

SOUTHWESTERN PENNSYLVANIA COMMISSION

FTA TITLE VI PLAN



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Purpose

This plan is intended to meet the requirements set forth in FTA's Title VI Circular 4702.1B, for the Southwestern Pennsylvania Commission (SPC) CommuteInfo Vanpool Program. Title VI was enacted as part of the landmark Civil Rights Act of 1964. It prohibits discrimination on the basis of race, color, and national origin in programs and activities receiving federal financial assistance. All recipients and subrecipients of Federal Transit Administration (FTA) funds must ensure that programs, policies and activities comply with FTA Title VI regulations.

To provide recipients with specific guidance, FTA published Circular 4702.1B, October, 2012 (http://www.fta.dot.gov/legislation_law/12349_14792.html). The instruction provided in the circular is intended to ensure recipients meet the Title VI requirements and appropriately integrate them into FTA-funded programs throughout each state.

Description of Service Provided

The SPC is a metropolitan planning organization (MPO) serving a 10-county Southwestern Pennsylvania region. As the MPO, SPC directs the use of state and federal transportation funds allocated to the region---approximately \$31 billion through 2045. SPC member governments include Allegheny, Armstrong, Beaver, Butler, Fayette, Greene, Indiana, Lawrence, Washington and Westmoreland Counties and the City of Pittsburgh.

Through sponsorship of the CommuteInfo project, SPC is a direct recipient of FTA Section 5307 urban area formula grant funds. The funding is utilized to subsidize the CommuteInfo Vanpool Program— the only SPC program subsidized with FTA funding. SPC is the sole operator of the program, and does not fund additional subrecipient programs (pass-through) with the grant funds. The program currently has 38 vans in service throughout the SPC service area.

Title VI Notice to the Public

The Southwestern Pennsylvania Commission will provide information to the public regarding the SPC's obligations under FTA's Title VI regulations and apprise members of the public of the protection against discrimination afforded to them by Title VI. At a minimum, the SPC shall disseminate this information to the public by posting the notice on its website and in public places where the Title VI notice is relevant. The SPC will post this notice on our website, in our office and in the vanpool vans. See Appendix A for copies of SPC's Title VI poster.

The SPC will widely distribute its Title VI plan. The Title VI notifications are also included with all newly printed or revised agency publications, brochures and pamphlets meant for public consumption. The following notice is standard wording for publications, brochures, flyers, etc.

The SPC is committed to compliance with Title VI of the Civil Rights Act of 1964 and all related regulations and relevant guidance. The SPC assures that no person in the United States shall, on the grounds of race, color or nation 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.

To request additional information on the SPC's Title VI policy, or to file a discrimination complaint, please contact the SPC at (412) 391-5590.

The Complaint Procedure is located on our website at <https://spcregion.org/pdf/titleVI/SPCTitleVIComplaintPolicyandForm.pdf> and a hard copy can be obtained from our office at:

Southwestern Pennsylvania Commission

Title VI Coordinator

Two Chatham Center, Suite 500
112 Washington Place
Pittsburgh, PA 15219

SPC Title VI Notice To Public

The Southwestern Pennsylvania Commission (SPC) hereby gives public notice that it is the policy of the Commission to assure full compliance with Title VI of the Civil Rights Act of 1964, the Civil Rights Restoration Act of 1987, Executive Order 12898 on Environmental Justice, and related statutes and regulations in all programs and activities. Title VI and other related statutes require that no person in the United States of America shall, on the grounds of race, color, sex, national origin, age, or disability, be excluded from the participation in, be denied the benefits of, or be otherwise subjected to discrimination under any program or activity for which SPC receives federal financial assistance. Any person who believes they have been aggrieved by an unlawful discriminatory practice by SPC under Title VI has a right to file a formal complaint with the Commission. Any such complaint must be in writing and filed with SPC's Title VI Coordinator within one hundred eighty (180) days following the date of the alleged discriminatory occurrence. For more Information call 412-391-5590.

Title VI Complaint Procedures

Title VI of the Civil Rights Act of 1964, as amended, prohibits discrimination on the basis of race, color, or national origin. Subsequent laws and Presidential Executive Orders added disability, sex, age, income status and limited English proficiency to the criteria for which discrimination is prohibited, in programs and activities receiving federal financial assistance. As a recipient of federal assistance, the SPC has adopted a Discrimination Complaint Procedure as part of its Title VI Plan to comply with Title VI, Title II of the Americans with Disabilities Act of 1990 (ADA)/Section 504 of the Rehabilitation Act of 1973 (Section 504), and associated statutes.

1. Any person who believes that he or she, individually, as a member of any specific class, or in connection with any disadvantaged business enterprise, has been subjected to discrimination prohibited by Title VI of the Civil Rights Act of 1964, as amended, Title II of the Americans with Disabilities Act of 1990 (ADA)/Section 504 of the Rehabilitation Act of 1973 (Section 504), or any nondiscrimination authority, may file a complaint with SPC. A complaint may also be filed by a representative on behalf of such a person. All complaints will be referred to the SPC Title VI Coordinator for review and action.
2. In order to have the complaint considered under this procedure, the complainant must file the complaint no later than 180 days after:
 - a. The date of the alleged act of discrimination; or
 - b. Where there has been a continuing course of conduct, the date on which that conduct was discontinued. In this case, the recipient or his/her designee may extend the time for filing or waive the time limit in the interest of justice, specifying in writing the reason for so doing.
3. Complaints shall be in writing and shall be signed by the complainant and/or the complainant's representative. Complaints should set forth as fully as possible the facts and circumstances surrounding the claimed discrimination. In the event that a person makes a verbal complaint of discrimination to an officer or employee of the recipient, the person shall be interviewed by the Title VI Coordinator. If necessary, the Title VI Coordinator will assist the person in putting the complaint in writing and submit the written version of the complaint to the person for signature. The complaint shall then be handled in the usual manner.
4. Within 10 days, the SPC Title VI Coordinator will acknowledge receipt of the allegation in writing; inform the complainant of action taken or proposed action to process the allegation; advise the respondent of their rights under Title VI and related statutes; and, advise the complainant of other avenues of redress available, such as the Pennsylvania Department of Transportation (PennDOT), the Federal Highway Administration (FHWA) or the Federal Transit Administration (FTA).
5. Within 10 days, a letter will be sent to the PennDOT Central Office, Civil Rights Division, and a copy to the FHWA Pennsylvania Division Office or other agency. This letter will list the names of the parties involved, the basis of the complaint, and the assigned investigator.
6. Generally, the following information will be included in every notification to the Penn DOT Office of Civil Rights:
 - a. Name, address, and phone number of the complainant.
 - b. Name(s) and address(es) of alleged discriminating official(s).

- c. Basis of complaint (i.e., race, color, national origin, sex, age, disability, income status, limited English proficiency).
 - d. Date of alleged discriminatory act(s).
 - e. Date of complaint received by the recipient.
 - f. A statement of the complaint.
 - g. Other agencies (state, local or federal) where the complaint has been filed.
 - h. An explanation of the actions the recipient has taken or proposed to resolve the issue raised in the complaint.
7. Within 60 days, the SPC Title VI Coordinator will conduct and complete an investigation of the allegation and based on the information obtained, will render a recommendation for action in a report of findings to the Executive Director. The complaint should be resolved by informal means whenever possible. Such informal attempts and their results will be summarized in the report of findings.
8. Within 90 days of receipt of the complaint, the SPC Title VI Coordinator will notify the complainant in writing of the final decision reached, including the proposed disposition of the matter. The notification will advise the complainant of his/her appeal rights with Penn DOT or the FHWA or other agency, if they are dissatisfied with the final decision rendered by SPC. SPC's Title VI Coordinator will also provide the PennDOT Civil Rights Central Office with a copy of the determination and report findings.
9. In the case a nondiscrimination complaint that was originated at SPC is turned over to and investigated by Penn DOT, FHWA or another agency, the SPC Title VI Coordinator will monitor the investigation and notify the complainant of updates, in accordance with applicable regulations, policies and procedures.
10. In accordance with federal law, the SPC will require that applicants of federal assistance notify the SPC of any law suits filed against the applicant or sub-recipients of federal assistance or alleging discrimination; and a statement as to whether the applicant has been found in noncompliance with any relevant civil rights requirements.
11. The SPC will collect demographic data on staff, committees, and program areas in accordance with 23 CFR, 49 CFR and SPC's established procedures and guidelines.
12. The SPC will retain Discrimination Complaint Forms and a log of all complaints filed with or investigated by SPC.
13. Records of complaints and related data will be made available by request in accordance with the Pennsylvania Freedom of Information Act.

Title VI Complaint Form

Information on how to file a complaint is located on the SPC website. The complaint may be mailed or delivered to:

**Southwestern Pennsylvania Commission
Title VI Coordinator
Two Chatham Center, Suite 500
112 Washington Place
Pittsburgh, PA 15219**

Individuals may also reach the designated SPC Title VI Coordinator at (412) 391-5590, or send email to: TitleVI-Coordinator@spcregion.org.

TITLE VI COMPLAINT FORM

Complaints must be in writing and filed with the SPC Title VI Coordinator within 180 calendar days following the date of the alleged discriminatory occurrence. Complainant has a right to representation, file a written complaint with FTA, Regional Civil Rights Officer, and complainant has the option to remain anonymous or to seek assistance in filling out the complaint form.

Your Name _____ **Date of Filing** _____

Your Address _____

Work Phone _____ **Home Phone** _____ **Cell Phone** _____

FTA recognizes race, color and national origin as basis for Title VI complaints. Indicate on what ground(s) you believe you were discriminated against by checking the applicable boxes below:

- Race** **Color** **Nat. Origin** **Other**

Explain why you believe discrimination has taken place. Please provide date(s), time(s), and location(s) of discrimination. Please provide witness name(s), address (es), and telephone number(s). Please provide name(s) and work location(s) of person(s) you believe responsible for the discrimination. Explain the resolution you request. (Use additional sheets of paper if needed.)

Indicate the person(s) who are alleged to be responsible.

Name(s)	Agency	Work Location (if known)	Classification (if known)

What Remedy? Requested Action? And/or Adjustment you are requesting? Please be specific. Use additional sheets as necessary. _____

Your Signature _____

Date _____

Form SFN 51795
Revised: June 1, 2011

Appeal Process

If the Complainant does not agree with the decision by the Respondent and cannot come to an informal agreement, the Complainant can directly file the complaint with:

Pennsylvania Department of Transportation
Bureau of Equal Opportunity
PO Box 3251
Harrisburg, PA 17101-3251

Federal Highway Administration
Pennsylvania Division Office
228 Walnut Street, Room 508
Harrisburg, PA 17101-1720

Federal Transit Administration
Office of Civil Rights
Title VI Program Coordinator
East Building, 5th Floor – TCR
1200 New Jersey Ave., SE
Washington, DC 20590

U.S. Department of Justice
Office for Civil Rights
810 7th Street, NW
Washington, DC 20531

Comisión del suroeste de Pensilvania
Coordinador del Título VI Two Chatham Center, Suite 500
 112 Washington Place
 Pittsburgh, PA 15219
 (412) 391-5590

FORMULARIO DE QUEJAS TITULO VI

Quejas deben ser sometidas por escrito y presentadas al Coordinador de Titulo VI durante los 180 días a partir de la fecha en que ocurrió la presunta discriminación. El demandante tiene derecho a representación. Someta su queja por escrito a FTA, Oficial de Derechos Civiles de la Region. El demandante tiene la opción a permanecer anónimo o solicitador ayuda llenando el formulario de quejas.

Nombre _____

Fecha _____

Dirección

Tel Empleo _____ **Tel Hogar** _____

Tel Cel _____

FTA reconoce raza, color, y origen nacional como bases para quejas al Titulo VI. Indique el motivo por el cual cree haber sido discriminado(a) marcando una de las siguientes opciones:

- Raza** **Color** **Origen Nacional**

Explique porqué cree que ha sufrido discriminación. Por favor provea fecha(s), hora(s), y lugar(es). Por favor provea nombres de testigo(s), direccion(es), y número(s) de teléfono. Por favor provea nombre(s) y lugar(es) de empleo de la(s) persona(s) quienes usted cree son responsables de la discriminación. Explique la resolución que está pidiendo. (Use mas hojas si es necesario)

Indique que persona(s) son presuntamente responsables

Nombre(s)	Agencia	Lugar de empleo (si disponible)	Clasificación (si disponible)

¿Qué remedio, acción, o ajuste está solicitando? Por favor sea específico(a). Use mas hojas si es necesario.

Firma _____

Fecha _____

Formar SFN 51797

Revisado: October 24, 2011

Proceso de apelación:

Si el demandante no está de acuerdo con la decisión del demandado y no puede llegar a un acuerdo informal, el demandante puede presentar la queja directamente a:

Departamento de transporte de Pensilvania
Oficina de Igualdad de Oportunidades
PO Box 3251
Harrisburg, PA 17101-3251

Administración Federal de Carreteras
Oficina de la división de Pensilvania
228 Walnut Street, Room 508
Harrisburg, PA 17101-1720

Administración Federal de Tránsito
Oficina de Derechos Civiles
Coordinador del programa del Título VI
East Building, 5th Floor – TCR
1200 New Jersey Ave., SE
Washington, DC 20590

Departamento de justicia
Oficina de Derechos Civiles
810 7th Street, NW
Washington, DC 20531

Transit-Related Title VI Investigations, Complaints, and Lawsuits

The SPC has had no Title VI investigations, complaints or lawsuits since the inception of our Title VI plan. If there is ever a Title VI complaint, it will be tracked using the complaint log. See Appendix B for Title VI complaint log.

Public Participation Plan

SPC's goal is to foster significant and ongoing two-way communication with our region's citizens. Education and public outreach are essential parts of our responsibility to inform the public about the transportation planning process. SPC works diligently to make information accessible to the public and to provide timely public notice. We provide information to the public that is accurate, understandable and pertinent to specific engagement activities, and do so through the use of varied communication tools. In addition to informing the public, SPC makes every effort to educate the public about the vanpool and provide supportive policy, program and technical information. Educating the public supports informed public contribution and continued engagement by the public.

SPC continues to develop methods and opportunities for traditionally underserved portions of the population to participate in the transportation planning process, including minority, non-English speaking, and low-income groups. It is a continual priority to increase the diversity and number of participants in previous engagement activities through building new relationships with organizations and communities that serve these populations.

SPC encourages continued public participation by ensuring an engagement process that is meaningful. This includes providing various ways to engage and communicate with the public, responding to all comments and questions in a timely manner, using our network of partners for help with responses as needed and providing other opportunities for further engagement and education. The concept of two-way communication between SPC and the public is a key element to developing our planning goals and outcomes. We encourage input, respond in a reasonable and timely manner, and include comments as feedback to decision-makers to shape the planning process. It is important to note that all regular meetings of the Southwestern Pennsylvania Commission feature a public comment opportunity.

SPC documents all input received from the public. This documentation provides a record of all comments and assists SPC staff and committees in reviewing public input, which is then used in the development of transportation plans and programs. The process of incorporating public input into transportation planning documents is transparent and consistent with the provisions outlined in this Public Participation Plan. SPC informs the public of the decision-making process for each planning activity in which public comment is solicited. This information is presented to the public at the beginning of each planning activity and throughout the engagement process.

In order to sustain best practices in public participation, SPC continually monitors the public engagement process to develop a framework for evaluating and improving the strategies that guide how SPC engages the public.

Although the SPC provides a myriad of outreach through its planning activities, including outreach in minority communities, specific CommuteInfo outreach to targeted populations has not been done to date. As a vanpool program, SPC has marketed to a large audience across the region. However, moving forward, the program will leverage (when appropriate) ongoing outreach opportunities through the SPC to reach targeted populations. In addition, public outreach will include identifying minority owned businesses and additional efforts will be made by CommuteInfo to work with Chambers, Councils of Governments, and civic clubs in the region to identify of minority owned businesses, in order to provide direct CommuteInfo information and highlight the service benefits. In addition, these businesses will be included in future CommuteInfo outreach campaigns and marketing events/opportunities.

Language Assistance Plan

Individuals who do not speak English as their primary language and who have a limited ability to read, speak, write, or understand English can be Limited English Proficient, or LEP, and therefore, are entitled to language assistance under Title VI of the Civil Rights Act of 1964, with respect to a particular type of service, benefit, or encounter.

Title VI states 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”.

Executive Order 13166 requires federal agencies to examine the services they provide, identify any need for services to those with Limited English Proficiency (LEP), and develop and implement a system to provide those services so LEP individuals can have meaningful access to them. It is expected that agency plans will provide for such meaningful access consistent with, and without unduly burdening, the fundamental mission of the agency. The Executive Order also requires that the federal agencies work to ensure that recipients of federal financial assistance provide meaningful access to their LEP applicants and beneficiaries.

The U.S. Department of Transportation published policy guidance on December 14, 2005 (Federal Register Volume 70; Number 239). The guidance explicitly identified Metropolitan Planning Organizations (MPOs) as organizations that must follow this guidance.

SPC is required to take reasonable steps in ensuring meaningful access to the programs and activities by LEP individuals. The US DOT Policy Guidance gives flexibility to federal transportation funding recipients in determining the appropriate level of language assistance to LEP populations. The starting point in determining “reasonable steps” is to conduct an individualized assessment for SPC utilizing a Four Factor Analysis.

Four Factor Analysis

Factor 1: The number or proportion of LEP persons eligible to be served or likely to be encountered by a MPO program, activity, or service

Using US Census Bureau 2010-2014 American Community Survey (ACS) 5-year estimates, the population of the Southwestern Pennsylvania region over the age of 5 years is 2,444,261. It was determined that approximately 5% (122,876) of that population speak a language other than English at home. Approximately 31% of the 122,876 persons over 5 years old that speak a language other than English at home speak English less than “very well”. This represents 1.5% of the total population of the region over 5 years old. Table 1 illustrates the number of LEP individuals at the county level.

Table 1. LEP Individuals at the County Level

Limited English Proficient Population in the SPC Region By County of Residence (All Languages)				
County	Total Population	Speak a language other than English at home	Number of Non-English Speakers	Percent of Non-English Speakers
Allegheny	1,165,553	84,220	27,388	2.3%
Armstrong	64,038	1,233	366	0.6%
Beaver	160,384	4,531	1,262	0.8%
Butler	176,480	5,223	1,381	0.8%
Fayette	127,536	3,296	960	0.7%
Greene	35,793	1,148	211	0.6%
Indiana	83,292	5,588	1,866	2.2%
Lawrence	83,964	3,485	1,208	1.4%
Washington	197,770	6,362	1,940	1.0%
Westmorelan	342,752	9,519	2,317	0.7%
TOTAL	2,353,598	121,309	38,899	1.5%

Source: American Community Survey Five Year Estimates (2012–2016): Summary Table DP14

Table 2 illustrates the language subpopulations most frequently spoken by LEP individuals in the region. As illustrated, individuals speaking Spanish or Creole make up the largest group, followed by Chinese, Italian, and Indic.

Table 2. Regional Language Subpopulations

LEP Populations in the SPC by Language Spoken	
Language	Number of Non-English
Spanish or Creole	7,645
Chinese	6,207
Italian	3,238
Indic Languages	1,533

Source: American Community Survey Five Year Estimates (2012-2016): Table C16001

The concentrations of these four language groups are mostly located in Allegheny County, specifically in and around the City of Pittsburgh, the Urban Core of the region. There are also pockets of Spanish-speaking LEP individuals found around the Cities of Washington, Uniontown, Connellsville and the Boroughs of Canonsburg, Charleroi, Donora, Indiana and Waynesburg. The concentrations of LEP individuals for the four language groups (Table 2) in census tracts that are above the regional average of LEP concentrations (1.5%). It is important to note that the Italian language group has no concentrations above the regional LEP average for Census Tracts in the region.

Factor 2: The frequency with which LEP individuals come in contact with the program

The more frequent the contact with a particular language group, the more likely that enhanced language services are needed. If an LEP person from a specific language group utilizes a program or service on a daily basis, the federally funded agency has greater language assistance requirements than if the same person's frequency of contact with the program or service is unpredictable or infrequent. However, federal aid recipients must bear in mind the possibility that the frequency of contact with LEP populations could increase when appropriate outreach to those LEP populations is enhanced.

The next factor to be considered in the LEP Assessment is the frequency with which LEP persons encounter the services and programs of the Southwestern Pennsylvania Commission.

The Southwestern Pennsylvania Commission provides transportation planning and programming services on behalf of the ten-county region, and serves as the regional forum for transportation decision making. Decisions made by the Commission affect the residents, including LEP individuals, of the ten-county service area. Public input is routinely sought in the development and advancement of key planning processes, including the Long Range Transportation Plan (LRTP), Transportation Improvement Program (TIP), Public Participation Plan (PPP) and other key initiatives. During these public comment periods, comments are solicited from interested parties. To date, no comments or requests for information have been received in a language other than English.

Factor 3: The nature and importance of the programs, activity, or service provided by the MPO to the LEP community

SPC utilizes state and federal funds to plan for improvements to the surface transportation system. This planning is multimodal and includes a wide range of strategies, programs, and services aimed at improving accessibility, mobility, safety, and quality of life for all users. No element of the SPC program requires the compulsory participation of area residents, nor does SPC administer or oversee any programs or services that impose involuntary restrictions on area residents. Involvement by any person with SPC or its committees and forums is completely voluntary.

SPC takes reasonable steps in ensuring that all segments of the population, including LEP persons, have the opportunity to be involved throughout the transportation planning process. Based on SPC's responsibility for coordinating the planning and programming of transportation investments in the Southwestern Pennsylvania region, potential interest in the planning process by the public, and any effects on the public's quality of life resulting from SPC functions; the following planning documents have been identified as the vital products of SPC's metropolitan planning process:

- **Public Participation Plan (PPP)** - provides a framework for SPC's transportation planning processes in order to facilitate a proactive public participation process and comply with federal

participation plan requirements.

- **The Long-Range Transportation Plan (LRTP)** - establishes a regional vision and outlines the policy direction guides all planning and programming undertaken at SPC.
- **The Transportation Improvement Program (TIP)** - is a program of the highest priority transportation improvements and programs to be implemented in the next four years with federal, state and local funds.

Factor 4: The resources available to the MPO and costs to provide assistance services

Based on the language data and assessment used in Factor 1, as well as financial constraints, full multi-language translations of large transportation plan documents is not considered to be warranted at this time. In that regard, SPC will make summaries of the Public Participation Plan (PPP), the Long-Range Transportation Plan (LRTP), and the Transportation Improvement Program (TIP) available in Spanish. As identified in Table 2, Spanish is the language the SPC staff is most likely to encounter.

SPC will provide translation and/or interpretation services, upon request, for the vital products of the Metropolitan Planning Process, identified in Factor 3. Furthermore, all public meeting notices and notices for public comment periods are classified as vital services requiring translation services. To facilitate this process, SPC uses a standardized template for public meeting and comment period notices.

SPC will continue to provide in both English and Spanish notifications for newspaper advertisements. SPC also offers the Google[®] Translator tool on its website. This tool allows for real-time, in place translation of the SPC website in more than 100 languages. (Important: The Google[®] Translator tool is provided on SPC's website as a convenience for site visitors and is not intended or used by SPC in place of providing professional translation and interpretation services).

SPC implements LEP provisions including providing assistance to LEP persons, disseminating LEP information to the public, training staff, and monitoring the LEP Plan.

SPC takes the following actions in order to identify LEP individuals during meetings, events and throughout the planning process:

- Record requests for language assistance and encounters with LEP individuals at meetings, events and throughout the public involvement process.
- Assign a staff member at a sign-in table to greet attendees at public meetings and SPC events in order to informally gauge the attendee's ability to speak and understand English.
- Utilize U.S. Census Bureau's "I Speak Cards" at the sign-in table in order to assist in identifying language needs for future meetings and events.
- Post a notice of available language assistance on the SPC website and in the SPC office reception area.

SPC utilizes the following measures to reasonably provide interpretation and translation language assistance to LEP individuals:

- When it is determined that an interpreter is needed, either in person or via telephone,

SPC staff will first determine what language is required via the “I Speak Cards” or by utilizing a web-based tool such as Google* Translator. These tools offer the translation of web pages and documents as well as online and instant speech translations through a PC or a smart phone application.

- Provide oral interpretation services for public meetings. SPC contracts with interpretation (and translation) service providers for these services. A request for such service must be made in advance, preferably with 72 hours’ notice, as requested by our contracting service. Should a request be made with less than 72 hours’ notice, we will attempt to resolve the individual’s request with the best available resources and accommodations.
- Provide translated copies of materials and plan summaries in Spanish, the most common language as identified in Factor 1 of the Four Factor Analysis. SPC will also provide translations into other languages, as requested. SPC contracts with interpretation and translation providers for these services, and can provide assistance upon request.
- Continue to offer a translator tool on SPC’s website for instant translations of website content. As referenced in Factor Four of the Four Factor Analysis, SPC currently offers the Google° Translator tool on its website. This tool allows for real-time, in place translation of the SPC website in more than 100 languages. (Important: The Google° Translator tool is provided on SPC’s website as a convenience for site visitors and is not intended or used by SPC in place of providing professional translation and interpretation services.

SPC staff that interact with the public will be provided access to the LEP Plan and will be offered training on procedures and services available. **Training topics may include:**

- Title VI of the Civil Rights Act
- LEP program responsibilities
- Use of LEP language Assistance Cards (“I Speak Cards”)
- Language assistance resources offered
- Documentation of language assistance requests

Concluding the Four Factor Analysis, SPC has determined that it will provide language assistance services. It is important that the SPC notify LEP persons of services available free of charge in a language LEP persons will understand. **Examples of notifications undertaken by SPC include:**

- Signage in the SPC office reception area stating that free language assistance is available.
- Stating in outreach and vital documents that language services are available from SPC.
- Include translated meeting notices, and public notices, in three of identified languages from Factor 1, on the SPC website. Requests for any of the fifteen languages included in the Indic language group will be translated as requested.
- Distribute meeting notices, and public notices to organizations that target LEP groups.
- Include statements in notices for public meetings and participation opportunities announcing that SPC will provide assistance related to sight, language, or hearing with three day’s advance notice.

- Working through SPC’s Public Participation Panels and with community-based organizations to inform LEP individuals of SPC’s programs and service, including the availability of language assistance services.
- Include notices in local Spanish language newspaper.
- Include notices in non-English media outlets and community service organizations regarding the availability of language translation and interpretation services.

The SPC takes the following steps to monitor, review and update its LEP Plan, as needed, to ensure meaningful access to its programs and services by LEP individuals:

- Every four years, SPC will review and update, as necessary, the demographic data of the SPC region’s LEP populations.
- Review the frequency of contact with LEP individuals (i.e., interpretation and translation requests and translated website views) and adjust strategies as necessary.
- Evaluate the availability of resources, including technological advances.
- Review any feedback received from LEP individuals on the effectiveness of SPC’s language assistance services.
- Review the potential need for expansion of services and/or programs.
- Review the nature and importance of programs, services and activities to LEP individuals.

Committee /Council Membership & Description Title VI Process

The SPC, is the region's forum for collaboration, planning, and public decision-making. As the official Metropolitan Planning Organization (MPO) for the ten-county region including the City of Pittsburgh and the counties of Allegheny, Armstrong, Beaver, Butler, Fayette, Greene, Indiana, Lawrence, Washington, and Westmoreland, SPC is responsible for planning and prioritizing the use of all state and federal transportation funds allocated to the region. The Commission has the authority and responsibility to make decisions affecting the 10-county region.

The Commission typically meets every other month, on the last Monday. Members serve multi-year terms and may be reappointed. The chair and vice-chair, elected by voting members, serve two-year terms.

The Commission is comprised of elected bodies from the ten member Counties and the City of Pittsburgh. SPC staff provides demographic data on the composition of the member Counties to those bodies in order to assist Commissioners considering selection of participants for the County-sponsored Public Participation Panels.

In addition to the Commission, CommuteInfo has a partner group that meets on a quarterly basis. The partner group consists of various regional areas, businesses, communities and nonprofits—representing an array of interests, missions, and perspectives (See Appendix C for list of CommuteInfo Partner organizations). These meetings serve as a forum for regional exchange of information, coordination of promotion for TDM, ridesharing and transit under the CommuteInfo regional brand. Partner organizations and individuals participate in the CommuteInfo regional Partners meetings to help provide feedback and direction for the overall CommuteInfo program – including the regional vanpool program. Partners do not provide governance but an advisory function to provide feedback and suggestions on all program initiatives. CommuteInfo staff is available to assist Partners in the promotion of TDM strategies to employers and organizations in which they have an interest – including assistance in the formation of vanpool groups.

Monitoring Subrecipients for Compliance with Title VI

SPC does not have any subrecipient agreements, thus only responsible for CommuteInfo compliance. The CommuteInfo vanpool program receives an annual allocation as a subrecipient of 5307 funds from the designated urban area grantee which is the Port Authority of Allegheny County.

Title VI Equity Analysis

FTA funding is not utilized for facility construction or operate a fixed route service. The 5307 grant is utilized for the purposes of operating the CommuteInfo Vanpool only. As a result, a Title VI equity analysis has not been performed.

Documentation of an Approved FTA Title VI Program

SOUTHWESTERN PENNSYLVANIA COMMISSION

RESOLUTION NO. 5-19

A RESOLUTION OF THE EXECUTIVE COMMITTEE of the SOUTHWESTERN PENNSYLVANIA COMMISSION to adopt an updated Title VI program document.

WHEREAS, the Southwestern Pennsylvania Commission as a sub-recipient of Federal Transit Administration financial assistance, is required to comply with Title VI and subsequent nondiscrimination laws;

WHEREAS, pursuant to Title VI of the Civil Rights Act of 1964; Title 49, Chapter 53, Section 5332 of the United States Code and the Federal Transit Administration's Circular 4702.1B the Southwestern Pennsylvania Commission is required to submit its Title VI plan to the Federal Transit Administration for review every three years;

WHEREAS, the Federal Transit Administration received Southwestern Pennsylvania Commission's last Title VI program update in January 2017;

WHEREAS, the procedures described in the updated Title VI program help ensure 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;

WHEREAS, an updated Limited English Proficiency (LEP) plan has been incorporated into the Title VI program to ensure both of these documents are synced and updated concurrently in the future;

WHEREAS, any transportation project or program to be constructed or conducted within the Southwestern Pennsylvania region and to be paid for with federal funds must receive approval by the Southwestern Pennsylvania Commission before any federal funds can be expended; and

WHEREAS, the Commission recognizes that Title VI components are a required element of the Long Range Plan, the Transportation Improvement Program, the Unified Planning Work Program, the Public Participation Plan, and other planning products produced under the provisions of federal transportation planning legislation.

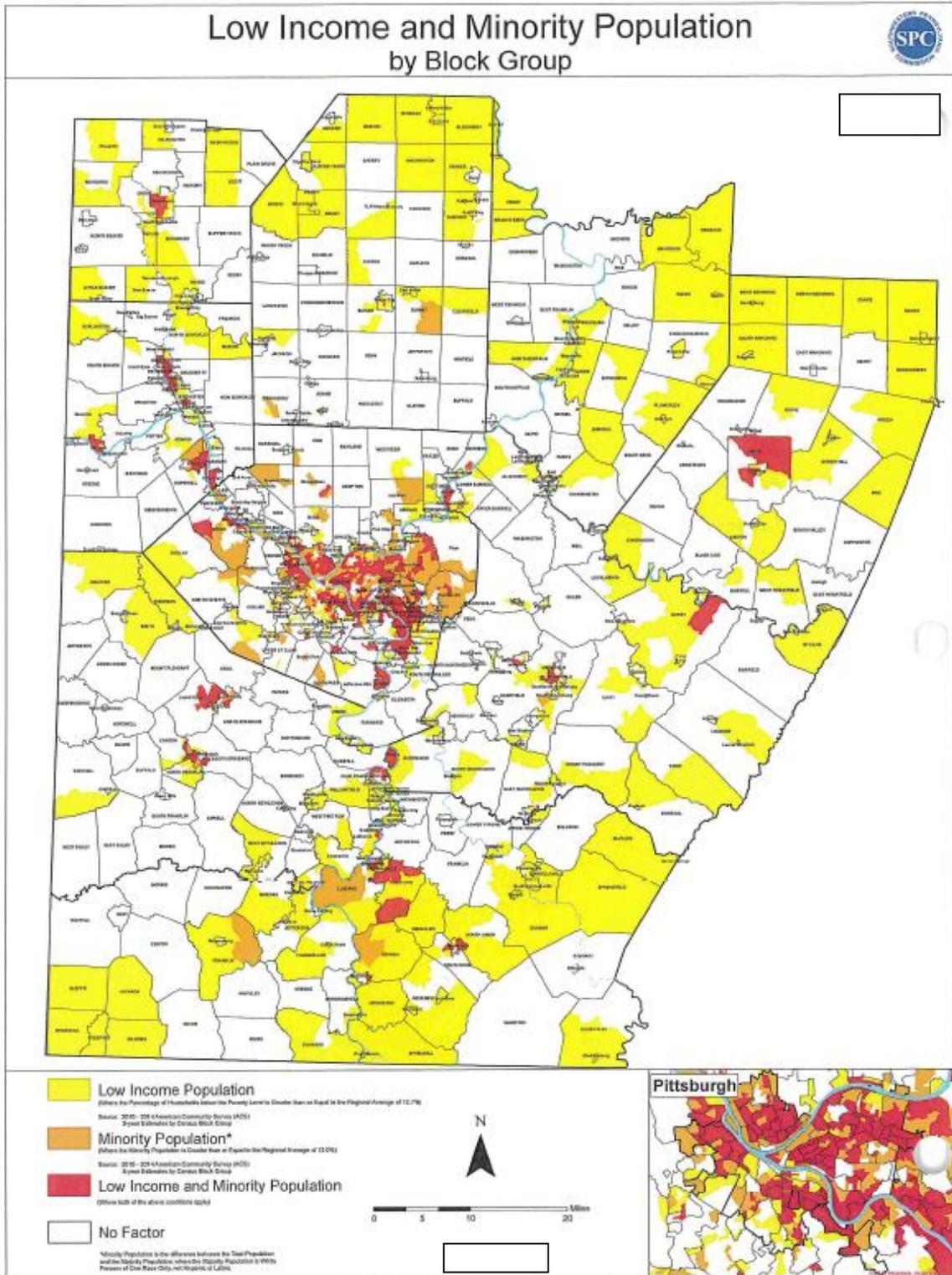
NOW, THEREFORE, BE IT RESOLVED that the Executive Committee of the Southwestern Pennsylvania Commission hereby adopts the updated Title VI program dated December 2019.

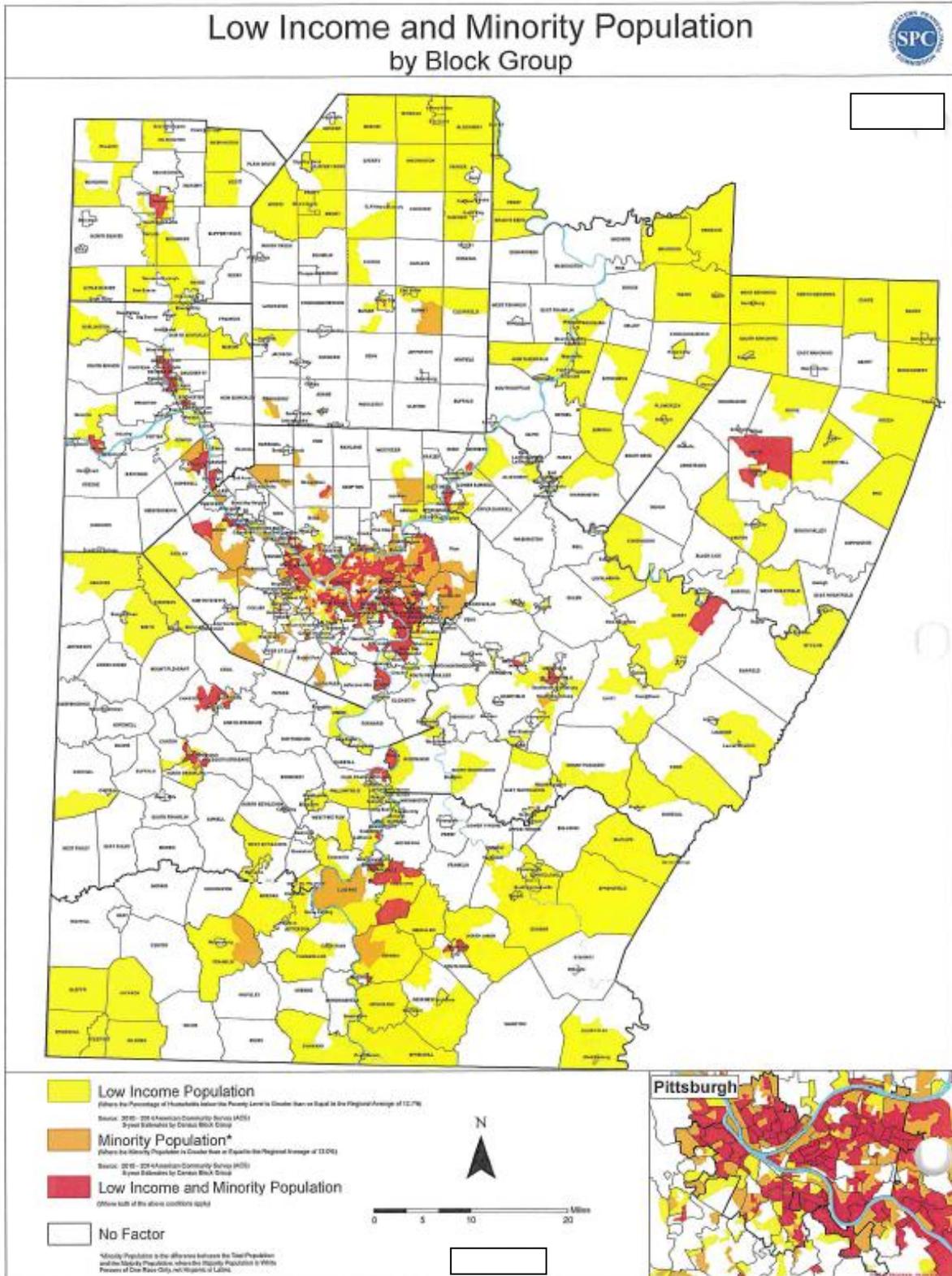
I, Tony Amadio, HEREBY CERTIFY that I am Secretary-Treasurer of the SOUTHWESTERN PENNSYLVANIA COMMISSION that the foregoing resolution was adopted, in accordance with the By-Laws, at a meeting duly called and held on the 16th day of December 2019, a quorum being present and that said resolution is now in full force and effect.

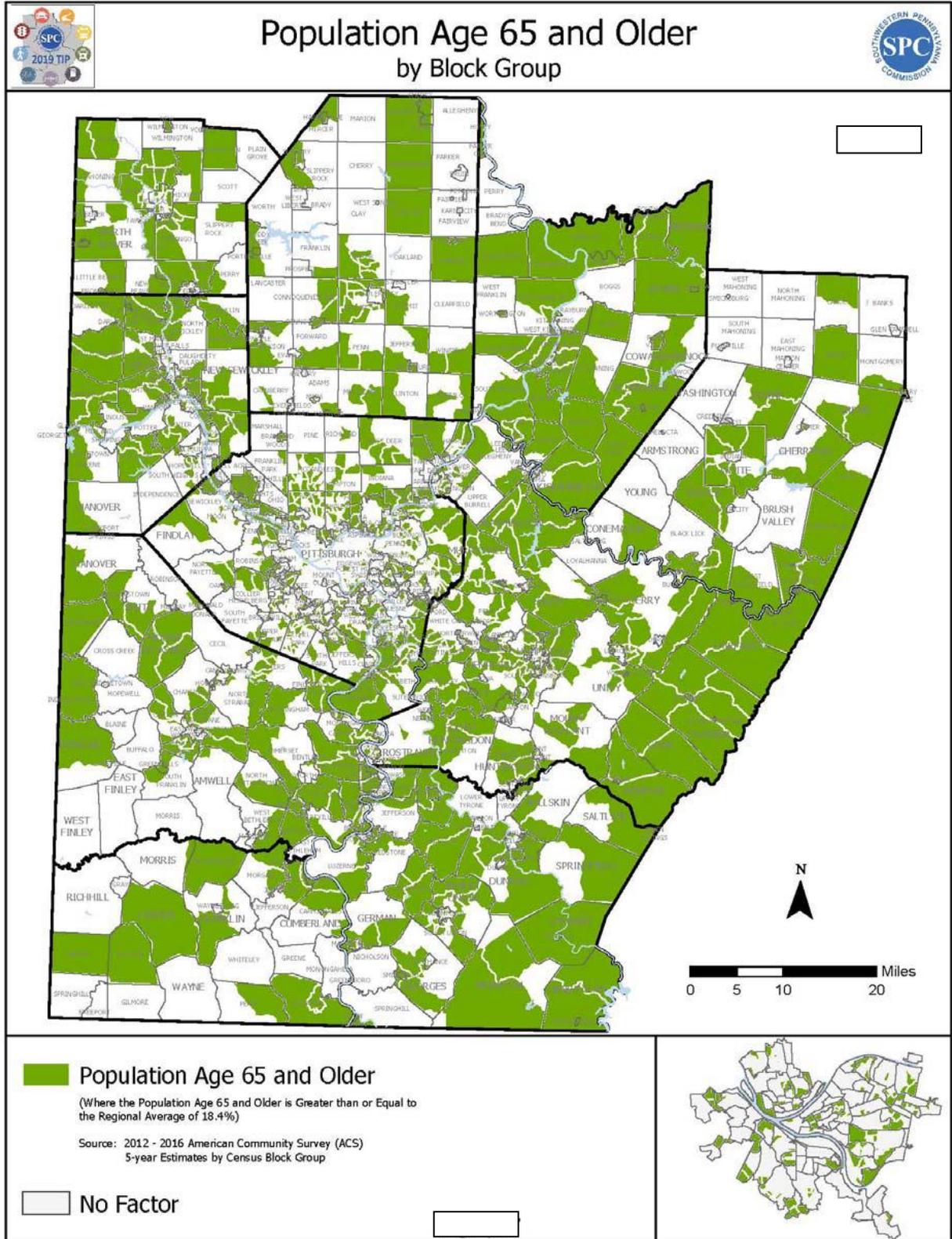
IN TESTIMONY WHEREOF I hereto subscribe my name as Secretary-Treasurer.

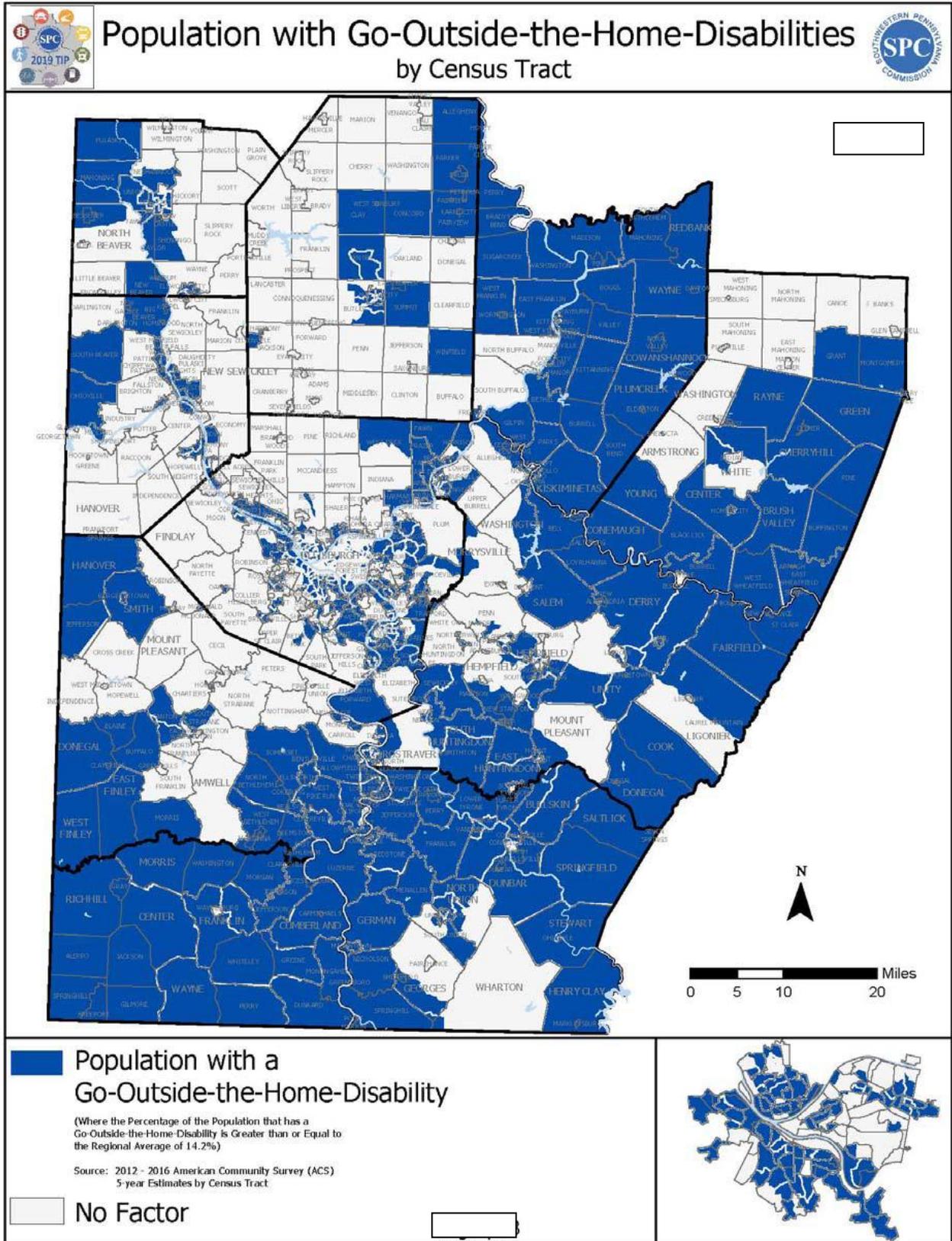

Secretary-Treasurer

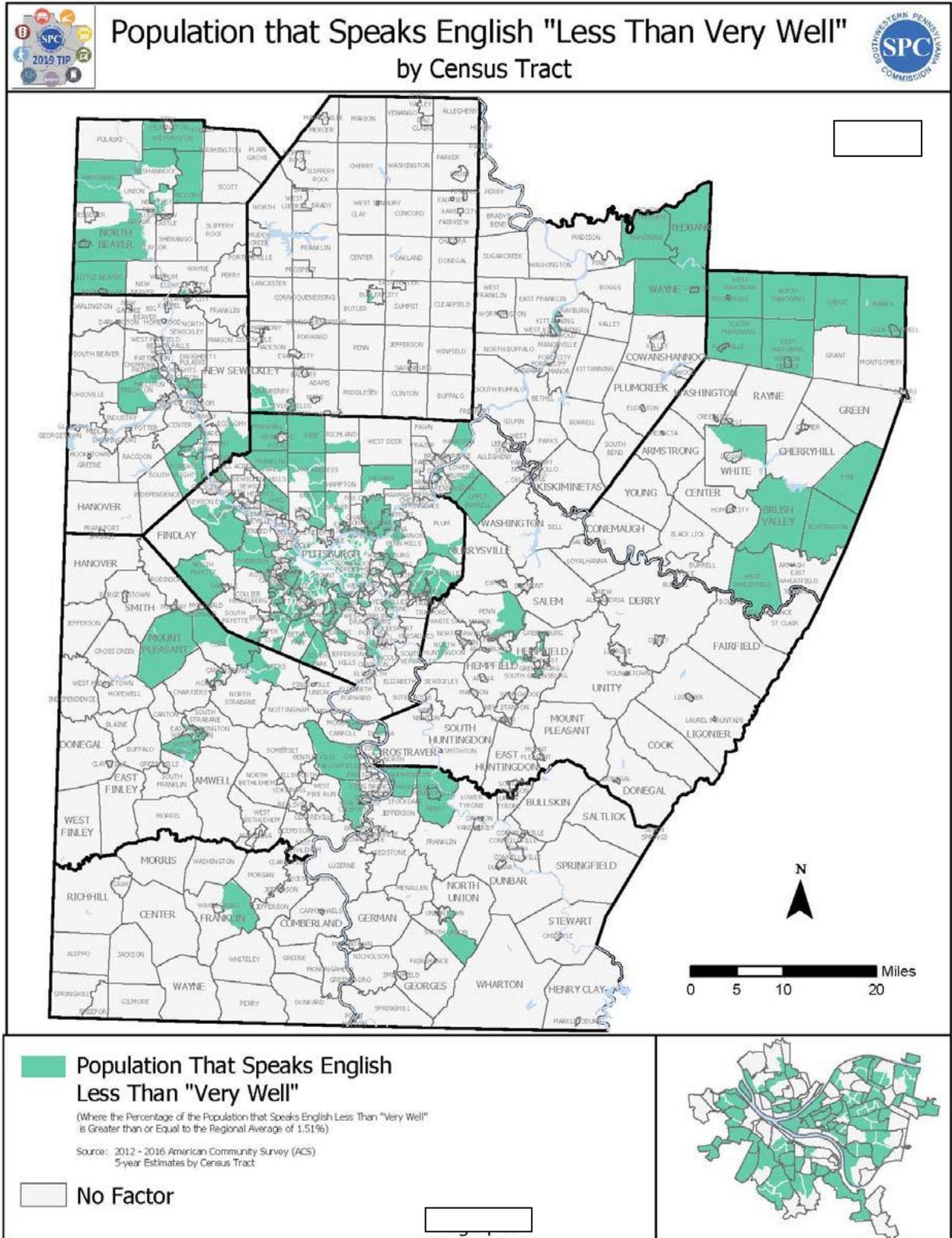
Demographic Profile of the SPC Region

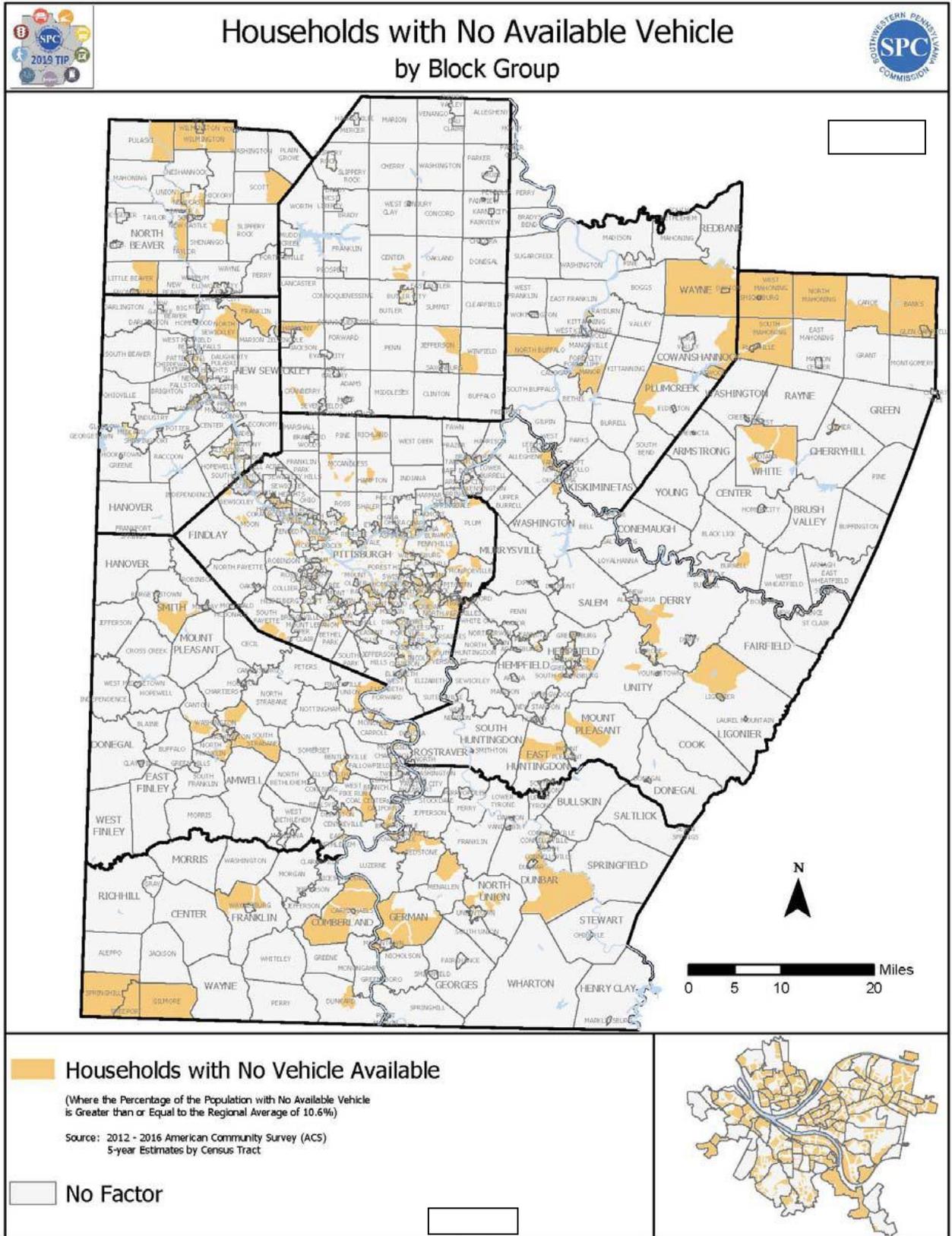


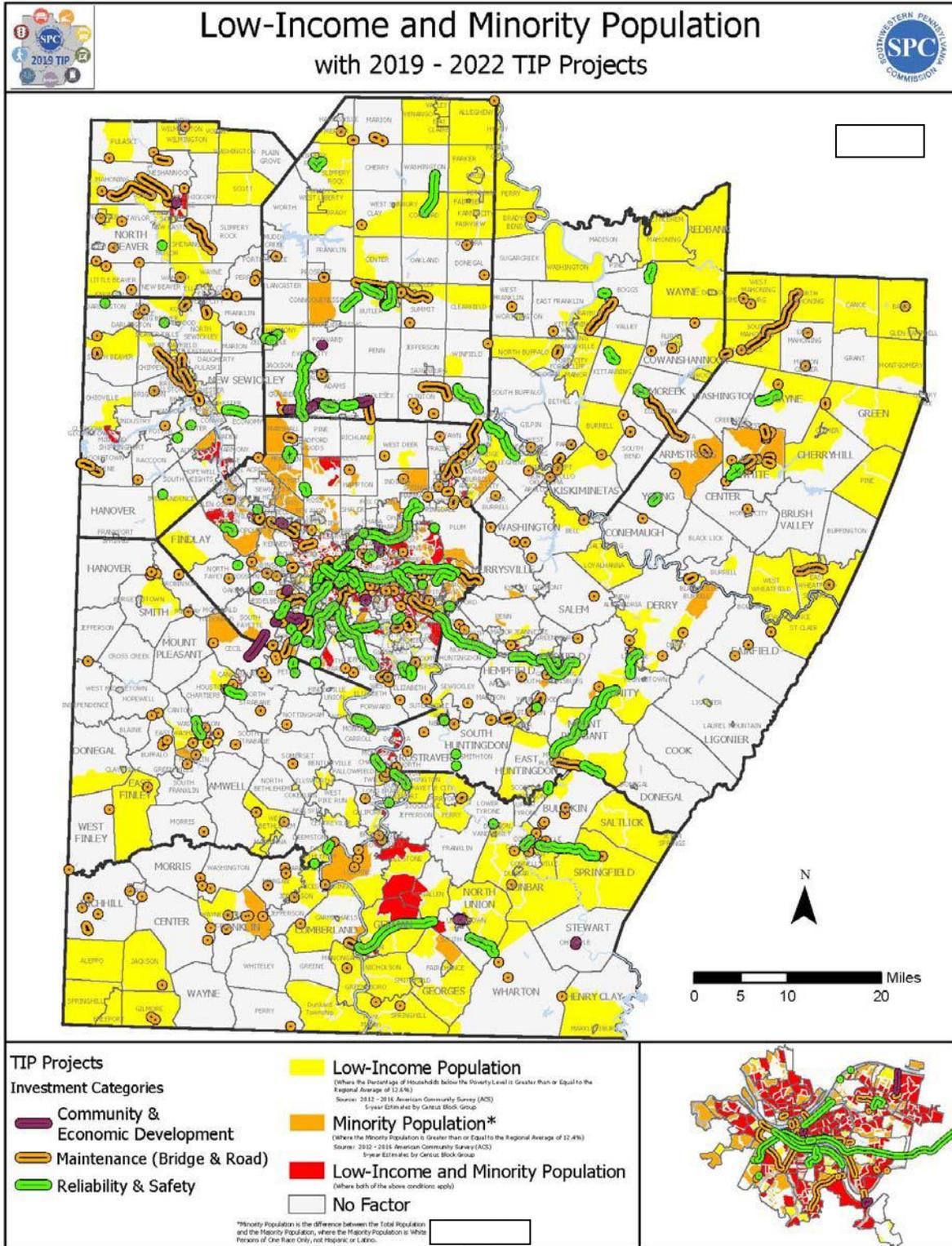






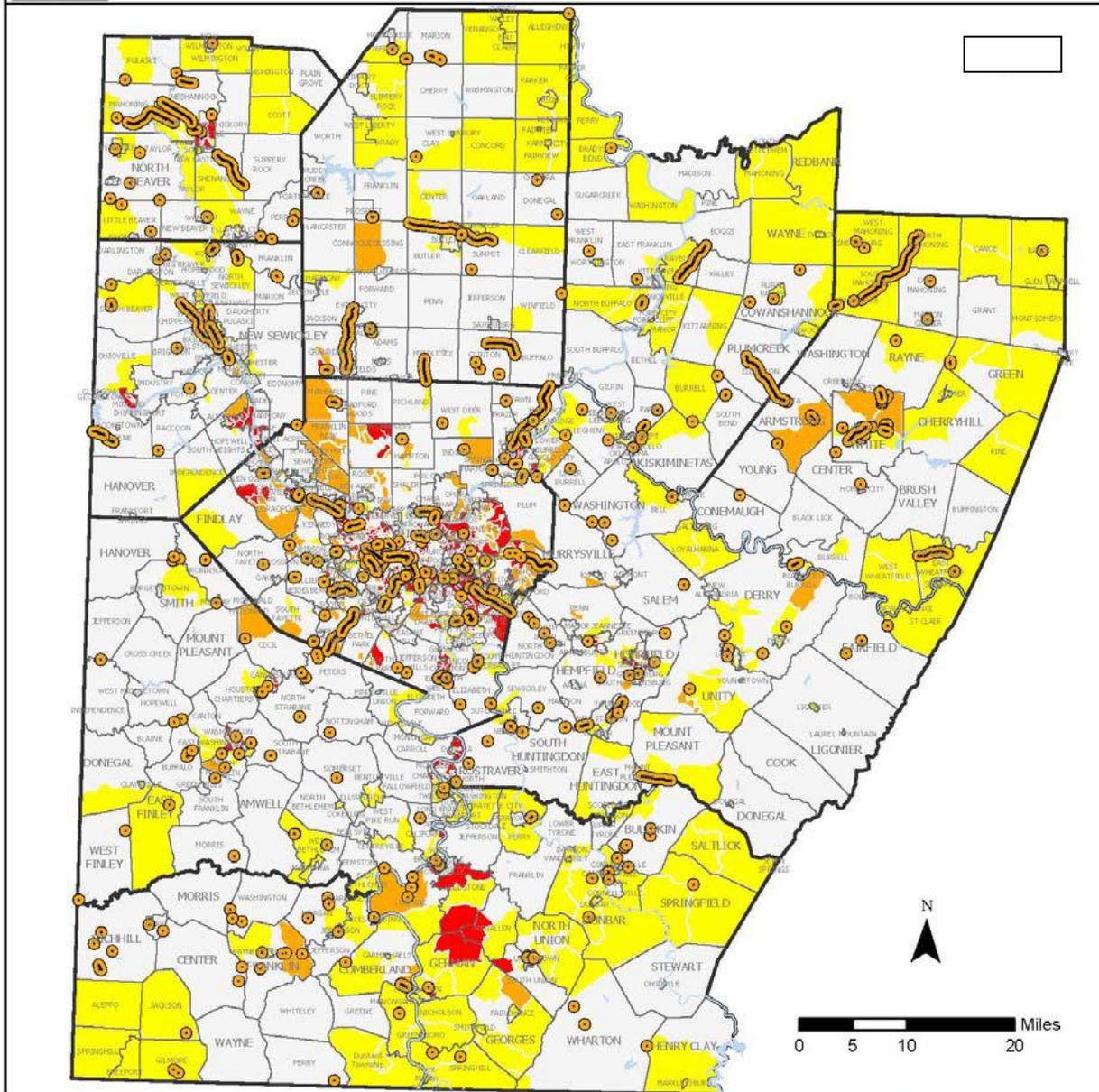








Low-Income and Minority Population with 2019 - 2022 TIP Maintenance Projects



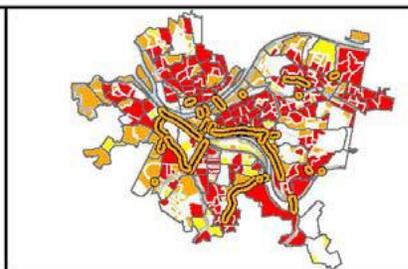
TIP Projects

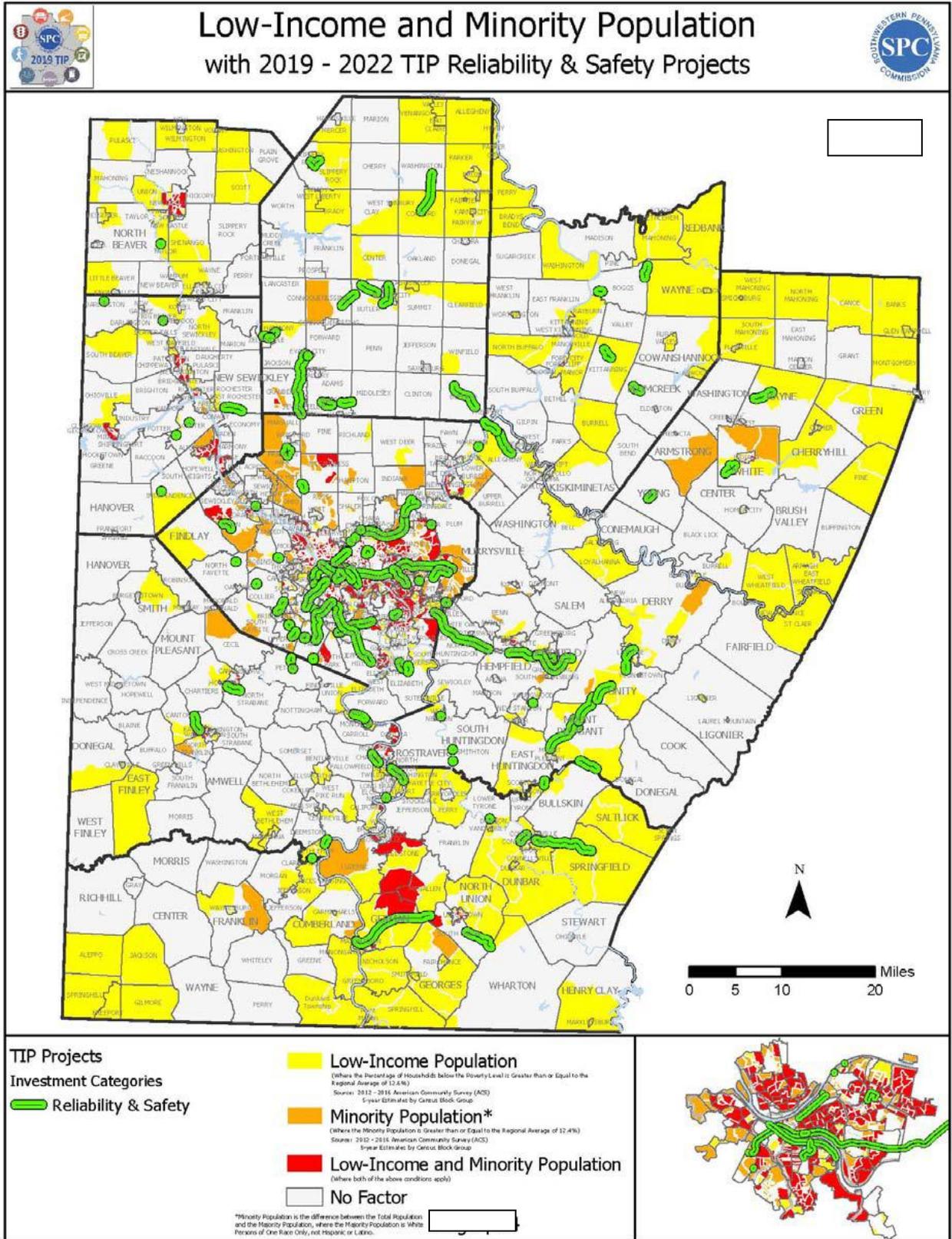
Investment Categories

- Maintenance (Bridge & Road)

- Low-Income Population**
(Where the Percent of Households below the Poverty Level is Greater than or Equal to the Regional Average of 12.6%)
Source: 2012 - 2016 American Community Survey (ACS)
1-year Estimates by Census Block Group
- Minority Population***
(Where the Minority Population is Greater than or Equal to the Regional Average of 12.4%)
Source: 2010 - 2016 American Community Survey (ACS)
1-year Estimates by Census Block Group
- Low-Income and Minority Population**
(Where both of the above conditions apply)
- No Factor**

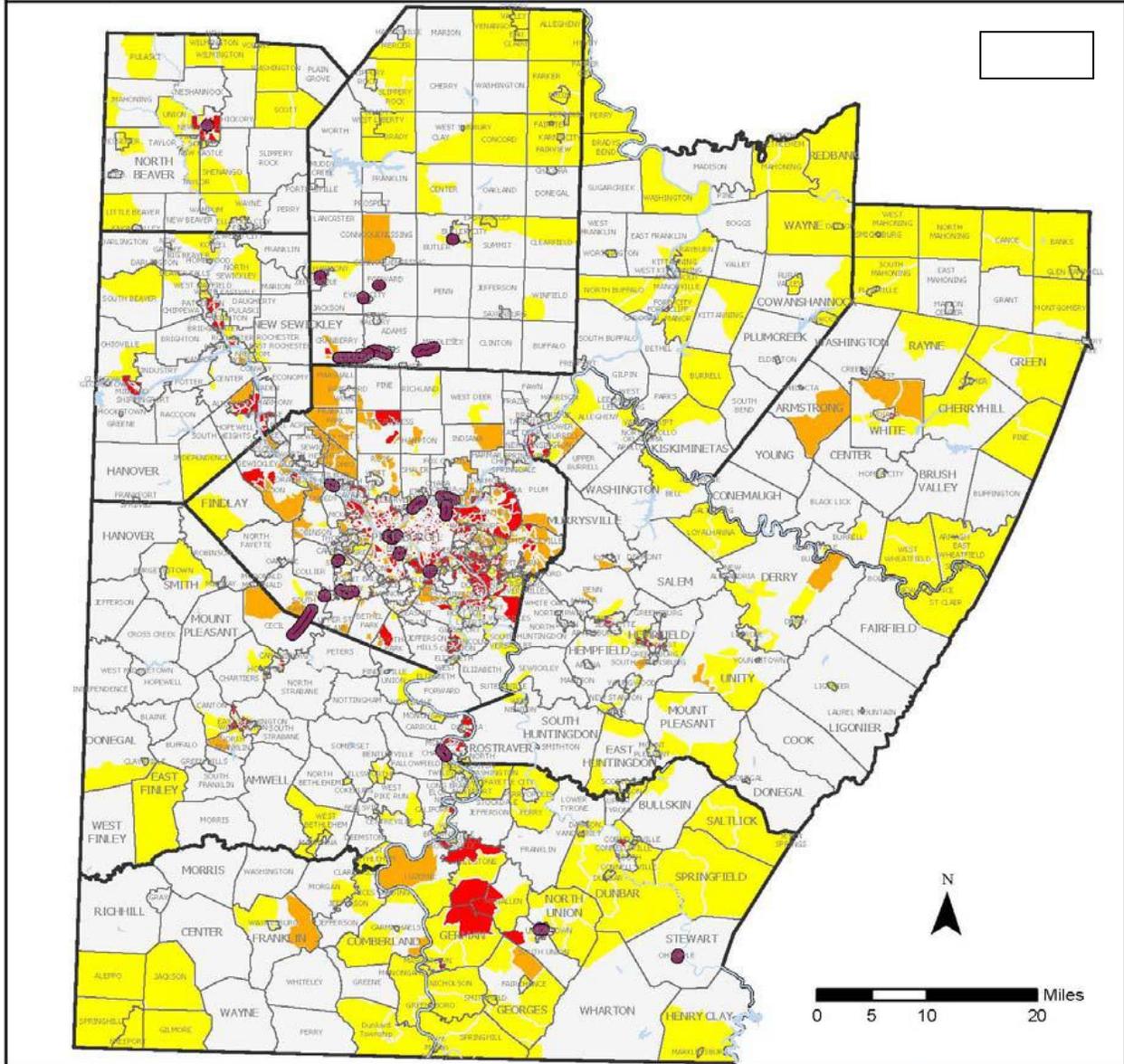
*Minority Population is the difference between the Total Population and the Majority Population, where the Majority Population is White Persons of One Race Only, not Hispanic or Latino.







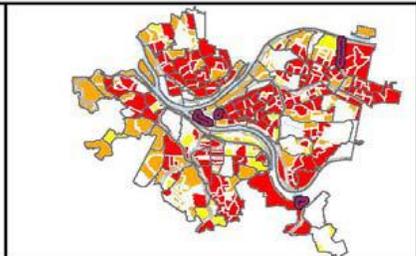
Low-Income and Minority Population with 2019 - 2022 TIP Community & Economic Development Projects



TIP Projects
Investment Categories

- Community & Economic Development
- Low-Income Population**
(Where the Percent of Households below the Poverty Level is Greater than or Equal to the Regional Average of 12.6%)
Source: 2012 - 2014 American Community Survey (ACS)
Source Estimates by Census Block Group
- Minority Population***
(Where the Minority Population is Greater than or Equal to the Regional Average of 12.4%)
Source: 2012 - 2014 American Community Survey (ACS)
Source Estimates by Census Block Group
- Low-Income and Minority Population**
(Where both of the above conditions apply)
- No Factor

*Minority Population is the difference between the Total Population and the Majority Population, where the Majority Population is White Persons of One Race Only, not Hispanic or Latino.



How Minority Mobility Needs are Identified in the Planning Process

SPC addresses the mobility needs of minority populations by conducting an Environmental Justice analysis during the development of the TIP and LRP and by preparing and updating a demographic profile of the region using the most current and appropriate statistical information available on race, income, and other pertinent data. SPC developed and maintains a GIS database with the capability to analyze socioeconomic demographics, define target populations, and locate them spatially.

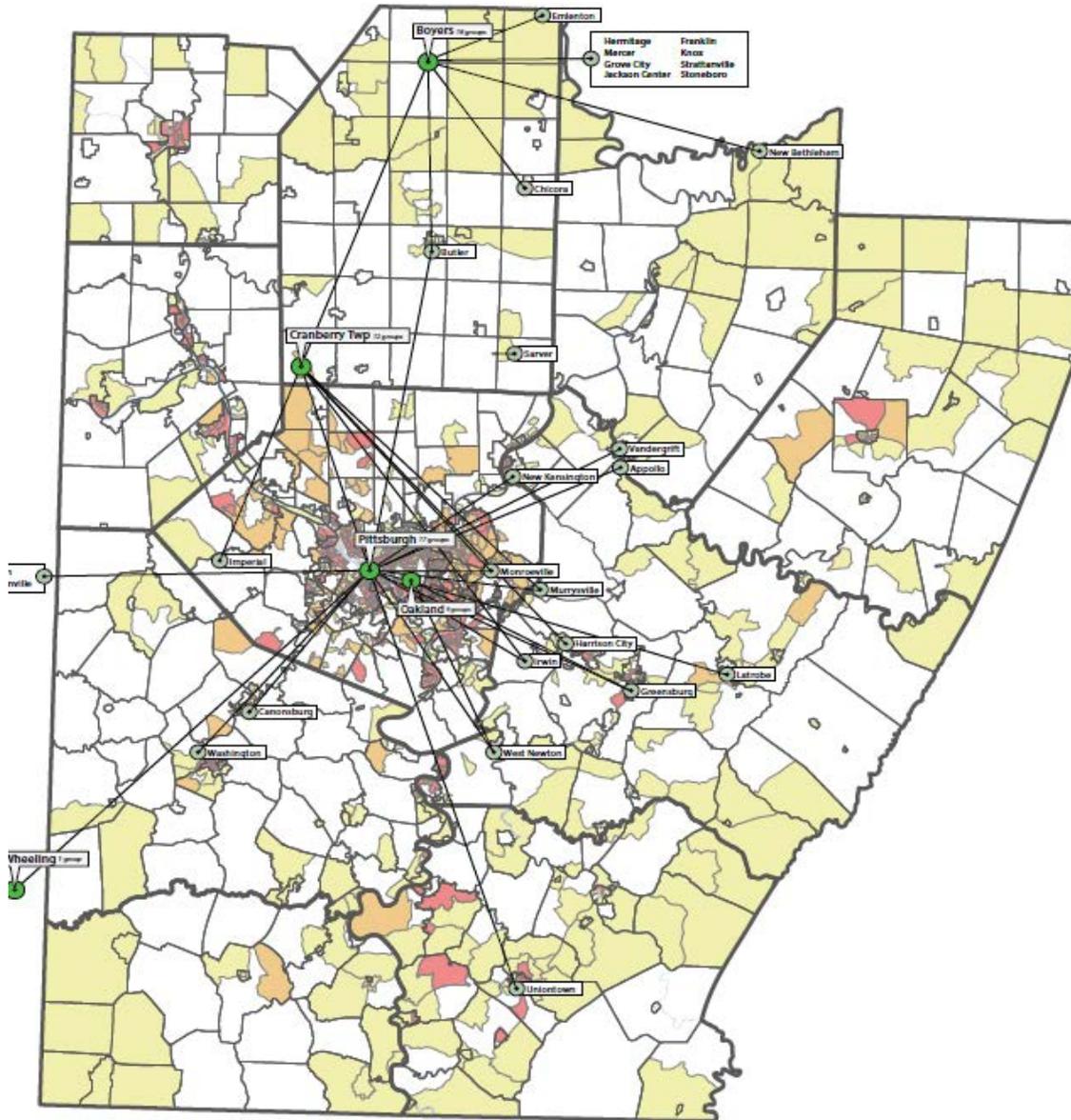
SPC has an established process for assessing the distributional effects of transportation investments on accessibility of low-income and minority populations to jobs and services and on the availability of transportation alternatives in each region. SPC will document the results for use in planning decision-making.

SPC develops, maintains, and enhances public involvement efforts that are oriented toward achieving a better understanding of the needs and concerns of low-income and minority populations. SPC's Public Participation Plan includes Environmental Justice guidelines and outreach strategies for minority, low-income and LEP populations during the development and implementation of SPC plans and programs (including the CommuteInfo program). SPC disseminates information to the public on the processes used and findings of Environmental Justice analyses.

Distribution of State and Federal Funds Public Transportation Projects

Below is a demographic map with financial information for FFY 2014-2018 showing where the FTA 5307 funded vanpool operates within the ten county region of SPC

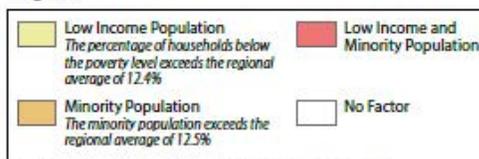
SPC CommuteInfo Vanpool Program Federal funding Distribution



CommuteInfo Vanpool Program

Year	Project	Federal	Local	Total
2014	Capital Cost of Contracting	\$1,548,784	\$387,196	\$1,935,980
2014	Mobility Management	\$100,000	\$25,000	\$125,000
2015	Capital Cost of Contracting	\$395,634	\$98,909	\$494,543
2016	Capital Cost of Contracting	\$395,634	\$98,909	\$494,543
2017	Capital Cost of Contracting	\$676,228	\$169,057	\$845,285
2018	Capital Cost of Contracting	\$676,228	\$169,057	\$845,285
TOTAL:		\$3,792,508	\$948,128	\$4,740,636

Legend



Source: 2013-2017 American Community Survey (ACS) 5-Year - Estimates by Census Block Group

Analysis of Investments that Addresses Disparate Impacts

FTA funds subsidize the vanpool service for the ten-county region of Southwestern Pennsylvania. SPC's member governments include Allegheny, Armstrong, Beaver, Butler, Fayette, Greene, Indiana, Lawrence, Washington and Westmoreland Counties, and the City of Pittsburgh. There are no feasible or identifiable disparate impacts on LEP and minority populations resulting from 5307 vanpool service.

For the LRP, SPC identifies and provides information to "interested parties" about the Long Range Transportation Plan. For the TIP, SPC identifies and provides "interested parties" information about the TIP and its projects.

Disparate impacts are identified and addressed during the planning process by collection of data regarding low-income and minority populations and cultural resources, and analysis of locations of low-income and minority populations.

Project selection criteria incorporate projected impacts and benefits of infrastructure on low-income and minority populations. The selection of cost-feasible projects is to minimize impacts on low-income, LEP/minority populations and cultural resources.

APPENDIX A – TITLE VI POSTERS

SPC Title VI Notice To Public

The Southwestern Pennsylvania Commission (SPC) hereby gives public notice that it is the policy of the Commission to assure full compliance with Title VI of the Civil Rights Act of 1964, the Civil Rights Restoration Act of 1987, Executive Order 12898 on Environmental Justice, and related statutes and regulations in all programs and activities. Title VI and other related statutes require that no person in the United States of America shall, on the grounds of race, color, sex, national origin, age, or disability, be excluded from the participation in, be denied the benefits of, or be otherwise subjected to discrimination under any program or activity for which SPC receives federal financial assistance. Any person who believes they have been aggrieved by an unlawful discriminatory practice by SPC under Title VI has a right to file a formal complaint with the Commission. Any such complaint must be in writing and filed with SPC's Title VI Coordinator within one hundred eighty (180) days following the date of the alleged discriminatory occurrence. For more information, or to obtain a Title VI Discrimination Complaint Form, please see our website at: www.spcregion.org or call 412-391-5590.

SPC titolo VI avviso pubblico

La Commissione di Pennsylvania sud-occidentale (SPC) dà con il presente avviso pubblico che è la politica della Commissione per assicurare la piena conformità con il titolo VI del Civil Rights Act del 1964, il Civil Rights Act di restauro del 1987, ordine esecutivo 12898 sulla giustizia ambientale e relativi statuti e regolamenti in tutti i programmi e le attività. Titolo VI e altri statuti correlati richiedono che nessuna persona in Stati Uniti d'America è, per motivi di razza, colore, sesso, nazionalità, età o disabilità, esclusi dalla partecipazione, essere negata i benefici di o altrimenti essere oggetto di discriminazione in qualsiasi programma o attività per cui SPC riceve assistenza finanziaria federale. Qualsiasi persona che crede che essi hanno state lese da una pratica discriminatoria illecita di SPC ai sensi del titolo VI ha un diritto di presentare un reclamo formale con la Commissione. Tali reclami devono avvenire per iscritto e archiviato con titolo VI coordinatore di SPC entro centottanta 180 giorni successivi alla data della presunta occorrenza discriminatoria. Per ulteriori informazioni o per ottenere il modulo di denuncia di discriminazione un titolo VI, si prega di consultare il nostro sito Web a: www.spcregion.org o chiamare 412-391-5590.

SPC título VI aviso público

La Comisión de Pennsylvania al sudoeste (SPC) se da aviso público que es la política de la Comisión para asegurar la completa conformidad con el Título VI de la ley de derechos civiles de 1964, el acto de la restauración de los derechos civiles de 1987, orden ejecutiva 12898 en justicia ambiental y relacionados con los estatutos y reglamentos en todos los programas y actividades. Título VI y otras leyes conexas requieren que ninguna persona en los Estados Unidos de América, por motivos de raza, color, sexo, origen nacional, edad o discapacidad, se excluirá de la participación en, ser negada los beneficios de o que esté sujeta a discriminación bajo cualquier programa o actividad para que el SPC recibe asistencia financiera federal. Cualquier persona que crea que haber sido agraviadas por una práctica discriminatoria ilegal por SPC bajo el Título VI tiene derecho a presentar una denuncia formal ante la Comisión. Cualquier denuncia debe ser por escrito y presentado con título VI Coordinador de SPC dentro de ciento ochenta 180days siguientes a la fecha de la supuesta aparición discriminatoria. Para obtener más información, o para obtener un formulario de queja de discriminación título VI, vea por favor nuestro Web site en: www.spcregion.org o llamar al 412-391-5590.

SPC Titel VI Mitteilung an die Öffentlichkeit

Die Southwestern Pennsylvania Kommission (SPC) gibt hiermit öffentliche Bekanntmachung, dass es die Politik der Kommission zur Übereinstimmung mit Titel VI den Civil Rights Act von 1964, der Civil Rights Restoration Act von 1987, Executive Order 12898 auf ökologische Gerechtigkeit zu versichern, und ähnliche Gesetze und Verordnungen in allen Programmen und Aktivitäten. Titel VI und andere zugehörige Satzung erfordern, dass keine Person in den Vereinigten Staaten von Amerika, aus Gründen der Rasse, Farbe, Geschlecht, nationaler Herkunft, Alter oder Behinderung, ausgeschlossen von der Teilnahme an, die Vorteile verweigert oder Diskriminierung unter ein Programm oder eine Aktivität, die für die SPC staatliche finanziellen Unterstützung erhält sonst ausgesetzt werden. Jede Person, die glaubt, dass sie durch eine rechtswidrige diskriminierende Praktiken von SPC nach Titel VI gekränkt worden sind hat ein Recht auf eine formale Beschwerde bei der Kommission einreichen. Eine solche Beschwerde muss schriftlich erfolgen und mit SPC Titel VI Koordinator innerhalb ein hundert achtzig (180) Tage nach dem Zeitpunkt des angeblichen diskriminierende Vorkommens. Für weitere Informationen oder ein Titel VI Diskriminierung Beschwerde-Formular erhalten, finden Sie in unserer Website unter: www.spcregion.org oder telefonisch unter 412-391-5590.

SPC titre VI avis public

Le Commission du sud-ouest de la Pennsylvanie (CPS) donne par les présentes avis public que c'est la politique de la Commission pour assurer la pleine conformité avec le titre VI du Civil Rights Act de 1964 droits civiques Restoration Act de 1987, décret 12898 sur la Justice environnementale et concernant les lois et les règlements dans tous les programmes et activités. Titre VI et autres lois connexes exigent que nul dans les États-Unis d'Amérique est, fondée sur la race, couleur, sexe, nationalité, âge ou invalidité, exclus de la participation, se voir refuser les avantages d'ou autrement soumis à discrimination sous n'importe quel programme ou l'activité pour laquelle SPC reçoit une aide financière fédérale. Toute personne qui croit qu'ils ont été lésés par une pratique discriminatoire illégale par SPC relevant du titre VI a le droit de déposer une plainte officielle auprès de la Commission. Une telle plainte doit être écrite et déposé auprès titre VI coordinateur de la CPS au sein de cent quatre-vingts 180 jours suivant la date de l'événement discriminatoire alléguée. Pour plus d'informations, ou pour obtenir un formulaire de plainte de Discrimination titre VI, veuillez consulter notre site Web à: www.spcregion.org ou appelez 412-391-5590.

APPENDIX B – TITLE VI COMPLAINT LOG

APPENDIX C – COMMUTEINFO PARTNERING GROUPS

Murrysville Trail Alliance	Airport Corridor Transportation Association	City of Pittsburgh	University of Pittsburgh/WalkWorks
United States District Court U.S. Probation Office	PennDOT District 11	RubyRide	Walnut Capital
Mid Mon Valley Transit Authority	United Way of Southwestern Pennsylvania	Allegheny County Housing Authority	Duquesne University
Westmoreland County Chamber of Commerce	PennDOT D-10	University of Pittsburgh	City of Pittsburgh
Westmoreland County Transit Authority	City of Pittsburgh	Westmoreland County	UPMC
U.S. Department of Veterans Affairs	Port Authority	Small Business Administration	Fresh Foods Manufacturing Giant Eagle
Allegheny County Health Department PennDOT District 11 CTSP	Urban Redevelopment Authority	Group Against Smog and Pollution	Mackin Engineering
SPC	PennDOT District 11	FedEx	PennDOT District 11
Rand Pittsburgh	PADOT Central Office	University Relations and Diversity Program Manager	Freedom Transit
Pittsburgh Downtown Partnership	Fayette Area Coordinated Transportation	SPC	Pittsburgh Community Reinvestment Group (PCRG)
SPC	Breathe Project	Michael Baker	SPC
WCTA	Pennsylvania Public Utility Commission	City of Pittsburgh	Carnegie Mellon University
BikePGH	Michael Baker	Butler County Economic Development and Planning	Sustainable Pittsburgh
Oakland Planning & Development Corporation	Lawrence County	SPC	Moon Township
Department of Mobility & Infrastructure (DOMI)	Michael Baker	Allegheny Conference on Community Development	Port Authority
Westmoreland County Transit Authority	PennDOT District 11	City of Pittsburgh - Nighttime Economy	Green Building Alliance
Marshall Twp	Office of the Allegheny County Executive	SPC	SPC
Fayette County	JFCS Career Development Center	Pennsylvania Public Utility Commission	West
Westmoreland County Department of Planning and Development	Southwest Training Services	SMC Business Councils/Airport Area Chamber of Commerce	SPC
Healthy Ride	Builders Guild of Western Pennsylvania	SPC	Washington County Chamber of Commerce

PADOT Engineering District 10-0	PennDOT District 11	Quaker Valley Council of Governments	PA Department of Transportation, Engineering District 12-0
SPC	Allegheny County Economic Development	Sustainability Manager at 3R Building sustainability	Washington County
Walk Bike Shaler/Shaler Township Planning Commission	Pittsburgh Department of City Planning	SPC	City of Pittsburgh DOMI
Green Building Alliance	Brooke Hancock Jefferson Metropolitan Planning Commission	SPC	SPC
USDOJ - Western Pennsylvania District	Butler Transit Authority	Pennsylvania Public Utility Commission	SPC
Allegheny County Health Department	Pittsburgh Department of Mobility and Infrastructure	HWPS + PLACE (?)	Penn State Extension / Smart Growth
SPC	Walnut Capital	SPC	Department of Veterans Affairs - VA Pittsburgh Healthcare System
Oakland Planning & Development Corporation	Duquesne Light Corporation	Moon Township	Jewish Family & Children's Service of Pittsburgh
SPC	Carnegie Mellon University	Lark Enterprises	Friends of the Riverfront
Alliance for Nonprofit Resources	Family Services of Western Pennsylvania Transportation Loan Program	Allegheny County	SPC
Duquesne University	Pittsburgh Bike Share / Healthy Ride	Duquesne University	SPC
Westmoreland County Industrial Development Corporation	Sustainable Pittsburgh	Washington County Planning Commission	Brooke Hancock Jefferson Metropolitan Planning Commission
Presbyterian Senior Care Network	Oakland Transportation Management Agency (OTMA)	PennDOT District 11	Pittsburghers for Public Transit
UPMC Mercy Consultant	Carnegie Museums/BOMA	Butler County Department of Planning and Development	Port Authority
		Westmoreland Transit	Pittsburgh University