503-797-1555.

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 503-797-1890 or TDD/TTY 503-797-1804 (8 a.m. to 5 p.m. weekdays) at least five 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.

## TABLE OF CONTENTS

Introduction and submission.....	6
1. Title VI Notice .....	8
A. Title VI notices.....	8
B. Posting locations .....	8
2. How to file a Title VI discrimination complaint .....	9
A. Instructions.....	9
B. Complaint form .....	10
3. Title VI investigations, complaints or lawsuits .....	13
A. Investigations, complaints or lawsuits .....	13
B. Procedures for investigations and tracking complaints.....	13
C. Procedures for recording and reporting investigations, complaints and lawsuits .....	20
4. Public participation plan.....	22
A. Public participation plan for transportation planning .....	22
B. Metro’s Public Engagement Guide .....	22
C. Summary of outreach efforts .....	22
5. LIMITED ENGLISH PROFICIENCY PLAN .....	27
6. TRANSIT-RELATED ADVISORY COMMITTEE CITIZEN REPRESENTATIVES .....	27
A. Transportation Policy Alternatives Committee .....	28
B. Public Engagement Review Committee .....	29
7. Efforts to ensure subrecipients compliance .....	29
A. Efforts to ensure subrecipients are complying with Title VI .....	29
B. Schedule of subrecipient Title VI program submissions.....	30
8. Facility construction: N/A.....	30
9. Additional information .....	31
A. Regional demographics .....	31
B. Identifying and considering mobility needs of minority populations .....	35
C. Demographic maps.....	36
D. Disparate impacts analysis .....	38

E. Subrecipient procedure .....	45
F. Subrecipient application assistance .....	45
Attachment A. Posted civil rights Notice (18x24).....	47
Attachment B. civil rights Notice, Metro Council and committee agendas .....	48

This page intentionally left blank.

## 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 1.7 million people living in the urbanized areas of the Portland metropolitan region. Metro's Title VI designee is responsible for initiating and monitoring Title VI activities and for preparing these reports.

This report covers the period from Oct. 1, 2024, through September 30, 2027. 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 people of color, people with limited English proficiency and other marginalized populations, 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 community representatives, whom Metro selects, and a description of efforts made to encourage the participation of people of color and other marginalized populations.
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 people of color and other marginalized populations in the aggregate. (VI.2.a.2)
11. **Identifying and considering mobility needs of people of color other marginalized 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,

Tracey Lam  
Equity Program Manager

September 30, 2024

## 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 503-797-1555. 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 503-797-1890 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).

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 503-797-1555. If you need language assistance, call 503-797-1890 (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 recent update known as 2023 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

---

<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> In September 2021, this notice was translated into 13 languages: Spanish, Vietnamese, Chinese, Russian, Korean, Ukrainian, Japanese, Arabic, Romanian, Tagalog, Somali, Mon-Khmer and Hmong.



vehicles. Metro's Title VI notice appears on a web page [oregonmetro.gov/civilrights](https://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.

Metro is in the process of updating its physical notice to include additional languages. The updated notice will be posted 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 also includes translated Civil Rights notices on Metro Council and other public meeting agendas.

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](https://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.

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.

For complaints of discrimination because of race, color, national origin, sex, age or income level:

- Fill out the discrimination complaint form.
- Email [civilrights@oregonmetro.gov](mailto:civilrights@oregonmetro.gov)
- Mail to Title VI coordinator, Metro, 600 NE Grand Ave., Portland, OR 97232
- call 503-797-1555

For complaints of discrimination because of disability:

- Fill out the discrimination complaint form.
- Email [accessibility@oregonmetro.gov](mailto:accessibility@oregonmetro.gov)
- Mail to Heather Buczek, ADA coordinator, Metro, 600 NE Grand Ave., Portland, OR 97232
- Call 971-940-3157 or 503-797-1804 TDD
- Visit Metro's administrative office at 600 NE Grand Ave. in Portland, Oregon.

## **B. Complaint form**

The complaint form is available from the web page [www.oregonmetro.gov/civilrights](http://www.oregonmetro.gov/civilrights). A screen shot of the online form is included below.

# Discrimination complaint form

We are asking for the following information to assist in processing your complaint. If you need help completing this form, call 503-797-1890.

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:

**Title VI coordinator**

Metro

600 NE Grand Ave.

Portland, OR 97232-2736

Phone: 503-797-1890

Fax: 503-797-1799

Email: [civilrights@oregonmetro.gov](mailto:civilrights@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:

**Heather Buczek**

ADA Coordinator - Accessibility Program

Manager

Metro

600 NE Grand Ave.

Portland, OR 97232-2736

Phone: 971-940-3157; TDD 503-797-1804

Email: [accessibility@oregonmetro.gov](mailto:accessibility@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 that 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 received no Title VI complaints under its transportation authority during the 2021-2024 fiscal years. The online form was used by greater Portland residents with potential issues of discrimination with their neighbors, property managers or local businesses; when contact information was provided, these were responded to with sympathy and a clarification of Metro's authority. In FY 2022-23, Metro received one potential complaint regarding potential discrimination by a TriMet driver. The complaint was referred and transferred to TriMet per FTA guidance on complaints and Metro's transit-related Title VI complaint procedures.

#### **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.]
8. 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.
9. 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.
10. 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 calendar 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 calendar 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).
- Background.
- Name of persons to be interviewed.
- Questions for the complainant
- Questions for the respondent.
- Questions for the witness(s).
- Evidence to be obtained during the investigation.
- Proposed activity schedule (including timeframes and anticipated sequence of on-site visits and interviews).



## 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.

## **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, USDOJ 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 great Portland” is available at [oregonmetro.gov/public-engagement-guide](https://oregonmetro.gov/public-engagement-guide). It includes the decision-making structure and process, as well as ways to be involved and stay informed. This document has received feedback from FHWA and is in the process of being updated as part of the update to Metro’s Public Engagement Guide.

### **B. Metro’s Public Engagement Guide**

The most recent update to Metro’s Public Engagement Guide was adopted by the Metro Council in April 2024 following a 45-day public comment period and community engagement. 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 adopted document is available at [oregonmetro.gov/public-engagement-guide](https://oregonmetro.gov/public-engagement-guide). Additional supplemental appendices are in development and expected to be completed by December 2024. Metro staff will review and update the guide every three to five years starting in 2027.

### **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 2022-2023 reporting period.

## 1) 2023 Regional Transportation Plan

The 2023 Regional Transportation Plan update initiated in Fall 2021 and adopted in November 2023. The public engagement plan adopted by JPACT and the Metro Council for the 2023 RTP update guided the strategic direction, approach and desired outcomes for sharing information and engaging with people, community-based organizations, businesses, jurisdictional staff, federally recognized tribes, transportation agencies, regional decision-makers and other interested parties throughout the two-year RTP update process.

Engagement activities included:

- 4 online surveys with a total of 4,110 participants
- 3 public hearings
- 4 in-language focus groups in Spanish, Chinese, Vietnamese and Russian
- 3 Community Leaders' Forums
- 7 community-based organizations engaged 380+ people
- 1 High-Capacity Transit Strategy online open house and survey with 350+ respondents
- 10 HCT public tabling events with TriMet's Forward Together Plan
- 1 Climate expert panel
- 1 Modeling 101 panel
- 2 business forums
- 2 discussions about HCT with local chambers of commerce
- 3 business focus groups, including 1 focused on HCT
- 6 joint JPACT and Metro Council workshops
- 22 Metro Council meetings
- 32 JPACT and MPAC meetings
- 3 Metro Committee on Racial Equity (CORE) meetings
- 47 TPAC and MTAC workshops and meetings
- 8 High Capacity Transit strategy working group meetings
- Periodic County Coordinating Committee briefings
- 41 interviews with elected officials and staff of local jurisdictions, state agencies, and community and business organizations from across the region
- 6 consultation meetings with Tribes
- 6 consultation meetings with federal, state and regional agencies

## **Agency and jurisdictional outreach and coordination**

Metro staff collaborated and coordinated with cities, counties and other transportation agencies during the 2023 RTP update. Throughout the process, Metro staff presented to Metro regional advisory committees and county-level coordinating committees (as well as their technical advisory committees). Cross-agency project management teams were convened for the High Capacity Transit Strategy, the Regional Mobility Policy update and the Regional Freight Delay and Commodities Movement Study.

Metro's jurisdictional boundary encompasses the urban portions of Multnomah, Washington and Clackamas counties. As previously noted, Metro's planning partners included the 24 cities, three counties and affected special districts of the region, ODOT, DEQ, DLCD, the Port of Portland, South Metro Area Regional Transit (SMART), TriMet and other interested community, business and advocacy groups as well as state and federal regulatory agencies such as the U.S. Environmental Protection Agency (EPA), Federal Highway Administration (FHWA) and Federal Transit Administration (FTA). Metro also coordinated with the City of Vancouver, Clark County Washington, the Port of Vancouver, the Southwest Washington Regional Transportation Council (RTC), C-Tran, the Washington Department of Transportation, the Southwest Washington Air Pollution Control Authority and other Clark County governments on bi-state issues. The Southwest Washington Regional Transportation Council is the federally designated MPO for the Clark County portion of the Portland- Vancouver metropolitan region.

In addition, the project lists included in the 2023 RTP are priority projects from local, regional or state planning efforts that included opportunities for public input. Clackamas, Multnomah and Washington counties and cities within each county recommended priority projects for their jurisdictions at county coordinating committees. ODOT, the Port of Portland, TriMet, SMART and other agencies worked with county coordinating committees and the City of Portland to recommend priority projects. The City of Portland recommended projects after reviewing priorities with its community advisory committees.

## **Joint JPACT and Metro Council Workshops**

A series of six workshops brought regional decision-makers together to discuss major policy topics in the 2023 RTP. Community representatives provided opening remarks at three of the workshops, sharing lived experiences and community perspective on transportation needs and priorities.

The workshops included:

- Updating our vision and goals for the future of transportation (June 30, 2022).
- Developing regional congestion pricing policy (July 28, 2022).
- Creating safe and healthy arterials (Sept 29, 2023).
- Strengthening the backbone of regional transit (Oct. 27, 2023).
- Working together to tackle climate change (Nov. 10, 2022).
- Connecting our priorities to our vision and goals for the future of transportation (May 11, 2023).



## Final public comment period, hearings and notifications

A final 45-day public comment period was held from July 10 to August 25, 2023. 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 at jurisdictions across the region. Notices were published in newspapers across the region and on the Metro website. Metro also posted to social media throughout the public comment period. Notifications were sent to the RTP interested persons list (2,772 people) in addition to Metro's four regional advisory committees and their respective interested parties. Partner agencies and organizations that participated throughout the RTP update process also posted the public comment opportunity.
- *Public review draft materials:* The public review drafts of the 2023 RTP and High Capacity Transit Strategy and their appendices were posted on the 2023 RTP webpage at [oregonmetro.gov/rtp](https://oregonmetro.gov/rtp). Supplemental materials were also posted to the webpage to provide interactive and accessible versions of these documents. Those materials included executive summaries of the 2023 RTP and High Capacity Transit Strategy and an interactive map and list of the RTP investment priorities.
- *Online survey #4 (July 10 to August 25, 2023):* During the public comment period, an online survey provided brief overviews of key elements of the 2023 RTP, including the project list, new and updated policies and High Capacity Transit Strategy priorities. The survey invited feedback on whether the key elements of the plan will move the greater Portland's transportation system in the right direction. The survey also provided opportunities for open-ended feedback. There were 663 survey participants.
- *Comment platforms:* There were several ways for people to provide specific comments and suggested changes to the plan, including an online comment form, email, letter and voicemail. More than 50 emails and 20 letters were received and are included in the Final Public Comment Report.
- *Online comment form (July 10 to August 25, 2023):* Members of the public, public agencies and organizations used an online comment form to provide comments, specific changes and edits to the public review draft 2023 RTP and HCT Strategy.
- *Public hearings (July 27, 2023):* A public hearing on the public review draft 2023 Regional Transportation Plan and High Capacity Transit Strategy was held at a Metro Council meeting at the Metro Regional Center and online. Twenty people testified through oral or written testimony on topics ranging from traffic safety and climate to parking and feedback on RTP Chapter 8.
- *Community based organizations:* Continued to engage their community members in identifying transportation investment priorities and, in some cases, organizations shared community input through comments made during the formal public comment. Community input was also shared with Metro through reports, stories and video. Organizations engaged more than 380 community members in the 2023 RTP and, in many cases, developed community interest and capacity to engage in future local and regional transportation planning.
- *Consultations:* Metro staff invited federal, state and local resource, land management and regulatory agencies to consult on the public review draft 2023 RTP and High Capacity

Transit Strategy in accordance with 23 CFR 450.316. Metro convened two separate consultation meetings on Aug. 17 (resource agencies) and Aug. 22 (federal and state agencies). These consultation activities built on consultations with agencies earlier in the 2023 RTP process. Summaries of consultation meetings held during public comment are included in public comment report appendices. Throughout the 2023 RTP update, Metro invited consultation with the seven Tribes to inform Metro's 2023 update to the Regional Transportation Plan. Staff and representatives from multiple Tribes engaged formally and informally. No formal consultation meetings were held with Tribes during the public comment period. Metro's Tribal Liaison engaged with Tribes informally during this time.

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) 2024-2027 Metropolitan Transportation Improvement Program**

The MTIP is complementary to the Regional Transportation Plan (RTP), which identifies needed capital and maintenance transportation projects in the region through 2040. For the Portland region, the 2024- 2027 MTIP is a little over \$1.3 billion of investments. Spread over 130 transportation projects and programs, the 2024-2027 includes:

- A majority of maintenance and preservation investments to take care of the transportation infrastructure already in place.
- A small number of capital investments to enhance and fill gaps on the transportation system across all forms of travel.
- Operations investments to guide travelers and use technologies to make the system run smoother and safer.
- Programs that educate about travel options, support kids in walking and rolling to school safely, and reinforcing the connection between housing and transit.

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 (2025-2027)**

Residents of the greater Portland region were asked to help decide how an estimated \$67.3 million in Regional Flexible Funds and Parks and Nature bonds will be spent on projects that will help make the region's transportation system more equitable, safer, cleaner and more reliable.

During this public comment period:

- 1,551 participants provided 1,798 project-specific comments through an interactive comment map available in English, Spanish, Vietnamese, Chinese, Russian and Korean.
- 50 emails, with seven providing general, non-project specific comments and 43 providing project specific comments and 16 of those 43 providing comments on more than one project.

- 28 letters, with one letter providing comments about a project that is not included in the proposals, 27 providing project specific comments and five of those providing comments on more than one project.

Notice and invitation to participate were distributed through community involvement offices and community participation organizations; Metro’s email lists; Metro’s website; social media channels in multiple languages; and jurisdictional and community partners.

## **2024-2027 Metropolitan Transportation Improvement Program**

Public comment on the draft of the 2024-2027 Metropolitan Transportation Improvement Program was solicited from April 5 through May 5, 2023. Opportunities for public comment included an online survey, written submissions via mail, email submissions, voicemail/ telephone and a public hearing at Metro Council on April 20, 2023. The public comment opportunities were publicized on Metro’s website, community and civic email lists, and advertisements in local community newspapers.

To ensure the length and detail of the 2024-2027 MTIP document were not a barrier to participation, the online public survey summarized the 2024-2027 MTIP and the results of the performance evaluation. The survey asked respondents to rate, on a scale of one (1) to five (5), how well the MTIP is advancing the region’s priorities established by the 2018 Regional Transportation Plan (RTP). Those priorities include equity, safety, climate and mobility.

## **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 for fiscal years 2024-2027, documenting actions taken to provide language access and assistance to persons with limited English proficiency, as well as efforts to be taken to monitor, refresh and improve the program.

## **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 two transit-related advisory committees that include non-elected, citizen representatives, the Transportation Policy Alternative Committee (typically six community representatives) and the Public Engagement Review Committee (typically up to nine community

representatives). Table 6-1 shows the racial breakdown of these committees in summer 2024.

**Table 6-1. Racial breakdown of Metro’s transit-related advisory committee community representatives, summer 2024**

<b>Committee</b>	<b>American Indian / Native American</b>	<b>Asian</b>	<b>Black or African American</b>	<b>Hispanic or Latino/a/x</b>	<b>Middle Eastern or North African</b>	<b>Native Hawaiian or other Pacific Islander</b>	<b>White</b>
TPAC		1*	2				5*
PERC	1	1*	2			1	4*

\*One TPAC community member is part of two racial communities

\*One PERC member is part of two racial 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 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.

### **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.

## **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>3</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.

---

<sup>3</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.

- Submit completed complaint investigation documentation to Metro.

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

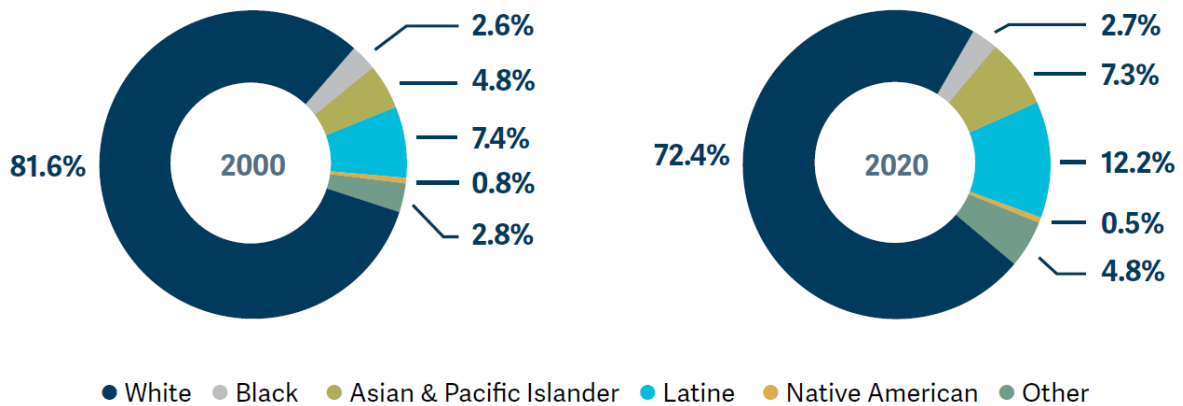
### A. Regional demographics

*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. Population by race and ethnicity in the seven-county region, 2000 and 2020**



Source: 2020 U.S. Census

**Table 9-2. Household income for occupied housing units in the Portland region and surrounding counties<sup>4</sup>, 2020 (American Community Survey)**

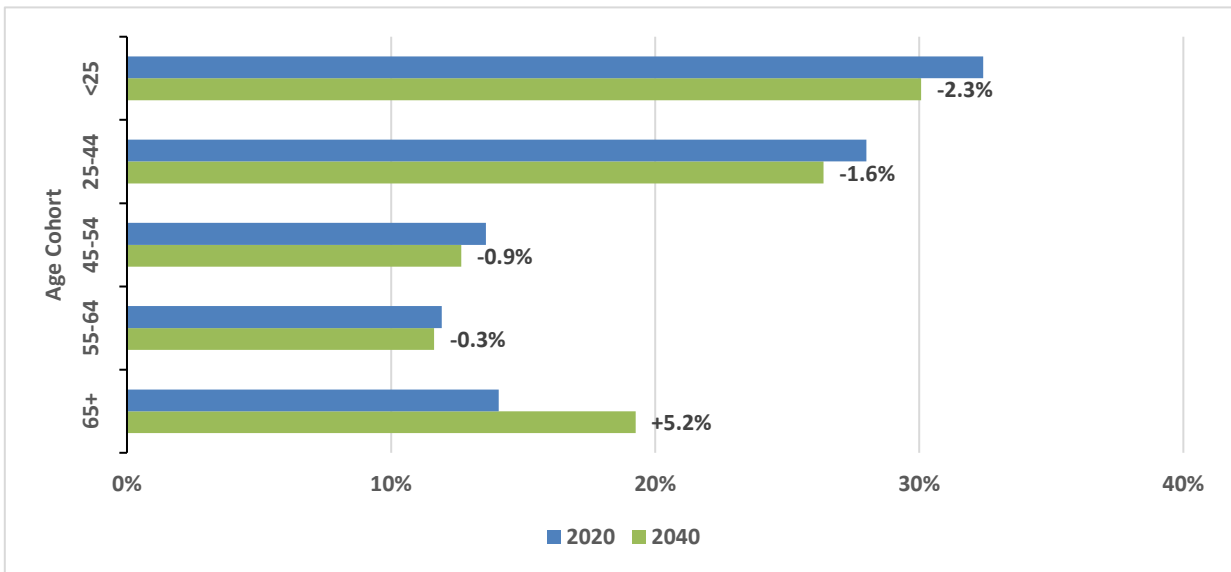
<b>Income</b>	<b>Households</b>	<b>Percent of households</b>
Less than \$5,000	22,289	2.3%
\$5,000 to \$9,999	20,331	2.1%
\$10,000 to \$14,999	27,919	2.9%
\$15,000 to \$19,999	27,759	2.9%
\$20,000 to \$24,999	31,898	3.3%
\$25,000 to \$34,999	66,163	6.9%
\$35,000 to \$49,999	102,696	10.7%
\$50,000 to \$74,999	165,030	17.2%
\$75,000 to \$99,999	130,159	13.6%
\$100,000 to \$149,999	181,605	19.0%
\$150,000 or more	182,128	19.0%
Total	957,977	100.0%

---

<sup>4</sup> For consistency with regional and state population forecasts, Metro uses a broader seven-county region (Clackamas, Clark, Columbia, Multnomah, Skamania, Washington and Yamhill counties) in its demographic data.



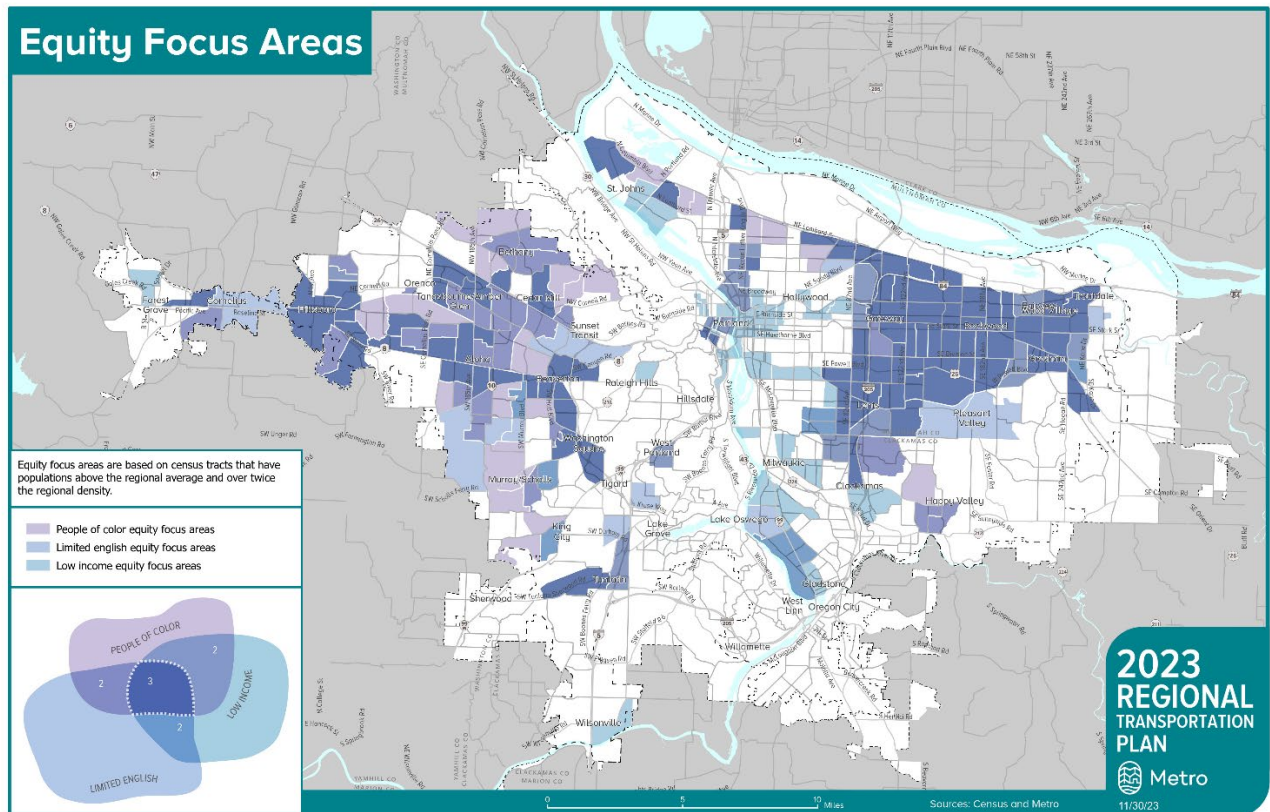
**Table 9.3. Current and forecasted population by age cohort in the Portland region and surrounding counties<sup>5</sup>, 2020 and 2045 (MetroScope)**



<sup>5</sup> For consistency with regional and state population forecasts, Metro uses a broader seven-county region (Clackamas, Clark, Columbia, Multnomah, Skamania, Washington and Yamhill counties) in its demographic data.

The following map shows the Equity Focus Areas used in the 2023 Regional Transportation Plan. Equity Focus Areas are 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.

**Figure 3. 2023 Regional Transportation Plan Equity Focus Areas**



## **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 region's 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 where people of and other marginalized communities (such as communities of people with limited English proficiency or with low incomes as well as older and young people) live, work and travel.

**Encouraging minority voices in engagement and decision-making:** Metro continuously seeks to better serve communities of color and other marginalized communities with its public engagement practices and to include more representation from people of color and other 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 people of color and other 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 people of color and other marginalized communities allows Metro to focus on gathering the perspective of specific, underserved or underrepresented 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 marginalized communities through interviews, discussion groups or focus groups at multiple points in any planning process. Metro also compares what it hears from people of color and other marginalized participants to what it hears from the general population when appropriate; for instance, with a 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 marginalized communities that are identified through these processes are elevated for consideration at both the staff and decision-making level.

---

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

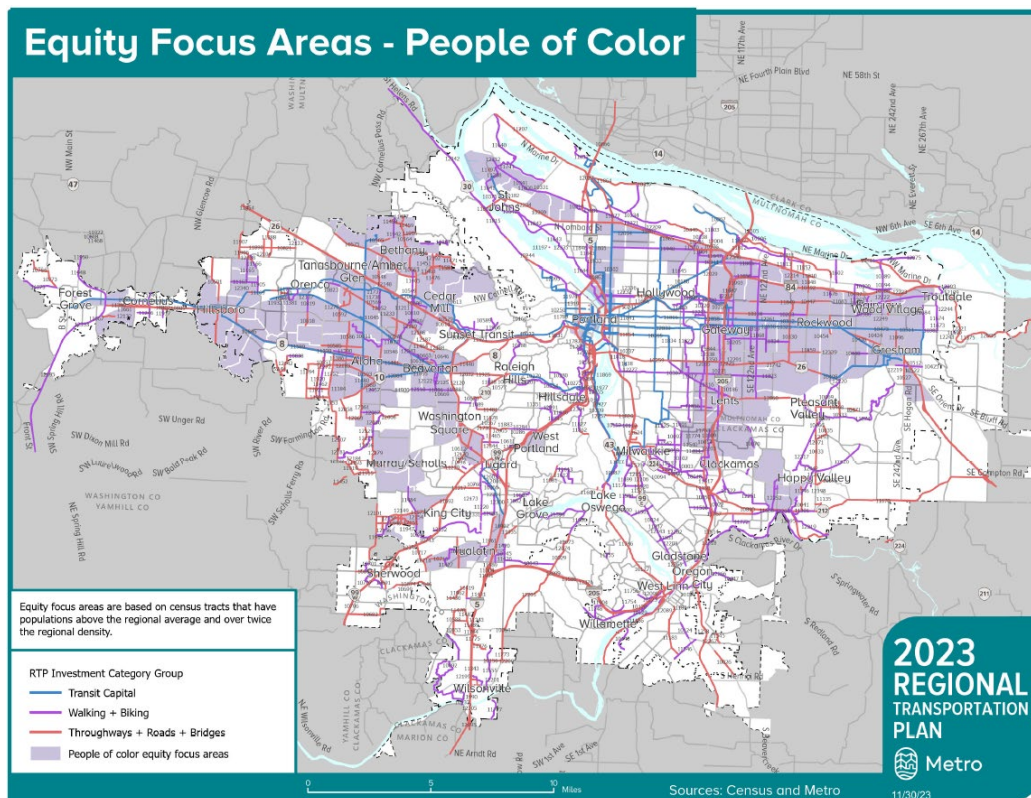
**Creating criteria related to the needs and visions of minority populations:** For several years, Metro has included equity components to its criteria in its assessment of projects and plans to help decision-makers understand the benefits to or burdens on communities of color and other marginalized groups. 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)*

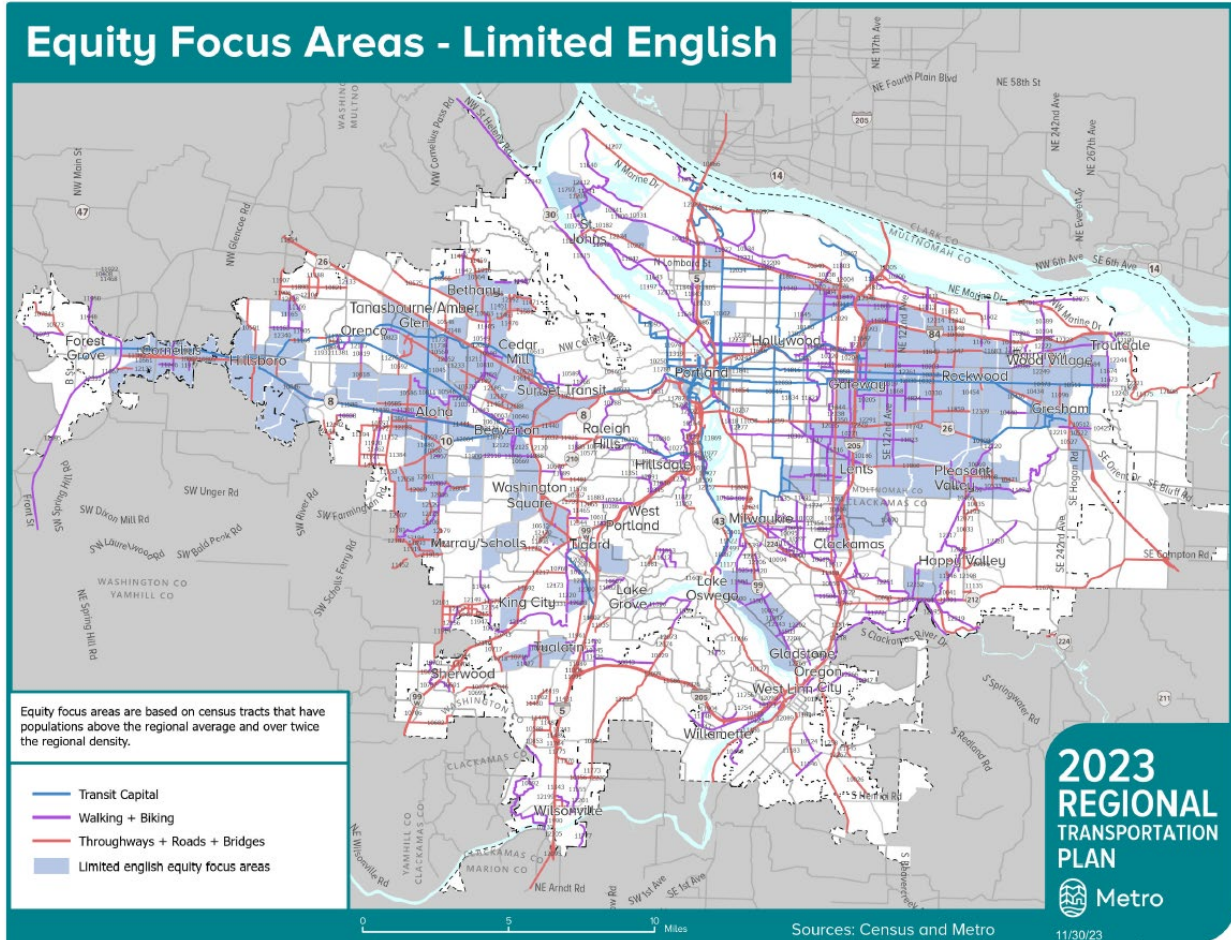
The following maps show the distribution of planned investments for the fiscally constrained list of the current Regional Transportation Plan relative to the three individual population groups that are used to define the Equity Focus Areas shown in Figure 3 above: people of color, people who speak limited English, and people with low incomes.<sup>7</sup>

**Figure 4. Regional Transportation Plan Investments and Census Tracts with High Concentrations of People of Color (Metro, 2020 Census)**

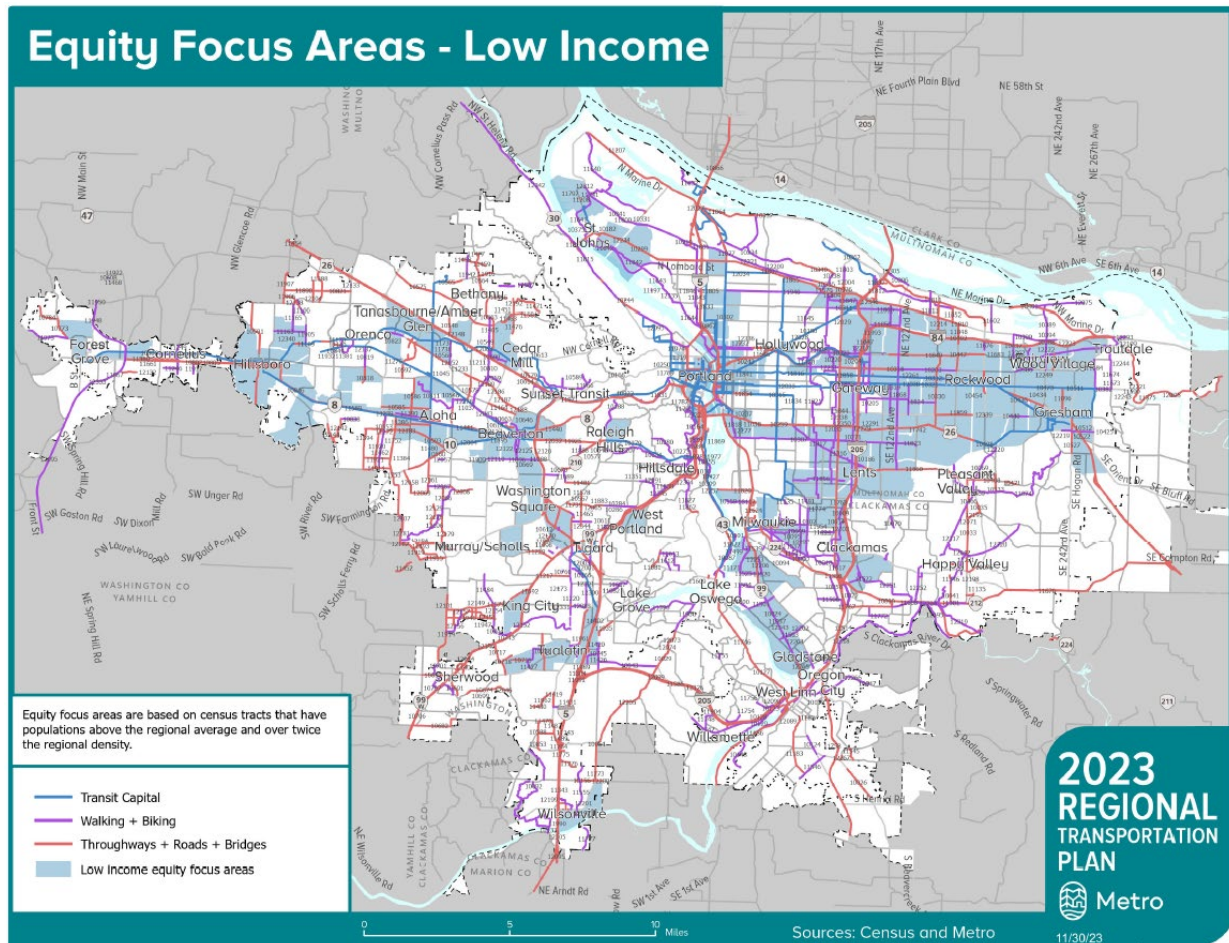


<sup>7</sup> The maps showing the locations of these investments throughout the remainder of this document include only those investments in the RTP project lists that had enough spatial information to be mapped.

**Figure 5. Regional Transportation Plan Investments and Census Tracts with High Concentrations of People who Speak Limited English (Metro, 2016-2020 American Community Survey)**



**Figure 6. Regional Transportation Plan Investments and Census Tracts with Low Incomes (Metro, 2016-2020 American Community Survey)**



## 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 2023 Regional Transportation Plan (RTP), Metro conducted a transportation equity evaluation of the financially constrained 2023 RTP investment strategy. The evaluation of the plan's investment strategy stemmed from the region's decision-makers desire to understand whether transportation investments make progress towards addressing inequities and disparities experienced by 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.

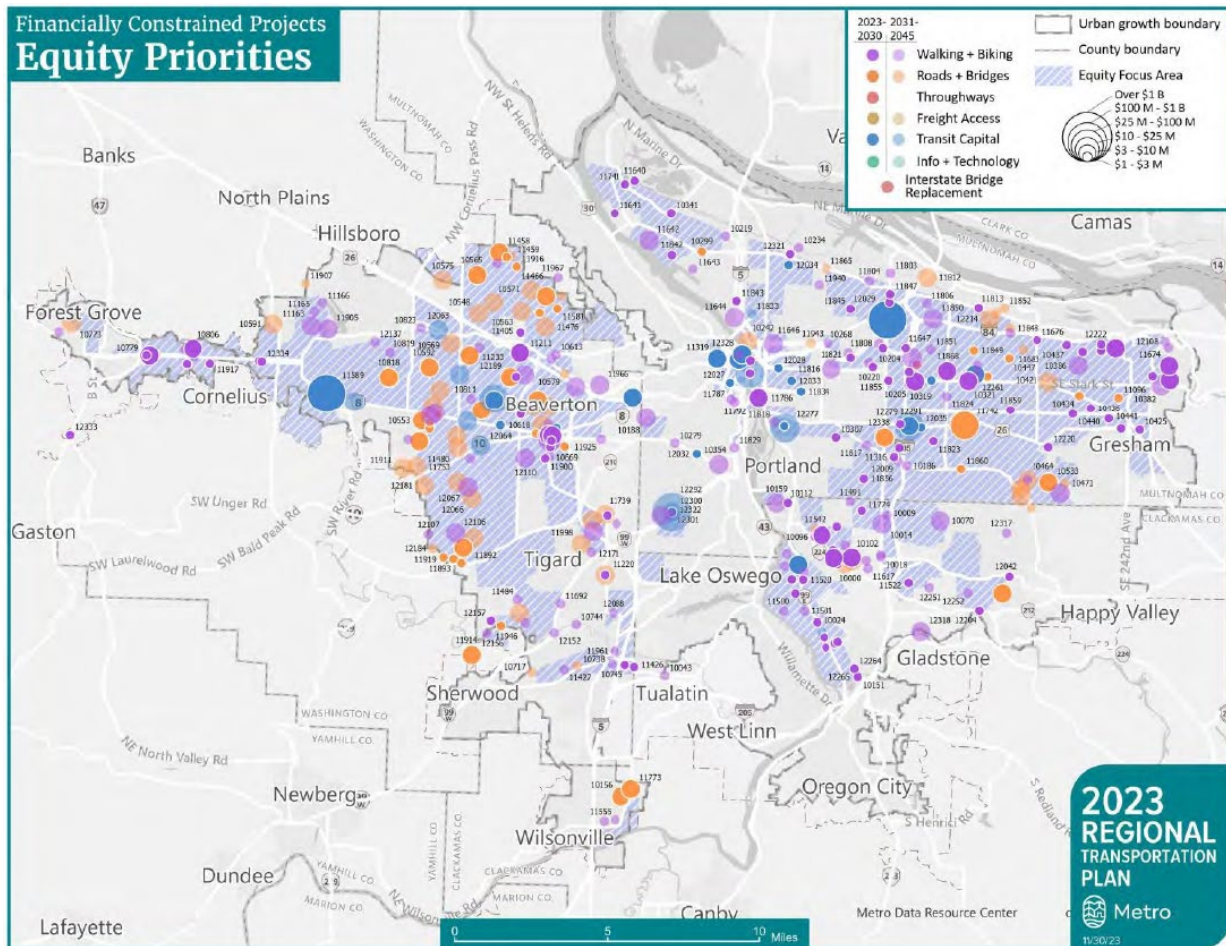
Evaluation of the 2023 RTP investment strategy involved two rounds of analysis. The first round was a high-level assessment that identified whether individual projects met criteria associated with each of the five RTP goals, including equity. This allowed Metro to summarize the number, value, and type of projects that invest in equity; compare RTP investments across different goal areas; and compare the investments made in the Equity Focus Areas shown above to investments in other areas of the region. The second round was an outcomes-based analysis that used performance measures that were established through multiple previous RTPs—including Metro’s 2018 RTP update, which engaged a Transportation Equity Working Group in a targeted effort to update these measures—and that Metro continued to refine during the 2023 update. This section describes the results of both rounds of analysis.

The RTP reflects a regional commitment to plan and invest in the region’s transportation system to reduce transportation-related disparities and barriers faced by communities of color and other marginalized communities, regardless of race, language proficiency, income, age or ability, while maintaining affordability and preventing displacement is necessary. Of the capital projects in the RTP constrained project list, 474 capital projects (63% of all capital projects, representing 69% of the constrained RTP budget) are within an Equity Focus Area (EFA), and 337 projects (45% of all capital projects, representing 26% of the constrained RTP budget) are located within an EFA and complete gaps in the bicycle, pedestrian or transit networks. During RTP engagement, people of color and other marginalized people consistently expressed that completing these gaps was a high priority.<sup>8</sup> The map below shows the location and cost of both types of projects.

---

<sup>8</sup> [https://www.oregonmetro.gov/sites/default/files/2024/02/07/2023-RTP-community-based-organization-engagement-summaries\\_FINAL.pdf](https://www.oregonmetro.gov/sites/default/files/2024/02/07/2023-RTP-community-based-organization-engagement-summaries_FINAL.pdf).

**Figure 7. Greater Portland region: Map of RTP Constrained Project List Equity Priorities, 2023-2045)**



The table below compares the number and value of RTP projects by type for capital projects in Equity Focus Areas versus all capital projects.



**Table 9-5. Summary of number and value of projects by investment category and scenario, all capital projects versus capital projects in Equity Focus Areas**

	All capital projects				Capital projects in equity focus areas			
	Number of projects	% of projects	RTP spending (YOE\$M)	% of RTP spending	Number of projects	% of projects	RTP spending (YOE\$M)	% of RTP spending
<b>Near-term constrained (2023-2030)</b>								
Walking + Biking	137	41%	\$1,055	12%	89	41%	\$700	12%
Freight Access	4	1%	\$74	1%	2	1%	\$30	0%
Roads + Bridges	125	37%	\$3,048	36%	84	39%	\$2,354	39%
Throughways	12	4%	\$2,578	30%	7	3%	\$1,886	31%
Transit Capital	37	11%	\$1,576	18%	25	12%	\$990	17%
Info + Technology	20	6%	\$180	2%	9	4%	\$36	1%
Megaprojects	0	0%	\$0	0%	0	0%	\$0	0%
Other	3	1%	\$66	1%	0	0%	\$0	0%
<b>Total</b>	<b>338</b>	<b>100%</b>	<b>\$8,575</b>	<b>100%</b>	<b>216</b>	<b>100%</b>	<b>\$5,996</b>	<b>100%</b>
<b>Long-term constrained (2031-2045)</b>								
Walking + Biking	177	42%	\$2,120	11%	115	45%	\$1,363	10%
Freight Access	10	2%	\$307	2%	4	2%	\$73	1%
Roads + Bridges	160	38%	\$4,365	23%	102	40%	\$2,369	18%
Throughways	13	3%	\$2,919	15%	9	3%	\$1,456	11%
Transit Capital	26	6%	\$3,072	16%	13	5%	\$1,885	14%
Info + Technology	29	7%	\$392	2%	14	5%	\$75	1%
Megaprojects	1	0%	\$6,000	31%	1	0%	\$6,000	45%
Other	3	1%	\$122	1%	0	0%	\$0	0%
<b>Total</b>	<b>419</b>	<b>100%</b>	<b>\$19,298</b>	<b>100%</b>	<b>258</b>	<b>100%</b>	<b>\$13,220</b>	<b>100%</b>
<b>All constrained projects (2023-2045)</b>								
Walking + Biking	314	41%	\$3,175	11%	204	43%	\$2,063	11%
Freight Access	14	2%	\$381	1%	6	1%	\$103	1%
Roads + Bridges	285	38%	\$7,413	27%	186	39%	\$4,723	25%
Throughways	25	3%	\$5,497	20%	16	3%	\$3,342	17%
Transit Capital	63	8%	\$4,648	17%	38	8%	\$2,875	15%
Info + Technology	49	6%	\$571	2%	23	5%	\$111	1%
Megaprojects	1	0%	\$6,000	22%	1	0%	\$6,000	31%
Other	6	1%	\$188	1%	0	0%	\$0	0%
<b>Total</b>	<b>757</b>	<b>100%</b>	<b>\$27,873</b>	<b>100%</b>	<b>474</b>	<b>100%</b>	<b>\$19,216</b>	<b>100%</b>

As discussed above, people of color and other marginalized people consistently expressed that investing in active transportation and transit near where they live is a high priority. The RTP generally invests a similar share of resources in walking, bicycling and transit capital projects in EFAs as it does for the region as a whole. The share of constrained RTP funding spent on transit capital projects in EFAs is slightly lower than the region-wide share (15% vs. 17%), and the share of funding spent on walking and bicycling is the same in both geographies (11%). However, a slightly higher share of total projects in EFAs are focused on walking and bicycling (43% vs. 41%), which reflects that the region is prioritizing investments in active transportation that also benefit equity.

The table below summarizes the RTP’s performance with respect to equity using the system analysis measures described in Chapters 3 and 7 of the RTP. For each measure, the table includes a sentence describing the measure followed by rows with numbers showing the associated target and data on results and targets for the years 2020, 2030, and 2045. The tables use **blue text to indicate where the RTP meets targets**, **orange text to indicate where it doesn’t**, and **purple text to indicate mixed results**. The text below the tables **highlights key findings in bold**, provides additional context to help interpret results, and discusses any performance measures or analyses that are still pending.

Metro sometimes cannot estimate results for certain years, and targets sometimes do not apply to all years for which the tables below show data. Blank cells in a table mean that a result or target is not available for a particular year for the measure in question.

**Table 9-6. Summary of system analysis results: equity measures**

Measure	Base year value	Base year target	2030 result	2030 target	2045 result	2045 target
<i>Safety is a critical issue in equity focus areas. The RTP aims to eliminate transportation related fatalities and serious injuries for all users of the region’s transportation system, particularly in equity focus areas, which experience higher rates of serious crashes.</i>						
Serious crashes in Equity Focus Areas (EFAs)	65%	35%				
Pedestrian- and bicyclist-involved crashes in Equity Focus Areas (EFAs)	75%	25%				
<i>The RTP prioritizes completing the bicycle and pedestrian system in equity focus areas (relative to other communities)<sup>9</sup> to provide safe streets for the most vulnerable travelers.</i>						
% of the pedestrian network that is complete within EFAs	70%		76%	51%	82%	59%
% of the pedestrian network near transit that is complete within EFAs	73%		79%	58%	83%	65%
% of the bicycle network that is complete within EFAs	61%		69%	53%	75%	59%
% of the bicycle network near transit that is complete within EFAs	64%		72%	60%	77%	65%
<i>The RTP prioritizes improving access to jobs within equity focus areas (relative to other communities).<sup>10</sup></i>						
% of regional jobs accessible by transit in equity focus areas	8%		9%	5%	10%	5%
% of regional jobs accessible by driving in equity focus areas	41%		42%	39%	39%	32%
<i>The RTP seeks to advance equity by funding projects that benefit equity in the communities that have the greatest needs.</i>						
% of the capital RTP spending invested in equity projects (transit or walk/bike investments)			70%		69%	
% of the capital RTP spending invested in projects located in equity focus areas			43%		39%	
% of the capital RTP spending invested in equity projects that are located in equity focus areas			28%		26%	

<sup>9</sup> As discussed above in the Mobility section, the RTP aims to complete the entire regional bicycle and pedestrian systems by 2035. This is a more aspirational goal that requires significant additional resources for bicycle and pedestrian facilities. If these additional resources are not available, the RTP aims at a minimum to prioritize bicycle and pedestrian facilities in the places where they produce the most benefits—including in EFAs. Comparing system completeness in EFAs to other communities holds the RTP accountable to this secondary target.

<sup>10</sup> The results shown here measure access to all jobs during peak hours. Community feedback has emphasized that marginalized people particularly prioritize access to community places such as schools, grocery stores and community services and access to jobs that they are qualified for, and that marginalized people are less likely to commute during peak hours and more likely to need to travel throughout the day. Metro staff analyzed access to jobs by wage level and access to community places, and also access during off-peak periods. All of these analyses show the same basic patterns as the results in Table 7.5—access to destinations via transit and auto is slightly better in equity focus areas than in other communities, and access to destinations via auto is much higher than access via transit—and this memorandum does not reproduce those results in order to conserve space. The final RTP will include complete results of the accessibility analysis.

The RTP achieves mixed results on equity—it invests equitably, but these investments do not undo longstanding transportation inequities in safety and access to jobs. The region’s bicycle and pedestrian networks are currently more complete in many Equity Focus Areas (EFAs) where people of color, low-income people and people who speak limited English are concentrated, and the RTP continues to invest in completing those networks. However, recent data shows that these areas continue to experience three times the number of crashes that involve people walking and biking—who are particularly vulnerable to death and injury during crashes—and almost twice as many fatal and serious injury crashes as other parts of the region.

Similarly, people living in some EFAs currently have significantly better access to jobs via transit and driving than people living in non-EFAs, and the RTP continues to improve access to jobs in these communities relative to others. However, despite continued efforts to grow transit service during this and previous RTP cycles, driving in general continues to offer much more efficient and convenient access to jobs than transit does. Both research and community feedback emphasize that people of color and people with low incomes are more likely to rely on transit. This suggests that an equitable transportation system is one in which transit offers the same level of access to jobs as driving—and even with the investments in the RTP the region still falls short of providing equal access via driving and transit.

Over two thirds of RTP capital spending goes toward projects that invest in the transportation equity needs identified by people living in EFAs, and over one third goes toward projects in EFAs, with a slightly higher share of near-term funding than long-term funding devoted to these priorities. See above for a map of the equity focus areas that are used in these analyses.

Metro recognizes three limitations of the evaluation methodology and results described above:

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 is 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:

- Metro website.
- Metro social media.
- Metro newsletters.
- 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 scoring and input from the program’s grant review committee per the stated criteria in the request for application. In addition, we have developed specific grant categories to build capacity with community-based organizations and deliver meaningful and culturally responsive projects.

Other programs, such as the regional flexible funds allocation process using funds from the Congestion Mitigation Air Quality Program, Carbon Reduction 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 Metro newsletters aimed at 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 they types of programs eligible for funding, including aiding potential applicants in identifying and framing qualified programming.
- Develops training resources on different components of the application, including review of budget requirements and walking through the application process and materials via publicized online workshops. Metro shares recordings of online workshops with closed captioning on its website and through newsletters.
- 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)



## 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 503-797-1790. 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 503-797-1804 (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 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 trong [oregonmetro.gov/civilrights](http://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

Metro з повагою ставиться до громадянських прав. Для отримання інформації про програму Metro зі захисту громадянських прав або форми скарги про дискримінацію відвідайте сайт [oregonmetro.gov/civilrights](http://oregonmetro.gov/civilrights) або зателефонуйте за номером 503-797-1790. Якщо вам потрібен перекладач на зборах, для задоволення вашого запиту зателефонуйте за номером 503-797-1790 з 8.00 до 17.00 у робочі дні за п'ять робочих днів до зборів.

### Metro's 不歧视公告 | Chinese

Metro 尊重民權。欲瞭解 Metro 民權計畫的詳情，或獲取投訴表，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, wax 503-797-1790 (8 galkinka hore illaa 5 galkinka dambe maalmaha shaqada) 5 maalmaha shaqa ka hor kullanka. Haddii aad u baahan tahay turjubaan si aad uga qaybqaadid kullan dadweyne, wax 503-797-1790 (8 galkinka hore illaa 5 galkinka dambe maalmaha shaqada) shan maalmaha shaqa ka hor kullanka si loo tiixaliyo codshadaada.

### Metro의 차별 금지 관련 통지서 | Korean

Metro 는 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 (오류 5시 주중에 오전 8시) 503-797-1790를 호출합니다. 또는 차별에 대한 불만을 신고 할 수.

### Metro의 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) にご覧になるか、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がご要請に対応できるよう、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 nediscriminare | 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) ca 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 ntxov txog 5 teev tsaus ntuj weekdays) 5 hnub ua hauj lwv ua ntej ntawm lub rooj sib tham.

### សេចក្តីជូនដំណឹងអំពីការបដិសេធនៃ Metro | Khmer Cambodian

Metro បដិសេធនៃការបដិសេធនៃអ្នកប្រើប្រាស់ Metro. ប្រសិនបើអ្នកមានសំណួរ ឬត្រូវការទម្រង់របស់ [oregonmetro.gov/civilrights](http://oregonmetro.gov/civilrights) ឬប្រសិនបើអ្នកត្រូវការអ្នកបកប្រែភាសាសាធារណៈ ប្រសិនបើអ្នកមានសំណួរ ប្រសិនបើអ្នកមានសំណួរ 503-797-1790 (ពីថ្ងៃទី 8 ម៉ោង ៨ ព្រឹក រហូតដល់ថ្ងៃទី ៥ ម៉ោង ៥ ល្ងាច ថ្ងៃច័ន្ទ) ៥ ថ្ងៃ មុនការប្រជុំប្រតិភូ ៧ ថ្ងៃ មុនការប្រជុំប្រតិភូ។

### मेट्रो नगरिक अर्थबिरोहको समान गरदछ | Nepali

आफ्नो अर्थबिरोह वाहा चान्द्रावे तपाईंको दोषादे भनि र तपाईंको मेट्रो बाहेकको समानागी हुन तथा नरिणहरू गद नदछन मेट्रो अन्वय बन्वदवस्तु भनि समान बन्दिछ। मेट्रोले सबै संघीय गैर-भेदभाव बन्वदवस्तुको समान गरदछ। तपाईंको सारबन्वदवस्तुको बिनामा बाघ दोषादे बाह्रदिश भन्ने आफ्नो अनुरोधलाई समानागी गरदको सार 503-797-1790 (बिना 8 बजे 5 बजेसम्म सव दृश) बिनाको सबै बन्वदवस्तुको भनि अन्वय सव गरदछे। मेट्रोको समान वन्दवस्तुको समानागी मेट्रोको नगरिक अर्थबिरोह बाहेकको समानागी जन्वदवस्तुको समान, [oregonmetro.gov/civilrights](http://oregonmetro.gov/civilrights) मा अनुरोध मा 503-797-1790 मा सव गरदछे।

### Metro ព្រឹត្តិបត្រនៃការបដិសេធនៃ Metro | Laotian

ឧប្រតិភូនៃប្រតិភូនៃការបដិសេធនៃអ្នកប្រើប្រាស់ Metro បដិសេធនៃការបដិសេធនៃអ្នកប្រើប្រាស់ Metro. ប្រសិនបើអ្នកមានសំណួរ ឬត្រូវការទម្រង់របស់ [oregonmetro.gov/civilrights](http://oregonmetro.gov/civilrights) ឬប្រសិនបើអ្នកត្រូវការអ្នកបកប្រែភាសាសាធារណៈ ប្រសិនបើអ្នកមានសំណួរ ប្រសិនបើអ្នកមានសំណួរ 503-797-1790 (ពីថ្ងៃទី 8 ម៉ោង ៨ ព្រឹក រហូតដល់ថ្ងៃទី ៥ ម៉ោង ៥ ល្ងាច ថ្ងៃច័ន្ទ) ៥ ថ្ងៃ មុនការប្រជុំប្រតិភូ ៧ ថ្ងៃ មុនការប្រជុំប្រតិភូ។

### إشعار بعدم التمييز من Metro | Arabic

تتزم Metro الحقوق المدنية. لتزيد من المعلومات حول برنامج Metro للحقوق المدنية أو لإبداء شكوى ضد التمييز، يرجى 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 8 صباحاً حتى الساعة ٥ مساءً، أيام الاثنين إلى الجمعة) قبل ساعة (٧) أيام عمل من موعد الاجتماع.

### مشرو به حقوق مناهي احترام می گنارد | Persian

از حقوق خود آگاه باشید شما حق دارید از خدمات مترو نهادهای 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 فدرال را رعایت می کند. اگر در یک جلسه عمومی نیاز به یک مترجم شفاهی داشته باشید، پنج روز قبل از برگزاری جلسه جهت باخترگویی به درخواستتان، با شماره 503-797-1790 (از 8 صبح تا 5 بعد از ظهر روز های هفته) تماس بگیرید. برای اطلاعات در مورد برنامه حقوق مناهي مترو با برای دریافت فرم تبعیض، به وبسایت [oregonmetro.gov/civilrights](http://oregonmetro.gov/civilrights) مراجعه نمایید یا با شماره 503-797-1790 تماس بگیرید.

Printed on recycled content paper, 2024

# 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 503-797-1890. 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 503-797-1890 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 chủng tộc

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 trang [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 的不歧视公告

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 galka hore illaa 5 galka dambe maalmaha shaqada) shan maalmo shaqo ka hor kullanka si loo tiigaliyo 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, 회화에 앞서 5 영업일 (오후 5시 주중에 오전 8시) 503-797-1700를 호출합니다.

### Metro의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、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 ១ នៃរដ្ឋអភិវឌ្ឍន៍អាមេរិកសម្រាប់សិទ្ធិពលរដ្ឋរបស់ Metro ឬសេចក្តីបញ្ជាក់ការគោរពសិទ្ធិពលរដ្ឋរបស់ Metro គឺ [www.oregonmetro.gov/civilrights](http://www.oregonmetro.gov/civilrights) ។ បើសិនជាអ្នកត្រូវការអ្នកបកប្រែភាសាដើមរបស់អ្នក ឬជំនួយផ្សេងៗទៀត ទាក់ទងនឹងការប្រជុំសាធារណៈ សូមទូរស័ព្ទមេលេខ 503-797-1700 (ម៉ោង 8 ព្រឹកដល់ម៉ោង 5 ល្ងាច ថ្ងៃច័ន្ទ រហូតដល់ថ្ងៃពុធហើយ) មុនថ្ងៃប្រជុំសាធារណៈយ៉ាងតិច ៥ ថ្ងៃមុន។

### إشعار بعدم التمييز من Metro

تحتزم Metro الحقوق المدنية. لتزيد من المعلومات حول برنامج Metro للحقوق المدنية أو لإيداع شكوى عند التمييز، يرجى 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 bang 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 nediscriminarea

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 lb daim ntawv tsis txaus siab, mus saib [www.oregonmetro.gov/civilrights](http://www.oregonmetro.gov/civilrights). Yog hais ties koj xav tau lus kev pab, hu rau 503-797-1700 (8 teev sawv ntov txog 5 teev tsaus ntiv weekdôys) 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)

**Follow oregonmetro**



**Metro Council President**

Lynn Peterson

**Metro Councilors**

Ashton Simpson, District 1

Christine Lewis, District 2

Gerritt Rosenthal, District 3

Juan Carlos González, District 4

Mary Nolan, District 5

Duncan Hwang, District 6

**Auditor**

Brian Evans

600 NE Grand Ave.

Portland, OR 97232-2736

503-797-1700