

# Federal Transit Administration Title VI Program January 2, 2024

(Plan expires 3 years from date approved by the board)

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## **Title VI Plan Table of Contents**

The **Northwest Colorado Council of Governments** Title VI plan includes the following elements:

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# Section 1: Title VI Plan Approval & Compliance Requirements

Title VI Plan Adopted on: Click or tap here to enter text. 1/2/2025

Adopted by: Jon Stavney, Executive Director for

NWCCOG

Signature(s): Jon Stavnsy

Approval:

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#### **Annual Certifications and Assurances**

In accordance with 49 CFR Section 21.7(a), every application for financial assistance from FTA must be accompanied by an assurance that the applicant will carry out the program in compliance with Title VI regulations. This requirement shall be fulfilled when the applicant/recipient submits its annual certifications and assurances. Primary recipients will collect Title VI assurances from sub-recipients prior to passing through FTA funds.

Northwest Colorado Council of Governments will remain in compliance with this requirement by annual submission of certifications and assurances as required by CDOT.

## **Title VI Plan Revision Log**

<b>Date</b> Month/day/year	Section Revised	Summary of Revisions

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# **Section 2: Title VI Policy Statement**

#### **Policy Statement**

The **Northwest Colorado Council of Governments,** operating as a recipient of Federal Transit Administration (FTA) grant dollars either directly from FTA or through the Colorado Department of Transportation (CDOT), will comply with the Title VI of the Civil Rights Act of 1964 (42 U.S.C. 2000d), the U.S. Department of Transportation implementing regulations, FTA Circular 4702.1B, and CDOT Public Transportation requirements as specified in Master Grant Agreement, and State Management Plan. The **Northwest Colorado Council of Governments** operates its programs and services without regard to race, color, and national origin in accordance with Title VI of the Civil Rights Act.

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#### **Section 3: Notice to the Public**

#### Title VI Notice to the Public

The Northwest Colorado Council of Governments' Notice to the Public is as follows:

# **Notifying the Public of Rights Under Title VI**

# Northwest Colorado Council of Governments

- The Northwest Colorado Council of Governments operates its programs and services
  without regard to race, color, and national origin in accordance with Title VI of the Civil
  Rights Act. Any person who believes she or he has been aggrieved by any unlawful
  discriminatory practice under Title VI may file a complaint with the Northwest Colorado
  Council of Governments.
- For more information on the Northwest Colorado Council of Governments' civil rights program, the procedures to file a complaint, or to file a complaint, please contact the Office Manager at 970-468-0295, email <a href="mailto:office@nwccog.org">office@nwccog.org</a>, or visit our administrative office at 249 Warren Ave., Silverthorne, CO 80498. It is highly recommended that you email the Office Manager or call our office as we do not see customers at our physical office. For more information, visit www.nwccog.org.
- For transportation-related Title VI matters, a complaint may also be filed directly with the:

CDOT Civil Rights Office 2829 W. Howard Pl., Denver, CO 80204, email dot civilrights@state.co.us.

Federal Transit Administration, Office of Civil Rights, Attention: Complaint Team, East Building, 5<sup>th</sup> Floor-TCR, 1200 New Jersey Ave., SE Washington, DC, 20590.

• If information is needed in another language, Contact the Office of Environmental Justice & Equity at <a href="mailto:dot:civilrights@state.co.us">dot civilrights@state.co.us</a>.

The **Northwest Colorado Council of Governments** Notice to the Public is posted in the following areas:

Once approved, a link will be placed at <u>nwccog.org</u>.

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#### Notificación al público de los derechos contemplados en el Título VI

Consejo de Gobiernos del Noroeste de Colorado

- El Consejo de Gobiernos del Noroeste de Colorado opera sus programas y servicios sin consideración de raza, color y origen nacional de acuerdo con el Título VI de la Ley de Derechos Civiles. Cualquier persona que crea que ha sido agraviada por una práctica discriminatoria ilegal bajo el Título VI puede presentar una queja ante este Consejo.
- Para más información sobre el programa de derechos civiles del Consejo de Gobiernos del Noroeste de Colorado, los procedimientos para presentar una queja, o para presentar una queja, póngase en contacto con el administrador de la oficina al 970-468-0295, envíe un correo electrónico a office@nwccog.org o visite nuestra oficina administrativa en 249 Warren Ave., Silverthorne, CO 80498. Se recomienda encarecidamente que envíe un correo electrónico al Gerente de Oficina o llame a nuestra oficina, ya que no atendemos a clientes en nuestra oficina física.Para más información, visite www.nwccog.org.
- Para asuntos relacionados con el transporte bajo el Título VI, también se puede presentar una queja directamente ante la:

CDOT Civil Rights Office 2829 W. Howard Pl., Denver, CO 80204, correo electrónico dot\_civilrights@state.co.us.

Federal Transit Administration, Office of Civil Rights (Administración Federal de Tránsito, Oficina de Derechos Civiles) Attention: Complaint Team, East Building, 5th Floor-TCR, 1200 New Jersey Ave., SE Washington, DC, 20590.

• Si necesita información en otro idioma, póngase en contacto con la Oficina de Justicia Ambiental y Equidad en dot\_civilrights@state.co.us.

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#### **Section 4: Title VI Complaint Procedure**

The **Northwest Colorado Council of Governments'** Title VI Complaint Procedure is made available in the following locations:

- ☑ Agency website, if available: **nwccog.org**
- ☑ Agency Title VI Plan

Any individual, group of individuals or entity that believes they have been discriminated against on the basis of race, color, or national origin by the **Northwest Colorado Council of Governments** may file a Title VI complaint by completing and submitting the agency's Title VI Complaint Form.

Any individual having filed a complaint or participated in the investigation of a complaint shall not be subjected to any form of intimidation or retaliation. Individuals who have cause to think that they have been subjected to intimidation or retaliation can file a complaint of retaliation following the same procedure for filing a discrimination complaint.

A complaint must be filed with the **Northwest Colorado Council of Governments** no later than 180 days after the following:

- 1. The date of the alleged act of discrimination; or
- 2. The date when the person(s) became aware of the alleged discrimination; or
- 3. Where there has been a continuing course of conduct, the date on which that conduct was discontinued of the latest instance of the conduct.

Once the complaint is received, the **Northwest Colorado Council of Governments** will review it to determine if our office has jurisdiction. A copy of each Title VI complaint received will be forwarded to the Colorado Department of Transportation within ten (10) calendar days of receipt. The complainant will receive an acknowledgement letter informing her/him whether the complaint will be investigated by our office.

The **Northwest Colorado Council of Governments** has 45 days to investigate the complaint. If more information is needed to resolve the case, the **Northwest Colorado Council of Governments** may contact the complainant requesting further information. The complainant has **5** business days from the date of the letter to send requested information to the investigator assigned to the case. If the investigator is not contacted by the complainant or does not receive the additional information within **5** business days, the **Northwest Colorado Council of Governments** can administratively close the case.

After the investigator reviews the complaint, the agency will issue one of two (2) letters to the complainant: a closure letter or a letter of finding (LOF).

- ✓ A <u>closure letter</u> summarizes the allegations and states that there was not a Title VI violation and that the case will be closed.
- ✓ A <u>letter of finding (LOF)</u> 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.

If the complainant wishes to appeal the decision it must direct the appeal to the agency initially. The complainant has **5** days after the date of the closure letter or the letter of finding to do so. If there is outstanding concern, the appeal may be directed to the state DOT or FTA. The appeal process information will be included in the letter.

A person may also file a complaint directly with the CDOT Civil Rights Office 2829 W. Howard Pl., Denver, CO 80204, email dot civilrights@state.co.us.

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If information is needed in another language, Contact the Office of Environmental Justice & Equity at <a href="mailto:dot.civilrights@state.co.us">dot.civilrights@state.co.us</a>.

Or

Federal Transit Administration, Office of Civil Rights, Attention: Complaint Team, East Building, 5<sup>th</sup> Floor-TCR, 1200 New Jersey Ave., SE Washington, DC, 20590.

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# Section 5: Title VI Complaint Form

The **Northwest Colorado Council of Governments 's** Title VI Complaint Procedure is made available in the following locations:

oxtimes Once approved, a link will be placed on the agency's website:  $\mathbf{nwccog.org}$ 

☑ Agency Title VI Plan

Title VI Complaint Form					
Section I:					
Name:					
Address:					
Telephone (Home):		Telephone	e (Work):		
E-Mail Address:					
Accessible Format Requirements?	Large Print		Audio Tape		
Section II:	TDD		Other		
Section II.			T		
Are you filing this complaint on your	own behalf?		Yes*	No	
*If you answered "yes" to this quest	ion, go to Section III.				
If not, please supply the name and r you are complaining:	elationship of the person	for whom			
Please explain why you have filed for a third party:					
			1		
Please confirm that you have obtained the permission of the aggrieved party if you are filing on behalf of a third party.  No					
Section III:					

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I believe the discrimin	ation I experience	ed was based on (check all that appl	y):	
Title VI: [ ] Race	[] Color	[] National Origin		
Other (specify):				
Date of Alleged Discrin	nination (Month,	Day, Year):		
persons who were invo	olved. Include the	ened and why you believe you were on ame and contact information of the stact information of any witnesses. If	e person(s) who disc	criminated against
Section IV				
Have you previously fil	led a Civil Rights r	elated complaint with this agency?	Yes	No
Section V				
Have you filed this con	nplaint with any o	ther Federal, State, or local agency, o	or with any Federal	or State court?
[] Yes	[ ] No			
If yes, check all that ap	ply:			
[] Federal Agency:				
[] Federal Court		[ ] State Agency		-
[] State Court		[ ] Local Agency		
If marked Yes in Sectio complaint was filed.	n V, please provid	de information about a contact perso	n at the agency/cou	rt where the
Name:				
Title:				
Agency:				
Address:				
Telephone:				
Section VI				
Name of agency comp	laint is against:			

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Contact person:	
Title:	
Telephone number:	
You may attach any written materials or other information that you think is relevant to your	

complaint.

Signature and date required below

Signature	Date

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

**Northwest Colorado Council of Governments** Office Manager PO Box 2308 Silverthorne, CO 80498 970-468-0295 x101 office@nwccog.org

El Procedimiento de Quejas de Northwest Colorado Council of Governments 's conforme al Título VI está disponible en los siguientes lugares:

- ☐ Una vez aprobado, se colocará un enlace en el sitio web de la agencia: nwccog.org
- ☑ Plan del Título VI de la agencia

Formulario de Queias conforme al Título VI

Sección I:							
Nombre:							
Dirección:							
Teléfono (casa):		Teléfono	(trabajo):				
Dirección de correo electrónico:							
¿Requiere formato accesible?	Texto en letra grande		Cinta de audio				
	Dispositivo TDD		Otro				
Sección II:				·			
¿Está presentando esta queja er	su propio nombre?		Sí*	No			
*Si ha contestado "sí" a esta pre	gunta, pase a la Sección III.		•				
En caso negativo, indique el non	nbre y el parentesco de la persor	na en					
nombre de la cual presenta la qu	ueja:						
Explique el motivo por el que ha	presentado la queja en nombre						
de un tercero:							
Confirme que ha obtenido el permiso de la parte agraviada si presenta la Sí No							
queja en nombre de un tercero.							
Sección III:							

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Creo que la discrimina Título VI: [ ] Raza Otro (especifique):	ición que sufrí fue [] Color	por motivos de (marque todo lo que [ ] Origen nacional	e corresponda):	
personas que estuvier	nente posible lo qu on implicadas. Inc o de tenerlos), así o	ue ocurrió y por qué cree que fue di luya el nombre y los datos de conta como los nombres y datos de contac	cto de las personas	s que le
Sección IV				
¿Ha presentado anter ante esta agencia?	iormente una quej	a relacionada con derechos civiles	Sí	No
Sección V				
estatal?	լueja ante alguna α	otra agencia federal, estatal o local,	o ante algún tribu	nal federal o
[ ] Sí [ ] No En caso afirmativo, ma	arque todas las qu	e correspondan:		
[] Agencia federal				
[] Tribunal federal []	-			
[] Tribunal estatal []	-			1-
agencia/tribunal dond		oporcione información sobre una pe	rsona de contacto	en ia
Nombre:	e se presento la q	ueja.		
Cargo:				
Agencia:				
Dirección:				
Teléfono:				
Sección VI				
Nombre de la agencia	objeto de la queja	n:		
Persona de contacto:				
Cargo:				
Número de teléfono:				
Puede adjuntar cualqui	er material escrito	o u otra información que considere r	elevante para su q	ueja.
Firma y fecha requerid	as a continuación:			
Firma		Fecha		

Presente este formulario en persona en la dirección indicada a continuación o envíelo por correo a: Northwest Colorado Council of Governments

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Office Manager PO Box 2308 Silverthorne, CO 80498 970-468-0295 x101 office@nwccog.org

**Check One:** 

# Section 6: List of Transit Related Title VI Investigations, Complaints and Lawsuits

The **Northwest Colorado Council of Governments** maintains a list or log of all Title VI investigations, complaints and lawsuits, pertaining to its transit-related activities.

x	There have been <u>no</u> investigations, complaint and/or lawsuits filed against us since the last plan submission.
	There have been investigations, complaints and/or lawsuits filed against us. See list below. Attach additional information as needed.

	Date (Month, Day, Year)	Summary (include basis of complaint: race, color, or national origin)	Status	Action(s) Taken
Investigations				
1.				
2.				
Lawsuits				
1.				
2.				
Complaints				
1.				
2.				

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#### **Section 7: Public Participation Plan**

#### **Strategies and Desired Outcomes**

To promote inclusive public participation, the **Northwest Colorado Council of Governments** will employ the following strategies:

- ✓ Provide Spanish language interpretation and translation of Mobility Program documents, upon request.
- ✓ Select accessible and varied meeting locations and times
- ✓ Employ different meeting sizes and formats
- ✓ Use organizational partnerships for outreach that serve LEP populations. Outreach to LEP populations may also include newsletters and emails.

#### **Public Outreach Activities**

The public outreach and involvement activities conducted by the **Northwest Colorado Council of Governments** since the last Title VI Program submission are summarized in the table below. All meetings are open to the public and are posted on the NWCCOG website one week prior to the meetings.

Specific Public Participation activities are listed in the table below:

	Northwest			
	Colorado			
	Council of		Communication	
	Governments		Method	
Event	Staffer(s) or		(Email, newsletter,	Notes
Date	Department	Activity	flyer, or website)	
January	Dana Wood,	IMTPR	Email, website posting	Meeting was held
19, 2024	Mobility	Quarterly		virtually and in Eagle,
	Director	Meeting		CO. Notes and recording
				can be found <u>here</u> .
February	Dana Wood,	RTCC Quarterly	Email, website posting	Meeting was held
1, 2024	Mobility	Meeting		virtually and the notes
	Director			and recording can be
				found <u>here</u> .
April 19,	Dana Wood,	IMTPR	Email, website posting	Meeting was held
2024	Mobility	Quarterly		virtually and in Gypsum,
	Director	Meeting and		CO. Notes and recording
		Retreat		can be found <u>here</u> .
May 1,	Dana Wood,	RTCC Quarterly	Email, website posting	Meeting was held
2024	Mobility	Meeting		virtually and the notes
	Director			and recording can be
				found <u>here</u> .
July 19,	Dana Wood,	IMTPR	Email, website posting	Meeting was held
2024	Mobility	Quarterly		virtually and in
	Director	Meeting		Glenwood Springs, CO.
				Notes and recording can
				be found <u>here</u> .
August 1,	Dana Wood,	RTCC Strategic	Email, website posting,	Meeting was held
2024	Mobility	Planning	Mobility newsletter	virtually and in person in
	Director	Meeting		Gypsum, CO. The notes

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				and recording can be
				found <u>here</u> .
September	Dana Wood,	RTCC Summit	Email, website posting,	The Summit was held in
12, 2024	Mobility		Mobility newsletter	person in Frisco, CO.
	Director			
October	Dana Wood,	IMTPR	Email, website posting	Meeting was held
18, 2024	Mobility	Quarterly		virtually and in Eagle,
	Director	Meeting		CO. Notes and recording
				can be found <u>here</u> .
November	Dana Wood,	RTCC Quarterly	Email, website posting	Meeting was held
4, 2024	Mobility	Meeting		virtually and the notes
	Director			and recording can be
				found <u>here</u> .

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#### **Section 8: Language Assistance Plan**

#### **Plan Components**

As a recipient of federal US DOT funding, the **Northwest Colorado Council of Governments** is required to take reasonable steps to ensure meaningful access to our programs and activities by limited-English proficient (LEP) persons.

Limited English Proficient (LEP) refers to persons for whom English is not their primary language and who have a limited ability to read, write, speak, or understand English. This includes those who have reported to the U.S. Census that they speak English less than very well, not well, or not at all.

The **Northwest Colorado Council of Governments'** Language Assistance Plan includes the following elements:

- Item #1: The results of the *Four Factor Analysis*, including a description of the LEP population(s), served.
- Item #2: A description of how language assistance services are provided by language
- Item #3: A description of how LEP persons are informed of the availability of language assistance service
- Item #4: A description of how the language assistance plan is monitored and updated
- Item #5: A description of how employees are trained to provide language assistance to LEP persons

#### **Four Factor Analysis Methodology**

To determine if an individual is entitled to language assistance and what specific services are appropriate, the **Northwest Colorado Council of Governments** has conducted a *Four Factor Analysis* of the following areas: 1) Limited-English Proficient (LEP) Speaker Demography, 2) Contact Frequency, 3) Importance of Service, and 4) Resources and Costs.

Factor 1: The number or proportion of LEP persons eligible to be served or likely to be encountered by the program or recipient. In addition to the number or proportion of LEP persons served, the Northwest Colorado Council of Governments 's will identify:

- (a) How LEP persons interact with the recipient's agency;
- (b) Identification of LEP communities, and assessing the number or proportion of LEP persons from each language group to determine the appropriate language services for each language;
- (c) The literacy skills of LEP populations in their native languages, in order to determine whether translation of documents will be an effective practice; and
- (d) Whether LEP persons are underserved by the recipient due to language barriers.

**Factor 2: The frequency with which LEP persons come into contact with the program**: Identifies and assesses the frequency **Northwest Colorado Council of Governments 's** staff comes into contact with LEP persons. Examples of contact could include:

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- (a) Participation in public meetings
- (b) Customer service interactions

Factor 3: The nature and importance of the program, activity, or service provided by the program to people's lives. Generally speaking, the more important the program, the more frequent the contact and the likelihood that language services will be needed.

Factor 4: The resources available to the recipient for LEP outreach, as well as the costs associated with that outreach. Resource and cost issues can often be reduced by technological advances, reasonable business practices, and the sharing of language assistance materials and services among and between recipients, advocacy groups, LEP populations and Federal agencies. Large entities and those entities serving a significant number of LEP persons should ensure that their resource limitations are well substantiated before using this factor as a reason to limit language assistance.

Item #1 –Results of the Four Factor Analysis (including a description of the LEP population(s) served)

Factor 1: The number or proportion of LEP persons eligible to be served or likely to be encountered.

Of the 56,465 residents in the **Northwest Colorado Council of Governments'** service area, the latest U.S. Census Bureau data shows that among the area's population, 14.5%% residents describe themselves as speaking English less than "less than very well". **For these groups** who speak English "less than very well", 30% speak Spanish and 6.1% speak other Indo-European languages.

	Total of all counties (Eagle, Grand, Pitkin, Routt, Summit)	
	Estimate	Percent
Total households	56,465	
LANGUAGE SPOKEN AT HOME		
Speak English less than "very well"	8,213	14.50%
Spanish	17,051	30%
Speak English less than "very well"	7,230	12.80%
Other Indo-European languages	3,454	6.10%
Speak English less than "very well"	666	1.17%
Asian and Pacific Islander languages	839	1.48%
Speak English less than "very well"	308	0.50%
Other languages	213	0.30%
Speak English less than "very well"	9	0%

Factor 2: The frequency with which LEP persons come into contact with the program.

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The objective of Northwest Colorado Council of Governments' Regional Transit Coordinating Council (RTCC) is to serve as the coordinating council for a seven-county rural area of Colorado, including Garfield, Eagle, Grand, Jackson, Routt, Pitkin, and Summit Counties, and to provide regional transportation coordination especially for the veteran, people with disabilities, older adults, and low-income adult populations. The RTCC's goals are to:

- 1. Work collectively to address gaps and silos in the regional transportation network;
- 2. Ensure consistent operation of safe, accessible, and affordable service;
- 3. Encourage use of integrated technology and educate the region on the use of technology in transit;
- 4. Develop inclusive information and materials for educating and engaging the public; and
- 5. Support ongoing planning, coordination, and collaboration while creating new community partnerships.

The Northwest Colorado Council of Governments assessed the frequency with which staff have, or could have, contact with LEP persons. If an individual has speech limitations, will work with our partnering area transit agencies if needed, to ensure the individual receives access to the transit services.

# Factor 3: The nature and importance of the program, activity, or service provided by the program to people's lives.

The Northwest Colorado Council of Governments is committed to providing meaningful access and will provide written translation for any of its documents, when reasonable, effective and with the available resources. In other cases, the Northwest Colorado Council of Governments will strive to provide alternative but meaningful accessibility. Moreover, the Northwest Colorado Council of Governments continually evaluates its programs, services, and activities to ensure that persons who may be LEP are provided with meaningful access. The complaint form is available in English and Spanish on our website. The Title VI policy and LEP policy are available in Spanish upon request.

#### Factor 4: The resources available for LEP outreach, as well as the costs associated with that outreach.

The Northwest Colorado Council of Governments makes every effort to make its programs, services, and activities, accessible to LEP individuals. The Northwest Colorado Council of Governments will use available resources, both internal and external to accommodate reasonable requests for translations.

The Northwest Colorado Council of Governments will provide outreach to LEP persons as well as train staff on Title VI and LEP principles. This outreach will include developing new partnerships, translating all vital documents related to the RTCC (upon request), having Spanish language interpretation (upon request) at all RTCC meetings, and elevating Spanish speaking community members into roles within the RTCC.

#### Item # 2 - Description of how Language Assistance Services are Provided, by Language

The Northwest Colorado Council of Governments has identified, developed, and uses the following:

a) The Northwest Colorado Council of Governments has developed partnerships with local agencies, organizations, social service agencies, Convey Language Solutions (for interpretation and translation services), and Community Language Cooperative (for interpretation and translation services), that are available to assist with LEP responsibilities.

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b) A list of web-based translation services can be provided by contacting the Mobility Director.

Item # 3 – Description of how LEP Persons are Informed of the Availability of Language Assistance

In order to ensure that LEP individuals are aware of Northwest Colorado Council of Governments' language assistance measures, Northwest Colorado Council of Governments provides the following:

- Title VI Program Language Assistance Plan, which is made available on the website nwccog.org.
- Complaint Procedure and Complaint form is made available on the website, <a href="https://www.nwccog.org/contact-us/">https://www.nwccog.org/contact-us/</a>.

#### Item # 4 - Description of how the Language Assistance Plan is Monitored and Updated

Northwest Colorado Council of Governments will continue to update the LEP plan as required by U.S. DOT. At a minimum, the Title VI Plan will continue to be reviewed and updated every three (3) years in conjunction with the Title VI submission and use data from the U.S. Decennial Census or the American Community Survey as available, or when it is clear that the concentrations of LEP individuals are present in the Northwest Colorado Council of Governments service area.

Updates will continue to include the following:

- The number of documented LEP person contacts encountered annually.
- How the needs of LEP persons have been addressed.
- Determination of the current LEP population in the service area.
- Determination as to whether the need for translation services has changed.
- Determine whether local language assistance programs have been effective and sufficient to meet the need.
- Determine whether Northwest Colorado Council of Governments' financial resources are sufficient to fund language assistance resources needed.
- Determine whether Northwest Colorado Council of Governments has fully complied with the goals of this LEP Plan.
- Determine whether complaints have been received concerning Northwest Colorado Council of Governments' failure to meet the needs of LEP individuals

# Item # 5 - Description of how Employees are Trained to Provide Language Assistance to LEP Persons

The following training will continue to be provided to Northwest Colorado Council of Governments Office Manager and Mobility Director:

- Information on the Northwest Colorado Council of Governments Title VI Procedures and LEP responsibilities.
- Description of language assistance services offered to the public, upon request and once approved, will be listed on the Mobility Program website: <a href="https://www.nwccog.org/programs/mobility/">https://www.nwccog.org/programs/mobility/</a>
- Documentation of language assistance requests.
- How to handle a potential Title VI / LEP complaint.

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Limited English Proficient (LEP) Resource Materials:

**LEP Policy** 

**Northwest Colorado Council of Governments** shall provide for communication for limited English proficient community members to ensure them equal opportunity to benefit from services, as budget allows. Convey Language Solutions is the partnering agency and can be contacted to obtain interpreters for meetings or to translate documents.

If you need help with English, please email, office@nwccog.org.

Si usted necesita ayuda con el inglés, por favor correo electrónico, office@nwccog.org.

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# **Log of LEP Encounters**

Date	Time	Language Spoken By Individual (if available)	Name and Phone Number of Individual (if available)	Service Requested	Follow Up Required	Staff Member Providing Assistance	Notes

#### Section 9: Minority Representation Information

Recipients that have <u>transit-related</u>, non-elected planning boards, advisory councils or committees, or similar committees, the membership of which is selected by the recipient, must provide a table depicting the racial breakdown of the membership of those committees, and a description of efforts made to encourage the participation of minorities on such committees.

#### A. Minority Representation Table

#### Table Depicting Membership of Board, Committees, Councils, Broken Down by Race

Body	Caucasian	Hispanic	African American	Asian American	Native American	Two or More Races
RTCC Members (19 members out of the 50 responded to this survey)	99%	1%				

#### **B.** Efforts to Encourage Minority Participation

To encourage participation on its boards, committees, and councils, the Northwest Colorado Council of Governments will make every effort to encourage minority participation on the boards.

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The RTCC is on track to launch strategic projects by 2025 and with specific goals and strategies identified at that time. The RTCC has identified board diversification and deepening community relationships as part of their efforts in 2025 and beyond. The group will focus on recruiting community members to the RTCC that are representative of the population. The RTCC will also make meetings more accessible for those that are mono lingual or bilingual and choose to listen and speak in Spanish. Meeting agendas and notes will also be translated into Spanish upon request and simultaneous Spanish language interpretation will be available upon request at meetings.

#### **Section 10: Providing Assistance to and Monitoring Subrecipients**

- 1. Does agency provide funding to subrecipients?
  - $\boxtimes$  No, the agency does not have subrecipients.

#### Section 11: Title VI Equity Analysis for Facility Acquisition

Title 49 CFR, Appendix C, Section (3)(iv) requires "the location of projects requiring land acquisition and the displacement of persons from their residences and business may not be determined on the basis of race, color, or national origin." For purposes of this requirement, "facilities" does not include bus shelters, as they are considered transit amenities. It also does not include transit stations, power substations, or any other project evaluated by the National Environmental Policy Act (NEPA) process. Facilities included in the provision include, but are not limited to, storage facilities, maintenance facilities, operations centers, etc. Has the agency built a facility? (check a response below)

⋈ No, the agency has not built a facility.

#### <u>Section 12: Fixed Route Transit Providers Service Standards and Policies</u>

FTA Circular 4702.1B, Chapter III, Paragraph 10: All fixed route transit providers shall set service standards and policies for each specific fixed route mode of service they provide.

Northwest Colorado Council of Governments:

☑ is **not** a fixed route transit provider

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