



# **Guidelines for Addressing Title VI and Environmental Justice in Transportation Planning**

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# Introduction

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## Purpose

Title VI and Environmental Justice (EJ) populations are a special focus in transportation planning and project development, and specific reporting requirements exist related to these federally recognized populations. Title VI and EJ regulations are intended to make participation in transportation planning and project development more inclusive of diverse communities in planning and project areas, as well as to make the analysis conducted for transportation planning and project development more inclusive of the needs of the groups and individuals that live in these communities. The Title VI federal regulations and EJ Executive Order are supported by Statewide Planning Goals in Oregon, particularly Goal 1 (Citizen Involvement).

These guidelines are intended to provide information and tools for Oregon Department of Transportation (ODOT) staff to use when conducting Title VI and EJ activities for transportation planning projects. The document is aimed specifically at ODOT Planning Project Managers, but may also be helpful to ODOT project delivery staff, and other ODOT staff members responsible for Title VI and EJ compliance. It should also prove useful to ODOT's jurisdictional partners and to consultants who have a role to play in addressing Title VI-related tasks. The approach presented here offers a process by which to identify, engage, and address the needs of protected populations in the development of ODOT statewide policy plans, facility plans, local and regional transportation system plans, and similar long-range planning documents. ODOT's goal is to achieve greater consistency in the elements and tasks that are included in project statements of work and to facilitate more systematic Title VI and EJ project reporting.

## Overview of Federal Regulations and Populations Addressed

Title VI of the 1964 Civil Rights Act and the 1994 Executive Order 12898, Federal Actions to Address Environmental Justice in Minority Populations and Low-Income Populations (Environmental Justice or "EJ"), represent federal efforts to make the planning and decision-making processes more inclusive as well as to more equitably share the impacts and benefits of projects and programs that receive federal funding.

Title VI and the associated Code of Federal Regulations for Transportation (49 CFR, Subtitle A, Part 21) affirms that any program or activity receiving federal financial assistance may not exclude or discriminate against groups or individuals based on their race, color, national origin, sex, age, and disability. In particular, a person may not be denied any benefit of the program, denied the opportunity to participate in planning or advising for the program, or subjected to discrimination under the program (including the siting of facilities) on the basis of race, color, national origin, sex, age, and disability.

Guiding principles established in Executive Order (EO) 12898 (Federal Actions to Address Environmental Justice in Minority Populations and Low-Income Populations) for transportation programs that receive federal assistance include: avoiding, minimizing, or mitigating disproportionately high and adverse human health, social, economic, and environmental effects; ensuring full and fair participation in the decision-making process; and providing full and prompt benefits.

## Introduction

While Title VI itself names only race, color, and national origin as the basis for protection against discrimination, the Federal Highway Administration (FHWA) has established a list of “Title VI nondiscrimination authorities,” which includes other federal regulations designed to protect groups and individuals based on the following characteristics and authorities :

<b>Demographic Characteristics</b>	<b>Legal Authority for Protection from Discrimination</b>
Race, color or national origin	Title VI of the Civil Rights Act
Disability	American with Disabilities Act and Rehabilitation Act
Age	Age Discrimination Act
Gender	23 United States Code (USC) 324
Limited English Proficiency	Executive Order 13166
Minority and low income	Executive Order 12898 (environmental Justice)
Handicap, age, race, color, sex or national origin	23 Code of Federal Regulations (CFR) 771

The FHWA list of authorities includes EO 12898, EO 12898, and the associated US Department of Transportation (USDOT) and the FHWA Orders on Environmental Justice, define protected minority and low-income populations as Black, Hispanic, Asian, American Indian, Alaskan Native, Native Hawaiian or Pacific Islander, and people with a median household income at or below the poverty level as defined by the US Department of Health and Human Services.<sup>1</sup>

In summary, both Title VI and EJ work in tandem to engage protected populations in the planning and decision-making processes, avoid adverse impacts to protected populations, and fairly distribute the benefits of transportation projects and programs. While the former is regulatory and the latter is directive, ODOT has historically unified these federal requirements and used the terms Title VI and EJ interchangeably in its planning processes. The terms “protected populations” or “protected class” in the context of transportation planning are inclusive of all of the groups described above, but not all types of these described groups will be present in any given study area of a planning project.

The demographic profiles of Title VI and EJ communities vary throughout the state and the specific populations identified for special considerations during a planning process will depend on the nature of the project and the size, location, and special characteristics of the study area. In these guidelines, the term Title VI populations will be used to refer to populations both strictly protected by Title VI in addition to those addressed by the related authorities in the table above, including the EJ Executive Order.

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<sup>1</sup> For comparison, the ODOT Office of Civil Rights Title VI Nondiscrimination Statement names race, color, national origin, and sex as the basis for protection. Its current Title VI Plan (2013) refers to a set of authorities that names race, color, national origin, sex, age, low-income, and minority demographic characteristics as the basis for protection. The ODOT Transportation Development Division Title VI Guidance for Transportation Planning (2009) cites federal nondiscrimination regulations related to race, color, national origin, minority status, limited English proficiency, economic and low-income status, disability, sex, and age.

## Moving Toward a Consistent Approach in Transportation Planning

The goal of Title VI/Environmental Justice (EJ) is to ensure that services and benefits are fairly distributed to all people, regardless of race, national origin or income, and that they have access to meaningful participation. The ways Title VI and EJ requirements have been addressed in statements of work and products within ODOT has varied, both in content and magnitude. Addressing the contextual needs of protected populations is specified as a component of a required public involvement plan developed for facility and system planning processes. Detailed demographic analysis that would inform the appropriate type of outreach is often performed later in the project delivery process. ODOT Planning must conduct Title VI analysis when determining the site or locating projects to ensure non-discrimination. Identifying existing and future Title VI and EJ populations is a step required in planning projects, but there is little guidance on determining how these protected populations differ in their use of the existing transportation system, the deficiencies in the transportation system from the perspective of these populations and the potential impacts of improvements being considered on protected populations. There are examples of how impacts on Title VI and EJ populations have been included in the criteria for evaluating alternatives analyses, in both local government transportation system planning and ODOT facility planning. Stipulating this in statements of work ensures that these impacts are considered – even if no impacts or substantial differences in impacts are ultimately found – and assists in reporting in the planning process as well as in preparing for project development.

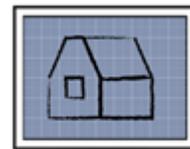
There are key opportunities in both the project scoping phase and in statement of work language to identify the overlap and differences in Title VI and EJ populations and to clearly determine which populations should be addressed in the planning process based on Title VI and related authorities cited in ODOT Title VI guidance documents. Future planning involves addressing Title VI and EJ-related questions during project scoping and performing demographic analysis early in the planning process. After documenting the protected populations in the study area, planners can then use this information to develop a meaningful public involvement plan, that is appropriate to reach specific groups, as well as to provide the baseline data for the existing and future conditions analyses and alternatives analysis.

The Title VI and EJ planning approach described in detail in this document provides a methodical way to ensure that Title VI and EJ goals are acknowledged as part of project scoping, that protected populations are identified early in a project, and that reporting elements are consistent at the conclusion of a project. The approach is organized into four phases – scoping, outreach, analysis, and reporting – and specific steps under each of these phases are described to help planners and project managers address Title VI and EJ regulations in planning projects and report how the concerns of these populations were addressed during the process. Most steps have associated **checklists** regarding what characteristics to consider, who to consult, or what questions to ask at various stages of a project. Links to **resources and tools** to aid in performing project

Checklist



Model Statement of Work Language



Resources and Tools



tasks are also provided. To assist in developing a statement of work and project task language, a template with **model statement of work language** is provided in Appendix A. This language can be modified to be incorporated into statement of work documents of upcoming projects, as appropriate for the project type and study area.

An important element under Resources and Tools is a standardized reporting form, provided in Appendix B, to document the Title VI and EJ activities once the planning project has been completed. ODOT is required to prepare an annual Title VI Accomplishment Report to document how the state's programs and projects comply with federal requirements.<sup>2</sup> An ODOT project manager's individual project reports are incorporated into a comprehensive regional report that includes all of the Region's Title VI reporting. This regional report is then compiled into the annual statewide Title VI Accomplishment Report. The Title VI and EJ Project Summary form will help standardize planning project reporting, as well as assist in the compilation of necessary information to fulfill regional and statewide reporting obligations. The Title VI and EJ Project Summary form will document how each project going forward has identified and considered Title VI and EJ populations in a way that is meaningful and appropriate to the type of project and circumstances within the study area.

## **Transportation Planning Approach**

The approach suggested in this document, which works to ensure that Title VI and EJ populations are considered and included in project scoping and execution, is organized into four phases:

- **Phase I: Scoping**
- **Phase II: Public Involvement Analysis and Outreach**
- **Phase III: Solution Alternatives Analysis**
- **Phase IV: Reporting**

Specific steps are described under each of these headings. The breadth and depth of each of the steps will depend on the context of the project. However, each step should be thoughtfully considered during the project scoping phase.

Checklists included under each of the phases may provide additional assistance in executing certain steps. The links to resources and tools provided are intended to aid in performing tasks in the statements of work. The model statement of work language serves as a sample and starting point for developing statement of work documents for future projects. Links to relevant pieces of model language are located throughout these guidelines. All of these steps and tools should expedite reporting that is required at the end of the project. A standardized reporting form is provided with these guidelines to document the Title VI and EJ components once the project is complete.

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<sup>2</sup> The Title VI Guidance for Transportation Planning (2009), prepared by ODOT's Transportation Development Division (TDD), provides an instructive overview of reporting requirements.

## PHASE I: SCOPING

Steps in this phase provide a preliminary picture of the potential impacts of proposed projects on protected populations. Activities in this phase are centered on statistical data collection, informal information meetings and discussions with local residents who know the area, are familiar with past planning efforts and outcomes and who may work with groups or individuals considered protected under Title VI and EJ. The goals of this phase are to estimate the amount of effort and resources needed for a specific project and to develop a realistic scope and budget for the Consultant Work Order Contract or staff statement of work.

### Step 1: Develop a demographic profile of the area

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The objects of the Planning evaluation are to consider project feasibility; focus the issues to be addressed for potential avoidance, minimization and mitigation opportunities. Communities change over time. Therefore, potential sociocultural effects are reevaluated at the project development phase. For planning purposes the evaluation process will include:

- Step 1: Review Project Information
- Step 2: Define the Study Area
- Step 3: Prepare Community Information
- Step 4: Evaluate Sociocultural Effects
- Step 5: Identify Solutions to Project Impacts
- Step 6: Document Findings

Sources for this information include census data, American Community Survey (ACS) data and GIS mapping. All of which are outlined later in this guide.

### Step 2: Internal Discussions

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- ✓ **Initiate discussions with ODOT staff about the history of planning area and collect any information about potential Title VI and EJ populations.**

ODOT staff discussions are particularly useful prior to developing ODOT facility plans, where the project is focused on a specific facility or facilities. These discussions should be done in any type of planning process where the subsequent step involves project planning, development, and environmental documentation for NEPA purposes. In contrast to facility planning, local transportation system planning accounts for a larger geographic area, which means that facility-specific issues are less likely to be identified and examined. Consequently, potential impacts on protected populations are less clear and may be overlooked. However, despite the differences in scope and scale, preliminary internal conversations are useful in both facility and system planning projects. The objective of this initial inquiry is to address the needs of protected populations by gauging the level of effort needed for effective public outreach and alternatives analysis.



### Questions for Internal Discussion

- What other transportation projects have there been in the area in the last 10 years?
- Has ODOT staff worked in the area before? If so, what analysis has been done?
- Who are some ODOT staff members familiar with Title VI populations, interest groups that represent populations and issues in the study area?

## Step 3: External Discussions

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- ✓ **Initiate discussions with local agencies about the history of planning in the study area.**
- ✓ **Engage the Planning Consultant on the project.**

Talking to a staff member of local public agency can provide insight into the needs of protected populations and the possible harms and benefits of the proposed project. These conversations also offer ODOT staff with an opportunity to review Title VI and EJ-related objectives and reporting requirements with local staff. Another key resource is your Planning Consultant, who may be able to provide a historical overview about protected populations and past planning projects based on their experience in the study area.



### Questions for External Discussion

- What other planning projects have been conducted in the area in the last 10 years that may have had an associated demographic analysis? Examples of relevant planning studies include housing needs analysis, economic development studies, school facilities plans, transit plans, and, potentially, subarea plans.
- Is there any history of controversial projects in the area? Examples include projects that involved residential or business displacement, mitigated environmental impacts, conflicts with property rights, and other disputed elements.
- Have there been complaints about outreach related to past projects?
- Were Title VI and EJ considerations specifically incorporated in past efforts?

*Note: The focus of these questions is not limited to past ODOT plans and projects, or local transportation-related planning generally, but should encompass any past or current planning projects that may provide insight into the demographic composition and experiences of the community. Answers to these questions should provide the Planning Project Manager additional perspective when setting project objectives associated with Title VI, EJ, and associated federal reporting requirements.*

## Step 4: Level of Effort Determination & Drafting the Statement of Work

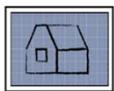
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- ✓ **Reference findings from internal and external discussions in the project background and project objectives sections of the statement of work.**
- ✓ **Reflect findings from internal and external discussions in the statement of work tasks.**

Each project statement of work (SOW) will have language that states that the project will “meet the requirements of” Title VI and address EJ directives. The language will indicate that demographic analysis will be required to help define the protected populations within the study area. In addition to exploring how these directives can be addresses, this step encourages providing more specificity in the statement of work language related to the anticipated protected populations, based on initial discussions with ODOT and local public agency staff. Model SOW language is provided in Appendix A as a starting point for developing statement of work documents.

As part of drafting the SOW, the level of effort needs to be determined for two specific approach elements: the Public Involvement Analysis and Outreach and the Solution and Alternative Analysis. Public involvement efforts will be guided by types of groups identified and location (or concentrations). The approach is to determine needed demographic data and identify the Title VI and EJ populations within the study area as part of developing the public involvement plan. This information can then be used in the existing/future conditions documentation and alternative analysis steps of the project.

Questions that may assist a project manager in developing the Statement of Work are found in the checklist in this section. If there are many uncertainties related to the questions below, project statements of work should acknowledge that fact and specify that there may be unanticipated outreach needs not identified in the work tasks. Statement of work language can accommodate potential additional outreach needs either through amendments or, if enough is known about the nature of the potential uncertainty, by identifying a contingency task.



### **[Model Language: Statement of Work](#)**

See Appendix A



## Considerations for Statement of Work (SOW) development:

### Community Expectations

- Is the project likely to generate a lot of public interest or to be controversial?
- Does the local partner have a structured public involvement program or established process for community engagement that is already inclusive of Title VI and EJ populations, or will this process be created for the project?

### Geographic Issues

- How large is the geographic reach of the project or its likely study area?
- Are protected or sensitive populations that are expected to be found in the study area relatively few and concentrated, or dispersed?

### Translation Needs/Costs

- Are there non-English speaking populations that will require translation services? Given an estimation of this population in the study area, estimate the extent of translation service needed, e.g., translation of all or some online and printed materials, translators at all meetings or only upon request.
- Will translation services be provided by ODOT, local partners, consultants, or a combination of these possibilities? What types of media will be employed for the planning effort (meetings, print, electronic media) and at what level of sufficiency to the meet anticipated project needs?

### Availability of Local Demographic Data

- Are there recent planning studies that include demographic information in sufficient detail and applicability to the current transportation planning project to eliminate or reduce the need for additional research?

### Availability of Demographic and Travel Information through Local Planning and Social Service Agencies and Non-Profit Organizations

- Do local jurisdiction planning departments and/or local or regional transportation or social service agencies have existing data that can be easily accessed /analyzed for purposes of the project?

*See Relevant Organizations list in Phase II.*



## Considerations for Statement of Work (SOW) development:

(continued from page 8)

### GIS/mapping needs and capabilities

- Confirm that consultants have the capabilities to map Census data and any other data provided by project team members or from other sources. This includes incorporating GIS files from other sources (and possibly different versions of GIS) and/or manually entering data into GIS such as key destinations for low-income populations in the study area seeking social services.
- If local partners are assigned mapping tasks for project budget and/or other purposes, do they have the mapping capabilities described above “in house”? If not refer them to ODOT’s EJ Mapping or the EPA mapping site.



## Title VI and EJ Background

### Title VI of the 1964 Civil Rights Act

[https://www.oregon.gov/ODOT/Business/OCR/Documents/titlevi\\_of\\_the\\_1964\\_civil\\_rights\\_act.pdf](https://www.oregon.gov/ODOT/Business/OCR/Documents/titlevi_of_the_1964_civil_rights_act.pdf)

### FHWA Title VI Related Authorities

<https://www.fhwa.dot.gov/civilrights/programs/tvi.cfm>

### ODOT Title VI Nondiscrimination Statement

<https://www.oregon.gov/ODOT/Business/OCR/Pages/Non-Discrimination.aspx>

### ODOT Title VI Non-Discrimination Program Plan, November 2013

<https://www.oregon.gov/ODOT/Business/OCR/Pages/Non-Discrimination.aspx>

### Title VI Guidance for Transportation Planning (July 2009), ODOT TDD

<https://www.oregon.gov/ODOT/Planning/Documents/Title-VI-Guidelines-Transportation-Planning.pdf>

### Western States Peer Exchange Standards – Creation of Uniform Data Collection Standards

<https://www.oregon.gov/ODOT/Business/OCR/Pages/Non-Discrimination.aspx>

## PHASE II: PUBLIC INVOLVEMENT ANALYSIS AND OUTREACH

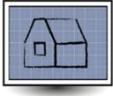
In order to ensure a strong level public involvement during the course of the planning project, planners should cognizant of the characteristics of the community. It is helpful to know the demographics of the study area and assess community factors that may translate to local transportation-related needs. To this end, once the Notice to Proceed (NTP) is provided (or the project process begins, if a consultant is not being used), the Public Involvement Analysis and Outreach phase should begin with defining and identifying the Title VI and EJ populations within the study area. Information gathered during the scoping phase should inform planners of the specific groups that are protected Title VI populations in the study area. The project public involvement plan can include targeted outreach strategies that utilize data from the US Census data on these specific groups. This same data may serve as the basis for developing specific evaluation criteria in the Solution Alternatives Analysis phase of the project.

### Step 1: Define Populations

#### ✓ Determine Title VI and EJ populations to be addressed.

The Planning Project Manager should identify race characteristics (typically non-white populations) and low-income characteristics in their study areas.

<p>Gather community information describing the sociocultural context of the project area including community facilities/services; presence of certain population groups; and indications of community values, concerns, and preferences.</p> 	<p><b>General list of Title VI and EJ populations</b></p>
<ul style="list-style-type: none"> <li>• <b>Title VI (per Title VI and “Related Authorities”)</b> <ul style="list-style-type: none"> <li>○ Race/color/national origin</li> <li>○ Age</li> <li>○ Sex</li> <li>○ Disabilities (mental and physical)</li> <li>○ Limited English proficiency</li> <li>○ (EJ Executive Order as a “related authority”)</li> </ul> </li> <li>• <b>EJ (per Executive Order 12898)</b> <ul style="list-style-type: none"> <li>○ Minority (Black, Hispanic, Asian, American Indian, Alaskan Native, Native Hawaiian and Pacific Islander)</li> <li>○ Low-income (median household income at or below poverty level)</li> </ul> </li> </ul>	



**[Model Language: Defining Populations](#)**

See Appendix A

## Step 2: Identify Populations

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### ✓ Map Census data for Title VI and EJ populations for the study area.

Mapping Title VI and EJ related information using the US Census Bureau’s Tiger shape files is the most comprehensive and readily available means to illustrate where Title VI and EJ concerns may exist within any given study area. However, it should be noted that the Census data geography may not always coincide with the study area. For example, some Census data related to Title VI populations is available at a Block Group level. The data lies between the Census Tract and Block levels, and is dependent on population/density. Thus, Block Groups tend to be large in rural settings and smaller in urban settings. Large Block Groups in rural areas potentially compromise how helpful data at this level can be. In these situations, supplemental information from field surveys and social service providers may help hone identification of protected populations.

ODOT currently has an online GIS application through its TransGIS website that provides for mapping Title VI and EJ-related information at the zip code level. This level of aggregation can be a starting place for understanding the Title VI and EJ characteristics of a project study area. However, it is probably not detailed enough to help illustrate how specific project recommendations may affect those populations. The Environmental Protection Agency (EPA) also hosts an online GIS mapping resource called NEPAssist that may be useful in determining area characteristics. Some of their data is available at the Tract and Block level and includes information from the American Communities Survey (ACS).

Links to these tools are available on the next page of this guidance.



### Considerations for Analysis

#### **Extent of Title VI and EJ populations being studied**

- What populations were tentatively identified during scoping discussions in the study area and what resources are necessary to document these populations?

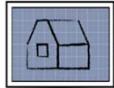
*See links to the list of Title VI and EJ populations in Step 1 and available resources under “Prepare Public Involvement Plan” in Step 3.*

- Is information available at only the Census Tract level, or is it available at the smaller Census Block Group level?



## Considerations for Analysis

- How closely does Census geography coincide with the project study area? If they do not coincide closely, this should be acknowledged in the text of the technical memoranda. As feasible or reasonable, make approximations about the percentage of the population within the project study area using a set of stated/supported assumptions and GIS.



## [Model Language: Mapping Census Data](#)

See Appendix A



## Resources: Mapping Title VI and EJ Populations

### **Title VI Plan (2013), pp. 15-17 Data Collection**

<https://www.oregon.gov/ODOT/Business/OCR/Pages/Non-Discrimination.aspx>

### **TransGIS (EJ layer nested under Boundary layer)**

<https://gis.odot.state.or.us/transgis/>

### **Environmental Protection Agency – NEPAssist mapping tool**

<https://nepassisttool.epa.gov/nepassist/nepamap.aspx?wherestr=Oregon>

### **US Census Data**

<https://www.census.gov/>

The Decennial Census (DC) is conducted every ten years and the American Community Survey (ACS), is conducted in the years between the Decennial Census. These efforts provide extensive demographic data. ACS data tends to be available at larger, less detailed levels of geography than Decennial Census data. These differences present a trade-off between data that is more recent and data that is more detailed. The following demographic data is generally available at the Census Tract level in ACS 5-year Estimates and at the Census Block Group level in Decennial Census 100% data.



## Resources: Mapping Title VI and EJ Populations

However, data availability may vary from survey to survey as may the data file names.

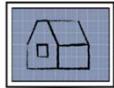
### **Step-By-Step Instructions:**

1. Navigate to American Fact Finder, Advanced Search:  
<https://factfinder.census.gov/faces/nav/jsf/pages/searchresults.xhtml?refresh=t>
2. Enter county, state, and Census geography (Census Tract or Census Block Group) for the study area.
3. Set topic for race, age, sex, disabilities, language spoken at home, or poverty and search files.
  - **Race/color/national origin** – All who did not identify as White Non-Hispanic
    - DC: Race Alone or in Combination and Hispanic or Latino (Summary File 1 (SF1), 100% Data, QT-P6, Decennial Census)
    - ACS: Race (File B02001, ACS 5-Year Estimates; note: but only White Alone, not White Non-Hispanic/Latino)
  - **Age** – 18 years and younger/65 years and older
    - DC: Single Years of Age and Sex (Summary File 1 (SF1), 100% Data, QT-P2 in Decennial Census)
    - ACS: Age and Sex (File S0101, ACS 5-Year Estimates)
    - ACS: Population 65 Years and Over in the United States (File S0103, ACS 5-Year Estimates)
  - **Sex** – Female and male
    - DC: Age Groups and Sex (Summary File 1 (SF1), 100% Data, QT-P1, Decennial Census)
    - ACS: Age and Sex (File S0101, ACS 5-Year Estimates)
  - **Disabilities** – Sensory, physical, mental, self-care, go-outside-the-home, or employment disability, 5 years and older
    - DC: Disability by Status by Sex (Summary File 1 (SF3), Sample Data, QT-P21, Decennial Census; note: data for 2000 Census but not 2010 Census)
    - ACS: No recent ACS data
  - **Limited English proficiency** – Did not speak any English (spoke English less than very well), 5 years and older
    - DC: No recent Decennial Census data
    - ACS: Language Spoken at Home (File S1601, ACS 5-Year Estimates)
  - **Low-income** – Income at or below federal poverty level (individuals/households/families with poverty status in last 12 months)
    - DC: No recent Decennial Census data
    - ACS: Poverty Status in the Past 12 Months (File S1701, ACS 5-year estimates)

### ✓ **Determine “Concentration” of Title VI and EJ populations.**

Analysis of the Census data should lead to some conclusions regarding potential concentrations of Title VI and EJ populations in the planning project area. Ways in which to illustrate the concentrations of specific groups include comparisons to city, county, or state averages and mapping the location of highest/lowest percentages within the study area. With this step, general conclusions can be made regarding the significance or relevance of identified groups in terms of level or type of effort in public outreach activities and, later in the process, how possible transportation solutions may disproportionately impact or benefit these populations.

(continued from page 12)



**[Model Language: Land Use Survey/Site Visit](#)**

See Appendix A



**Options for Defining Concentrations of Mapped Populations**

Percentages in Census Block Group or Tract that are:

- Above city average
- Above county average
- Above state average
- Highest in the plan/project area



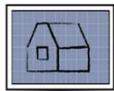
**Existing Conditions Information**

In the field, identify housing and services that potentially have concentrations of occupancy by minority, immigrant, young, senior, disabled, predominantly male or female, and/or low-income populations.

- Multi-family housing
- Manufactured home parks
- (Farm)worker housing
- Residential and care facilities
- Retirement homes/communities
- Shelters and missions
- Tribal facilities and land holdings

- ✓ **Consult with local transportation and social service organizations (as applicable) to identify concentrations of Title VI and EJ populations in the study area and map these findings (in GIS).**

The Planning Project Manager may determine that contacting local organizations may yield relevant information regarding facilities used by Title VI and EJ populations. There may be situations where census data, field observations, and other existing conditions do not provide a clear picture regarding the presence or needs of Title VI and EJ populations. In these cases, the Planning Project Manager may deem it appropriate to contact select community organizations about potential concentrations of Title VI populations in the study area to further identify key land uses and transportation facilities and services accessed/used by these populations.



**Model Language: Consulting with Other Providers**

See Appendix A



**Relevant Organizations**

Organizations that may have information pertaining to Title VI and EJ populations include:

- Transit agencies
- Other public or non-profit transportation service providers
- Health care providers
- City/County health and human services
- City/County housing services
- State or local police
- State public assistance/social service agencies
- School districts (K-12) and community colleges
- Educational service organizations (e.g., Head Start)
- Affordable housing advocacy organizations
- Charitable organizations (e.g., United Way, Salvation Army)
- Faith-based organizations
- City/County disability support programs and advisory committees
- Other City/County advisory committees
- Disability advocacy organizations (e.g., the Arc)

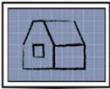
	<h2>Relevant Organizations</h2>
<ul style="list-style-type: none"> <li>• Race- or nationality-based community organizations</li> <li>• State refugee coordinators</li> <li>• Immigrant aid organizations</li> <li>• Tribal governments</li> <li>• Labor unions, industry groups, business associations</li> </ul>	

## Step 3: Prepare Public Involvement Plan

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### ✓ Prepare a Public Involvement Plan

The public outreach requirements in a statement of work should include drafting a plan or strategy that identifies specific project requirements. The project Public Involvement Plan (PIP) referred to in this document may also be called a Stakeholder Involvement Strategy (SIS) or some hybrid of the two titles. The PIP/SIS should present findings based on Census data and mapping, land use surveys, site visits, and various consultations. The plan should clearly state how the proposed public outreach strategies and the previous two steps are connected.

	<p><b><u>Model Language: Public Involvement Plan</u></b> See Appendix A</p>
-------------------------------------------------------------------------------------	---------------------------------------------------------------------------------

	<h2>Considerations for Public Involvement</h2>
<p>Strategies to engage protected populations and elements to incorporate into a public involvement plan may include items listed below:</p> <ul style="list-style-type: none"> <li>• Involve members of identified Title VI populations, members of organizations representing Title VI populations, and/or social service provider staff on advisory committees.</li> <li>• Use targeted media and outlets (e.g., community newspapers, newspapers in languages other than English, radio programs and websites, flyers sent home from school with students, flyers posted places like housing developments, social service offices, transit stops/centers, and</li> </ul>	



## Considerations for Public Involvement

(continued from page 16)

grocery stores).

- Choose appropriate meeting times, dates, and locations.
- Determine if protected populations in the study area have certain characteristics (e.g., single-parent households, seasonal workers, faith-based observances, age-related accessibility challenges) that may influence the choice of venue, date, or time of project-related meetings.
- Identify if there are logical areas within the project study area that are frequented, or can be easily accessed, by those populations that are likely/potentially going to be impacted by project recommendations and outcomes.
- Hold meetings in locations where identified populations congregate, including meetings and events held at community sites (e.g., places of worship, schools, local businesses, and other gathering places). Choose locations that are accessible by transit, walking or biking.
- Request to be put on the agenda(s) of regularly scheduled community, civic and business group meetings and ensure attendance of planning project representatives at community events.
- Determine if the project's public involvement plan will need to be found consistent with the local jurisdiction's policies and practices and/or if it will need to be deemed acceptable to local partner(s).



## Resources: Preparing a Public Involvement Plan

### **ODOT Title VI Plan (November 2013)**

<https://www.oregon.gov/ODOT/Planning/Documents/Title-VI-Guidelines-Transportation-Planning.pdf>

- Public Participation Plan, Environmental Justice Plan, and Language Access Plan
- Public Involvement Plan Template and Checklists (appendix)

### **International Association for Public Participation (IAP2)**

<https://iap2usa.org/>

- Tools and information to conduct public participation processes
- Online resource are available to members



## Resources: Preparing a Public Involvement Plan

### **Oregon Chapter, American Planning Association (OAPA)**

<http://www.oregonapa.org/>

The OAPA Women and Diversity in Planning Committee provides forums on a variety of topics including conducting public outreach to diverse communities, with a focus on outreach methods and lessons learned.

### **Metropolitan Organizations**

#### ***Metro, Portland, Oregon***

*Public Engagement Guide, Final Adoption Draft (November 2013)*

[https://library.oregonmetro.gov/files/final\\_draft\\_public\\_engagement\\_guide\\_112113.pdf](https://library.oregonmetro.gov/files/final_draft_public_engagement_guide_112113.pdf)

- Meeting considerations (times, locations and accessibility)
- Identifying participants
- Language discussion groups
- Local Engagement and Non-Discrimination Checklist (appendix)
- Title VI Event Form (appendix)
- Tools and Techniques Matrix (appendix)

#### ***Metropolitan Transportation Commission, San Francisco, California*** *Mission-Geneva Community-Based Transportation Plan (2007)*

<https://mtc.ca.gov/our-work/plans-projects/equity-accessibility/community-based-transportation-plans>

- Commissioning a community-based organization for developing and implementing an outreach plan

#### ***Metropolitan Transportation Commission Public Participation Plan for the San Francisco Bay Area (2010)***

<https://mtc.ca.gov/about-mtc/public-participation/public-participation-plan>

- Using media outlets to increase engagement
- Techniques for involving low-income communities and communities of color
- Techniques for involving Limited-English Proficient Populations

#### ***Metropolitan Transportation Commission Plan for Special Language Services to Limited English Proficient Populations***

<https://mtc.ca.gov/tools-and-resources/digital-library/final-revised-plan-special-language-services-limited-english>

### **Public Involvement Firms**

Public involvement firms will be contracted as needed in consultation with the Region Planning



## Resources: Preparing a Public Involvement Plan

(continued from page 17)

Manager and the ODOT Communications Team.



## Considerations for Enlisting a Public Involvement Firm

### **Title VI and EJ-related considerations in searching for a public involvement consultant:**

- Experience in “non-traditional” approaches in reaching out to Title VI and EJ populations
- Experience in working with and including Title VI and EJ populations in planning processes
- Access to translation services such as assisted-listening devices, spoken translation, braille, and sign language for public events
- Experience with “e-participation” outreach tools such as video, social networking sites, online mapping, and digital and photographic documentation
- Knowledge of, and relationships with, community engagement organizations

## PHASE III: SOLUTION ALTERNATIVES ANALYSIS

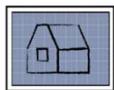
This phase relies on the previous Define Populations and Identify Population steps in the Public Involvement Analysis and Outreach Phase (Phase II). The census data and other analysis that informed the development of the Public Involvement Plan is used to describe and illustrate existing conditions as they pertain to the Title VI demographic information. This information can be used to assess and consider the potential transportation impacts and benefits to protected populations under future traffic conditions during the development of alternatives. As part of the alternatives evaluation (Step 3 of this phase), the evaluation criteria developed for determining recommended programs or projects should include their potential effect on Title VI populations.

### Step 1: Identify Existing Conditions and Issues

---

- ✓ **Identify key destinations, transportation facilities and services used by Title VI and EJ populations in the study area**
- ✓ **Identify gaps in facilities and services or any other issues that may affect Title VI and EJ populations.**

The location of specific attractors and certain land uses (e.g., low-income housing, public, private and religiously affiliated social service providers) in relation to existing transportation facilities and public transit service should be mapped and described in this step. If necessary, a land use field survey or site visit can provide additional information to supplement data analysis and mapping, providing location-specific features (land use and transportation) that will give an indication of the location of populations with specific transportation needs. Consultations with project team and service providers will also be useful to complete an existing conditions analysis (see the Identify Populations step under Outreach). Note that these consultations, as well as field surveys and site visits, can serve multiple project objectives and may not necessarily be subtasks solely focused on documenting Title VI or EJ existing conditions. The objective is to incorporate Title VI and EJ inquiry into early project tasks where appropriate and, for this step, to formally document what is known about Title VI and EJ populations within the study area as part of the project's existing conditions analysis.



#### **[Model Language: Existing Conditions](#)**

See Appendix A



### Potential Key Attractors and Destinations

- Grocery/specialty or ethnic grocery stores
- Ethnic restaurants
- Schools
- Senior centers
- Residential and care facilities
- Shelters and missions
- Community centers
- Places of worship
- Health and social service offices (public, non-profit)



### Sources to Identify Existing Transportation and Land Use Facilities and Services

- Consultation with project team
- Consultation with other facility/service providers in study area
- Site visits/field surveys
- Inventories of pedestrian, bicycle, and transit facilities
- Maintenance records
- Facilities with high traffic counts and/or crash counts
- Transit service plan

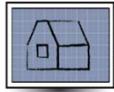
## Step 2: Determine Benefits/Impacts (Future Conditions)

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### ✓ Identify impacts and benefits of transportation improvements for Title VI and EJ populations when developing alternatives.

Scope requirements and work products related to future conditions analysis should include specific consideration of potential effects on Title VI and EJ populations. Common measures for assessing existing and future conditions and needs are mobility and safety performance. Existing and future conditions reports also typically address multimodal “gaps” in services and facilities that may affect transportation system accessibility. These aspects of the analysis and reporting can directly or indirectly address Title VI and EJ needs (e.g. lack of sidewalks reduces accessibility for populations who cannot drive). Considering these needs

and their proximity to Title VI and EJ populations can be used as a factor in determining whether solution alternatives have a significant or disproportionately adverse effect on Title VI and EJ populations.



**Model Language: Future Conditions**

See Appendix A

### **Step 3: Determine Recommended Projects/Preferred Alternative (Alternatives Evaluation)**

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- ✓ **Develop and use evaluation criteria addressing impacts and/or benefits to Title VI and EJ populations in determining recommended projects and/or preferred alternative.**

Evaluation criteria should specifically address Title VI and EJ populations. Where a determination has been made that there are no significant concentrations of protected populations in the study area, the needs of the transportation disadvantaged could be included in the criteria, such safety, property impacts, accessibility and mobility. For alternatives selected as “preferred,” any potential impacts and benefits should be flagged for consideration during project development.



**Model Language: Alternatives Evaluation**

See Appendix A

## PHASE IV: REPORTING

Following the steps in the previous phases –incorporating necessary and appropriate elements in the project SOW and successfully performing related Title VI tasks – should make required Title VI reporting a relatively easy task. The directions in the Reporting phase are consistent with ODOT’s Planning Business Line Operational Notice PB-04 Title VI/EJ and Non-Discrimination Data Collection, Compliance and Reporting. Information included below is intended to assist Planning Project Mangers in reporting Title VI accomplishments on a continuous basis to make yearly reporting an easy process.

### Project Level Reporting of Title VI Activities

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- ✓ **Summarize generally and/or refer to State reporting requirements and the role of Planning Project Manager re: reporting outcomes of individual projects.**

Planning Managers are responsible for summarizing and recording Title VI activities for individual planning projects. The Title VI and EJ Project Summary Report Form in Appendix B includes the recommended steps to ensure compliance with Title VI and consistency with the Guidelines for Addressing Title VI / EJ in Transportation Planning. This report should be completed as activities occur and uploaded to the TDD Planning Section Inclusive Public Involvement Site by selecting the Accomplishment Reports tab.

	<b><u>Model Language: Reporting</u></b>
	See Appendix A

	<b>Resources: Reporting Title VI / EJ Requirements</b>
	<b>ODOT Title VI Non-Discrimination Program Plan, November 2013</b>
	<a href="https://www.oregon.gov/ODOT/Business/OCR/Pages/Non-Discrimination.aspx">https://www.oregon.gov/ODOT/Business/OCR/Pages/Non-Discrimination.aspx</a>
	<b>ODOT Title VI Update Accomplishment Report 2012-2013</b>
	<a href="https://www.oregon.gov/ODOT/Business/OCR/Pages/Non-Discrimination.aspx">https://www.oregon.gov/ODOT/Business/OCR/Pages/Non-Discrimination.aspx</a>
	<b>ODOT Government-to-Government 2012 Activity Report</b>
	<a href="http://library.state.or.us/repository/2011/201102091051323/cis_gov_to_gov_2012AnnualReports_2012_ODOT.pdf">http://library.state.or.us/repository/2011/201102091051323/cis_gov_to_gov_2012AnnualReports_2012_ODOT.pdf</a>
	<b>Title VI Guidance for Transportation Planning (July 2009), ODOT TDD</b>
	<a href="https://www.oregon.gov/ODOT/Planning/Documents/Title-VI-Guidelines-Transportation-Planning.pdf">https://www.oregon.gov/ODOT/Planning/Documents/Title-VI-Guidelines-Transportation-Planning.pdf</a>



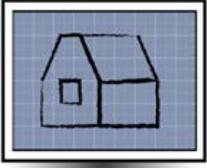
**Resources: Reporting Title VI / EJ Requirements**

(continued from page 22)

- Appendix A – Title VI Accomplishment Report Template for ODOT Planning and Subrecipient Monitoring
- Appendix B – Title VI Accomplishment Report Template for Metropolitan Planning Organizations
- Appendix C – Title VI Accomplishment Report Template for Local Governments

## **APPENDIX A**

# **Model Statement of Work Language**



## MODEL STATEMENT OF WORK LANGUAGE

The model language below is intended to provide a starting point for developing statement of work documents. Language is organized under topic headings (Phase and Step) according to where particular planning project elements are discussed in the guidelines.

### **Phase I: Scoping**

#### ***Level of Effort Determination & Drafting the Statement of Work***

##### **For Project Description or Background sections:**

The [jurisdiction] has a significant [protected population(s)] community(ies) and recognizes the need for specific outreach to [this/these] communities, as well as consideration of the impacts and benefits to [this/these] communities as a result of this planning process in this planning process.

**-OR-**

Initial scoping for this planning process has not revealed concentrations of populations protected by federal Title VI regulations and related authorities in the study area. However, this initial finding will be researched further in the early tasks of this planning process.

### **Phase II: Public Involvement Analysis and Outreach**

#### ***Define Populations***

##### **For Project Description or Background sections:**

Title VI and related federal authorities including Executive Order 12898 (Environmental Justice) prohibit discrimination on the basis of race, color, national origin, and other demographic characteristics. They are intended to make planning and decision-making more inclusive and to more equitably share the impacts and benefits of projects and programs

receiving federal funding.

The [Consultant/jurisdiction] shall identify protected Title VI and EJ populations during this planning process, including those defined by race, English proficiency, age, sex, disabilities, and income. Further definition of these and other populations identified in the planning study area can be provided by Census data (see Task [X, Identifying Populations]); site visits; and consultation with the project team, transportation facility and service providers, and social service providers in the study area (see Task [X, Identifying Populations]). Identification of Title VI and EJ populations in the study area shall be accompanied by observations and discussion of transportation facilities and services used by these populations. This includes identification of any gaps in facilities and services or any other issues with these facilities and services in order to inform subsequent phases of the project.

### ***Identify Populations***

#### **Mapping Census data:**

The [Consultant/jurisdiction] shall use Census demographic data files and, if appropriate, field observations to map Title VI and EJ populations in the study area. Describe the level (e.g., Census Tract or Census Block Group) and extent of the data in relationship to the study area. Concentrations of Title VI and EJ populations in the study area should be described in text, tables, and in maps.

#### **Land use survey/site visit:**

In addition to mapping demographic data, the Consultant shall consider potential concentrations of Title VI and EJ populations during initial site visits and/or land use surveys. The Planning Project Manager will determine if this task is necessary. Items to be considered, and documented where present, include housing and other land uses that are known to have or may be anticipated to have higher numbers of Title VI or EJ residents or patrons, such as multi-family housing, manufactured home parks, shelters, and health and social service facilities. Field information is expected to assist in identifying Title VI and EJ populations in the study area and the transportation facilities and services used by identified populations, based on significant land uses and attractors. Field findings should be cross-referenced with Census data and mapping in Task [X] and noted in maps and figures related to Title VI and EJ populations.

#### **Consulting with other facility and service providers:**

The [Consultant/jurisdiction/Project Team] shall consult with transportation and social service organizations in the study area to identify where potential concentrations of Title VI populations

live, the location of land uses (such as schools and social service agencies), and transportation facilities and services used by Title VI populations. Consultations may include those with transit providers, [jurisdictions within or impacted by study area] health departments, and non-profit or advocacy organizations. Cross-reference these findings with Census data and mapping, and add these locations to GIS mapping related to Title VI populations.

### ***Prepare Public Involvement Plan***

#### **Public Involvement Plan Requirements:**

The Consultant shall develop a [Public Involvement Plan/Stakeholder Involvement Strategy], with input from the [Project Management Team/Advisory Committee], that is consistent with the [jurisdiction's] public involvement policies and practices. The [Plan/Strategy] will include strategies for [*language will vary, based on several variables including size of the geographic study area, role and responsibilities of the partner jurisdiction and consultant team, and type of planning project*].

In developing the [PIP], the Consultant shall identify an approach that is acceptable to the City and ODOT. The goal of the PIP is to conduct outreach activities consistent with federal Title VI program and Environmental Justice (EJ) Executive Order provisions, and to ensure full and fair participation by all potentially affected community members in the decision-making process. The [PIP] will clarify roles and responsibilities of City and Consultant team. Consultant shall document efforts taken during the course of the project to comply with Title VI program and EJ provisions as part of the final report.

**-OR-**

The [PIP] must include specific steps to provide opportunities for participation by federal Title VI populations such as minority, non-English speaking/immigrant, youth, senior, disabled, and low-income populations. Consultant shall use the ODOT Title VI Plan and guidance to identify Title VI populations, formulate public involvement strategies, and report special outreach efforts to distribute information and involve these communities.

### **Phase III: Solution Alternatives Analysis**

#### ***Identify Issues (Existing Conditions)***

#### **Add to existing conditions task requirements:**

The Consultant shall prepare an inventory of existing conditions in the study area. Draft

Technical Memorandum [X] will describe the existing transportation system conditions and identify where gaps in facilities or services have the potential to affect identified Title VI and EJ populations. This information will be used in subsequent tasks to help identify and prioritize potential improvements during the Solution Alternatives Analysis phase. Inventory information will be represented graphically and in text and tables. Consultant shall include the following information in the inventory where it is available in GIS format. [Note that locations of Title VI populations will be approximated using Census data from Identify Populations task, Task [X].]

*[Note that the following language requires additional effort and mapping to document the presence or needs of Title VI and EJ populations, beyond Census data analysis. Requiring this extra effort may be particularly useful for area-specific facility plans and where Census populations are low or relatively dispersed.]*

Identify and map key attractors and destinations for Title VI populations in the study area. Identify transportation facilities and services used by Title VI populations, and identify deficiencies or any other relevant issues related to these facilities and services. Refer to site visit observations and consultations with project team and service providers conducted in Task [X] to identify these land uses, facilities, and services.

***Determine Benefits/Impacts (Future Conditions)***

**For future conditions task requirements:**

During the process of developing solution alternatives, the Consultant shall identify the extent to which each solution considered may have an effect on Title VI and EJ populations where possible. This task includes overlaying mapped areas and concentrations of Title VI and EJ populations with mapped proposed alternatives, including proposed right-of-way and roadway (displacement potential) and pedestrian, bicycle, and transit facilities associated with each alternative.

***Determine Recommended Projects/Preferred Alternative (Alternatives Evaluation)***

**For evaluation criteria and alternatives analysis:**

The Consultant shall develop criteria for identifying and evaluating projects, implementation measures, and other elements of the [project]. Evaluation criteria will include how to address impacts on Title VI and EJ populations.

## **Phase IV: Reporting**

### ***Reporting at Project Completion***

#### **For Summary of Findings:**

The Consultant shall prepare Technical Memorandum [X] to summarize the key findings and actions associated with the [completion/adoption of the planning process]. The findings will include a review of Title VI and EJ issues and solutions, if applicable, and may address how Title VI and EJ populations were identified and involved during the planning process. Additionally, the findings will indicate how development and evaluation of [plan/project] alternatives considered potential impacts on and benefits for Title VI and EJ populations. The Title VI and EJ program reporting form will be completed to comply with the requirements of this task.

# APPENDIX B

## Title VI/EJ Project Summary Report Form

### Title VI/EJ Project Summary Report Form

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The Oregon Department of Transportation (ODOT) is a recipient of Federal financial assistance. All recipients are required to comply with Title VI of the Civil Rights Act of 1964 and related authorities. Title VI of Civil Rights Act of 1964 forbids discrimination against anyone in the United States because of race, color, or national origin by any agency receiving Federal funds. ODOT expects every Planning Project Manager to be aware of and apply the intent of Title VI of the Civil Rights Act of 1964 and related authorities in to ensure that activities do not treat any part of the community differently than another.

Planning Project Managers are responsible for summarizing project information for Title VI activities into a Title VI report and uploading it to TDD/Planning Inclusive Public Involvement intranet site to be included in the annual statewide planning report. This reporting sheet is located on the site for checkout and is intended to assist Region Planning Managers in summarizing and recording Title VI activities for individual planning projects. The reporting sheet includes the recommended steps to ensure compliance with Title VI, consistent with the Guidelines for Addressing Title VI and Environmental Justice (EJ) in Transportation Planning, and should be completed as projects progress. Please contact the Planning Programs Coordinator at (503)986-4220 if you need any assistance with this process.

Planner Name:

Region:

Date:

Project Name/Location:

What is the dollar amount for this project?

Were there any DBE or minority contractors involved with the project?

Data Collection/Demographics: What data collection methods were used to capture data relative to minority persons, travel habits, neighborhood income levels and physical environment?

Impact Analysis: What were the identified potential project impacts to minority, low-income, or LEP populations? What strategies were used to avoid or mitigate the negative project impacts?

Summarize public involvement metrics. What tools or methods were used to identify the communities represented and measure citizen participation at public meetings (e.g., Citizen Advisory Committee member and stakeholder committee lists or attendance sign-in sheets).

What outreach efforts were taken to encourage minority and female participation in advisory boards/committees and contract selection? For diversity composition, indicate the number of members on the board/committee and how many of those members are held by either women or minorities.

Summarize public outreach efforts for this project (e.g. public meetings, hearings, public announcements) used during planning to enhance citizen participation, focusing particularly on minority populations, women, older adults, people with disabilities and low-income populations.

Describe any effects Title VI public involvement activities had on planning outcomes.

Summarize significant problem areas and actions taken to improve Title VI process integration, documentation and reporting for planning

Attach any pictures or public notices you want to share

**Training/Guidance/Education:** Have you attended any training or events to enhance your knowledge of Title VI/Environmental Justice? Would you like more training in this area?

**Miscellaneous:** Identify any additional Title VI efforts not included above:

## PHASE I: SCOPING

<b>Step 1: Internal Discussions</b>			
<b>Discussed project with ODOT staff for preliminary assessment of Title VI populations and issues.</b>	Yes	No	N/A
<b>Notes:</b> <i>Indicate contacts, date(s) contacted and conversation highlights.</i>			
<b>Step 2: External Discussions</b>			
<b>Discussed relevant project and planning history with affected local partners.</b>	Yes	No	N/A
<b>Notes:</b> <i>Indicate contacts, date(s) contacted and conversation highlights.</i>			
<b>Discussed project with planning consultant.</b>	Yes	No	N/A
<b>Notes:</b> <i>Indicate contacts, date(s) contacted and conversation highlights.</i>			
<b>Step 3: Level of Effort Determination &amp; Drafting the Statement of Work</b>			
<b>The statement of work project background and/or project objectives section(s) reflect findings from internal and external discussions.</b>	Yes	No	N/A
<b>Notes:</b> <i>Reference statement of work section(s) and summarize scope language.</i>			
<b>The statement of work public outreach and analysis work tasks reflect findings from internal and external discussions.</b>	Yes	No	N/A
<b>Notes:</b> <i>Reference statement of work section(s) and summarize scope language.</i>			

## PHASE II: PUBLIC INVOLVEMENT ANALYSIS AND OUTREACH

<b>Step 1: Define Populations</b>			
<b>Title VI and EJ populations were defined, specific to project and project area.</b>	Yes	No	N/A
<b>Notes:</b> <i>Indicate populations addressed and rational for selection; reference statement of work section(s) and summarize scope language.</i>			
<b>Step 2: Identify Populations</b>			
<b>Census data for Title VI and EJ populations for the study area was mapped.</b>	Yes	No	N/A
<b>Notes:</b> <i>Indicate statement of work task(s) and include reference for final work product(s).</i>			
<b>Concentrations of Title VI and EJ populations were identified and analyzed.</b>	Yes	No	N/A
<b>Notes:</b> <i>Indicate statement of work task(s) and include final work product reference.</i>			
<b>Local transportation and social service organizations consulted/assisted in the identification of concentrations; findings summarized/mapped.</b>	Yes	No	N/A
<b>Notes:</b> <i>If applicable, list agencies/organizations contacted; indicate statement of work task(s) and include final work product reference.</i>			
<b>Step 3: Prepare Public Involvement Plan</b>			
<b>Public involvement plan was prepared.</b>	Yes	No	N/A
<b>Notes:</b> <i>Reference statement of work task(s) and include final work product reference; indicate how previous steps (census data and mapping, land use survey/site visit, service provider consultations, etc.) are reflected in the PIP.</i>			

## PHASE III: SOLUTION ALTERNATIVES ANALYSIS

<b>Step 1: Identify Issues (Existing Conditions)</b>			
<b>Key destinations and transportation facilities and services used by Title VI populations were identified.</b>	Yes	No	N/A
<b>Notes:</b> <i>Indicate statement of work task(s) and include final work product reference.</i>			
<b>Transportation facility and/or services deficiencies specific to Title VI populations were identified.</b>	Yes	No	N/A
<b>Notes:</b> <i>Indicate statement of work task(s) and include final work product reference.</i>			
<b>Step 2: Determine Benefits/Impacts (Future Conditions)</b>			
<b>Alternatives development considered the impacts and benefits of transportation improvements for Title VI and EJ populations.</b>	Yes	No	N/A
<b>Notes:</b> <i>Indicate statement of work task(s) and include final work product reference.</i>			
<b>Step 3: Determine Recommended Projects/Preferred Alternative (Alternatives Evaluation)</b>			
<b>Evaluation criteria included impacts and/or benefits to Title VI and EJ populations.</b>	Yes	No	N/A
<b>Notes:</b> <i>Indicate statement of work task(s) and include final work product reference.</i>			

## PHASE IV: REPORTING

<b>Reporting at Project Completion</b>			
		Yes	No
<b>Key findings and actions associated with this project are summarized in this report only.</b>			
<b>Key findings and actions associated with this project are summarized in this report and in work products, as required by the statement of work (see notes below).</b>			
<p><b>Notes:</b>  <i>Indicate statement of work task(s) and include final work product reference.</i></p>			
<b>Project Summary Report completed on:</b>		Month	Day
			Year
<b>Completed by:</b>	Name	Title/Department	