

Maumee Valley Planning Organization

Title VI Policies and Procedures

2024



CONTENTS

1.0 INTRODUCTION	4
1.1 Maumee Valley Planning Organization & the Civil Rights Act	4
Environmental Justice Populations	5
1.2 About the Maumee Valley Planning Organization	5
1.3 MVPO Executive Council, Committees, and Organizational Structure	6
MVPO Committees.....	7
2.0 DEMOGRAPHICS.....	8
2.1 Demographic Profile.....	8
3.0 Nondiscrimination Policies.....	10
3.1 Nondiscrimination Policy	10
3.2 List of Assurances.....	10
3.3 Environmental Justice (EJ) Areas of Concern	10
4.0 PUBLIC INVOLVEMENT	13
4.1 Public Participation Plan	13
4.2 Ongoing Outreach Efforts.....	15
Long-Range Transportation Plan	15
Regional Transportation Improvement Program (RTIP)	16
Other RTPO Planning Documents	16
Fair Housing Program.....	16
Community Development Block Grant (CDBG) Program	16
Community Housing Impact and Preservation (CHIP) Program.....	17
4.3 Limited English Proficiency (LEP)	17
Proportion of LEP Individuals in the MVPO Region	17
4.4 Interpretation and Translation Services	20
Printing Vital Documents in a Language Other Than English.....	20
Availability of Public Documents.....	20
Vital Documents.....	20
5.0 PLANNING & PROGRAMS.....	20
5.1 Programs	20
Community Housing Impact and Preservation (CHIP)	20
Fair Housing	20
Community Development Block Grant (CDBG).....	21

Regional Transportation Planning Organization (RTPO).....	21
5.2 Planning.....	21
Coordinated Transportation Planning	21
Analysis of Impediments to Fair Housing.....	21
6.0 TITLE VI TRAINING & ADMINISTRATION.....	22
6.1 Title VI Coordinator.....	22
6.2 Title VI Training.....	22
Filing a Complaint.....	22
Investigative Merit	23
APPENDICES	24
Appendix A: Committees	24
Appendix B: Title VI Notice	27
Appendix C: Title VI Complaint Form	28

1.0 INTRODUCTION

1.1 Maumee Valley Planning Organization & the Civil Rights Act

Title VI of the Civil Rights Act of 1964 prohibits discrimination based on race, color, or national origin in programs and activities receiving federal financial assistance. Specifically, Title VI provides that "no person in the United States shall, on the grounds of race, color, or national origin, be excluded from participation in, be denied the benefits of, or be subjected to discrimination under any program or activity receiving Federal financial assistance" (42 U.S.C. Section 2000d). Maumee Valley Planning Organization (MVPO) does not tolerate discrimination in any of its programs, services, or activities and will not discriminate against anyone based on race, color, national origin, gender, age, disability, religion, income, sexual orientation, gender identity, or family status.

The Civil Rights Restoration Act of 1987 clarified the intent of Title VI to include all programs and activities of federal aid recipients, sub-recipients, and contractors whether those programs and activities are federally funded or not.

During the Obama Administration, the Federal Transit Administration (FTA) placed renewed emphasis on Title VI issues, including providing meaningful access to persons with limited English proficiency (LEP).

Additional authorities and citations include:

- Title VI of the Civil Rights Act of 1964 (42 USC 2000d et seq); Section 162 (a) of the Federal Aid Highway Act of 1973
- Age Discrimination Act of 1975
- Section 504 of the Rehabilitation Act of 1973
- Americans with Disabilities Act of 1990
- Civil Rights Restoration Act of 1987
- 23 CFR Part 200
- USDOT Order 1050.2
- Executive Order 12898 – Federal Actions to Address Environmental Justice in Minority Populations and Low-income Populations (1994)
- Executive Order 13166 – Improving Access to Services for People with Limited English Proficiency (2000)
- U.S. DOT regulation, 49 CFR part 21, "Nondiscrimination in Federally-Assisted Programs of the Department of Transportation— Effectuation of Title VI of the Civil Rights Act of 1964" (June 18, 1970, unless otherwise noted)

Of particular interest is Executive Order 12898. It was intended to ensure that minority and low-income individuals receive equitable benefits from federally funded programs, that they do not suffer disproportionately from any environmental burdens caused by those programs, and that they have the opportunity for meaningful input into the process.

Environmental Justice Populations

U.S. DOT guidelines for environmental justice (EJ) populations include the following groups:

- Persons whose household income is at or below the Department of Health and Human Services poverty guidelines.
- The following five minority groups:
 - Black (a person having origins in any of the black racial groups of Africa)
 - Hispanic or Latino (a person of Mexican, Puerto Rican, Cuban, Central or South American, or other Spanish culture or origin, regardless of race)
 - Asian American (a person having origins in any of the original peoples of the Far East, Southeast Asia, the Indian subcontinent)
 - American Indian and Alaskan Native (a person having origins in any of the original people of North America, South America, including Central America, and who maintains cultural identification through tribal affiliation or community recognition)
 - Native Hawaiian or Other Pacific Islander (people having origins in any of the original peoples of Hawaii, Guam, Samoa, or other Pacific Islands)

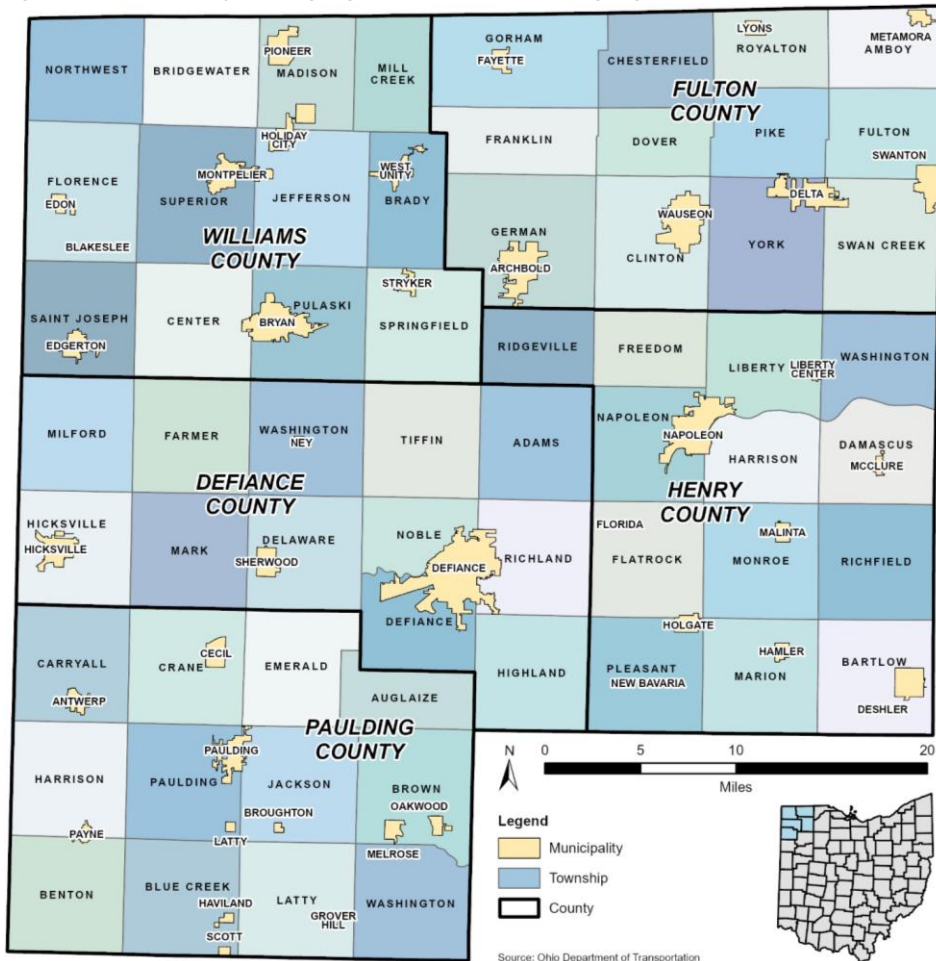
1.2 About the Maumee Valley Planning Organization

The Maumee Valley Planning Organization (MVPO) is a voluntary association of local governments organized as a regional planning commission under the Ohio Revised Code Section 713.21. The agency serves the counties of Defiance, Fulton, Henry, Paulding, and Williams, which include four cities, 36 villages, and 61 townships (see Figure 1). The total area has a combined population of approximately 165,000 people (U.S. Census Bureau).

MVPO was established in 1973. Since then, the organization has grown from a three-person staff to a fifteen-person staff. MVPO is funded through administration and implementation funds that are provided through successful grants secured for grantees, as well as member dues provided by the Board of County Commissioners for each county in the planning region. As each member county pays membership fees, all entities within the five counties are eligible for assistance provided by the organization.

MVPO provides a full range of services in the areas of housing, transportation planning, economic development, downtown redevelopment, landbanks, and general community development. On behalf of the local units of government, MVPO makes applications for and administers various grant programs available through the Ohio Development Services Agency (ODSA) and other state and federal programs. MVPO also serves as the District 5 Liaison for the Ohio Public Works Commission's State Capital Improvement Program and the Local Transportation Improvement Program. In 2013, MVPO added transportation planning to its existing planning services because of the Regional Transportation Planning Organization (RTPO) program initiated by the Ohio Department of Transportation (ODOT). MVPO is now designated by the Governor of Ohio as the region's RTPO and has taken an active role in transportation planning for the five-county area. As an RTPO, MVPO provides the region with technical services, as well as general transportation planning expertise, and strives to be an overall transportation resource for all entities in the area. The overarching goal of the RTPO is to further transportation projects in the region and accomplish the long-range goals and objectives established in MVPO's transportation plan.

Figure 1: Maume Valley Planning Organization (MVPO) Planning Region



1.3 MVPO Executive Council, Committees, and Organizational Structure

The Executive Council governs the Maume Valley Planning Organization. This board is comprised of county commissioners, city and village administrators or mayors, and township trustees from each county that MVPO serves. This board meets quarterly on the 1st Monday of the month and a quorum shall consist of 1/3 of all representatives (5) and at least 3 counties must be represented. See Appendix A for a list of Executive Council members.

MVPO Committees

MVPO has several committees dedicated to enhancing the programs and processes of the organization. Organizational committees include the budget, personnel, and audit committees, whose members are appointed by the Executive Council. These committees make decisions on matters relating to MVPO budget and staff. Program-focused committees include the Comprehensive Economic Development Strategy (CEDS) Steering Committee and the RTPO Technical Committee. The CEDS Steering Committee oversees the planning and maintenance of the MVPO CEDS document, which outlines goals and objectives for improving economic development in the five-county area. See Appendix A for a list of all committee members.

MVPO's Executive Council, upon recommendations from the RTPO Technical Committee, is responsible for the final review and adoption of all RTPO planning documents. The Executive Council provides overall coordination of planning efforts, policies, and procedures in addition to input and guidance for all program activities through the RTPO program. The Council reviews and approves recommendations from the Technical Committee and then provides recommendations on plans, policies, and procedures. One commissioner from each county in the MVPO region serves on this Committee, as well as representatives from cities, villages, townships, and private businesses located in the region.

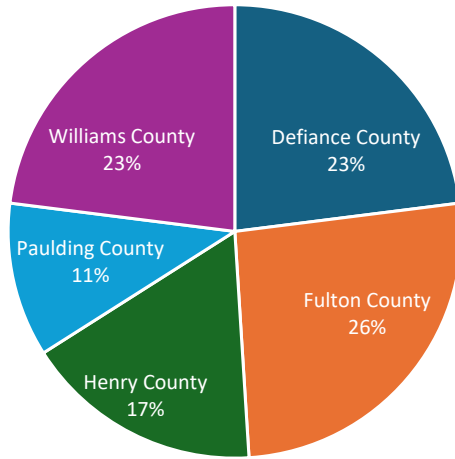
The Technical Committee oversees program and planning development for the RTPO. Membership includes representatives from county, city, and village engineers, economic development, and ODOT Districts 1 and 2. The Technical Committee provides specific input on transportation planning topics, such as materials input, construction or engineering techniques, and other detail-related information that is important to the planning process. It provides oversight and manages transportation planning/implementation, as well as reviews technical planning efforts, procedures, public input comments, and recommendations. The Technical Committee provides recommendations to the Executive Committee for their review and approval.

2.0 DEMOGRAPHICS

2.1 Demographic Profile

The MVPO region is located in the northwest corner of Ohio and borders the states of Indiana and Michigan. The five counties included in the region are mostly rural and are comprised of townships, small cities, and villages. The largest percentage of the MVPO area population resides in Fulton County (Figure 2).

Figure 2: Maumee Valley Planning Organization (MVPO) Counties Population by Percentage



As Table 1 below shows, Fulton County had the highest population according to ACS 2022 data with 42,602 people, while Paulding County has the lowest with 18,827 people.

Commented [AP1]: update

Table 1: MVPO Area Population Totals by County

	Defiance County	Fulton County	Henry County	Paulding County	Williams County	MVPO Region
Population	38,300	42,602	27,601	18,827	36,973	164,303

In the region, the ratio of males to females is rather close to 1:1 (Table 2). 15.2% of the population in the region has a disability (Table 3) and the MVPO region is relatively homogenous, with 92.5% of the total population being white (Table 4). The region has 7.6% Hispanic or Latino residents and approximately 3.9% of the population are two or more races (US Census Bureau ACS 2022).

Table 2: Percentage of Population by Male and Female

	Defiance County	Fulton County	Henry County	Paulding County	Williams County	MVPO Region
Male (%)	50.3	50.2	50.1	49.9	50.0	50.1
Female (%)	49.7	49.8	49.9	50.1	50.0	49.9

Table 3: Percentage of Population with a Disability

	Defiance County	Fulton County	Henry County	Paulding County	Williams County	MVPO Region
Disability (%)	13.9	14.6	12.9	16.9	17.5	15.2

Table 4: Percentage of Population by Race and Ethnic Origin

	Defiance County	Fulton County	Henry County	Paulding County	Williams County	MVPO Region
Total population	38,300	42,602	27,601	18,827	36,973	164,303
White	94.2%	91.2%	90.7%	93.3%	93.1%	92.5%
Black or African American	3.1%	0.5%	0.5%	0.6%	1.2%	1.2%
Hispanic or Latino (any race)	10.7%	9.1%	8.0%	5.1%	5.0%	7.6%
American Indian and Alaska Native	1.1%	0.4%	0.4%	0.1%	0.3%	0.5%
Asian	0.9%	0.5%	0.2%	0.2%	0.6%	0.5%
Native Hawaiian; Other Pacific Islander	0.1%	-	0.2%	-	-	0.1%
Some other race	6.4%	2.3%	3.9%	0.8%	1.8%	3.0%
Two or more races	2.6%	5.0%	4.0%	4.9%	3.1%	3.9%
White and Black or African American	1.2%	1.1%	0.6%	1.1%	0.8%	1.0%
White and American Indian; Alaska Native	0.5%	0.6%	0.4%	0.7%	0.4%	0.5%
White and Asian	0.4%	0.3%	0.1%	0.2%	0.1%	0.2%

MVPO identifies environmental justice (EJ) areas of concern and limited English proficiency (LEP) populations in the MVPO region to use for planning purposes. MVPO strives to ensure that all populations within the region are served equally, that no one group is disproportionately affected by any programs or activities undertaken by MVPO, and that all interested individuals have a voice in the transportation planning process.

3.0 Nondiscrimination Policies

The Title VI notice will be posted at MVPO's main office and on its organizational website. The full notice is available in Appendix B. Below is additional information on MVPO's nondiscrimination policy and list of assurances.

3.1 Nondiscrimination Policy

- As a recipient of federal funding, MVPO assures that no person shall be discriminated against concerning race, color, or national origin as stated in Title VI of the Civil Rights Act of 1964. Any person who believes that they have been discriminated against under Title VI has the right to file a complaint with MVPO.
- All discrimination is prohibited, including both intentional and unintentional. Harassment and retaliation are also prohibited forms of discrimination.
- Examples of prohibited discrimination based on race, color, national origin, sex, disability, or age include denial of service, financial aid, program benefits, and distinctions in the quality, quantity, or the way a benefit is provided. Discrimination in any activities related to highway and infrastructure or facility build or repair, and finally discrimination in employment.
- Title VI compliance is a condition for recipients of federal funds. The Title VI Coordinator is authorized to ensure compliance with this policy, Title VI of the Civil Rights Act of 1964, 42 U.S.C § 2000d and related statutes, and the requirements of 23 Code of Federal Regulation (CFR) pt. 200 and 49 CFR pt. 21.
- MVPO will comply with all federal regulations and report complaints of discrimination to the appropriate agency, and complaints will be investigated.

3.2 List of Assurances

- MVPO assures that no person on the grounds of race, color, national origin, or sex shall be subjected to discrimination, be excluded from participation in, or be denied the benefits of any program or activity.
- MVPO assures that the policies in Title VI will be followed in all bid documents, contracts, and other applicable documents.
- MVPO will formally and promptly investigate and report any person or persons alleging discrimination as defined in the Civil Rights Act of 1964, as it relates to transportation services, programs, and activities to the Ohio Department of Transportation.

3.3 Environmental Justice (EJ) Areas of Concern

MVPO identifies EJ areas of concern to ensure areas and communities with traditionally disadvantaged populations receive the same benefits and opportunities as the rest of the MVPO area. To identify the EJ areas of concern, data from the U.S. Census American Community Survey (ACS) five-year estimates are utilized for median household income and minority information, as EJ areas are typically determined by minority and low-income populations as defined in federal documents related to EJ.

- **Low-Income:** Refers to people in households where the median income is at or below the Department of Health and Human Services (HHS) poverty guidelines.
 - U.S. DOT FTA Federal Guidance on Environmental Justice (Federal Register August 15, 2012). For this document, the poverty level for a family of four for the year 2022 was used as defined by the HHS: \$27,750.

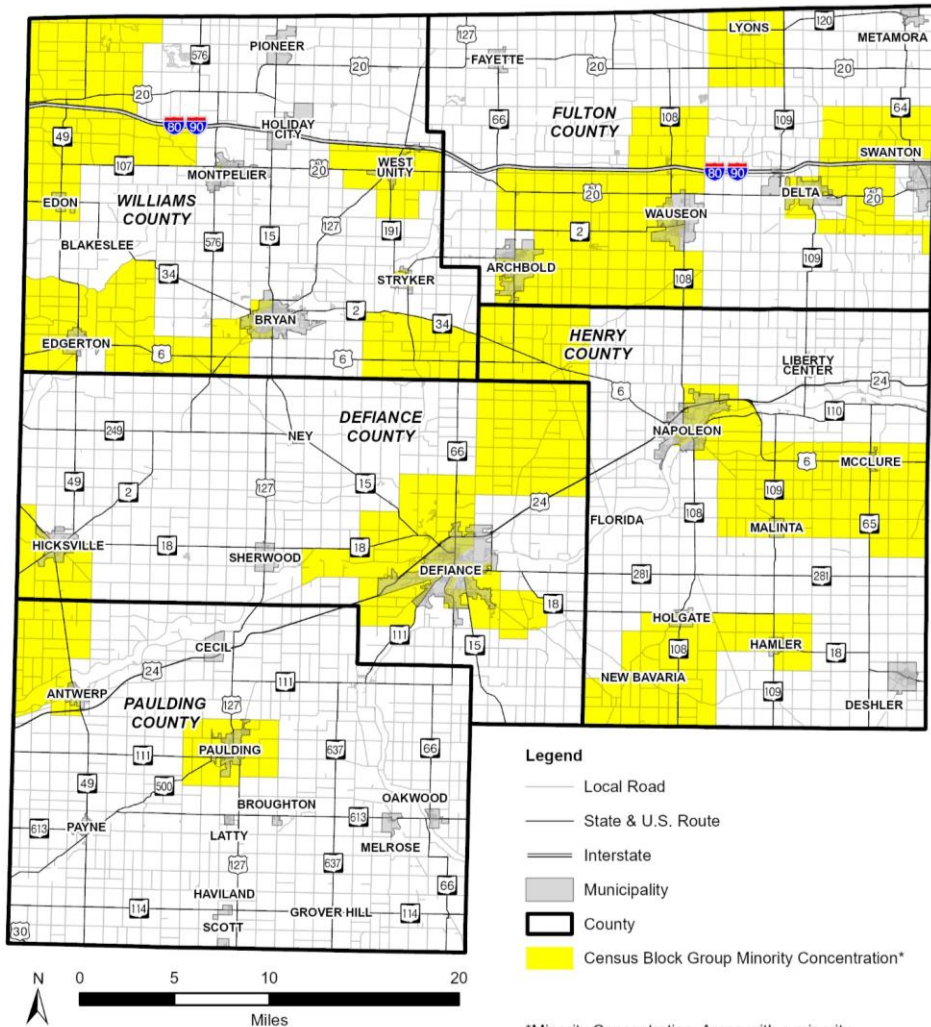
- **Minority Population:** Any readily identifiable group or groups of minority persons who live in geographic proximity, and geographically dispersed or transient persons who will be similarly affected by a proposed DOT program, policy, or activity. Minority includes persons who are American Indian and Alaska Native, Asian, Black or African American, Hispanic or Latino, and Native Hawaiian and other Pacific Islander as identified in the U.S. DOT FTA Federal Guidance on Environmental Justice (Federal Register August 15, 2012).

2020 U.S. Census block groups were utilized for analysis as they provide more refined data and colored maps are used to demonstrate which block groups have been identified as areas of concern (Figure 3).

MVPO regional averages for minority populations were compared to the block groups that make up the region, as well as block groups with a median household income at or below the 2022 poverty line. The regional average (percentage) of minority populations was 8.7%. Thus, any block group with a minority population of greater than 8.7% was identified as a minority concentration.

EJ findings showed that many areas of minority concentrations exist in the MVPO, however, no areas with a median household income below the 2022 poverty guidelines exist.

Figure 3: Environmental Justice Areas of Concern by U.S. Census Block Groups (2022)



Environmental justice areas of concern refer to geographic areas with a concentration of minority populations and/or low-income populations that may be disproportionately affected by environmental and health hazards.

Map Date: 3/27/2024
Sources: Ohio Department of Transportation, TIGER/Line 2023, U.S. Census Bureau

*Minority Concentration: Areas with a minority population greater than the 2022 regional average (8.7%).

All census block groups had a higher median household income than the 2022 poverty threshold for a family of four (\$27,750).

4.0 PUBLIC INVOLVEMENT

4.1 Public Participation Plan

MVPO maintains a Public Participation Plan (PPP) as part of its RTPO program. The PPP outlines several principles for the organization to follow to ensure that those affected by planning decisions have the right to be involved early and often in the decision-making process. The five goals of the plan are as follows:

Goal 1: Inform and Educate the Public

- Make information accessible to the public and provide timely public notice.
- Provide information to the public that is accurate, understandable, and pertinent to transportation planning.
- Utilize engagement activities using varied communication tools.
- Educate the public about the planning process and provide supportive policy, program, and technical information.

Goal 2: Encourage Participation of the Underserved and Underrepresented

- Increase the diversity and number of participants in engagement activities through building new relationships with organizations and communities that serve underrepresented populations.
- These groups include minority, non-English speaking, and low-income populations.

Goal 3: Engage the Public and Encourage Continued Participation

- Ensure an engagement process that is meaningful.
- Provide various ways to engage and communicate with the public.
- Respond to all comments and questions in a timely manner.
- Present a clear process for incorporating public input into MVPO's plans.
- Provide other opportunities for further engagement and education.
- Actively involve the public in all key transportation decisions throughout the planning process.

**Goal 4:
Use Input to Shape
Plan, Policies, and
Programs**

- Document all input received from the public.
- Record of received comments will assist MVPO staff and committees in the development of plans and programs.
- Transparent process of incorporating public input into transportation planning documents.
- Inform the public about each public input planning activity.
- Present opportunities at the beginning of each planning activity throughout the process.

**Goal 5:
Evaluate Public
Participation
Strategies**

- Sustain best practice in public participation by continuing to monitor the public involvement process.
- Create a framework for evaluating and improving this document and the strategies that guide engaging the public.

MVPO is committed to a public participation process that:

- Involves the public in decisions that affect their lives.
- Ensures that the public's contribution will influence decision-making.
- Communicates how the public's contribution will influence decisions.
- Is adaptable and sensitive to diverse audiences.
- Promotes respect.
- Provides equal access to opportunities, information, and education.
- Ensures timely response to participants.
- Is consistent and reliable.
- Promotes continued engagement.
- Maintains honesty and integrity throughout the process.
- Continuously strives to educate and inform affected and interested parties to give them a more meaningful participatory experience.
- Encourages early and active participation.
- Involves process evaluation and monitoring tools.
- Ensures full and fair public participation for all affected parties.

The purpose of the MVPO Public Participation Plan is to outline the standard procedures that will be followed to ensure proactive public involvement during all transportation planning processes through the RTPD Program. It is the policy of MVPO to have a public involvement process that provides complete information, timely public notice, and full public access to MVPO activities at all key stages of decision-making relating to transportation planning.

In addition to carrying out these required elements of the PPP, MVPO shall, to the maximum extent practicable:

- Hold all public participation activities at convenient and accessible locations, including handicap-accessible, and convenient times.
- Employ visualization techniques to aid in the description and explanation of all items relating to transportation planning.
- Make public information available in electronically accessible formats, as well as hard copy formats to afford reasonable opportunity for consideration of public information.
- Provide sufficient time and opportunity for all interested parties to comment on the contents of all transportation plans and programs and provide a response to all applicable public input.
- Employ a variety of public involvement techniques throughout the planning process to offer a variety of ways to engage all interested parties.
- Periodically review, revise, and update this plan to ensure a successful public participation process.

MVPO's Public Participation Plan is reviewed annually, updated periodically, and is available on the organization's website at www.mvpo.org/rtpo.

4.2 Ongoing Outreach Efforts

MVPO periodically provides opportunities to provide ongoing input through its website and social media channels. The website is updated frequently with information about the organization, including announcements regarding open funding application cycles, opportunities to participate in a public meeting or survey, employment opportunities, requests for proposals, etc. MVPO posts to its Facebook page at least once per week with similar information.

For its key programs and planning activities, MVPO conducts a variety of public outreach events to distribute information and request input. All these outreach efforts are designed to provide the best possible access to traditionally underserved populations. Public meetings held for MVPO's purposes are advertised through various media, such as in newspapers, on the radio, on MVPO's website, and through paper flyers distributed to locations, such as local libraries. The sections below outline a few programs that require public outreach at MVPO.

Long-Range Transportation Plan

MVPO's long-range transportation plan is known as 'Moving Together' and was first developed in 2015. The plan outlines existing and future conditions of the five-county region and includes a needs analysis, plan recommendations, and a list of priority projects. This plan is updated every five years and extensive public involvement is conducted as part of the planning process. For the update, a public survey will be conducted to gather feedback from residents of the area on various transportation topics. In addition, a public meeting will be held in each of the five MVPO counties to present the drafted updated plan and gather input on the plan and project list included. Once the final draft is completed, a public comment period will be held to allow members of the public to submit any additional comments on the plan before it is finalized. All public participation efforts will be documented in the long-range plan.

Regional Transportation Improvement Program (RTIP)

The Regional Transportation Improvement Program (RTIP) is a four-year planning document, which was developed to reflect the investment priorities of Regional Transportation Planning Organizations. These priorities come from Ohio's own Statewide Transportation Improvement Program (STIP), which is a short-range planning document that spans a four-year time period. The projects included in the RTIP maintain a balance of local and regional needs and include projects from all modes of transportation, including highways, transit, rail, bicycle, and pedestrian. For MVPO, the RTIP serves to reflect the comprehensive, cooperative, and continuing planning efforts adopted to advance the transportation needs of the Northwest Ohio region.

The RTIP is developed on a biennial basis in conjunction with the STIP development process and consistent with MVPO's long-range transportation plan. During rural consultation, which is an important step of the STIP/RTIP development process, MVPO serves as the regional voice to coordinate and identify regional transportation needs for consideration of inclusion in the STIP and RTIP. MVPO continues the coordination with ODOT and the MPOs within the region to provide a comprehensive RTIP document that is made available for public comment during the STIP/RTIP public involvement period. Public comments are then addressed and coordinated within the RTIP. The final RTIP is adopted by MVPO's Executive Council and then included in ODOT's STIP by reference.

Other RTPO Planning Documents

Most planning documents completed at MVPO for RTPO purposes require some form of public outreach. These plans include the Public Participation Plan, the annual long-range plan project list, active transportation plans, etc. This outreach is typically in the form of a public comment period in which the document is made available for the public to review, public comments are solicited during an appropriate amount of time and incorporated into the planning document. For this outreach, MVPO staff ensures that the comment periods are advertised via various media to reach all segments of the population. This includes on the radio, internet, in local newspapers, etc.

Fair Housing Program

MVPO is the fair housing office for the five-county area and serves to provide the public with information regarding fair housing and taking fair housing complaints. Public outreach is conducted year-round for this program in the form of distributing information about various aspects of fair housing to the public at meetings, publishing information on the organization's website, and making paper materials available to the public.

Community Development Block Grant (CDBG) Program

MVPO implements CDBG programs for local entities in the five-county area. These programs are designed to provide funding for public improvements, such as streets, sidewalks, flood & drainage, water and sewer, parks and recreation, abandoned structures, fire protection, etc. Communities and counties within the area can apply through MVPO for eligible projects to receive grant funding from the Ohio Development Services Agency. Each year, MVPO conducts a variety of public outreach events to first make the communities within the region aware of this funding source and then to make the public aware of projects that will be utilizing the funding. This outreach is provided in the form of public hearings at the County Commissioners' offices, public meetings, public notices in the newspapers, online and on the radio, and at meetings already taking place, such as city council meetings. This outreach is ongoing all year on an as-needed basis.

Community Housing Impact and Preservation (CHIP) Program

The CHIP program provides funding to eligible households that do not have the resources to make necessary improvements to their homes. MVPO oversees applications for Defiance, Fulton, Henry, Paulding, and Williams Counties. Grants are provided to homeowners whose income qualifies based on the Housing and Urban Development (HUD) guidelines, for projects that correct health and safety issues, such as structural issues, heating, electrical, plumbing, lead paint hazards, accessibility, and water/sewer issues. To make the public aware of this funding source, MVPO staff members attend social service agency meetings in all communities, collaborate with USDA Rural Development and Northwestern Community Action Commission on projects, send information to local churches, village offices, utility companies, post flyers in communities, libraries, agencies, and post information on Facebook and the MVPO website, as well as do radio segments on local stations.

4.3 Limited English Proficiency (LEP)

Proportion of LEP Individuals in the MVPO Region

Individuals are considered to have limited English proficiency if they do not speak English as their primary language and if they have a limited ability to speak, read, write, or understand English. This data is often recorded in the Census as the total population 5 years and older who speak a language other than English at home and who speak English 'less than very well'. It is important to understand how many LEP individuals reside in a planning area and what language is spoken most frequently to ensure the inclusion of these populations in an organization's planning process.

The Maumee Valley region has a relatively small proportion of LEP individuals and the most frequently spoken language other than English is Spanish. Out of the individuals who speak Spanish, only a small percentage speak English less than very well. According to the 2022 American Community Survey 5-year estimate data, the MVPO region has a total population of 164,303. Out of the population 5 years and older, 2,287 individuals are estimated to speak English less than very well. This data is further broken down by County and language spoken and is displayed as a percentage in the table below (Table 5).

Table 5: Percent of Population that Speaks English Less Than "Very Well"

	Defiance County	Fulton County	Henry County	Paulding County	Williams County	MVPO Region
Speaks Spanish	1.7%	1.3%	1.2%	< 1%	< 1%	1.2%
Speaks Indo-European	< 1%	< 1%	< 1%	< 1%	< 1%	< 1%
Speaks Asian and Pacific Islander	< 1%	< 1%	< 1%	< 1%	< 1%	< 1%
Other	0%	0%	< 1%	< 1%	< 1%	< 1%
Total	1.9%	1.7%	1.4%	< 1%	1.2%	1.5%

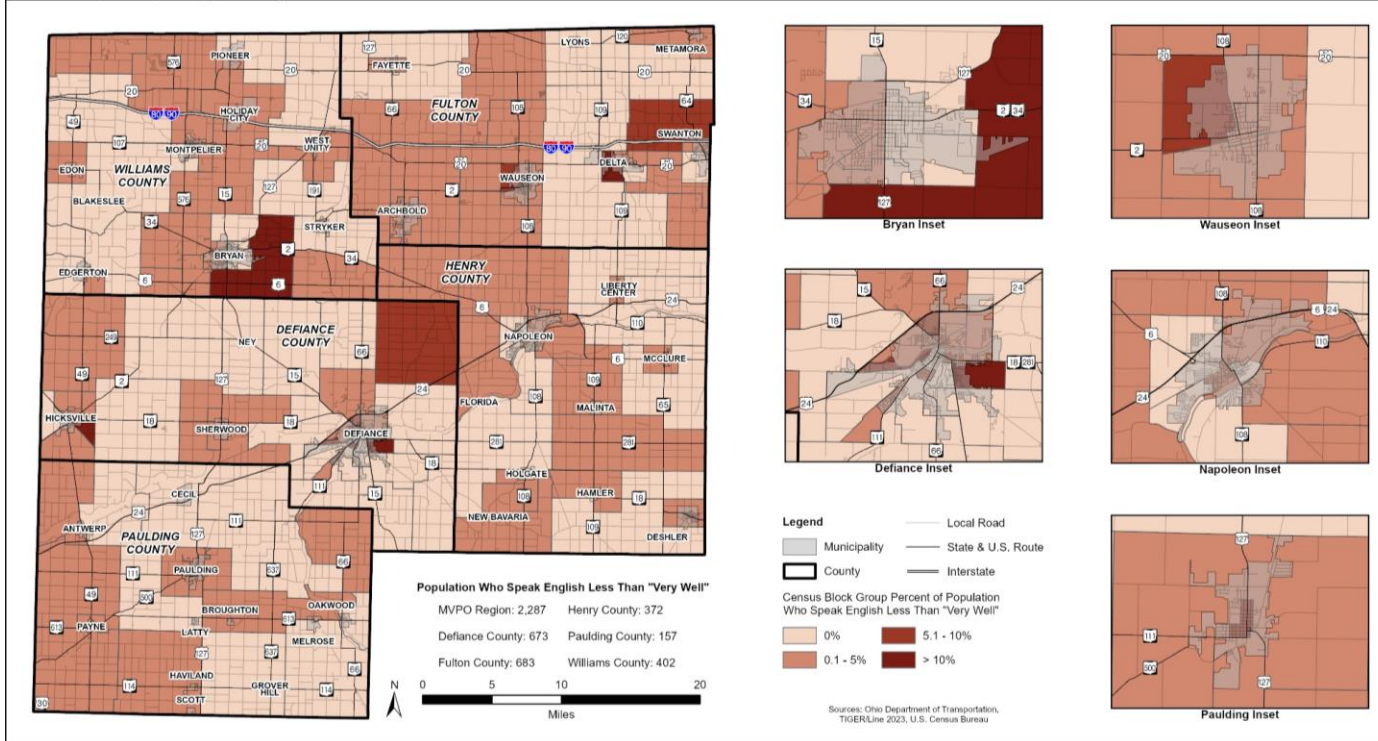
Since becoming a designated RTPO, MVPO has not had any encounters with LEP individuals through any of its activities or services. For the organization's other programs, there have not been many encounters with LEP individuals. In the scenarios in which there was an encounter, most often during conversations or meetings about the CHIP program, individuals have utilized family members to translate. MVPO will ensure that all future contact with LEP individuals will be tracked and recorded to determine if there is a greater need to provide more translation for programs, activities, and services.

Figure 4: Percent of Population Who Speak English Less Than "Very Well"



Percent of Population Who Speak English Less Than "Very Well"

by U.S. Census Block Groups (2022: ACS 5-Year Estimates)
 Defiance, Fulton, Henry, Paulding, and Williams Counties



4.4 Interpretation and Translation Services

Printing Vital Documents in a Language Other Than English

MVPO has historically provided vital documents in both English and Spanish. MVPO will continue to ensure residents have access to all vital information as requested regardless of their national origin or ability to speak English. The only added costs would be the cost of printing documents in Spanish.

Availability of Public Documents

MVPO will ensure that all surveys and applications are offered and available to LEP individuals and when requested, MVPO will provide appropriate translations for major documents and plans.

Vital Documents

The following vital documents must be available to be translated from English if requested:

- Title VI Notice to the Public
- Title VI Consent and Complaint forms
- Intake and application forms with the potential for important consequences
- Notices advising LEP individuals of free language assistance services
- Fair Housing Documents

5.0 PLANNING & PROGRAMS

MVPO complies with Title VI and other nondiscrimination requirements through its various programs which include the following.

5.1 Programs

Community Housing Impact and Preservation (CHIP)

This program provides funding to eligible households that do not have the resources to make necessary improvements to their homes. MVPO oversees applications for Defiance, Fulton, Henry, Paulding, and Williams Counties. Grants are provided to homeowners whose income qualifies based on the Housing and Urban Development (HUD) guidelines, for projects that correct health and safety issues, such as structural issues, heating, electrical, plumbing, lead paint hazards, accessibility, and water/sewer issues. Home repairs are also available to homeowners whose income qualifies to address necessary repairs, such as faulty wiring, water/sewer issues, badly leaking roofs, furnace replacement, etc., on a first-come, first-serve basis. Landlords can also access funding for rental properties, given that the tenants income-qualify. Landlords must agree to rent to income-eligible households and keep rents below the HUD Section 8 Fair Market Rent amounts for a 2-year period.

For more information visit: <http://www.mvpo.org/housing>

Fair Housing

MVPO is the home of the Maumee Valley Fair Housing Consortium. Fair Housing protects all individuals' rights to seek housing anywhere they can afford to live. The U.S Department of Housing and Urban Development enforces the Fair Housing Act which protects individuals against violations to their housing rights and prohibits discrimination in housing based on:

- Race
- Religion
- Color
- Sex
- Familiar status
- Ancestry
- National origin
- Disability
- Military status

For more information visit: <http://www.mvpo.org/fairhousing>

Community Development Block Grant (CDBG)

MVPO implements CDBG programs for local entities in the five-county area. These programs are designed to provide funding for public improvements, such as streets, sidewalks, flood & drainage, water & sewer, parks & recreation, abandoned structures, fire protection, etc. To be eligible, entities must qualify for a project in one of three ways. The first and most utilized qualification is through income status. To be eligible, benefiting areas must have 51% of residents with low-to-moderate income. Other ways to qualify are through slum & blight and limited Clientele (ADA).

For more information visit: <http://www.mvpo.org/community>

Regional Transportation Planning Organization (RTPO)

All activities performed under the RTPO strive to comply with Title VI and other non-discrimination requirements. As the RTPO for the region, MVPO is tasked with providing transportation planning services to all member counties and communities. These services include short and long-range planning, safety planning, asset management planning, traffic counts, map creation, data collection, and more. Throughout all planning processes for short and long-range plans, where appropriate, MVPO makes its best effort to engage and include all members of the public, including those traditionally underrepresented.

5.2 Planning

Coordinated Transportation Planning

All five counties in the region have a coordinated transportation plan. These plans outline existing transportation resources in Defiance, Fulton, Henry, Paulding, and Williams Counties, define where gaps and unmet needs exist within those resources, and determine a strategy for how to address the gaps and unmet needs. While the plan discusses transportation services for the public, it stresses the need for services for seniors, individuals with disabilities, and people with low incomes. MVPO currently maintains the Coordinated Transportation Plan and holds committee meetings quarterly which are open to the public, as well as a public meeting when the plan is being updated.

Analysis of Impediments to Fair Housing

The Analysis of Impediments to Fair Housing is updated annually and fully updated every five years. Maumee Valley Planning Organization is the Fair Housing Office for the region and has overseen this program for its five counties since 2001. Contacts are designated for each county and city in the region as well.

The Fair Housing Office is responsible for contacting all people and assessing each complaint. Based on the type of complaint, the Fair Housing Office will provide information on fair housing laws, filing fair housing complaints, tenant/landlord issues, and any other available housing information.

Potential fair housing complainants are informed of their fair housing rights and remedies. Fair Housing complaint forms and informational materials regarding complaint procedures are mailed to all complainants. If assistance is needed in filing a complaint, the Fair Housing Office will assist as needed. If not, all complainants are asked to send a copy of their complaint before forwarding it to the appropriate agency. Self-addressed envelopes are provided to the complainants. The Fair Housing Office also refers complainants to Legal Aid of Western Ohio. Legal Aid provides legal counseling for fair housing complaints and tenant/landlord issues.

- Fair Housing Complaint Intake Form
 - When a call or a referral is received by the Fair Housing Office, a Fair Housing Intake Form is completed. The form documents information about the complainant and a brief description of the complaint. The complaint is then assessed as to whether it is a fair housing complaint, tenant/landlord complaint, or a general housing complaint. Based on the complaint type, informational materials will be sent to the complainant or the person will be referred to the appropriate agency or office. All actions taken will be documented on the complaint form. The Fair Housing Office will follow up on all complaints that have been determined to be valid fair housing issues. The form is available on MVPO's website: <https://www.mvpo.org/housingcomplaint> and complaints can also be taken over the phone or in person.

6.0 TITLE VI TRAINING & ADMINISTRATION

6.1 Title VI Coordinator

The Title VI Coordinator for MVPO is Amanda Pobega and should be contacted for matters related to Title VI compliance or other concerns. Their contact information can be accessed below:

- Name: Amanda Pobega
- Contact information: gisplanner@mvpo.org, 419-784-3882

6.2 Title VI Training

MVPO will provide Title VI training to staff members to make them aware of relevant policies and procedures and how to record complaints. Appendix C contains the Title VI Complaint Form, which will be available on MVPO's website, as well as in paper format in the main office.

Filing a Complaint

Any person who believes that they or any specific class of persons has been subjected to discrimination or retaliation prohibited by any of the civil rights laws, based upon race, color, national origin (including LEP), sex, age, disability, or low-income status, may file a written complaint. A complaint may be filed by the affected individual or by a representative and must be in writing.

The law prohibits intimidation or retaliation of any kind. The procedures do not deny the right of the complainant to file formal complaints with other federal, state, or local agencies or to seek private counsel for complaints alleging discrimination. Every effort will be made to obtain early resolution of complaints.

For transportation-related Title VI matters, a person may also file a complaint directly with the Ohio Department of Transportation, at ODOT Office of Equal Opportunity, Attention: Title VI Coordinator, 1980 West Broad St., Columbus, OH 43223. Or a person may also file a complaint directly with the Federal Transit Administration, at FTA Office of Civil Rights, 1200 New Jersey Avenue SE, Washington, DC 20590.

For all other matters contact The Ohio Civil Rights Commission (Toledo, OH) (419) 245-2900 or HUD Discrimination Hotline at 1-800-669-9777 (voice) 1-800-927-9275 (TTY)

- A complaint must be filed no later than **180 days** after the date of the alleged discrimination.
- Complaints should be in **writing and signed** by the complainant
- Complaints should contain the following information:
 - Contact Information
 - Basis of Complaint (e.g. race, color, national origin)
 - Person/agency alleged to have discriminated
 - Date(s) the alleged discrimination occurred
 - Explanation of what happened

Investigative Merit

A complaint will be regarded as meriting an investigation unless:

- It clearly appears on its face to be frivolous or trivial
- The party complained against voluntarily conceded that the complaint is valid and agrees to take appropriate remedial action
- The complainant withdraws the complaint
- Other good cause for not investigating the complaint exists

If the complaint is against MVPO, they will lack jurisdiction to investigate the complaint. The complaint will be referred to the appropriate State or Federal Agency.

If you require a complaint form in a different format or language, please contact the Maumee Valley Planning Organization at 419-784-3882.

Si necesita un formulario de quejas en un formato o idioma diferente, comuníquese con Maumee Valley Planning Organization al 419-784-3882.

APPENDICES

Appendix A: Committees

Executive Council:

David Kern, Chairman.....	Defiance County Commissioners
Terry Rummel, Vice Chairman.....	Williams County Commissioners
Lisa McClure, Secretary.....	Paulding County Commissioners
Jon Rupp.....	Fulton County Commissioners
Glenn Miller.....	Henry County Commissioners
Carrie Schlade.....	City of Bryan Municipalities
Ryan Mack.....	City of Defiance Municipalities
Joseph Bialorucki.....	City of Napoleon Municipalities
Keith Torbet.....	City of Wauseon Municipalities
Jason Vance.....	Village of Paulding Municipalities
Brian Zeedyk.....	Defiance County Township Trustees
Ivan Hite.....	Fulton County Township Trustees
Charles Sheller.....	Henry County Township Trustees
Tim Copsy.....	Paulding County Township Trustees
Tod Schlachter.....	Williams County Township Trustees

Executive Council Budget Committee:

David Kern.....	Defiance County
Jon Rupp.....	Fulton County
Glenn Miller.....	Henry County
Mike Weible.....	Paulding County
Terry Rummel.....	Williams County
Ryan Mack.....	City of Defiance

Executive Council Personnel Committee:

David Kern.....	Defiance County
Brian Zeedyk.....	Defiance County
Charles Sheller.....	Henry County
Mike Weible.....	Paulding County
Tim Copsy.....	Paulding County
Terry Rummel.....	Williams County
Tod Schlachter.....	Williams County
Carrie Schlade.....	City of Bryan
Ryan Mack.....	City of Defiance
Jason Maassel.....	City of Napoleon
Keith Torbet.....	City of Wauseon
Greg White.....	Village of Paulding

Executive Council Audit Committee:

David Kern.....Defiance County
Ivan Hite.....Fulton County
Jon Rupp.....Fulton County
Glenn Miller.....Henry County
Mike Weible.....Paulding County
Terry Rummel.....Williams County
Ryan Mack.....City of Defiance

Comprehensive Economic Development Strategy (CEDS) Steering Committee:

Defiance County:

Erika Willitzer.....Executive Director, Defiance County Economic Development
Todd Pariseau.....Chief Executive Officer, Defiance Metal Products Co.
Tony Nighswander.....Vice President/Owner, A&P Tool, Inc.

Fulton County:

Matt Gilroy.....Executive Director, Fulton County Economic Development
Kim Smallman.....Metamora State Bank
Rick Kazmeircak.....Swan Creek Township, Trustee

Henry County:

Jen Arps.....Executive Director, Henry County Community Improvement Coordination
DonL Parsons.....Village of Deshler, Community Development Coordinator
Joel Miller.....Henry County Chamber of Commerce/Private Business

Paulding County:

Tim Copey.....Executive Director, Paulding County Economic Development
Peter Niagu.....Paulding Putnam Electric Co-op
Larry Manz.....Insource Technologies

Williams County:

Megan Hausch.....Executive Director, Williams County Economic Development
Sean Rupp.....Rupp Enterprises
Mari Ivan.....LE Smith

At Large:

Todd Hernandez.....Northwest State Community College
Angie Franklin.....NOCAC
Tiffany Dargenson.....Ohio Means Jobs (Defiance/Paulding)

Regional Transportation Planning Organization (RTPO) Technical Committee:

- City of Bryan Engineer
- City of Defiance Engineer
- City of Napoleon Engineer
- Defiance County Economic Development
- Defiance County Engineer
- FHWA Ohio Division
- Fulton County Economic Development Corporation
- Fulton County Engineer
- Henry County Community Improvement Corporation
- Henry County Engineer
- Henry County Planning Commission
- MVPO
- ODOT Central Office
- ODOT District 1
- ODOT District 2
- Paulding County Commissioners
- Paulding County Economic Development
- Paulding County Engineer
- Village of Archbold Engineer
- Williams County Economic Development Corporation
- Williams County Engineer

Appendix B: Title VI Notice

MVPO will post the Title VI Notice to the public online at www.mvpo.org and in the front area of the office. The notice is posted in English, but a request to have the notice in Spanish is listed at the end of the document.

Notifying the Public of Rights Under Title VI

Maumee Valley Planning Organization

Maumee Valley Planning Organization operates its programs and services without regard to race, color, and national origin in accordance with Title VI of the Civil Rights Act. Any person who believes she or he has been aggrieved by any unlawful discriminatory practice under Title VI may file a complaint with Maumee Valley Planning Organization.

For more information on Maumee Valley Planning Organization's civil rights program, and the procedures to file a complaint, contact 419-784-3882, email mvpo@mvpo.org; or visit our office at 1300 E. Second Street, Suite 200 Defiance, Ohio 43512. For more information, visit www.mvpo.org.

For transportation-related Title VI matters, a complainant may file a complaint directly with the Ohio Department of Transportation by filing a complaint with the Office of Equal Opportunity, Attention: Title VI Coordinator, 1980 West Broad St., Columbus, OH 43223. **Or** A complainant may file a complaint directly with the Federal Transit Administration by filing a complaint with the Office of Civil Rights, Attention: Title VI Program Coordinator, East Building, 5th Floor-TCR, 1200 New Jersey Ave., SE, Washington, DC 20590.

For other matters contact The Ohio Civil Rights Commission (Toledo, OH) (419) 245-2900 or HUD Discrimination Hotline 1-800-669-9777 (voice) 1-800-927-9275 (TTY).

If information is needed in another language, contact 419-784-3882.

Si necesita información en otro idioma, comuníquese con 419-784-3882.

Appendix C: Title VI Complaint Form

Section I: Contact Information		
Name:		
Address:		
Telephone (Home):	Telephone (Cell):	
E-mail Address:		
Section II		
Are you filing the complaint on your own behalf?	<input type="checkbox"/> Yes	<input type="checkbox"/> No
If no, please indicate the name of the person whom you are filing for and why you have filed for a third party. _____ _____		
Please indicate the basis of the alleged discrimination. <input type="checkbox"/> Race <input type="checkbox"/> Color <input type="checkbox"/> National Origin <input type="checkbox"/> Other _____		
Date and place of the alleged discrimination:		
Explanation of what happened, please be as specific as possible. Use the back of the document if needed. _____ _____ _____ _____		
Were there any witnesses to your alleged discrimination?	<input type="checkbox"/> Yes	<input type="checkbox"/> No
If yes, provide their name(s) and phone number(s). _____ _____		
Have you filed this complaint with any other Federal, State, or local agency, or with any Federal State courts? <input type="checkbox"/> Yes <input type="checkbox"/> No		
If yes, please indicated where the complaint has been filed. _____ _____		

Name of Agency Complaint is against: _____

Contact Person/Title: _____

Telephone Number:
