

NOACA TITLE VI PROGRAM

An Action Plan for
Compliance with Title VI
of the 1964 Civil Rights
Act



JANUARY 2015

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INTRODUCTION

The Northeast Ohio Areawide Coordinating Agency (NOACA) was formed in 1968 for the purpose of coordinating planning and development activities in northeast Ohio. NOACA is the federally designated metropolitan planning organization (MPO) for Cuyahoga, Geauga, Lake, Lorain and Medina Counties in northeast Ohio.

As a federally designated metropolitan planning organization, NOACA's Board of Directors is charged with determining how federal funds related to highways, bikeways and transit will be spent in northeast Ohio, and for helping to ensure that NOACA and its partners properly carry out the federally required Comprehensive, Cooperative and Continuing (3C) planning process.

NOACA also conducts certain air and water quality planning activities, which the Board of Directors oversees. In addition, the NOACA Board serves as a forum for local public officials to discuss regional issues and intergovernmental cooperation.

While NOACA oversees the processes for federal transportation funding and regional transportation planning in northeast Ohio, the agency does not directly provide any transportation services to individuals. Nevertheless, it is extremely important to NOACA that the agency complies with both the letter and spirit of all nondiscrimination laws, regulations and executive orders. The agency strives for continuous improvement in this area. This document outlines the scope of those efforts and lays out a plan for future efforts.

NOACA takes its nondiscrimination efforts very seriously. NOACA's associate director of compliance works with the executive director, and with the NOACA Board and committees to ensure ongoing compliance and improvement regarding Title VI, Environmental Justice and other state and federal nondiscrimination requirements. Each year NOACA self-certifies its compliance with these and other state and federal requirements in its [Overall Work Program and Budget](#).

THE NOACA BOARD OF DIRECTORS AND COMMITTEE STRUCTURE

NOACA's 45-member Board of Directors represents the communities, transit agencies and county governments of Cuyahoga, Geauga, Lake, Lorain and Medina. Membership distribution is proportionate to the population among the region's five counties, per NOACA's Code of Regulations. NOACA's Board of Directors members are the policy makers for NOACA.

The NOACA Board also functions as the 208 Policy Board for the Northeast Ohio Lake Erie Basin. In this capacity the Board oversees a continuing planning process for areawide water quality management planning in five rivers that are tributary to Lake Erie as well as direct areas that drain to the lake away from those five rivers. The 208 Policy Board adopted a Water Quality Plan in 1979, which has since been regularly updated to reflect changing water quality conditions and management strategies.

In addition to the executive director, there are six standing committees, three subcommittees and four advisory councils that ultimately report to the NOACA Board of Directors. The committee structure is depicted in Exhibit I.

Exhibit I



Four NOACA advisory councils have particular influence over issues with ramifications for the agency's Title VI compliance efforts.

- **The [Transit Council](#)** advises the [Transportation Subcommittee \(TS\)](#) on public transit issues with the goal of providing better transportation choice, improved air quality and reduced traffic congestion through greater use of public transit. Membership includes representatives from:
 - Brunswick Transit Authority (BTA)
 - Geauga County Transit (GCT)
 - Greater Cleveland RTA (GCRTA)
 - Laketran
 - Lorain County Transit (LCT)
 - Medina County Public Transit (MCPT)
- **The [Bicycle and Pedestrian Advisory Council \(BPAC\)](#)** assists the [Transportation Subcommittee](#) in proposing bike and pedestrian accommodations during the project planning stages. The BPAC helps NOACA increase modal choices by encouraging bicycling as a viable transportation mode, and supporting facilities that increase bicycle and pedestrian use.
- **The [Business Advisory Council](#)** is a new entity within NOACA's committee structure. The council charter calls on the council to provide "insight and feedback on how NOACA programs and policies are affecting business and economic development in Greater Cleveland to the External Relations Committee." The Council has 15 members selected from among small business owners, corporations, unionized labor, trade associations, universities, chambers of commerce etc.
- **The [Community Advisory Council](#)** is another new entity within NOACA's committee structure. The council charter calls for providing continuous and balanced public representation in the development of regional plans and policies. Council membership includes 15 members selected from among religious organizations, social service agencies, nonprofits, voter advocacy groups, health advocacy groups, modal organizations, senior organizations, schools, etc.

All NOACA committees and subcommittees are composed of elected and appointed officials who represent the residents of northeast Ohio. Their seats on NOACA's committees and subcommittees are based on the position they hold within government. The Transit Council is similarly comprised. However, the Bicycle and Pedestrian Council (BPAC), Community Advisory Council, and Business Advisory Council also include representatives from the bicycling community, the business community and the non-governmental organizations within the region. Exhibits II - V show the makeup of those four councils.

Exhibit II Transit Council Membership *

Name	Organization	Race	Gender
Patrick McNamara, Director	Brunswick Transit Authority (BTA)	White	Male
Michael Kasper, Transit Director	Geauga County Transit (GCT)	White	Male
Joseph Calabrese, CEO and General Manager **	Greater Cleveland Regional Transit Authority (GCRTA)	White	Male
Raymond Jurkowski, General Manager	Laketran	White	Male
James Cordes, Lorain County Administrator	Lorain County Transit (LCT)	White	Male
Michael Salamone, Director	Medina County Transit	White	Male

* Transit Council membership is prescribed in NOACA’s Code of Regulations based on organization and title.

** Council chair

Exhibit III Bicycle and Pedestrian Advisory Council (BPAC)

Name	Organization	Race	Gender
Samuel Alai, Mayor	City of Broadview Heights	White	Male
Allison Ball, Planner	Cuyahoga County Planning Commission	White	Female
Joyce Braverman, Planning Director	City of Shaker Heights	White	Female
Timothy DeGeeter, Mayor	City of Parma	White	Male
Gayle Lewin, Highway Design Engineer	Cuyahoga County Department of Public Works	White	Female
Robert Stefanik, Mayor	City of North Royalton	White	Male
Donna Studniarz, Director of Strategic Initiatives	Cleveland Metroparks	White	Female
Michael Summers, Mayor	City of Lakewood	White	Male
Richard Wong, Planning Director	City of Cleveland Heights	Asian	Male
Nicholas Gorris, Deputy Engineer	Geauga County	White	Male
Erin Fink, P.E., Lake County Engineer Rep.	Lake County	White	Female
Allen Pennington, Engineer	City of Mentor	White	Male
Barb Bickel, Executive Director	Visit Lorain County	White	Female

Eric Norenberg, City Manager	City of Oberlin	White	Male
James Ziemnik, Director	Lorain Metroparks	White	Male
Patrick McNamara	Brunswick Transit Authority	White	Male
Anthony Ratajczak	Medina County Bicycling Community		
Martin Cader, Bike and Pedestrian Coordinator	Cleveland City Planning Commission	White	Male
Martin Keane, Ward 17 Councilman *	City of Cleveland	White	Male
Jacob VanSickle, Executive Director	Bike Cleveland	White	Male
Leslie Farley	ODOT District 3	White	Female
David Short	ODOT District 12	White	Male

* Council Chair

Exhibit IV Business Advisory Council Membership

Name	Organization	Race	Gender
Barry Doggett	Eaton Corporation	White	Male
Scott Esterly	Building Owners and Managers Association	White	Male
Mike Hoag	WIRE-Net	White	Male
Brian Smith	Cleveland Clinic	White	Male
Sashi Brown	Cleveland Browns	Black	Male
Ed Rybka	City of Cleveland	White	Male
Sandra Luther	Lake County League of Women Voters	White	Female
Tony Gallo	Lorain Chamber of Commerce	White	Male
Don Romancak	Lorain County	White	Male
Melissa Krebs	Brunswick Area Chamber of Commerce	White	Female
Susan Davis	Cleveland Engineering Society	White	Female
Heidi Gartland	University Hospital	White	Female
Dennis Lafferty	Collection Auto Group	White	Male
David Wondolowski	Cleveland Building Trades Council	White	Male

Exhibit V Community Advisory Council Membership

Name	Organization	Race	Gender
Courtney Clark	Cuyahoga Community College	White	Female
Donovan Duncan	Cuyahoga Metropolitan Housing Authority	Black	Male
Tracy Strobel	Cuyahoga County Library	White	Female
Mary Warren	League of Women Voters	White	Female
Katie Lerner	Student	White	Female
Leo Serrano	Cleveland Public Schools	Latino	Male
James Clements	Catholic Charities	White	Male
Carrie Dotson	Lifeline, Inc.	White	Female
Bill Harper	United Way of Greater Lorain County	White	Male
Anne Spelic	Lorain County Office on Aging	White	Female
Skip Sipos	Medina Metropolitan Housing Authority	White	Male
David Beach	GreenCityBlueLake	White	Male
Barb Clint	YMCA	White	Female
Patty Kaplan	American Lung Association	White	Female
John Klee	Catholic Charities, Diocese of Cleveland	White	Male

Communications and Public Involvement

NOACA's public involvement processes are outlined in the Public Interaction Policy (PIP), which was last updated in 2011. The PIP outlines NOACA's policies with regard to public involvement, public comment at NOACA meetings, and public comment generally. This document is included as Appendix C.

The PIP includes a summary of federal regulations regarding Title VI, Environmental Justice and public participation. It also includes a public participation plan that outlines NOACA's strategies and techniques for public involvement and for gaining meaningful public input.

An update to that policy is currently being drafted that will be more specific with regard to outreach to Title VI and Environmental Justice populations, including individuals with limited English proficiency. That update will include:

- A NOACA Title VI public notice revised for clarity that is posted it more prominently on the agency's website and in public areas of the building
- Expanded and clarified complaint and appeals procedures in English and Spanish along with a detailed online complaint form
- Better defined processes to increase the use of socioeconomic data in NOACA's public involvement and outreach efforts, including the agency's work with social service organizations, schools and community groups to better reach Title VI, Environmental Justice and Limited English Proficiency (LEP) populations
- A more robust process for identifying and reaching out to Limited English Proficiency populations within the region, using Census data to pinpoint Census Tracts with high LEP populations
- Procedures to reach out to the Latino community through social service agencies and news outlets
- New procedures for public meetings that will reduce or eliminate barriers to participation due to
 - The location of public meetings
 - Work schedules
 - Transportation
 - Limited English proficiency
 - Special needs of people with disabilities
 - Child care needs

Current Outreach Efforts

NOACA provides many opportunities to provide ongoing input through its website and social media channels. NOACA posts to Facebook and Twitter daily and continuously updates its website with information about the agency, including announcements regarding nondiscrimination policy, public meetings, webinars, employment opportunities and requests for proposals.

NOACA conducts a wide variety of public outreach events to distribute information about key programs and to solicit feedback. All of these outreach events are designed to provide the fullest possible access to traditionally underserved populations, and some are specifically targeted at those populations.

For example, in recent years NOACA staff distributed bus passes at Cuyahoga County Job & Family Services, Lake County Job & Family Services, and a women's homeless shelter serving the urban core in two counties in exchange for completed transit surveys. NOACA directors have also met with directors of local social service organizations to both explain how they can apply for federal transportation funding and to learn how NOACA can be of greater assistance.

NOACA also conducts public meetings and focus groups on a regular basis. These meetings are widely advertised, including in newspapers serving minority populations. NOACA has conducted public meetings with traditionally underserved populations, and with the organizations that serve and represent them. The agency has also surveyed these organizations on a regular basis. All these efforts were aimed at developing a better understanding of the transportation challenges faced by low-income, minority, elderly and disabled populations. NOACA plans to build on this and increase its outreach to traditionally underserved populations.

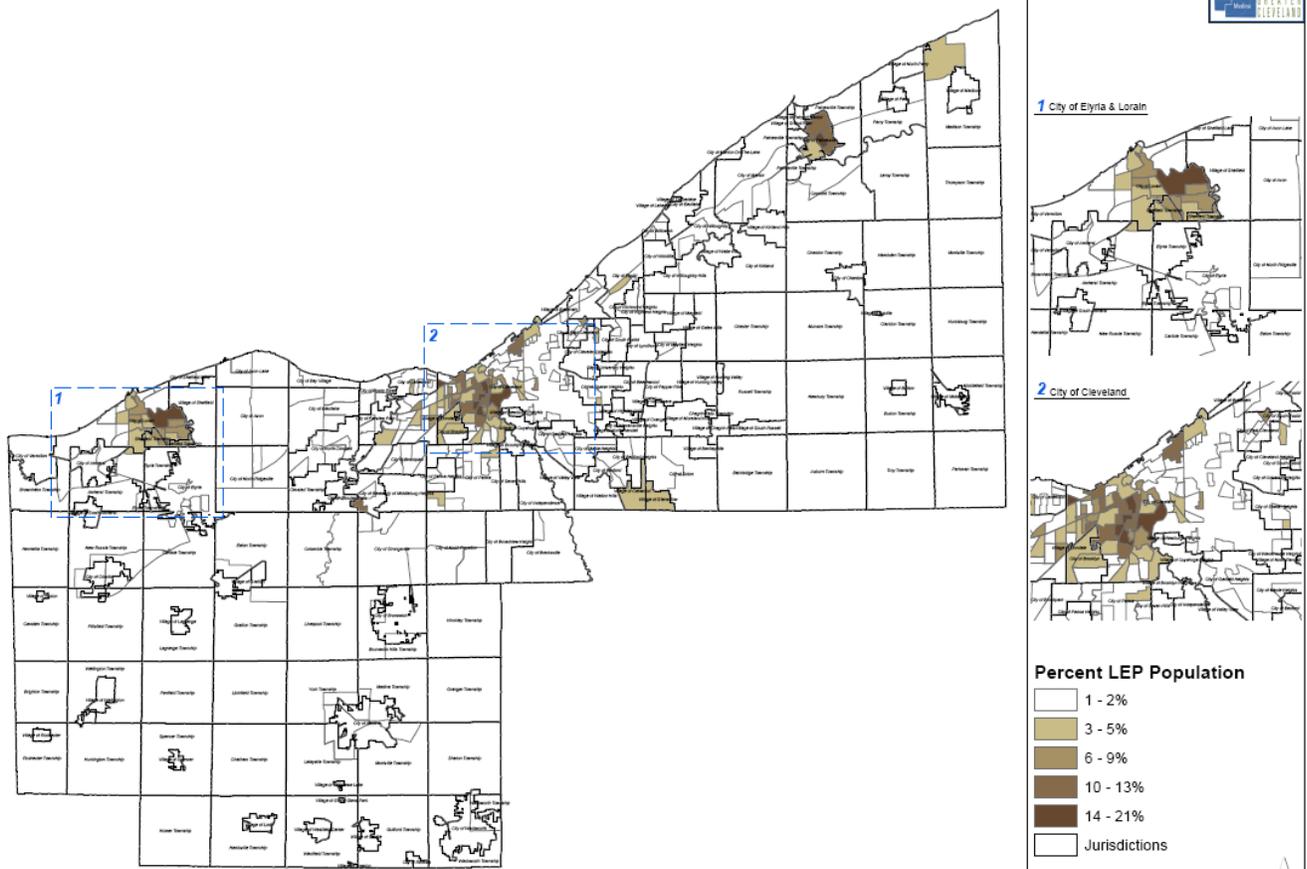
In addition, NOACA recently worked with the Greater Cleveland Regional Transit Authority to fund and administer an Onboard Transit Survey that determined the needs and travel patterns of transit riders, including minority, low income, disabled and transit dependent individuals. NOACA also funded and administered a regional Household Travel Survey to determine the travel patterns of individuals using all modes of transportation. The data gained from these surveys are being used in NOACA's travel demand model, in its transportation planning efforts and in its public involvement efforts.

Limited English Proficiency

According to the U.S. Census Bureau's 2007-2011 American Community Survey estimates, approximately 1.1 percent of persons over age 5 in the NOACA region speak English "less than very well." Among those individuals who don't speak English well, most speak Spanish at home. The percentages of LEP individuals vary from as little as 0.16% in Geauga County to as much as 1.46% in Lorain County.

	Cuyahoga County	Geauga County	Lake County	Lorain County	Medina County	NOACA Region
Total Population:	1,209,889	88,196	217,171	282,270	160,972	1,958,498
Speak English less than "very well"	14,572	137	2,517	4,131	438	21,795
Percent who speak English less than "very well"	1.20%	0.16%	1.16%	1.46%	0.27%	1.11%

Limited English Proficiency populations in the NOACA region are concentrated in portions of three cities: Lorain, Cleveland and Painesville. Looking at Census Tracts in those areas, the LEP population varies from 1-21% with most areas in the 3-9% range.



MAP 6.2.4: LEP POPULATION

It is worth noting that as the metropolitan planning organization (MPO) for northeast Ohio, NOACA provides no direct services to individuals. NOACA works with local communities, transit agencies, county engineers and the Ohio Department of Transportation to conduct the federally required metropolitan planning process for the region and to identify transportation projects for funding. NOACA does not provide bus service, rail service or other transportation services to the public.

As such, no LEP persons are directly served or likely to be encountered by NOACA programs, except through NOACA’s public outreach efforts. For this reason, NOACA’s programs, activities and services have little importance or relevance to the everyday lives of LEP individuals, except perhaps as a matter of general interest in good government.

Finally, the cost of mounting a significant LEP outreach campaign would be prohibitive for NOACA, given the agency’s size and budget. Such an effort would not affect the everyday lives of LEP individuals, but would divert agency resources from the planning work that benefits all the region’s residents, including LEP individuals.

Because the percentage of LEP individuals in the NOACA region is extremely low and NOACA programs and services are designed to serve governmental entities rather than individuals, we believe a modest approach to addressing the needs of LEP individuals is appropriate. Going beyond that modest approach would yield little or no direct benefit to the LEP population, would divert the agency's resources from its primary mission, and would not be a good use of taxpayer dollars.

As outlined in the above section, NOACA conducts a robust public involvement program and actively seeks out meaningful input from the public at large. Despite the factors described in the above paragraphs, we believe it is nevertheless important that the agency take steps to ensure that LEP individuals have reasonable access to that process. Currently:

- NOACA conducts a public involvement program that specifically includes outreach to Title VI and Environmental Justice populations. This program actively seeks meaningful public input on NOACA planning documents, policies and programs. However:
 - NOACA has seen no indication of a demand for translation services in its public outreach efforts or communications materials.
 - NOACA has not received a public request that its reports, studies or other materials be made available in a language other than English.
 - NOACA has never received a comment in a public meeting, on its public comment hotline, via email or social media, or through postal mail in any language other than English.
- NOACA posts a notice on its website and in its Public Interaction Policy (Attachment C) stating that the agency will provide language translation services for individuals who wish to attend NOACA public meetings or read NOACA documents. There have been no requests for these services to date.
- NOACA's Public Interaction Policy indicates that "NOACA will make every effort to arrange for translation, sign language or other special assistance at meetings for individuals with special needs who request them at least three business days before the meeting." To date, there have been no such requests.
- NOACA offers a language translation tool on its website.

For 2015, NOACA is expanding its LEP outreach efforts to include:

- Posting a revised and expanded Title VI notice to the public in English and Spanish on NOACA's website and in NOACA's public meeting areas
- Posting a revised and expanded Title VI complaint form on its website in English and Spanish
- Updating the Public Interaction Policy to outline a process that uses Census data and mapping to identify concentrations of LEP individuals for public outreach targeting
- Identifying partner organizations within the Latino community that can help with NOACA outreach to LEP individuals specifically and to the Latino community in general
- Gauge the need for further LEP oriented actions based on this outreach

PLANNING AND PROGRAMMING

Coordinated Public Transit – Human Services Plan

NOACA maintains a Coordinated Public Transit – Human Services Plan (Attachment D), which includes the analyses necessary to identify the needs of the target population groups for the Enhanced Mobility of Seniors and Individuals with Disabilities (Section 5310) funding program. For years NOACA has assisted the Ohio Department of Transportation in the administration of that important funding program, and has now successfully applied to be the designated recipient of those funds.

As part of the process of soliciting applications for Enhanced Mobility funding, NOACA holds a free Application Workshop for eligible applicants to describe the process and to answer any question that might arise regarding how to complete the application or the evaluation and selection process. These Workshops are generally very well attended. NOACA staff is also available to answer questions and provide assistance via email or telephone during office hours.

The Coordinated Plan includes:

- An assessment of available transportation services
- A demographic profile of the region that includes an analysis of elderly and disabled populations, along with people living in poverty, minority groups and limited English proficiency populations
- An assessment of the transportation needs of seniors, the disabled, low-income individuals and reverse commuters
- Strategies and activities to address the needs of the target populations
- Strategies and activities for implementation based on resources, feasibility and time

Coordinated Plan Objectives

First Tier

- Reduce transit/specialized transportation cost for riders and providers
- Improve frequency of service
- Improve weekend service
- Improve operational efficiencies at all levels
- Improve access to underserved areas with transit-dependent populations
- Improve evening service
- Advance awareness of growing unmet transportation funding needs

Second Tier

- Improve access to information and travel training for riders and health and human service agencies
- Improve last-minute transportation options
- Mitigate environmental barriers
- Improve inter-county transportation options

Data gathered in the Coordinated Plan is used in NOACA's planning and programming efforts, policy development, and public outreach efforts. Findings from the Coordinated Plan are included in the agency's transportation plan, *Connections⁺ 2035*.

Other Transportation Planning Activities for Seniors and People with Disabilities or Low Income

NOACA has provided funding to support work access activities conducted by transit agencies in Cuyahoga County for several years running. These funds are used to provide vanpool and other transportation services to low-income commuters, including many who are transitioning from welfare to work who are not served by existing transit routes.

In 2014, NOACA applied for and received a grant through the State of Ohio to hire a full-time mobility manager. That individual is now working to identify and coordinate transportation resources for low-income individuals, minority groups, the elderly and people with disabilities. These resources include public transit, welfare-to-work transportation programs and transportation services offered by local non-profit organizations. In addition to coordinating these service, NOACA's mobility manager also works to help improve the efficiency of these programs and to help eliminate gaps in service.

NOACA Urban Core Programs

In addition to its support for Work Access programs, NOACA has designated 34 communities within its five-county region as "urban core" communities. In order to be designated as an "urban core" community, it must meet three of the following five criteria:

- Have reached a maximum population by 1970 or earlier
- Have 50 percent or more housing units constructed prior to 1950
- Have a 1990 population density greater than 2,500 per square mile
- Have seven or more surface street miles per community square mile
- Have total assessed real property value per capita below the regional mean

Two of NOACA's Transportation Plan Goals are to:

- Improve the transportation mobility of the transit-dependent and low income individuals to jobs, housing and other trip purposes.

- Foster reinvestment in existing urban core areas throughout the region, and work to target and manage transportation investments to implement Plan goals.

NOACA sought to designate specific “urban core” communities in part as a way to help improve the mobility of transit-dependent and low-income individuals. These communities are home to the vast majority of Northeast Ohio’s minority and low-income populations.

Designation as an urban core community carries with it added weight during NOACA’s project planning review process (which is a prerequisite to project funding approval) and also makes them eligible for specific programs that NOACA has established specifically for urban core communities. The programs include:

Urban Core Preliminary Engineering Program

- Urban core communities are eligible to apply for financial assistance for the preliminary engineering phase of their transportation improvement projects. The Board of Directors shall approve the not-to-be-exceeded amount, dependent on the project and available funds. Communities that receive federal aid for preliminary engineering must commit in writing that the project will advance to construction within an agreed upon time. If the project does not advance, by federal law, the community will be required to pay back the federal funds.

Urban Core Right-of-Way Program

- Urban core communities may apply for federal funds for right of way, minus the initial \$50,000 right of way investment

Urban Core Neighborhood Planning Assistance

- Urban core communities are eligible to apply for NOACA’s Neighborhood Planning Program, wherein NOACA staff assists urban core communities in planning studies. More information on the program is available on NOACA’s website.

While NOACA does not provide services directly to individuals, the agency does provide significant benefit indirectly to Title VI and Environmental Justice populations and the communities in which they live through the Urban Core Programs. Staff is currently studying additional ways to assist Urban Core communities through new Regional Transportation Investment Policy initiatives, and expect to expand those policies in 2015.

TITLE VI PROGRAM AREAS

NOACA Provisional Asset Management Program (PTAMP)

Road infrastructure is the backbone of America's transportation system, and maintaining it in a state of good repair is essential for all modes of transportation. Roads and bridges accommodate not only passenger and freight vehicles, but also accommodate buses, bicyclists and pedestrians.

In 2014, the NOACA Board of Directors established a Provisional Transportation Asset Management Program to address the region's most critical pavement needs with the goal of bringing all the region's roadways up to a state of good repair. NOACA staff is currently developing a comprehensive Asset Management Program for the agency, which is expected to be ready by the summer of 2015.

A total of 23 projects totaling nearly \$35 million came out of the PTAMP analysis in 2014, which was intended to help bring the region's roadways up to a state of good repair. Of these, eight projects totaling \$15.7 million are to be constructed in fiscal year 2015. These eight projects are all in the urban core cities of Cleveland and Lorain, where there are significant Environmental Justice (EJ) populations. NOACA programmed another 15 projects totaling \$19.1 million for FY 2016, predominantly in urban core communities. These projects are on routes that provide significant access to jobs, centers of business, recreation and cultural amenities.

These projects will help revitalize some of the oldest infrastructure in the region and help spur economic development in important EJ areas. The PTAMP is not part of NOACA's Urban Core Program per se and does not exclusively focus on urban core communities. However, it is focused on the most deficient pavement and bridges in the region, and is expected to greatly benefit residents of urban core communities where some of the region's oldest and most deficient infrastructure can be found.

Backlog Maintenance Projects For The 2015 Construction Season						
Pavement Name	Community	Length	Average Width	Preliminary Construction Cost	Refined Construction Cost	Refined PTAMP 80% Funding
WEST BLVD.	Cleveland	2.10	37.50	\$2,575,000	\$2,900,017	\$2,320,014
HARVARD	Cleveland	1.70	43.00	\$1,648,000	\$2,050,194	\$1,640,155
BROADVIEW AVE.	Cleveland	1.72	42.00	\$2,060,000	\$2,284,870	\$1,827,896
EAST BLVD./FORD DR.	Cleveland	2.37	48.00	\$2,369,000	\$2,401,960	\$1,921,568
PROSPECT	Cleveland	1.00	60.00	\$1,236,000	\$1,577,651	\$1,262,121
COMMUNITY COLLEGE	Cleveland	0.88	62.00	\$1,236,000	\$1,526,120	\$1,220,896
Elyria Ave	Lorain	1.25	60.00	\$2,060,000	\$2,060,000	\$1,648,000
W 117th STREET	Cleveland	2.94	70.00	\$741,600	\$927,000	\$741,600
Total				\$13,925,600	\$15,727,812	\$12,582,250

TITLE VI PROGRAM AREAS

CONSULTANT CONTRACTS

NOACA's procurement policy outlines a set of written consultant selection procedures consistent with U.S. DOT requirements (49 CFR §18.36).

NOACA complies with 49 CFR §18.36 by following its written policies for engaging in procurements that meet federal requirements, as well as the "State and local laws" referenced in that CFR. For NOACA, the state and local laws mean all of Chapter 307 of the Ohio Revised Code. NOACA Board Resolution No. 2011-010, adopted on March 18, 2011, ensures that NOACA's procurement policy continuously complies with state law. All consultant selection procedures follow the NOACA policies, all of which include the DBE requirements.

NOACA uses the Ohio Department of Transportation's Disadvantaged Business Enterprise goals in its consultant contracting efforts. NOACA monitors this goal by reviewing all proposals for DBE prime consulting or sub-contractor participation before any contract is executed. NOACA reviews the lists of DBEs kept by the State of Ohio and by the Greater Cleveland Regional Transit Authority to assist in establishing the validity of DBE claims. In the recent past, NOACA has been fortunate in being able to contract directly with DBE firms in several instances.

NOACA's written procurement policies, as well as all past practices, have included advertising of requests for proposals in Cleveland's local minority-owned and minority-focused newspaper, the Call & Post. In addition, NOACA emails notice of its RFPs to any DBEs known to work in the subject field.

Title VI assurances and provisions are included in all NOACA contracts. The relevant clause is as follows:

"19. Equal Employment Opportunity Consultant agrees to abide by any and all applicable equal employment opportunity laws, whether state or federal, and to use its best efforts to subcontract with Disadvantaged Business Enterprises (DBE's) when possible. It is recommended that Consultant attempt to achieve 12% letting of subcontracts to DBE's. This complies with requirements of NOACA for its efforts at minority participation. Consultant agrees that it will not discriminate against any employee or applicant for employment because of race, color, religion, age, creed, sex, sexual orientation or national origin, and agrees to take affirmative action so that applicants are employed and that employees are treated during employment without regard for their race, color, religion, age, creed, sex, sexual orientation or national origin. Such action shall include, but not be limited to, the following: employment, upgrading, demotion or transfer, recruitment or recruitment advertising, layoff or termination; rates of pay or other forms of compensation; and selection for training, including apprenticeship. Consultant further agrees that it will insert the foregoing provision in all of its subcontracts in connection with services provided. Consultant further agrees to comply with all requirements of Title VI of the Civil Rights Act of 1964, 42 U.S.C. § 2000d et seq., 49 C.F.R. Part 21."

NOACA's consultants have made good faith efforts to comply with the agency's DBE goals by employing DBEs as subcontractors where possible, thus helping to ensure that NOACA always exceeds its participation goal. NOACA is proud of its DBE record.

TITLE VI ADMINISTRATION AND TRAINING

Administration

NOACA's associate director of compliance, under the direction of the NOACA Board and executive director, works with division directors to ensure that the agency's Title VI compliance and other nondiscrimination efforts are maintained at a high level. NOACA takes these responsibilities very seriously and strives for ongoing improvement in this area.

Compliance with Title VI and other nondiscrimination requirements happens through various means, including:

- NOACA's planning efforts and products, particularly its Coordinated Public Transit – Human Services Plan
- NOACA's *Public Interaction Policy* and public involvement efforts
- NOACA's *Overall Work Program* and planning and programming procedures
- NOACA's *Disadvantaged Business Enterprise Program* and procurement procedures
- NOACA staff training and direction

NOACA's Title VI and other nondiscrimination programs are administered in both internal and external ways. NOACA strives for transparency in all its operations, and its nondiscrimination policies and procedures are no exception. NOACA prominently displays a [Nondiscrimination](#) page in the *About Us* section of its website with links to various policies, procedures and forms. NOACA's home page provides a direct link to its *Nondiscrimination* page.

NOACA posts its Title VI Notice to the Public (Attachment A) on this page and in public meeting areas within the agency offices. This Title VI Notice includes a Nondiscrimination Policy describing the breadth of the agency's responsibilities under various laws, executive orders and regulations. NOACA also posts the Title VI complaint procedure and form (Attachment B) on this page.

NOACA has not been the subject of a discrimination complaint or lawsuit in at least 15 years.

Training

NOACA's internal responsibilities with regard to Title VI and other nondiscrimination requirements begin with staff training and awareness. Compliance with these laws and regulations is an integral part of the agency's planning, project programming and external relations processes. NOACA believes that raising awareness of these requirements among agency staff is vital to ensuring that the agency conforms to

both the letter and the spirit of the law. NOACA continually strives to increase that level of awareness among staff from all agency divisions.

In 2014, six NOACA employees attended the National Highway Institute's *Fundamentals of Environmental Justice* course. These included the two directors, plus staff from NOACA's Planning, Programming and External Relations divisions. Course materials were made available to other NOACA staffers and course highlights were discussed at a staff meeting.

In addition, NOACA's executive director attended a one-day Environmental Justice course in 2014 hosted by ODOT and presented by the Federal Highway Administration.

In 2015, NOACA's Associate Director of Compliance, who serves as the Title VI administrator, completed the Ohio Department of Transportation's *Title VI for Local Public Agencies* course. NOACA will require all Planning, Programming and External Relations division staff to also complete this course in 2015.

ATTACHMENTS TO THIS PROGRAM ARE AVAILABLE ONLINE

Attachment A: [Title VI Notice to the Public](#)

Attachment B: [Title VI Complaint Procedure and Form](#)

Attachment C: [NOACA Public Interaction Policy](#)

Attachment D: [Coordinated Public Transit-Human Services Transportation Plan](#)

