



METRO

TITLE VI COMPLIANCE REPORT TO FEDERAL TRANSIT ADMINISTRATION

2004-2007

I. INTRODUCTION

This is the Metro Regional Services' (Metro) report to the Federal Transit Administration (FTA) on Metro's Title VI compliance activities, as required by FTA Circular C 4702.1A. This report demonstrates Metro's compliance with Title VI regulations (49 CFR Part 21); Executive Orders 12250 and 12898; FTA circular 4702.1A; and the Safe, Accountable, Flexible, Efficient Transportation Equity Act: A Legacy for Users (SAFETEA-LU) as well as other applicable laws. Metro continues performance of its obligations in accordance with Metro's Title VI Plan sent to the Region X office of FTA on April 2, 2007.

Metro submits this report as a federally designated Metropolitan Planning Organization (MPO) that receives grant funding directly from the FTA for regional transit planning. Metro is a directly elected regional government serving 1.3 million people living in the urbanized areas of the Portland metropolitan region. Metro's Title VI Coordinator and Office of Citizen Involvement are responsible for initiating and monitoring Title VI activities and for preparing these reports.

This report covers the period from October 1, 2004 through September 30, 2007. It includes the following information specified in FTA Circular 4702.1A, Sections IV.7 (reporting content requirements) and VII.1 (specific guidance for MPOs):

- A summary of Metro's planning processes that integrate considerations expressed in Title VI and the Executive Order on Environmental Justice, including demographic and statistical data for the Metro region, and a description of public involvement practices;
- A summary of Metro's transportation-related public outreach and involvement activities initiated during the reporting period and a description of steps taken to ensure that minority and low-income people had meaningful access to these activities;
- Information on Metro's plan for providing language assistance for persons with limited English proficiency (LEP);
- A description of Metro's Title VI training opportunities and other efforts to combat discrimination and promote diversity;
- A copy of Metro's procedures for tracking and investigating Title VI complaints;

- A list of Title VI investigations, complaints, or lawsuits filed with Metro since the last submission; and
- A copy of Metro’s notice to the public that it complies with Title VI and instructions to the public on how to file a discrimination complaint.

II. SUMMARY OF METRO’S PLANNING PROCESSES FOR TITLE VI COMPLIANCE

A. Demographic and Statistical Data

Metro has gathered demographic and statistical data on race and ethnicity, minority groups, income level, language spoken, and sex of participants and beneficiaries of federally funded programs through census data, public opinion surveys, and self-identification on questionnaires. Metro uses this in transportation planning for the following reasons:

1. To determine impacts and benefits of potential projects on minority and low-income neighborhoods;
2. To ensure equity in evaluating project applications submitted for inclusion in the Regional Transportation Plan and the Metropolitan Transportation Improvement Program; and
3. To develop public outreach strategies.

The data gathered are reviewed regularly to ensure that Metro continues to meet the requirements of the Title VI program.

The table below summarizes the economic and ethnic composition of the Portland metropolitan region according to the US Census 2000.

Demographic Category	Clackamas County	Multnomah County	Washington County	Metro Region	United States
White	91% 308,512	79% 521,482	82% 365,382	83% 1,195,376	75% 211,460,626
Black	1% 2,184	5% 35,854	1% 4,510	3% 42,548	12% 34,658,190
American Indian/Alaska Native	1% 2,095	1% 6,674	1% 2,919	1% 11,688	1% 2,475,956
Asian	2% 8,114	6% 37,280	7% 29,946	5% 75,340	4% 10,242,998
Hawaiian/Pacific Islander	0% 616	0% 2,511	0% 1,399	0% 4,526	0% 398,835
Hispanic/Latino*	5% 17,021	7% 49,474	11% 49,476	8% 115,971	13% 35,305,818
Non-English-Speaking	0% 180	0% 717	0% 530	0% 1,427	1% 3,366,132
Very Low Income**	6% 21,969	12% 81,711	7% 32,575	9% 136,255	12% 33,899,812

Demographic Category	Clackamas County	Multnomah County	Washington County	Metro Region	United States
Low Income	12% 40,827	17% 109,149	13% 58,468	14% 208,444	17% 47,294,797
Total Low Income	19% 62,796	29% 190,860	20% 91,043	24% 344,699	30% 81,194,609
Disabled	12% 40,710	12% 78,873	10% 46,150	11% 165,733	15% 38,305,189
Elderly	11% 37,428	11% 73,607	9% 39,351	10% 150,386	12% 34,991,753
Total Population in 2000	338,391	660,486	445,342	1,444,219	281,421,906

According to recent data published by Portland State University's Institute for Metropolitan Studies, the Portland-Vancouver minority population increased 119 percent between 1990 and 2000, growing from 140,000 to 307,000 in that decade. Hispanic/Latino populations grew the fastest, increasing 181 percent from 1990 to 2000. The US Census estimates for 2005 report that the Hispanic/Latino population increased by an additional 36 percent, to 195,000.

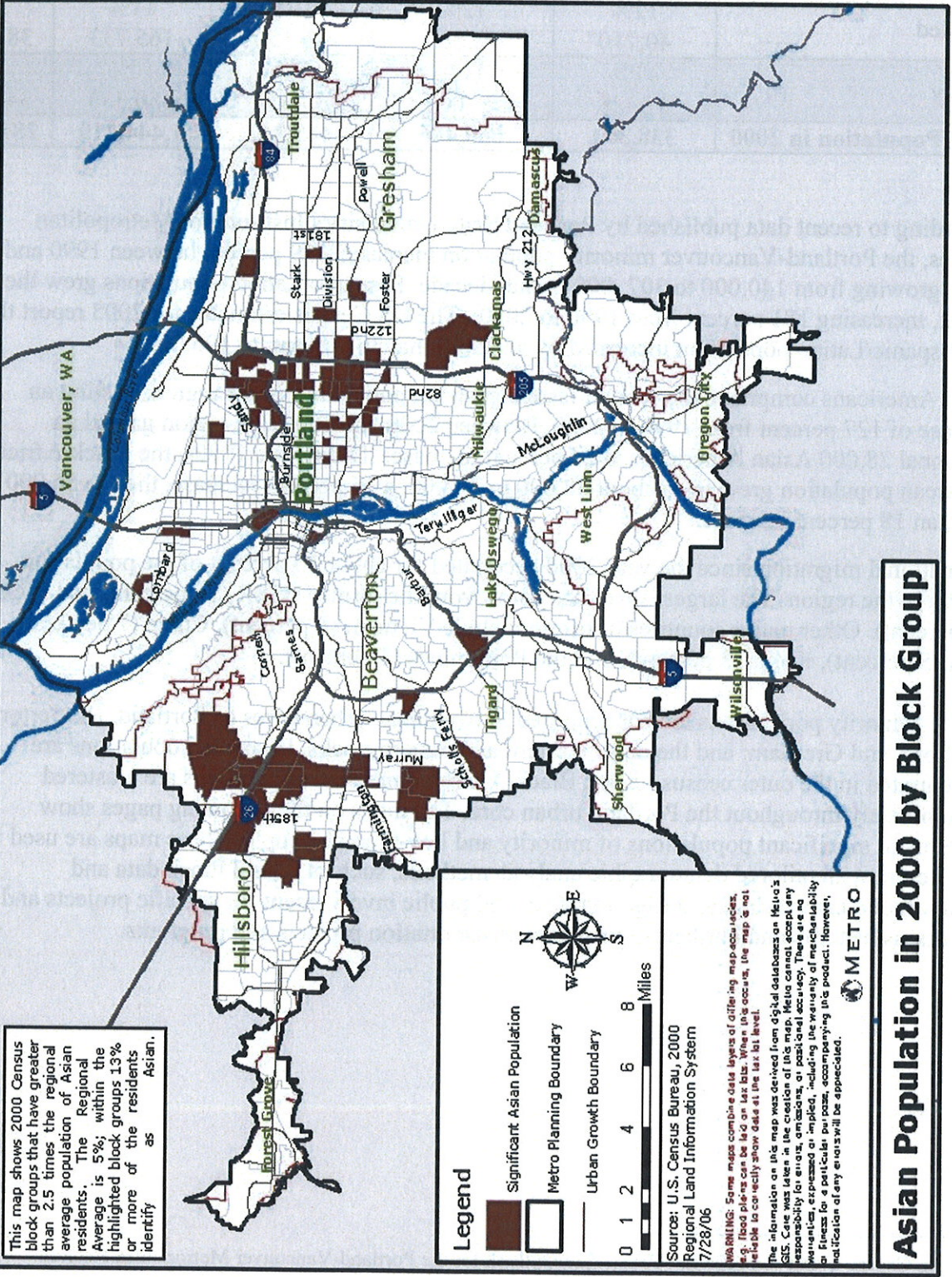
Asian Americans comprised the second fastest-growing population in the region, posting an increase of 127 percent from 1990 to 2000. Between 2000 and 2005, the region gained an additional 28,000 Asian Americans, a 24 percent increase.¹ During the 1990s, the Black/African American population grew from about 38,000 to 44,000, a 16 percent increase, then to 56,000 by 2005, an 18 percent increase.²

International migration since the year 2000 accounted for about 30 percent of the population growth in the region. The largest share has come from the former USSR (18 percent) and Mexico (17 percent). Other major countries of origin include Vietnam (8 percent), China (7 percent), India (5 percent), Korea (3 percent), and the Philippines (3 percent).

Minority populations are concentrated in two areas: urban cores of Portland, Beaverton, Hillsboro, and Gresham; and the outer western and eastern tracks. Hispanic populations are concentrated in the outer census tracks; Black/African American populations are clustered predominately throughout the Portland urban core. The maps on the following pages show locations of significant populations of minority and low-income people. These maps are used in conjunction with tailored demographic analysis methods, such as school lunch data and neighborhood canvassing, to design outreach and public involvement for specific projects and help assess benefits and burdens of proposed transportation projects and programs.

¹ Hough, George C and Amy Koski, "Population Outlook for the Portland-Vancouver Metropolitan Region;" Portland State University, 2007

² Ibid.



This map shows 2000 Census block groups that have greater than 2.5 times the regional average population of Asian residents. The Regional Average is 5%; within the highlighted block groups 13% or more of the residents identify as Asian.

Legend

- Significant Asian Population
- Metro Planning Boundary
- Urban Growth Boundary

0 1 2 4 6 8 Miles

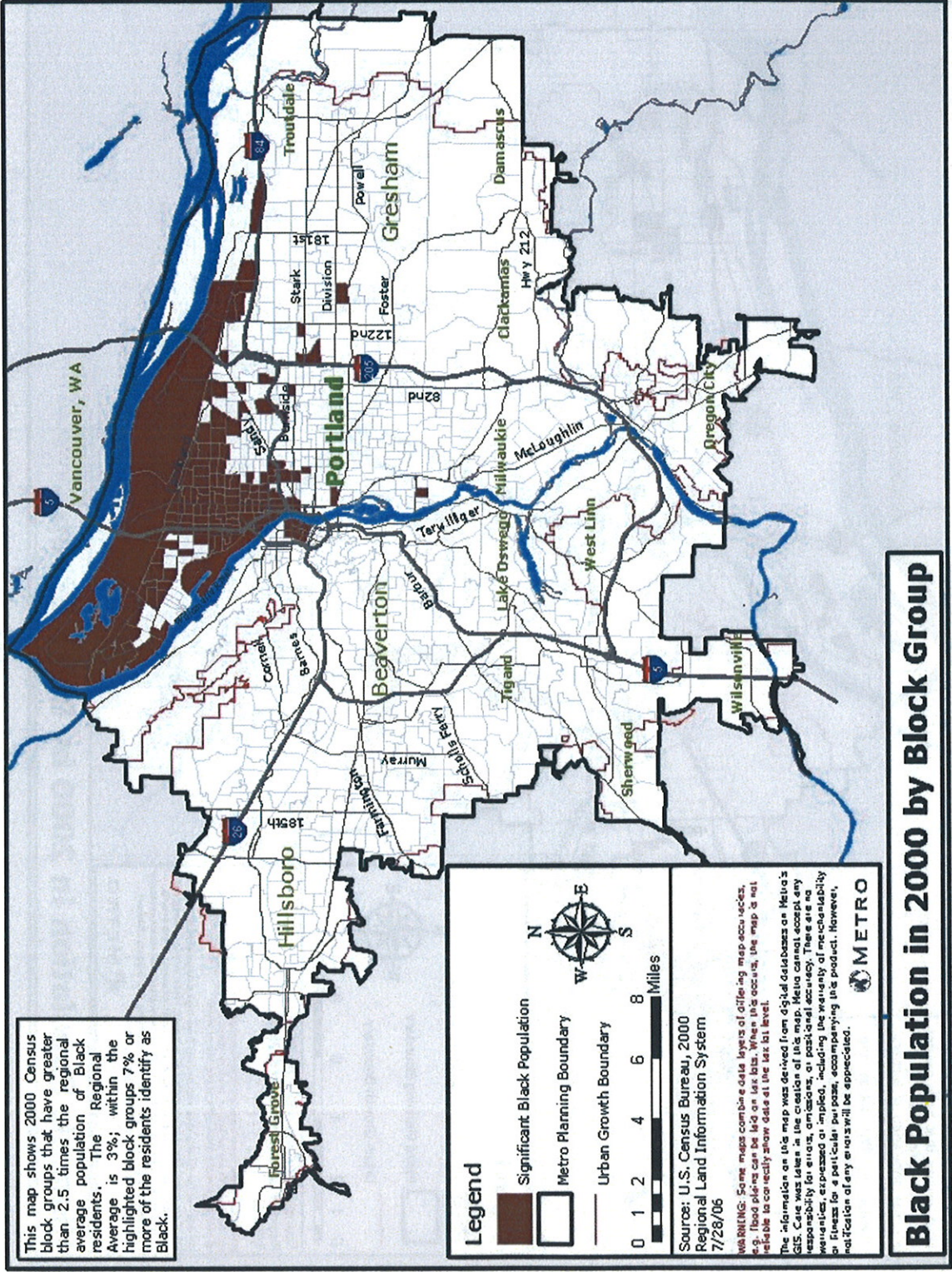
Sources: U.S. Census Bureau, 2000 Regional Land Information System 7/28/06

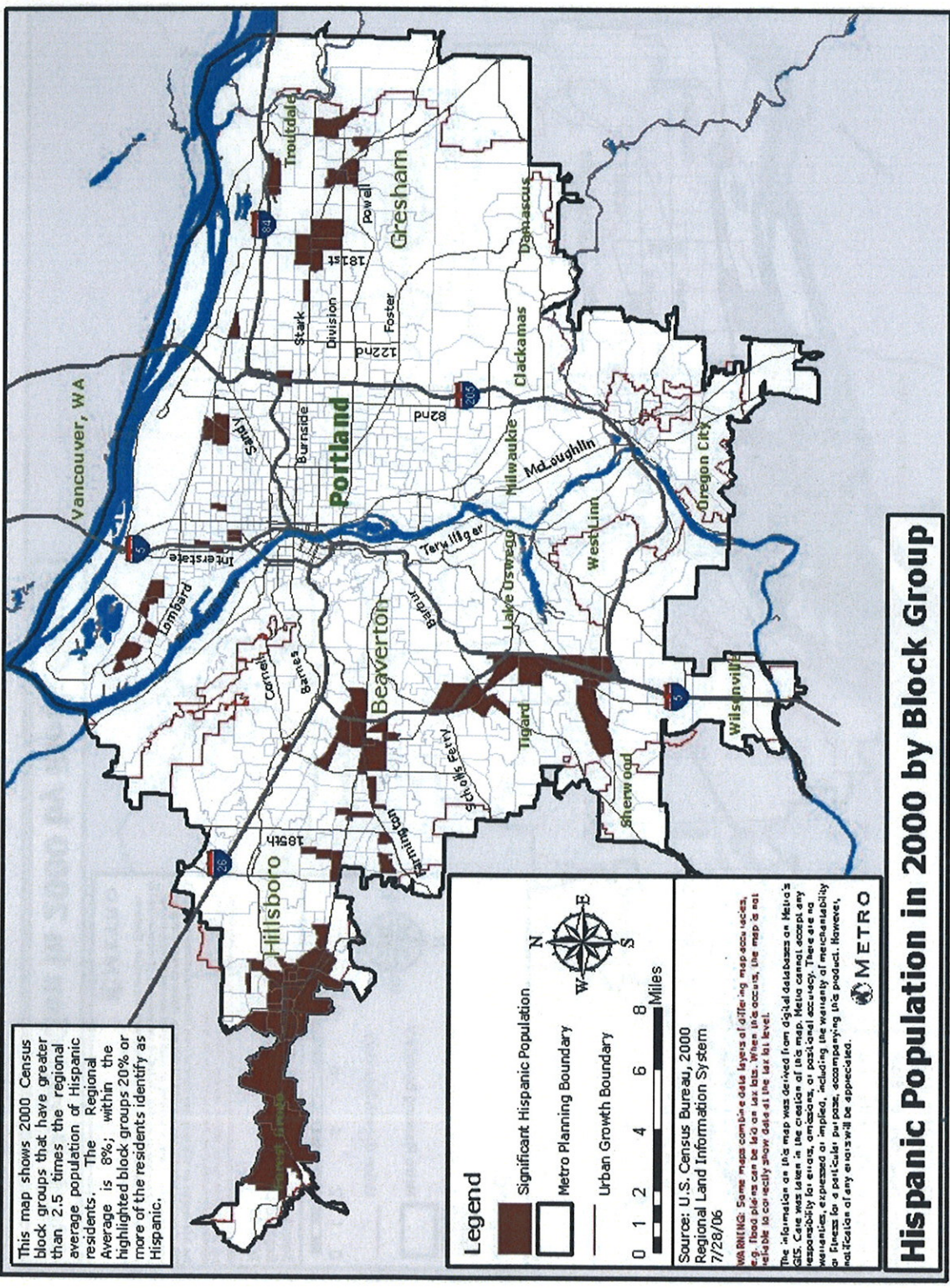
WARNING: Some maps combine data layers of differing map accuracies. For example, flood plain maps can be less accurate than tax maps. When this occurs, the map is not reliable to correctly show data at the tax lot level.

The information on this map was derived from digital databases on Metro's GIS. Care was taken in the creation of this map. Metro cannot accept any responsibility for errors, omissions, or positional accuracy. There are no warranties, expressed or implied, including the warranty of merchantability or fitness for a particular purpose, accompanying this product. However, notification of any errors will be appreciated.

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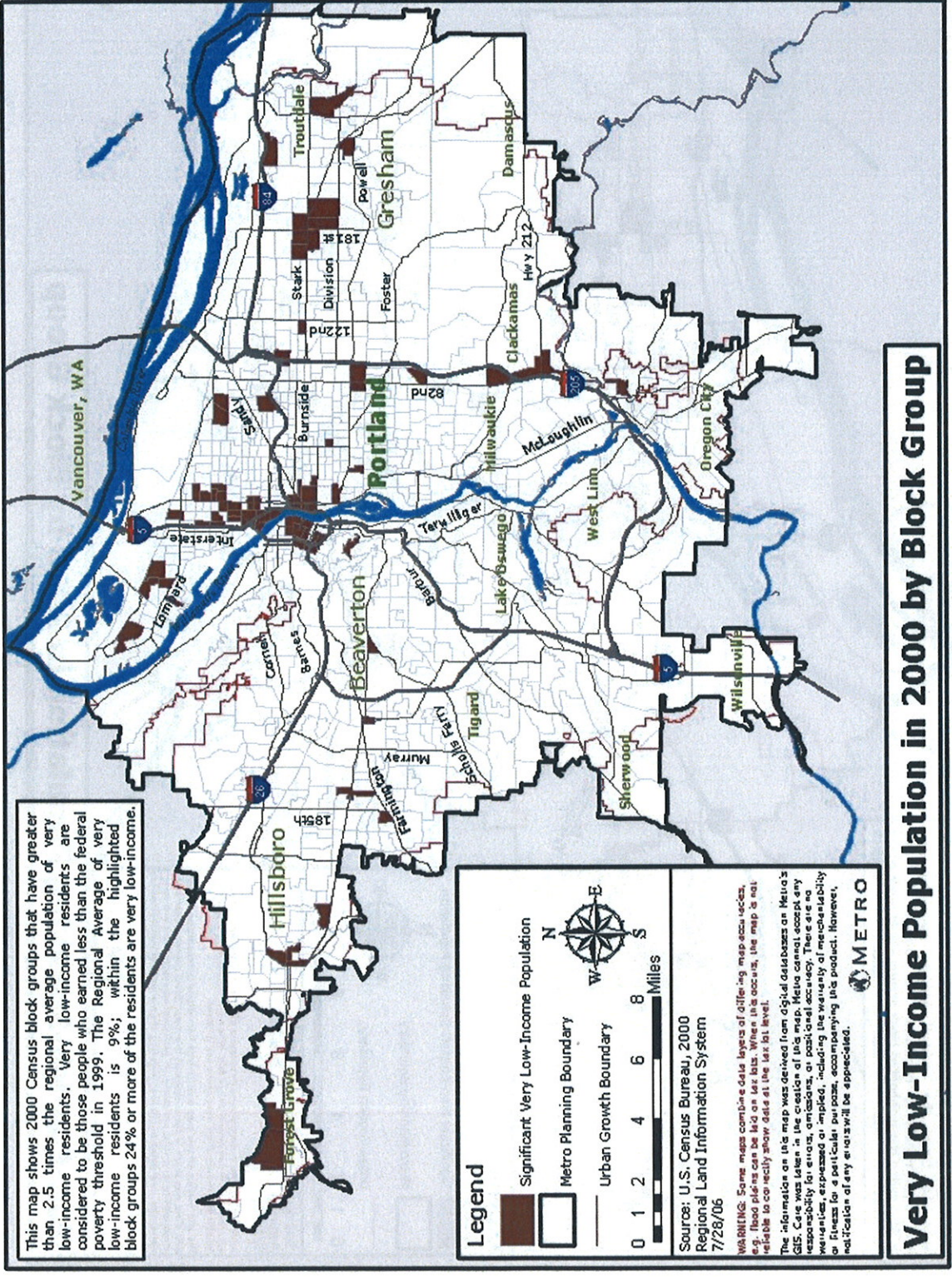
Asian Population in 2000 by Block Group

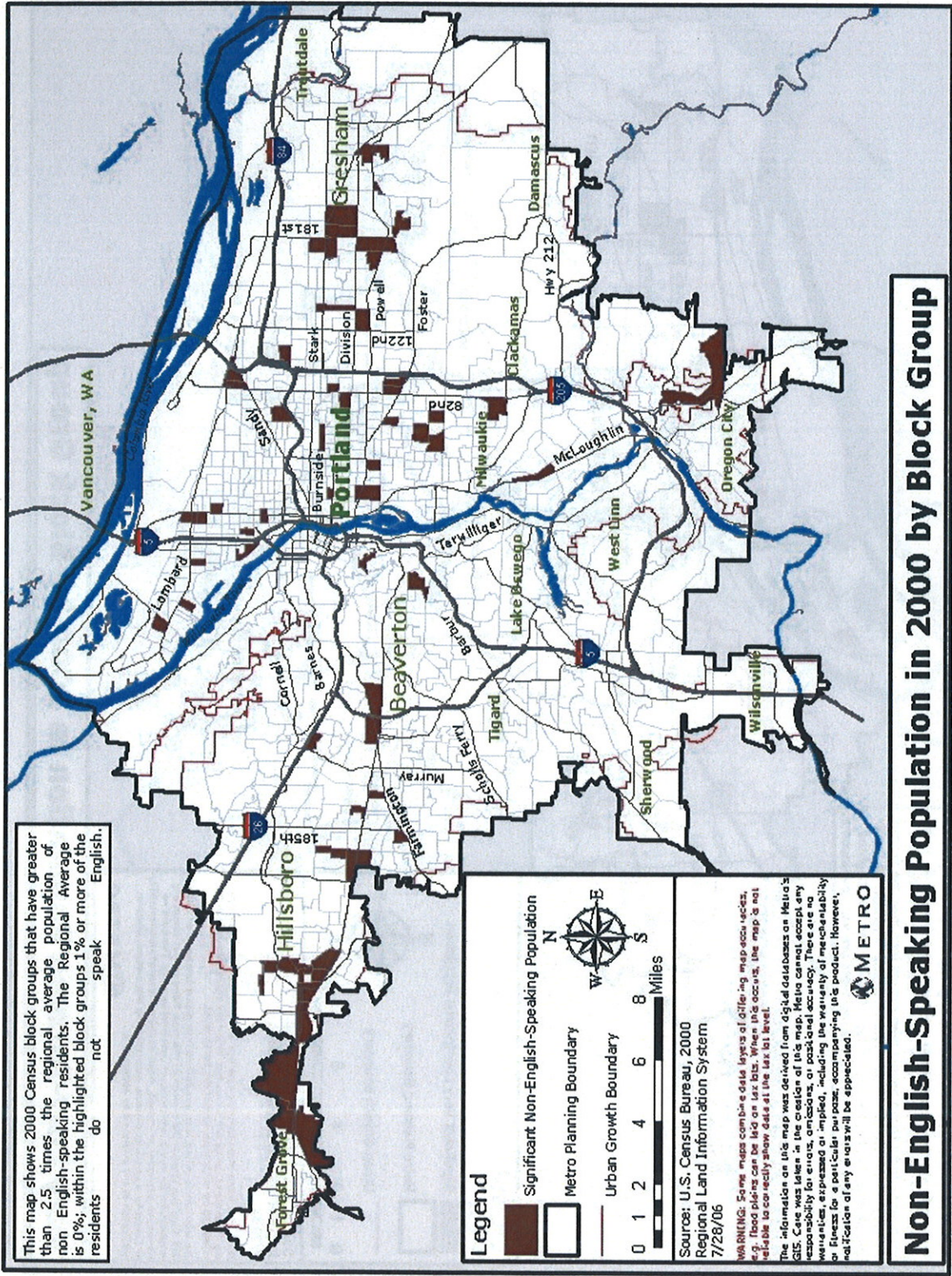




This map shows 2000 Census block groups that have greater than 2.5 times the regional average population of Hispanic residents. The Regional Average is 8%; within the highlighted block groups 20% or more of the residents identify as Hispanic.

Hispanic Population in 2000 by Block Group





Non-English-Speaking Population in 2000 by Block Group

III. SUMMARY OF METRO'S PUBLIC INVOLVEMENT PRACTICES

A. Metro's Internal Public Outreach Policies

Since its inception Metro has highly valued public participation in its varied projects that impact the Portland Metropolitan area. Since 1981, Metro has adopted significant policies regarding public participation in its decision-making process. Metro's 1981 Public Involvement Program provides that "Metro will establish a public involvement program, emphasizing public information and public participation ... A public involvement program for Metro will take into consideration the broad range of Metro's diverse publics." See Metro Executive Order No. 5. Metro further amplified public involvement in transportation planning in the Transportation Planning Public Involvement Policy first adopted by Metro in 1995 and revised in 2004. This policy states that Metro will "provide adequate public notice of public involvement activities and time for public review and comment at key decision points, including but not limited to, approval of transportation plans and improvement programs." The plan also states that Metro strives to "periodically review and update the public involvement process to reflect feedback from the public."

In keeping with the requirements of SAFETEA-LU, Metro's public involvement efforts aim to ensure early, broad-based and effective notification about, and participation in, major proposed actions and decisions by the Metro Council. Metro makes a concerted effort to reach all segments of the population, including people from minority and low-income communities, and organizations representing these groups and other protected classes. Public meetings are held at locations served by mass transit.

Before any project begins, Metro prepares a public involvement plan for review by the Metro Committee for Citizen Involvement (MCCI). The MCCI is a chartered committee composed of residents of the region charged with advising the Metro Council on public involvement. The public participation plan spells out the types of publications, events, communication pathways, and the timetable that will be used throughout the project. Staff provides periodic updates to and seeks advice from the MCCI on public involvement strategies during the life of the project.

In 2005, Metro formed an agency-wide Diversity Action Team (DAT). The team developed a five-year "Diversity Action Plan" that included specific goals and associated performance measures. The goals included improving recruitment to promote diverse representation on various Metro Community Advisory Committees and goals for ensuring that outreach efforts connect with diverse populations.

B. Summary of Transportation-Related Public Outreach and Involvement Activities

1. Regional Transportation Plan (RTP)

Initiation Date: February 2006

The RTP, a 20-year blueprint for our region's transportation system, identifies transportation needs and investment priorities. Metro updates the RTP every four years. Metro began updating the RTP for 2035 in February 2006. The public involvement strategy for the RTP recognized the need for early and continuous public involvement by identifying the needs of low-income and minority populations.

A major addition to the 2035 RTP is the incorporation of equity as a key value, as reflected in specific policy goals and objectives. Metro, through the RTP process, is developing measures to evaluate and monitor the regional transportation system's performance. Equity has been included as a key indicator. Staff is considering ways to measure equity of the system in terms of access to transportation mode choices, multi-use trails, jobs, and local community businesses and services. These measures will be part of an ongoing monitoring process to evaluate the degree to which the regional transportation system meets equity goals and will be used to monitor the implementation of the equity goal of the RTP over time.

The RTP public engagement process included the following elements:

- A scientific public opinion research poll conducted in Fall 2006 on high-priority needs and values to help inform the policies that form the basis of the RTP.
- Five targeted stakeholder workshops with community organizations and individuals held in Fall 2005, to discuss transportation needs and goals in depth. The workshops actively recruited participants from groups and populations that historically have not been well represented in transportation planning and decision-making in the Portland metropolitan region. For example, a workshop focused on the "active living" movement included representatives from a health clinic that serves migrant agricultural workers, a project on transportation for the disabled and the advocacy group Elders in Action, among others. Two workshops specifically addressed equity issues. The first workshop, held in Spanish at Centro Cultural in the far western edge of the region, identified transportation issues and needs among the largest concentration of Hispanic residents. The second workshop addressed disparate environmental impacts of transportation problems. It included members of the Environmental Justice Action Group and minority and low-income populations who live in North Portland.
- Metro has planned three public comment periods: one in Fall 2007 on the federal component of the RTP; one in February 2008 on the air-quality conformity report; and one in May 2008 on the final RTP. Metro will disseminate press releases announcing these public comment opportunities to major community and ethnic newspapers in addition to The Oregonian, the newspaper of record in the region. Metro will also hold public hearings in different parts of the region.

2. Metropolitan Transportation Improvement Program (MTIP)
Initiation date: April 2006

The MTIP currently has a process for ensuring that its funded projects meet environmental justice requirements. The process involves screening each project for an appropriate public involvement component in the initial phase. Metro then performs an environmental justice analysis to determine the proximity of project applications to high concentrations of minority or low-income populations. Metro requires that all projects meet requirements for outreach specific to the identified minority or low-income population.

The MTIP includes environmental justice as a qualitative evaluation criterion in scoring projects and programs for funding awards. The final MTIP approved funding for projects to improve street design, pedestrian and bicycle facilities in areas with concentrations of minority and low-income populations, as well as projects to support the Elderly and Disabled program and the Job Access/Reverse Commute program.

Public involvement activities centered around four public "listening posts" that were held in four different parts of the region in Fall 2006. These listening posts were publicized in all the major area newspapers, community newspapers, ethnic and minority publications, and neighborhood newsletters. At a citizen's request, Metro provided a Spanish language interpreter and translator to facilitate oral and written testimony.

3. South Corridor Supplemental Draft Environmental Impact Statement
Initiation Date: September 2001

Early in the South Corridor study, staff evaluated the 1990 US Census data and conducted site visits to identify concentrations of low-income and minority residents. No significant concentrations were found. However, given the age of the data, areas with potential concentrations were targeted for door-to-door canvassing and other outreach, including coordination with local social service providers who work with disadvantaged populations.

Over the course of the study, public involvement included the following activities:

- Listening posts to gather input about how transportation issues might be addressed.
- Community meetings to share information, gather input, and raise awareness.
- Scoping meetings to ensure that all viable alternatives are considered in the study.
- A scientific survey of 900 corridor residents to learn about preferences and priorities.
- A "Stop, Swap and Shop" series at grocery stores and transit centers to raise awareness.
- Two formal public comments periods. The first included meetings with community groups, open houses and formal scoping meetings, and a newspaper

advertisement and mailer. The second comment period followed within a month of the first, and involved public notices and a public hearing.

- Presentations to neighborhood associations and groups, business organizations, community groups and civic organizations to inform the alternatives narrowing process.
- Open houses to share results of the alternatives evaluation and receive public comment.
- Regular meetings of local advisory groups formed in communities along the corridor.
- Corridor-wide assemblies where local advisory group members could meet with neighborhood and community members to learn about and discuss alternatives.
- Project newsletters, fact sheets, and a briefing document.
- Regular updates to the project web site and telephone hotline.
- Door-to-door canvassing to inform residents about the study and other project meetings.
- Meetings with individual potentially impacted property and business owners.
- Newspaper advertisements and notifications via mail, e-mail, weekly meeting notices to the media, and leaflets.
- Public hearings and production of a Public Comment Report.

4. Highway 217 Corridor Study
Initiation Date: September 2005

Public involvement included two main components. First, Metro began with initial education and outreach to share the results of Phase 1 of the study and Phase 2 options under consideration after the preliminary Policy Advisory Committee recommendation. Second, Metro provided a public comment outreach period.

The education and outreach effort included the following activities:

- A video slideshow presentation including visual simulations for use at Speaker's Bureau events.
- A project newsletter and articles about upcoming public comment opportunities and a public forum in Metro Councilor newsletters (mail and e-mail).
- More than 30 presentations to a total of 500 people at community groups, neighborhood associations, business organizations, and local governments.
- Focus groups to discuss two specific topics – an interchange and freight issues.

Public engagement included the following activities:

- An overview report containing a brief history, findings, finance and cost information, study timeline, public involvement opportunities, and a preliminary recommendation.
- News releases to local newspapers containing information about public comment opportunities, an on-line questionnaire, and the public forum.
- Editorials and news stories in various newspapers, TV segments on the public forum, visual simulation, and elected official interviews.
- Newspaper advertisements.
- An online questionnaire.
- Email or mail notification to the project mailing list, neighborhoods within the corridor, freight contacts, and all project advisory committee members.
- Letters sent to all employers with more than 100 employees within one-half mile of Highway 217, and calls to all employers with more than 500 employees. Letters and calls asked that study information be shared with employees. Twelve employers reported sharing such information with employees.
- Speaker's Bureau presentations to business, civic, and other interest groups.
- A public forum and open house to share project information, findings, and recommendations, as well as a video simulation and online questionnaire.
- Production of a Public Comment Report.

The public process focused on the issue of equity in regard to tolling. The public opinion was that tolling discriminated against low-income people. As a result of this perception, a number of people opposed the tolling option. The public involvement report suggested that the next phase of study include a scientific survey for information on the general public's opinion on the issues associated with tolling. This will specifically focus on methods of tolling due to the confusion expressed by members of the public.

5. Eastside Transit Alternatives Analysis
Initiation Date: June 2005

Over the course of this study, public involvement included the following activities:

- Multiple fact sheets, Metro Councilor newsletter articles, and e-newsletter articles to share information, invite participation in project events, and encourage public comment.
- Presentations to community groups, neighborhood associations, business organizations, interested advisory committees, and local governments.
- Postcards mailed to business and property owners, interested persons, advocacy groups, neighborhood groups, and elected officials to invite participation in an open house and public hearing, and in the public comment period.
- A media advisory and newspaper advertisement distributed to local media with information about project events and the public comment period. Three news stories and an editorial followed.
- An open house that featured illustrated stations, explained the project history and timeline, and gave the options considered and findings. Metro also provided a video simulation and comment cards to collect feedback.
- A public hearing where all open house information was available again.
- A formal public comment period and production of a Public Comment Report.

Eight comments received during the formal public comment period specifically supported a streetcar option but focused on extending it north of the study area. Comment providers felt this would promote commercial revitalization and allow easy residential access to transit. The identified area was not included in the scope of the study but is in an area identified as including a concentration of low-income and minority populations. One neighborhood association in this area requested and received a presentation on the project during the course of the study. Comments from this area were specifically noted in the public comment report provided to all decision-makers even though the area was not actually included in the study.

6. Lake Oswego to Portland Transit Alternatives Analysis
Initiation Date: July 2005

Over the course of this study, public involvement included the following activities:

- Stakeholder interviews with residential and business property owners, educational institutions, neighborhoods, and other interest groups. The interviews used open-ended questions to identify community concerns and potential solutions.
- Regularly updated project web site and telephone hotline.
- An actively maintained project mailing list.

- Two postcards to announce public events and two project newsletters with background information, timeline, and public involvement opportunities.
- E-newsletters and Metro Councilor newsletter articles to share information, announce meetings, and invite input.
- News releases and newspaper advertisements sent in advance of project events and reporter briefings.
- Door-to-door canvassing to inform residents about the study and upcoming events.
- A community design workshop to generate alignment ideas.
- Small group discussions with affected stakeholders to discuss study alternatives, owner concerns, and mitigation ideas.
- Two open houses to share evaluation results and gather public input using a feedback form. The feedback form was also available on the project web site.
- An animated visual simulation used in presentations and on the web site to illustrate potential alignments.
- A non-scientific, self-selected survey of bus riders on Line 35 between Portland and Lake Oswego to understand rider needs and preferences. The survey was available in Spanish and three respondents completed it in Spanish.
- A formal public comment period and public hearing preceded by advertisements, e-newsletter messages, Metro Council newsletter messages, and postcard and newsletter mailings.
- Production of a Public Comment Report distributed to all project decision-makers.

7. Portland-Milwaukie Light Rail Supplemental Draft Environmental Impact Statement

Initiation date: April 2007 (Refinement Phase), August 2007 (SDEIS)

To date, this project has had the following public involvement activities:

- Regularly updated project web site and telephone hotline.
- An actively maintained project mailing list.
- Project fact sheets and maps.
- News releases and newspaper calendar notices sent in advance of project events and reporter briefings.
- Stakeholder meetings with residential and business property owners, educational institutions, neighborhoods, and interest groups with a key interest in the alignment.

- Two open houses to introduce the project and gather public input on design options being considered at the north and south ends of the alignment in the refinement phase.
- Three “segment meetings” at the south end of the alignment to further explore design options being considered in that area. Postcards and email were sent to announce the events.
- Five presentations, two to business groups and one each to an advisory Board, a Planning Commission, and a City Council to share additional alignment designs and considerations (McLoughlin/Main) at the request of a south-end community.
- Two community design workshops to generate and evaluate additional alignment options (Main/21st) at the request of the south-end communities, and a presentation to the Milwaukie City Council.
- Multiple north-end property owner and stakeholder meetings to consider specific design ideas, needs and solutions.
- E-newsletters and Metro Councilor newsletter articles to share information, announce meetings, and invite input.
- A project newsletter with background information, public involvement opportunities and a timeline is currently in development.

IV. METRO’S PLAN FOR PROVIDING LANGUAGE ASSISTANCE FOR PERSONS WITH LIMITED ENGLISH PROFICIENCY

Metro follows the U.S. Department of Transportation’s Policy Guidance Concerning Recipients’ Responsibilities to Limited English Proficient Persons issued on December 14, 2005 (DOT Guidelines). In accordance with DOT Guidelines, Metro will use the four-factor analysis that requires an individual assessment for each project of:

1. The number or proportion of LEP persons eligible to be served or likely to be encountered by a program, activity or service.
2. The frequency with which LEP individuals come into contact with the program.
3. The nature and importance of the program, activity or service provided.
4. The resources available and the costs associated with providing LEP services.

When issues or actions affect areas where concentrated populations of non-English-speaking people live, notices and announcements are placed in appropriate community media. Metro retains a list of individuals who can interpret at public events where non-English speaking people are expected to participate.

V. ADDITIONAL ACTIVITIES RELATED TO TITLE VI COMPLIANCE

A. Title VI Training Opportunities

In July 2006, Metro sent the designee of its Title VI Coordinator to training on Title VI requirements that was offered by the Federal Highway Administration in Seattle. The training included FTA Title VI requirements, and paid special attention to the requirements as they affect MPOs.

In May 2007, Metro offered the same training in Portland to MPOs across Oregon and southern Washington. Thirty-five individuals from the MPOs, local jurisdictions, and the Oregon Department of Transportation attended the training. Mini courses are planned for in-house training by Metro's Title VI designee and attorney, to ensure that all departments are clear on requirements for Title VI compliance.

B. Metro's Diversity Action Team

Metro convened a new DAT in 2005 with approval of the Metro Council and at the request of the Chief Operating Officer (COO). The DAT includes representatives from Metro areas of operation, a Council liaison, and a liaison to senior management as well as employees of the Metropolitan Exposition Recreation Commission, a subsidiary of Metro. The purpose of the DAT is to actively and aggressively promote cultural diversity in Metro's workforce, planning processes, and programs. The DAT's activities exceed the federal requirements embodied in the Title VI law and Environmental Justice executive order.

The DAT establishes annual and five-year goals accompanied by specific performance measures. The COO is accountable for ensuring the goals of the DAT are adopted and pursued by department directors.

1. Annual Initiatives For 2006:

- Integration of measurable diversity objectives with general business objectives.
- Providing diversity training to Metro Council, management, and employees.
- Promoting diversity in workforce recruitment programs.
- Promoting diversity on Metro advisory committees.
- Ensuring an inclusive and welcoming work environment.
- Increasing contracting opportunities.

2. Five-Year Initiatives:

- Ensuring Metro's diversity policies are clearly articulated through external and internal communications.
- Increasing opportunities for Metro to sponsor events that promote diversity.

- Increasing opportunities for Metro Council and senior management to participate in diverse community events.
- Increase opportunities for diverse populations to participate in transportation and land-use planning and other Metro decision-making processes.

VI. TITLE VI INVESTIGATIONS, COMPLAINTS, OR LAWSUITS FILED IN THIS REPORTING PERIOD

Metro had no Title VI investigations, complaints, or lawsuits filed during the reporting period.

VII. PROCEDURES FOR TRACKING AND INVESTIGATING TITLE VI COMPLAINTS

If any individual believes that s/he or any other program beneficiaries have been the object of unequal treatment or discrimination as to the receipt of benefits and/or services, or on the grounds of race, color, national origin, or sex, s/he may exercise their right to file a complaint with Metro. Every effort will be made to resolve complaints informally at the Metro, sub-recipient, and contractor level.

These procedures apply to all complaints filed under Title VI of the Civil Rights Act of 1964, relating to any program or activity administered by Metro or its subrecipients, consultants, and/or contractors. Intimidation or retaliation of any kind is prohibited by law.

These procedures do not deny the right of the complainant to file formal complaints with other state or federal agencies, or to seek private counsel for complaints alleging discrimination.

These procedures are part of an administrative process that does not provide for remedies that include punitive damages or compensatory remuneration for the complainant.

Every effort will be made to obtain early resolution of complaints at the lowest level possible. The option of informal mediation meeting(s) between the affected parties and the Title VI Coordinator may be utilized for resolution at any stage of the process. The Title VI Coordinator will make every effort to pursue a resolution to the complaint. Initial interviews with the complainant and the respondent will request information regarding specifically requested relief and settlement opportunities.

A. Procedure

1. Any individual, group of individuals, or entity that believes they have been subjected to discrimination prohibited by Title VI nondiscrimination provisions may file a written complaint with Metro's Title VI Coordinator. A formal complaint must be filed within 180 calendar days of the alleged occurrence or when the alleged discrimination became known to the complainant. The complaint must meet the following requirements:

- a. Complaint shall be in writing and signed by the complainant(s).
 - b. Include the date of the alleged act of discrimination (date when the complainant(s) became aware of the alleged discrimination; or the date on which that conduct was discontinued or the latest instance of the conduct).
 - c. Present a detailed description of the issues, including names and job titles of those individuals perceived as parties in the complained-of incident.
 - d. Allegations may be faxed or e-mailed and will be acknowledged and processed once the identity(ies) of the complainant(s) and the intent to proceed with the complaint have been established. The complainant is required to mail a signed, original copy of the fax or e-mail transmittal for Metro to be able to process it.
 - e. Allegations received by telephone will be reduced to writing and provided to complainant for confirmation or revision before processing. A complaint form will be forwarded to the complainant for him/her to complete, sign, and return to Metro for processing.
2. Upon receipt of the complaint, the Title VI Coordinator will determine the complaint's jurisdiction, acceptability, and the need for additional information, as well as investigate the merit of the complaint. In cases where the complaint is against one of Metro's subrecipients of federal funds, Metro will assume jurisdiction and will investigate and adjudicate the case. Complaints against Metro will be referred to the Oregon Department of Transportation's (ODOT) Office of Equal Opportunity (OEO), for proper disposition pursuant to their procedures. In special cases warranting intervention to ensure equity, these agencies may assume jurisdiction and either complete or obtain services to review or investigate matters.
 3. In order to be accepted, a complaint must meet the following criteria:
 - a. The complaint must be filed within 180 calendar days of the alleged occurrence or when the alleged discrimination became known to the complainant.
 - b. The allegation(s) must involve a covered basis such as race, religion, color, national origin, or gender.
 - c. The allegation(s) must involve a program or activity of a Federal-aid recipient, subrecipient, or contractor.

- d. The complainant(s) must accept reasonable resolution based on Metro's administrative authority (reasonability to be determined by Metro).
4. A complaint may be dismissed for the following reasons:
 - a. The complainant requests the withdrawal of the complaint.
 - b. The complainant fails to respond to repeated requests for additional information needed to process the complaint.
 - c. The complainant cannot be located after reasonable attempts.
5. Once Metro or ODOT decides to accept the complaint for investigation, the complainant and the respondent will be notified in writing of such determination within five calendar days. The complaint will receive a case number and will then be logged into Metro's records, identifying its basis and alleged harm, and the race, religion, color, national origin, and gender of the complainant.
6. In cases where Metro assumes the investigation of the complaint, Metro will provide the respondent with the opportunity to respond to the allegations in writing. The respondent will have 10 calendar days from the date of Metro's written notification of acceptance of the complaint to furnish his/her response to the allegations.
7. In cases where Metro assumes the investigation of the complaint, within 40 calendar days of the acceptance of the complaint, Metro's Investigator (who may be one of Metro's Title VI designees, an outside inspector, or Metro's Title VI Coordinator) will prepare an investigative report for review by the Office of Metro Attorney and the COO. The report shall include a narrative description of the incident, identification of persons interviewed, findings, and recommendations for disposition.
8. The investigative report and its findings will be sent to the Metro Attorney for review. The Metro Attorney will review the report and associated documentation and will provide input to the Investigator within 10 calendar days.
9. Any comments or recommendations from the Metro Attorney will be reviewed by Metro's Investigator. The Investigator will discuss the report and recommendations with the COO within 10 calendar days. The report will be modified as needed and made final for its release.
10. Metro's final investigative report and a copy of the complaint will be forwarded to the FHWA within 60 calendar days of the acceptance of the complaint.

11. Metro will notify the parties of its final decision.
12. If complainant is not satisfied with the results of the investigation of the alleged discrimination and practices, the complainant will be advised of the right to appeal to the U.S. Department of Transportation (USDOT). The complainant has 180 days after Metro's final resolution to appeal to USDOT. Unless facts not previously considered come to light, reconsideration or appeal to Metro will not be available.

VII. METRO'S NOTICES TO THE PUBLIC THAT IT COMPLIES WITH TITLE VI AND INSTRUCTIONS TO THE PUBLIC ON HOW TO FILE A DISCRIMINATION COMPLAINT.

The paragraph below is inserted in publications that are distributed to the public and is published on Metro's web site (www.metro-region.org) and IntraMet (available to Metro employees). The longer version (below) is used when space permits. When space is limited or cost is an issue, the abbreviated version (below the longer version) is used.

"Metro hereby gives public notice that it is the policy of the Metro Council 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 requires that no person in the United States of America shall, on the grounds of race, color, sex, or national origin, be excluded from the participation in, be denied the benefits of, or be otherwise subjected to discrimination under any program or activity for which Metro receives federal financial assistance. Any person who believes they have been aggrieved by an unlawful discriminatory practice under Title VI has a right to file a formal complaint with Metro. Any such complaint must be in writing and filed with Metro'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, see the web site at www.metro-region.org or call (503) 797-1536."

Abbreviated Nondiscrimination Notice to the Public

"Metro fully complies with Title VI of the Civil Rights Act of 1964 and related statutes and regulations in all programs and activities. For more information, or to obtain a Title VI Complaint Form, see www.metro-region.org or call (503) 797-1536."

