

Kingsport Metropolitan Transportation Planning Organization



Title VI Plan

September 26, 2012

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INTRODUCTION

Title VI of the Civil Rights Act of 1964 prohibits discrimination on the basis of race, color, or national origin in programs and activities receiving Federal financial assistance. Specifically, Title VI provides that "no person in the United States shall, on the ground of race, color, or national origin, be excluded from participation in, be denied the benefits of, or be subjected to discrimination under any program or activity receiving Federal financial assistance." (42 U.S.C. Section 2000d).

Recipients of Federal transportation funding, including FHWA, FTA, TDOT, VDOT, and the Virginia Department of Rail and Public Transportation (DRPT) are required to develop policies, programs, and practices that ensure that federal and state dollars are used in a manner that is nondiscriminatory as required under Title VI.

This document details how the Kingsport Metropolitan Transportation Planning Organization (MTPO) incorporates nondiscrimination policies and practices in providing services to the public. The MTPO's Title VI policies and procedures are documented in this plan and its appendices. This plan will be updated periodically (at least every three years) to incorporate changes and additional responsibilities that arise.

METROPOLITAN PLANNING

Federal law requires metropolitan areas (defined by the US Census as urbanized areas with a population of greater than 50,000 people) undertake a continuing, comprehensive, and cooperative transportation planning process. The Kingsport Metropolitan Transportation Planning Organization (MTPO) is the governing entity that is charged with carrying out this process for the Kingsport Urbanized Area. The planning area of the MTPO consists of the cities of Kingsport, Mount Carmel, Church Hill, Gate City, Weber City, and portions of Sullivan, Hawkins, Washington, and Scott Counties.

The Kingsport MTPO is comprised of an Executive Board, Technical Coordinating Committee (or Executive Staff), and MTPO staff. The Executive Board is made up of elected officials (Mayors, County Executives, and Governors) from the following jurisdictional members:

In Tennessee

- City of Kingsport
- Town of Mount Carmel
- City of Church Hill
- Hawkins County
- Sullivan County
- State of Tennessee

In Virginia

- Weber City
- Gate City
- Scott County
- State of Virginia

Additional members who have an advisory role include the Federal Highway Administration (FHWA), Federal Transit Administration (FTA), First Tennessee Development District, and the LENOWSICO Virginia Planning District Commission (representing Gate City and Weber City).

The MTPO Executive Board has periodic meetings to discuss and vote on various policies and products. Final responsibility for transportation planning and programming is vested with the Executive Board.

The MTPO Technical Coordinating Committee (Executive Staff) is comprised of a diverse group of transportation professionals, who advise the Executive Board members on all aspects of the planning process. The Executive Staff includes engineers, transportation and land use planners, from federal, state, and local agencies, as well as representatives from transit operators.

The MTPO staff is physically housed in the City of Kingsport and is responsible for all planning and administrative functions of the MTPO. The MTPO staff serves as a liaison between the MTPO Executive Board, TDOT, VDOT, DRPT, FHWA, FTA, local governments, and other groups and individuals interested in transportation issues within the MTPO area. The MTPO staff takes their direction from, and is accountable to the Executive Board and Executive Staff.

PROVISION OF TITLE VI ASSURANCES

The City of Kingsport, on behalf of the Kingsport Metropolitan Transportation Planning Organization (MTPO) hereby certifies that, as a condition of receiving Federal financial assistance under the Urban Mass Transportation Act of 1964, as amended, it will ensure that:

- a. The City shall submit on an annual basis, its Title VI Assurance, as part of its annual Certification and Assurance submission to the FTA.
- b. No person, on the basis of race, color, or national origin, will be subjected to discrimination in the level and quality of transportation services and transit-related benefits.
- c. The City will compile, maintain, and submit in a timely manner, Title VI information required by FTA Circular 4702.1A and in compliance with the Department of Transportation's Title VI Regulation, 49 CFR, Part 21.7.
- d. The City will make it known to the public that those persons or persons alleging discrimination on the basis of race, color, or national origin as it relates to the provision of transportation services and transit-related benefits may file a complaint with the Federal Transit Administration and/or the U.S. Department of Transportation.

INCORPORATION OF THE PROGRAM

The City of Kingsport (hereinafter referred to as the "City" or "Recipient") hereby agrees that, as a condition to receiving any Federal financial assistance from the Department of Transportation, it will comply with Title VI of the Civil Rights Act of 1964, 78 Stat. 252, 42 U.S.C. 2000d-42 U.S.C. 2000d-4 (hereinafter referred to as the "Act"), and all requirements imposed by or pursuant to Title 49, Code of Federal Regulations, Department of Transportation, Subtitle A, Office of the Secretary, Part 21, Nondiscrimination in Federally-Assisted Programs of the

Department of Transportation - Effectuation of Title VI of the Civil Rights Act of 1964 (hereinafter referred to as the "Regulations"), and other pertinent directives. No person in the United States shall, on the grounds of race, color or national origin, be excluded from participation in, be denied the benefits of, or be otherwise subjected to discrimination under any program or activity for which the City receives Federal financial assistance from the Department of Transportation, including the Federal Transit Administration, and HEREBY GIVES ASSURANCE THAT it will promptly take any measures necessary to effectuate this agreement. This assurance is required by subsection 21.7(a) of the Regulations. More specifically, and without limiting the above general assurance, the City hereby gives the following specific assurances with respect to its Federal Transit Administration program:

- a. That the City agrees that each "program" and each "facility", as defined in subsections 21.23(e) and 21.23(b) of the Regulations will be (with regard to a "program") conducted, or will be (with regard to a "facility") operated, in compliance with all requirements imposed by, or pursuant to, the Regulations.
- b. That the City shall insert the following notification in all solicitations for bids for work or material subject to the Regulations and made in connection with all Federal Transit Administration programs and, in adapted form in all proposals or negotiated agreements: The City of Kingsport, in accordance with Title VI of the Civil Rights Act of 1964, 78 Stat. 252, 42 U.S.C. 2000d to 2000d-4 and Title 49, Code of Federal Regulations, Department of Transportation, Subtitle A, Office of the Secretary, Part 21, Nondiscrimination in Federally Assisted Programs of the Department of Transportation issued pursuant to such Act, hereby notifies all bidders/proposers that it will affirmatively insure that in any contract entered into pursuant to this advertisement, minority business enterprises will be afforded full opportunity to submit bids in response to the invitation and will not be discriminated against on the grounds of race, color, or national origin in consideration for an award.
- c. That the City shall insert the applicable clauses as per the most recent version of the FTA's Best Practices Procurement Manual in every contract subject to this Act and the Regulations.
- d. That the City shall include the appropriate clauses as per the most recent version of the FTA's Best Practices Procurement Manual as a covenant running with the land, in any deed from the United States affecting a transfer of real property, structures, or improvements thereon, or interest herein.
- e. That where the City receives Federal financial assistance to construct a facility, or part of a facility, the assurance shall extend to the entire facility and facilities operated in connection therewith.
- f. That where the City receives Federal financial assistance in the form, or for the acquisition of real property or an interest in real property, the assurance shall extend to rights to space on, over or under such property.
- g. That the City shall include the appropriate clauses as per the most recent version of the FTA's Best Practices Procurement Manual as a covenant running with the land, in any future deeds, leases, permits, licenses, and similar agreements entered into by the City with other parties:
 - (a) for the subsequent transfer of real property acquired or improved under Federal Transit Administration programs; and

- (b) for the construction or use of, or access to, space on, over, or under real property acquired, or improved under Federal Administration programs.
- h. That this assurance obligates the City for the period during which Federal financial assistance is extended to the program, except where the Federal financial assistance is to provide, or is in the form of personal property or real property or interest therein or structures or improvements thereon, in which case the assurance obligates the City or any transferee for the longer of the following periods:
 - (a) the period during which the property is used for a purpose for which the Federal financial assistance is extended, or for another purpose involving the provision of similar services or benefits; or
 - (b) the period during which the City retains ownership or possession of the property.
- i. The City shall provide for such methods of administration for the programs as are found by the Secretary of Transportation or the official to whom he/she delegates specific authority to give reasonable guarantee that it, other interest, and other participants of Federal financial assistance under such program will comply with all requirements imposed or pursuant to the Act, the Regulations and this assurance.

GENERAL GUIDELINES/REQUIREMENTS

A. Annual Certification and Assurance

As part of the Certifications and Assurances submitted to the DRPT with the Annual Grant Application and all Federal Transit Administration grants submitted to the DRPT, the MTPO submits a Nondiscrimination Assurance which addresses compliance with Title VI as well as nondiscrimination in hiring (EEO) and contracting (DBE), and nondiscrimination on the basis of disability (ADA). In signing and submitting this assurance, the MTPO confirms to VDRPT the agency's commitment to nondiscrimination and compliance with federal and state requirements.

B. Complaint Procedures

In compliance with 49 CFR Section 21.9(b), the City has developed procedures for investigating and tracking Title VI complaints filed against them. Such procedures shall be made available to the public upon request. The City's complaint procedures and complaint form are contained herein as APPENDIX A.

C. Record Title VI Activities

In compliance with 49 CFR Section 21.9(b), the City shall prepare and maintain a list of any active investigations conducted by entities other than the FTA, lawsuits, or complaints naming the City that allege discrimination on the basis of race, color, or nation origin. Record logs are contained herein as APPENDIX B. Such list on the log sheet shall include:

- 1) Date the investigation, lawsuit, or complaint was filed;
- 2) Summary of the allegation(s);
- 3) The status of the investigation, lawsuit, or complaint; and

- 4) Actions taken by the City in response to the investigation, lawsuit or complaint.

D. Access for LEP Persons

The City shall take steps to ensure meaningful access to the benefits, services, information, and other important portions of their programs and activities for individuals who are Limited English Proficient (LEP). The City will assist persons with limited English proficiency to participate in the transportation planning process. City Staff will make every effort to provide translators and document translation, where feasible, upon request. The City's Limited English Proficiency (LEP) Plan is contained herein as APPENDIX C.

E. Public Notification

In compliance with 49 CFT Section 21.9(d), the City shall provide information to the public regarding its Title VI obligations and apprise members of the public of the protections against discrimination afforded to them by Title VI by the following notice:

The City of Kingsport operates its programs without regard to race, color or national origin. For inquiries about the City of Kingsport' non-discrimination policies, or to file a discrimination complaint, contact the Title VI Coordinator in the Kingsport City Human Resource Office, 423-229-9401.

The City's Notice of Rights under Title VI to the public, shown above, is available at the library, the MTPO office and website, and City Hall. It is also posted on all public notices.

F. Additional Information

The City acknowledges that, at the discretion of the FTA, information other than that which is required by FTA C 4702.1A, may be requested in writing of the City, to investigate complaints of discrimination or to resolve concerns about possible noncompliance with Title VI.

G. Timely Submission

The City acknowledges that its Title VI submissions and/or updates thereto, shall be supplied to its FTA Regional Office once every three (3) years. The submission shall include, but is not limited to:

- 1) A summary of public outreach and involvement activities undertaken since the last submission and a description of steps taken to ensure that minority and low-income people had meaningful access to these activities;
- 2) City's process for persons with limited English proficiency (LEP);
- 3) Title VI Complaint and Tracking procedures;
- 4) A list of any Title VI investigations, complaints or lawsuits filed since the last submission; and
- 5) A copy of City's public notice regarding Title VI compliance and public access and instructions to City Title VI complaint procedures.

Portions of the Plan which have not changed since the last submission will not be resubmitted, however, the City shall include a statement to this effect in lieu of copies of the original documents in order to eliminate redundancy in resubmissions.

H. Environmental Analysis of Construction Projects

The City shall integrate an environmental justice analysis into its National Environmental Policy Act (NEPA) documentation of construction projects of which require NEPA. If a Categorical Exclusion (CE) is performed, the City shall complete the FTA's standard CE checklist which includes a section on community disruption and environmental justice. While preparing an Environmental Assessment (EA) or Environmental Impact Statement (EIS), the City shall integrate into its documents, the following:

- 1) A description of the low-income and minority population within the study area affected by the project, and a discussion of the method used to identify this population;
- 2) A discussion of all adverse effects that would affect the identified minority and low-income population;
- 3) A discussion of all positive effects that would affect the identified minority and low-income population;
- 4) A description of all mitigation and environmental enhancement actions incorporated into the project to address the adverse effects, including, but not limited to, any special features of the relocation program that go beyond the requirements of the Uniform Relocation Act and address adverse community effects such as separation or cohesion issues, and the replacement of the community resources destroyed by the project, if applicable;
- 5) A discussion of the remaining effects, if any, and why further mitigation is not proposed; and
- 6) For projects that traverse predominantly minority and low-income and predominantly non-minority and non-low-income areas, a comparison will be completed of mitigation and environmental enhancement actions between the two stated areas. If there is no basis for such a comparison, the City shall describe why this is so.

I. Public Participation

The City shall seek out and consider viewpoints of minority, low-income, and LEP populations in the course of conducting public outreach and involvement activities in regards to proposed transportation decisions. The City shall make every effort to include the following practices, consistent with the MTPO's adopted public participation plan:

- 1) Coordination with individuals, institutions, or organizations and implementing community-based public involvement strategies to reach out to members in the affected minority and / or low-income communities;
- 2) Provision of opportunities for public participation through means other than written communication, such as personal interviews or use of audio or video recording devices to capture oral comments;
- 3) Utilization of locations, facilities and meeting times that are convenient and accessible to low-income and minority communities;
- 4) Utilization of different meeting sizes or formats, or varying the type and number of news media used to announce public participation opportunities; and
- 5) Implementation of DOT's policy guidance regarding the City's responsibilities to LEP persons.

TITLE VI COMPLIANCE HISTORY

- a. There are no outstanding lawsuits or complaints naming the City or MTPO which allege discrimination on the basis of race, color or national origin with respect to service or other transit benefits. See APPENDIX B
- b. During the course of the last three (3) years, there has not been any civil rights compliance review activities conducted with respect to the MTPO.
- c. There are currently no pending construction projects which would negatively impact minority communities being performed by the MTPO.

APPENDIX A

TITLE VI COMPLAINT PROCEDURES

Title VI Information, Limited English Proficient (LEP) information and Complaint Process (for printed materials, website, and other mediums upon request)

The City of Kingsport (City) grants all citizens equal access to all its transportation services. It is further the intent of the City that all citizens are aware of their rights to such access. This is designed to serve as an educational tool for citizens so that they may understand one of the civil rights laws that protect their benefits of the City's programs and services, specifically, as it relates to Title VI of the Civil Rights Act of 1964.

What is Title VI?

Title VI is a section of the Civil Rights Act of 1964 requiring that "No person in the United States shall on the grounds of race, color or national origin, be excluded from participation in, be denied the benefits of, or be subjected to discrimination under any program or activity receiving federal financial assistance." Note that Title VI does not address gender discrimination. It only covers race, color and national origin. Other Civil Rights laws prohibit gender discrimination.

What is LEP?

As part of Title VI requirements, the City has developed a Limited English Proficiency (LEP) Plan to help identify reasonable steps to provide language assistance for LEP persons seeking meaningful access to City services as required by Executive Order 13166 "Improving Access to Services for Persons With Limited English Proficiency," reprinted at 65 FR 50121. A Limited English Proficiency person is one who does not speak English as their primary language and who has a limited ability to read, speak, write, or understand English.

Title VI Complaint Investigation Procedure

Any complaint alleging that the Kingsport MTPO (a division of the City of Kingsport) has not complied with Title VI regulations must fill out a Title VI Complaint form and submit it to the City Manager, City of Kingsport, 225 West Center Street, Kingsport, Tennessee, 37660. The form can be found below.

Upon receipt of the written Title VI Complaint, the City Manager will contact the following City staff to provide a summary of the complaint, and request an investigation of the complaint:

- a) the Title VI Coordinator for City of Kingsport (the City's Human Resources Director)
- b) the MTPO Administrator

The HR Director and the MTPO Administrator will coordinate efforts into investigating the act(s) of non-compliance with Title VI regulations alleged in the complaint and preparing a written response. The written response will be submitted to the City Manager within 10 business days from the date it is received by the HR Director and the MTPO Administrator.

Upon review of the written investigation submission and any independent investigation deemed appropriate conducted by the City, the City Manager will either:

- a) render a decision which will be final, and advise all interested parties of this decision in writing; or

- b) at the sole election of the City Manager, conduct an informal hearing at which the interested participating parties will be afforded an opportunity to present their respective position, including facts, documents, justification, and technical information in support thereof.
- The parties may be, but are not required to be, represented by counsel at the informal hearing, which will not be subject to formal rules of evidence or procedures.
 - Following the informal hearing, the City Manager will render a decision, which will be final, and advise all interested parties thereof in writing.

Parties dissatisfied with the final decision of the City Manager, whether following review of the written submission or informal hearing, may contact the FTA Civil Rights office, the Tennessee Department of Transportation Civil Rights Office, Virginia Department of Transportation Civil Rights Office, and/or the U.S. Department of Justice. A copy of the Title VI Complaint Form is available below.

Any person who believes himself subjected to discrimination prohibited by Title VI may file a written complaint with the FTA. A complaint must be filed no later than 180 days after the date of the alleged date that FTA accepts the complaint for investigation.

Title VI Complaint Form

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

The following information is necessary to assist us in processing your complaint. Should you require any assistance in completing this form, please let us know.

Complete and return this form to: ATTENTION: Kingsport City Manager, 225 W. Center Street, Kingsport, TN 37660

1. Complainant’s Name: _____

2. Address: _____

3. City: _____ State: _____ Zip Code: _____

4. Telephone Number (home): _____ (business): _____

5. Person discriminated against (if someone other than the complainant):

Name: _____

Address: _____

City: _____ State: _____ Zip Code: _____

Telephone Number (home): _____ (business): _____

6. Which of the following best describes the reason you believe the discrimination took place? Was it because of your:

a. Race/Color:

b. National Origin:

7. What date did the alleged discrimination take place?

8. In your own words, describe the alleged discrimination. Explain what happened and whom you believe was responsible. Please use the back of this form if additional space is required.

9. Have you filed this complaint with any other federal, state, or local agency; or with any federal or state court? Yes : No:

If yes, check each box that applies:

Federal agency Federal court State agency

State court Local agency

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

Address: _____

City: _____ State: _____ Zip Code: _____

Telephone Number (home): _____ (business): _____

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

Complainant's Signature

Date

APPENIX B

**REQUIREMENT TO RECORD TITLE VI INVESTIGATIONS, COMPLAINTS,
AND LAWSUITS**

List of Active Lawsuits:

No lawsuits, investigations, or complaints alleging discrimination on the basis of race, color or national origin have been filed against the City of Kingsport, Tennessee with respect to transit service or other transit benefits during the past three years. The City of Kingsport does include Title VI Assurances in all agreements concerning transportation contractors in all public transportation procurement contracts.

Barbara Duncan
City of Kingsport, Title VI Coordinator

Date: 1/18/2012

APPROVED AS TO FORM:

J. Michael Bepler
City Attorney

APPENIX C

LIMITED ENGLISH PROFICIENCY PLAN

This document serves as the plan for Kingsport Metropolitan Transportation Planning Organization (MTPO) to provide services to Limited English Proficiency (LEP) individuals in compliance with Title VI of the Civil Rights Act of 1964 and Executive Order 13166: Improving Access to Service for Persons with Limited English Proficiency. This plan was developed to help identify reasonable steps to provide language assistance for LEP persons seeking access to transportation services. This plan details procedures on how to identify a person who may need language assistance, the ways in which language assistance may be provided, training staff, providing notice to LEP persons, and information for future updates.

FOUR FACTOR ANALYSES

In developing the LEP plan, the U.S. Department of Transportation policy guidance was used to utilize the four factor LEP analysis for assessing language needs and determining what steps should be taken to ensure access for LEP persons. The four factors include: 1) number of LEP individuals in the service area, 2) frequency of contract with LEP individuals, 3) importance of the program, and 4) resources available and costs.

1) According to Census 2006-2010 American Community Survey 5-Year Estimates, approximately 3.89% of Kingsport's population speaks a language other than English at home and the area is comprised of 2.32% Spanish speaking individuals with less than .7% speaking less than "very well" English. The total population considered to speak English less than "very well" is .01%. The following tables provide racial makeup and language spoken at home for the Kingsport area.

Race and Hispanic or Latino Source: U.S. Census 2010

	Number	Percent
Total Population	48,205	100
White	44,308	91.9
Black or African American	1,954	4.03
American Indian and Alaska Native	126	0.26
Asian	483	1.0
Native Hawaiian and Pacific Islander	14	0.02
Some other races	431	0.89
Two or more races	889	1.84
Hispanic or Latino	1,036	2.15

Language Spoken at Home

Kingsport	Estimate	Percent of Total Population
Total:	45,350	
Speak only English	43,584	96.11%
Spanish or Spanish Creole:	1,050	2.32%
Speak English "very well"	737	1.63%
Speak English less than "very well"	313	0.69%
French (incl. Patois, Cajun):	104	0.23%
Speak English "very well"	96	0.21%
Speak English less than "very well"	8	0.02%
French Creole:	0	-
Speak English "very well"	0	-
Speak English less than "very well"	0	-
Italian:	18	0.04%
Speak English "very well"	9	0.02%
Speak English less than "very well"	9	0.02%
Portuguese or Portuguese Creole:	23	0.05%
Speak English "very well"	23	0.05%
Speak English less than "very well"	0	-
German:	83	0.18%
Speak English "very well"	52	0.11%
Speak English less than "very well"	31	0.07%
Yiddish:	0	-
Speak English "very well"	0	-
Speak English less than "very well"	0	-
Other West Germanic languages:	0	-
Speak English "very well"	0	-
Speak English less than "very well"	0	-
Scandinavian languages:	0	-
Speak English "very well"	0	-
Speak English less than "very well"	0	-
Greek:	0	-
Speak English "very well"	0	-
Speak English less than "very well"	0	-
Russian:	0	-
Speak English "very well"	0	-
Speak English less than "very well"	0	-
Polish:	0	-
Speak English "very well"	0	-

Speak English less than "very well"	0	-
Serbo-Croatian:	67	0.15%
Speak English "very well"	26	0.06%
Speak English less than "very well"	41	0.09%
Other Slavic languages:	0	-
Speak English "very well"	0	-
Speak English less than "very well"	0	-
Armenian:	0	-
Speak English "very well"	0	-
Speak English less than "very well"	0	-
Persian:	0	-
Speak English "very well"	0	-
Speak English less than "very well"	0	-
Gujarati:	28	0.06%
Speak English "very well"	16	0.04%
Speak English less than "very well"	12	0.03%
Hindi:	0	-
Speak English "very well"	0	-
Speak English less than "very well"	0	-
Urdu:	45	0.10%
Speak English "very well"	45	0.10%
Speak English less than "very well"	0	-
Other Indic languages:	0	-
Speak English "very well"	0	-
Speak English less than "very well"	0	-
Other Indo-European languages:	0	-
Speak English "very well"	0	-
Speak English less than "very well"	0	-
Chinese:	179	0.39%
Speak English "very well"	97	0.21%
Speak English less than "very well"	82	0.18%
Japanese:	0	-
Speak English "very well"	0	-
Speak English less than "very well"	0	-
Korean:	52	0.11%
Speak English "very well"	52	0.12%
Speak English less than "very well"	0	-
Mon-Khmer, Cambodian:	0	-
Speak English "very well"	0	-

Speak English less than "very well"	0	-
Hmong:	0	-
Speak English "very well"	0	-
Speak English less than "very well"	0	-
Thai:	7	0.02%
Speak English "very well"	7	0.02%
Speak English less than "very well"	0	-
Laotian:	0	-
Speak English "very well"	0	-
Speak English less than "very well"	0	-
Vietnamese:	0	-
Speak English "very well"	0	-
Speak English less than "very well"	0	-
Other Asian languages:	32	0.07%
Speak English "very well"	32	0.07%
Speak English less than "very well"	0	-
Tagalog:	0	-
Speak English "very well"	0	-
Speak English less than "very well"	0	-
Other Pacific Island languages:	0	-
Speak English "very well"	0	-
Speak English less than "very well"	0	-
Navajo:	0	-
Speak English "very well"	0	-
Speak English less than "very well"	0	-
Other Native North American languages:	10	0.02%
Speak English "very well"	0	-
Speak English less than "very well"	10	0.02%
Hungarian:	0	-
Speak English "very well"	0	-
Speak English less than "very well"	0	-
Arabic:	68	0.15%
Speak English "very well"	53	0.12%
Speak English less than "very well"	15	0.03%
Hebrew:	0	-
Speak English "very well"	0	-
Speak English less than "very well"	0	-
African languages:	0	-
Speak English "very well"	0	-

Speak English less than "very well"	0	-
Other and unspecified languages:	0	-
Speak English "very well"	0	-
Speak English less than "very well"	0	-

Source: U.S. Census 2006-2010 American Community Survey 5-Year Estimates

- 2) The frequency with which LEP individuals come in contact with a MTPO program, activity, or service. The MTPO assesses the frequency at which staff have or could possibly have contact with LEP persons. This includes documenting phone inquiries, request for translated documents, and surveying drivers. To date, the MTPO has had no requests for interpreters and no request for translated documents. Currently, the frequency of contact with LEP persons associated with local public transportation services has not transpired at this juncture. There is no large geographic concentration of any one type of LEP individuals in the service area and no identified social, service, professional, or leadership organizations that focuses on outreach or membership of LEP individuals.

- 3) The nature and importance of the program, activity, or service provided to the community. Transportation is vital to many people's lives. To ensure that all people are considered and involved in the ultimate outcomes of the transportation projects, efforts by the MTPO, its member jurisdictions, and VDOT and TDOT, during the project development process should consider special outreach efforts for areas identified as communities of concern to help mitigate any adverse impacts and/or burdens from transportation improvements.

- 4) The resources available to the MTPO and the overall costs. Funds available to the MTPO for LEP services would be derived entirely from existing operating budgets and compete with other operational requirements on an annual basis. It is anticipated that the cost of providing transportation services, programs, and projects will continue to grow. The MTPO has access to both an oral interpreter and translation services on as needed basis by contracting with Avaza Language Services Corporation, 5209 Linbar Dr. Suite 603, Nashville, TN 37211 (www.avaza.com) telephone 615.534.3400.