Title VI Program

Corridor MPO

Adopted October 18, 2018
Amended January 16, 2020
RESOLUTION NO. 05-18
RESOLUTION ADOPTING THE CORRIDOR MPO 2018 TITLE VI PROGRAM AND AMENDMENTS TO THE 2018 PUBLIC PARTICIPATION PLAN

WHEREAS, the Corridor Metropolitan Planning Organization (CMPO), in cooperation with the Federal Highway Administration (FHWA), the Federal Transit Administration (FTA), and the Iowa Department of Transportation (Iowa DOT), periodically prepares a Public Participation Plan (PPP) that outlines the MPO’s activities in regards to public involvement in the transportation planning process; and

WHEREAS, the CMPO periodically prepares a Title VI Program which ensures recipients of federal funds, including the CMPO, do not have discriminatory policies, programs, and activities and outlines the MPO’s processes for reaching traditionally disadvantaged populations, including a Limited English Proficiency (LEP) Plan; and

WHEREAS, the preparation of the PPP is a federal requirement under the current federal transportation bill and Federal Code of Regulations; and

WHEREAS, the Title VI Program is a federal requirement of the Civil Rights Act of 1964, monitored by the FTA and Iowa DOT Office of Public Transportation, and amendments to the CMPO’s PPP are required to comply with CMPO’s Title VI Program; and

NOW THEREFORE BE IT RESOLVED by the CMPO Policy Board that the CMPO hereby approves and adopts the final Title VI Program and accepts the amendments to the PPP for compliance of Title VI and FTA Corrective Actions.

Passed this 18th day of October, 2018.

Charles Hinz, Chairperson
Corridor Metropolitan Planning Organization

Date 10/18/18
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### ACRONYM LIST

<table>
<thead>
<tr>
<th>Acronym</th>
<th>Full Form</th>
</tr>
</thead>
<tbody>
<tr>
<td>ADA</td>
<td>American with Disabilities Act</td>
</tr>
<tr>
<td>Corridor MPO</td>
<td>Corridor Metropolitan Planning Organization</td>
</tr>
<tr>
<td>CFR</td>
<td>Code of Federal Regulations</td>
</tr>
<tr>
<td>CRT</td>
<td>Cedar Rapids Transit</td>
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<tr>
<td>DOT</td>
<td>Department of Transportation</td>
</tr>
<tr>
<td>EPA</td>
<td>Environmental Protection Agency</td>
</tr>
<tr>
<td>FFY</td>
<td>Federal Fiscal Year</td>
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<tr>
<td>FTA</td>
<td>Federal Transit Administration</td>
</tr>
<tr>
<td>GTC</td>
<td>Ground Transportation Center</td>
</tr>
<tr>
<td>HACAP</td>
<td>Hawkeye Area Community Action Program</td>
</tr>
<tr>
<td>LEP</td>
<td>Limited English Proficiency</td>
</tr>
<tr>
<td>LRTP</td>
<td>Long-Range Transportation Plan</td>
</tr>
<tr>
<td>MAP-21</td>
<td>Moving Ahead for Progress in the 21st Century Act</td>
</tr>
<tr>
<td>MPA</td>
<td>Metropolitan Planning Area</td>
</tr>
<tr>
<td>MPO</td>
<td>Metropolitan Planning Organization</td>
</tr>
<tr>
<td>NE</td>
<td>Northeast</td>
</tr>
<tr>
<td>NTS</td>
<td>Neighborhood Transportation Service</td>
</tr>
<tr>
<td>NW</td>
<td>Northwest</td>
</tr>
<tr>
<td>POP</td>
<td>Program of Projects</td>
</tr>
<tr>
<td>PPP</td>
<td>Public Participation Plan</td>
</tr>
<tr>
<td>PTP</td>
<td>Passenger Transportation Plan</td>
</tr>
<tr>
<td>SE</td>
<td>Southeast</td>
</tr>
<tr>
<td>STBG</td>
<td>Surface Transportation Block Grant</td>
</tr>
<tr>
<td>SW</td>
<td>Southwest</td>
</tr>
<tr>
<td>TAP</td>
<td>Transportation Alternatives Program</td>
</tr>
<tr>
<td>TIP</td>
<td>Transportation Improvement Program</td>
</tr>
<tr>
<td>Title VI</td>
<td>Title VI of the Civil Rights Act of 1964</td>
</tr>
<tr>
<td>TTAC</td>
<td>Transportation Technical Advisory Committee</td>
</tr>
<tr>
<td>TAG</td>
<td>Transportation Advisory Group</td>
</tr>
<tr>
<td>WIC</td>
<td>Special Supplemental Nutrition Program for Women, Infants, and Children</td>
</tr>
</tbody>
</table>
RECIPIENT PROFILE

Recipient: Corridor Metropolitan Planning Organization

Administrative Head: Bill Micheel, MPO Manager

Recipient Title VI Coordinator: Hilary Hershner, Regional Transportation Planner

Address: 101 1st Street SE
City/State: Cedar Rapids, Iowa
Zip Code/County: 52401, Linn County
Phone: (319) 286-5041
Fax: n/a
Email: n/a
Website: www.corridormpo.com

Has the recipient signed and submitted its Title VI Assurances? Yes ☒ No

Has the recipient submitted its Title VI Program Plan? Yes ☒ No

What strategies has your planning process developed for ensuring, demonstrating, and sustaining compliance with Title VI?

The Corridor Metropolitan Planning Organization (MPO) makes sure we are meeting the requirements of Title VI. Including traditionally under served populations is a priority of Corridor MPO staff. This temporary site includes the Title VI notice, complaint procedure, and complaint form. Our Title VI notice is also posted in the Corridor MPO office. The Corridor MPO is working to update our website and the new website and will also include the Title VI notice, complaint procedure, and complaint form. There is a notice at the bottom of all Corridor MPO agendas that we will make accommodations for someone to participate in the Corridor MPO programs, services, or activities and the notice also states we comply with the Section 5307 Program of Projects. The Corridor MPO also ensures compliance of Title VI by identifying a staff member to be the Title VI Coordinator. The Title VI Coordinator participated in a training regarding racial equity and the role of government in April of 2017.

The Corridor MPO will continue to make efforts in reaching out to populations identified in the Title VI program. The Corridor MPO will look to surveys and other best management practices to ensure the needs of low-income and minority populations are continually being met and their opinions heard.
GENERAL REQUIREMENTS

1.)

**X** Attach a copy of recipient’s Title VI Notice to the Public

*See Attachment 1 for the Corridor MPO’s Title VI Notice to the Public*

Required Elements:

**X** A statement that the agency operates programs without regard to race, color, or national origin

**X** A description of the procedures that members of the public should follow in order to request additional information on the recipient’s Title VI obligations

**X** A description of the procedures that members of the public shall follow in order to file a Title VI discrimination complaint against the recipient

List locations where the notice is posted:

- Corridor MPO website
- Corridor MPO Office
- Bottom of TTAC, Executive Committee, and Policy Board agendas

2.)

**X** Please attach a copy of the recipient’s instructions to the public regarding how to file a Title VI discrimination complaint, including a copy of the complaint form

*See Attachment 2 for the Corridor MPO’s Title VI Complaint Procedure*

*See Attachment 3 for the Corridor MPO’s Title VI Complaint Form*

**X** Are complaint procedures and the complaint form posted on the recipient’s website?

Please provide the URL: [http://www.cedar-rapids.org/local_government/departments_a - f/community_development/mpo/Title_VI.php](http://www.cedar-rapids.org/local_government/departments_a - f/community_development/mpo/Title_VI.php)
Please list and describe any transit-related Title VI investigations, complaints, or lawsuits filed with, concerning, or naming the recipient in the last three years

<table>
<thead>
<tr>
<th>Date Filed (Month, Day, Year)</th>
<th>Summary (Include basis of complaint: race, color, or national origin)</th>
<th>Status</th>
<th>Action(s) Taken</th>
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</thead>
<tbody>
<tr>
<td>Investigations</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>1.</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>2.</td>
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<td></td>
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<tr>
<td>Lawsuits</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>1.</td>
<td></td>
<td></td>
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<tr>
<td>2.</td>
<td></td>
<td></td>
<td></td>
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<tr>
<td>Complaints</td>
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<td></td>
<td></td>
</tr>
<tr>
<td>1.</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>2.</td>
<td></td>
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</tbody>
</table>
4.) Please attach a public participation plan that includes an outreach plan to engage minority and limited English proficient populations, as well as a summary of outreach efforts made in the last three years. See Attachment 4 for the Corridor MPO’s Minority Outreach Plan in our Public Participation Plan.

Please describe the methods used to inform low-income and minority populations of planning efforts for transportation-related services and/or improvements:

The Corridor MPO will ensure we adequately provide access and provide these populations a chance to participate in our public process by:

- Issuing news releases to local foreign language media outlets
- Issuing media releases to local stakeholder groups and local non-profit organizations representing those populations
- Issuing media releases to the Corridor MPO’s Media Contact (see Attachment 5)
- Consider a third open house during the development of the TIP if a project seeking MPO funds will have a significant impact upon any of the populations above.

In Attachment 4, you will find the pages from the MPO’s PPP which specifically address the outreach plan to engage minority and LEP populations. The outreach plan to engage minority and limited English proficient populations is in the “Outreach and Access” section of the PPP. The LEP plan is included in Attachment 6. The entire PPP is available to view online here.

The Corridor MPO has attempted to reach these populations and engage them in the public participation process through having tables and displays at local community events. The Corridor MPO has attempted to reach these populations by seeking them out and going to where they would be. The Corridor MPO did this with our 2016 Transit Study, by having the open houses for that study at the Ground Transportation Center and during most of the day (from approximately 8:00 a.m. to 6:00 p.m.).

The Corridor MPO is a member of the Transportation Advisory Group (TAG) meetings, currently run by the Linn County Mobility Coordinator. TAG meets quarterly and they work to meet the transportation needs of Linn County through a network of community partners and providing transportation options. The TAG’s vision is that all citizens are informed of and have access to coordinated, safe, and effective transportation services that enhance their quality of life. While TAG is not currently run by the Corridor MPO, the MPO will have agenda items to notify this network of community partners of our plans, programs, projects, and events. Community partners included in TAG include Linn County LIFTS, United Way of East Central Iowa (UWECI), Cedar Rapids Transit (CR Transit), East Central Iowa Council of Governments (ECICOG), Iowa Department of Transportation (Iowa DOT), and Neighborhood Transportation Services (NTS)/Horizons. These community partners work with low-income and minority populations, and with persons with disabilities. Through these partnerships and connections, the MPO’s message can reach these populations through TAG.
List minority and/or community media utilized to ensure notification of public meetings or public review of recipient documents for residents in minority and low-income areas:

The Corridor MPO issues press releases to the City of Cedar Rapids’ Media Contact list and has developed our own Media/Press Release Contact (see Media Contact list in Attachment 5). Contacts have been included at local non-profits, churches, and organizations that serve one or all of the groups (minorities, low-income households, persons with limited English proficiency, persons with disabilities, and senior citizens). The local newspaper, The Gazette, local television media, KCRG, KGAN, and KWWL, and local radio, such as AM 600 WMT news radio, are included on this Media Contact list. There are no minority media organizations exclusively serving the Cedar Rapids metropolitan area, however Radio Z 95.5, a Spanish radio station, has been added to our contact list. Lastly, the Special Supplemental Nutrition Program for Women, Infants, and Children (WIC) is housed at Hawkeye Area Community Action Program (HACAP) in the Cedar Rapids metropolitan area, and a HACAP contact has been included in the contact. Utilizing this Media Contact list allows us to market our messages to everyone, without specifically excluding any certain populations.

The Corridor MPO has increased our presence on social media, particularly Facebook. According to PEW Research Center, around two-thirds of U.S. adults use Facebook and it is popular among all demographic groups\(^1\). We currently post on the Corridor MPO’s page several times a week. The Corridor MPO creates “event” pages for all of our open houses. Additionally, we use Facebook Live to allow members of the public to new our Transportation Technical Advisory Committee (TTAC), Executive Committee, Policy Board, and Grant Wood Trails meetings; this allows members of disadvantaged groups to participate and view our public meetings without having to travel to the physical meeting location. These Facebook Live events are also saved on the Corridor MPO’s Facebook page, so citizens can see and view the information after the event is live.

When was the public participation plan last reviewed? Please describe how.

The Corridor MPO is starting to work on updating our LRTP and the Iowa DOT notes that PPP’s should be updated prior to the LRTP process. The PPP was last updated and adopted August 8th, 2018. The Corridor MPO is going to the Policy Board in October of 2018 with amendments to the PPP to meet some of the findings in the FTA’s Triennial Review of Cedar Rapids Transit. The Corridor MPO will take another PPP amendment to the Policy Board in October to update the PPP to include a Limited English Proficiency (LEP) Plan and update the “Outreach and Access” to include information about our policies in reaching out to Title VI populations.

The Corridor MPO will periodically review and update the PPP as necessary.

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\(^1\) Use of different online platforms by demographic groups
5.)

Please attach a copy of the recipient’s plan for providing language assistance to persons with limited English proficiency, based on the DOT LEP Guidance, *Federal Register, Volume 70, Number 239*, [http://www.gpo.gov/fdsys/pkg/FR-2005-12-14/html/05-23972.htm](http://www.gpo.gov/fdsys/pkg/FR-2005-12-14/html/05-23972.htm)

See Attachment 6 for the Corridor MPO’s Limited English Proficiency Plan

What steps has the recipient taken to ensure meaningful access to the benefits, services, information, and other important components of its programs and services to persons with limited English proficiency?

The Corridor MPO has taken steps to ensure meaningful access to our programs and services to persons with limited English proficiency. Attachment 4 in the MPO’s PPP contains the LEP plan.

Within the Corridor MPO member jurisdictions, the percentage of LEP speakers ranges from 0% to 2.37% (see the table on page 12). Therefore, a vast majority of citizens within the MPO region are not defined as having limited English proficiency. While the percentage of LEP residents in the Corridor MPO planning boundary is low, the Corridor MPO is committed to providing everyone with the opportunity to learn about and participate in our programs and plans.

The MPO has flashcards available in multiple languages that allow a non-English speaker to point to the language they speak, which then enables MPO staff to obtain the translation services they require.

### Most Spoken Languages in Corridor MPO

<table>
<thead>
<tr>
<th>Language</th>
<th>Number of Speakers</th>
</tr>
</thead>
<tbody>
<tr>
<td>Spanish</td>
<td>2,800</td>
</tr>
<tr>
<td>Vietnamese</td>
<td>200</td>
</tr>
<tr>
<td>Tagalog</td>
<td>150</td>
</tr>
<tr>
<td>African Languages</td>
<td>100</td>
</tr>
<tr>
<td>Arabic</td>
<td>70</td>
</tr>
<tr>
<td>French</td>
<td>50</td>
</tr>
<tr>
<td>Chinese</td>
<td>30</td>
</tr>
<tr>
<td>Hindi</td>
<td>20</td>
</tr>
<tr>
<td>German</td>
<td>15</td>
</tr>
<tr>
<td>Other Asian Languages</td>
<td>10</td>
</tr>
<tr>
<td>Japanese, Vietnamese, Tagalog, African Languages, Arabic, French, Chinese, Hindi, German, Other Asian Languages, Spanish</td>
<td></td>
</tr>
</tbody>
</table>

Source: 2011 - 2015 American Community Survey 5 Year Estimates, most recent data available
6.)

List all non-elected committees and councils, the membership of which is selected by the recipient:

Representatives from Corridor MPO member jurisdictions that serve on the Policy Board, Executive Committee, and TTAC are chosen by each member jurisdiction and therefore are not selected by the recipient. The individual policies of each member jurisdiction are adhered to when Policy Board, Executive Committee, and TTAC members are selected by each jurisdiction. The Corridor MPO currently does not have any non-elected committees, councils, or task forces. In the event that the Policy Board creates a committee or task force, this issue will be considered by the recipient when selecting representatives.

Describe the process the recipient uses to encourage the participation of minorities on such committees.

Each member jurisdiction follows its internal guidelines related to appointment of representatives on Corridor MPO boards and committees. However, Corridor MPO annually encourages member jurisdictions to appoint women and minorities to MPO boards and committees at the December TTAC and Executive Committee meetings, before new appointees are selected for the upcoming calendar year. If no December TTAC or Executive Committee meetings are held, an email will be sent out reminding member jurisdictions that appointments to TTAC, Executive Committee, and Policy Board are required in January with a note encouraging women and minority appointments.

Racial/Ethnic Breakdown of the Non-Elected Committees and Councils:

The information provided in the Table 6 to the right includes representatives on the Corridor MPO’s Policy Board, Executive Committee, and TTAC. This does not include alternates to any committees nor does this include non-voting members of TTAC.

<table>
<thead>
<tr>
<th>Group</th>
<th>Number</th>
</tr>
</thead>
<tbody>
<tr>
<td>Male</td>
<td>31</td>
</tr>
<tr>
<td>Female</td>
<td>6</td>
</tr>
<tr>
<td>White</td>
<td>36</td>
</tr>
<tr>
<td>Black or African American</td>
<td>0</td>
</tr>
<tr>
<td>American Indian or Alaskan Native</td>
<td>0</td>
</tr>
<tr>
<td>Asian/Middle Eastern</td>
<td>1</td>
</tr>
<tr>
<td>Native Hawaiian or other Pacific Islander</td>
<td>0</td>
</tr>
<tr>
<td>Other</td>
<td>0</td>
</tr>
</tbody>
</table>

Source: 2012 - 2016 American Community Survey 5 Year Estimates
7.) If applicable, describe the efforts the recipient uses to ensure sub-recipients are complying with Title VI:

Not applicable to the Corridor MPO.

Include a schedule of sub-recipient Title VI program submissions:
(insert table or list)

N/A

8.) Has the recipient constructed a facility, such as a vehicle storage facility, maintenance facility, operation center, etc., with Federal Transit Administration funds?

☐ Yes ☐ No ☒

If yes, please attach the Title VI equity analysis conducted during the planning stage with regard to the location of the facility

9.) Please attach a copy(ies) of board meeting minutes, resolution(s), or other appropriate documentation showing the board(s) of directors or appropriate governing entity(ies) or official(s) responsible for policy decisions reviewed and approved the Title VI Program.

See page 3 for the approved resolution approving the Corridor MPO’s Title VI Program, including the Policy Board Chair’s signature.
REQUIREMENTS OF PLANNING AGENCIES

1.) Has the planning agency developed a demographic profile of the planning area that includes identification of the locations of socioeconomic groups, including low-income and minority populations? Provide a summary of the planning area demographics.

Summary of planning area demographics:

The Corridor MPO planning area has approximately 185,180 people as of the 2010 Census. The Census is estimating that by 2020 there will be 203,675 people within the Corridor MPO’s planning boundary. The City of Cedar Rapids has the largest share of the population with 126,232 citizens as of the 2010 Census. The City of Marion has the second largest population, with 32,768.

Of the population within the planning boundary, a little less than 7 percent of people have limited English proficiency. Linn County and Cedar Rapids have the highest shares of limited English proficient people in the area, at 3,525 and 2,856, respectively. While the 3,525 is representative of LEP populations within the entire Linn County boundary, the vast majority of individuals in Linn County live in the Cedar Rapids metropolitan area (approximately 80 percent).

Minority populations (African-American/Black, American Indian or Alaska Native, Asian, Native Hawaiian and other Pacific Islander, other, and two or more races) within the Corridor MPO’s planning boundary are generally concentrated in the downtown area and the Oakhill Jackson, Moundview, and Wellington Heights neighborhoods, with minority populations 30-35 percent in those areas. The east and southeast areas of Marion have between 46 to 86 percent minorities in the area. Another location that has between 46 and 86 percent minorities is the northwest area of the metro, generally encompassing the western half of the City of Hiawatha and the area of the City of Cedar Rapids north and west of Blairs Ferry Road, in close proximity to Viola Gibson Elementary School. In the northwest part of Cedar Rapids, generally at the southeast corner of Edgewood Rd NW and O Ave NW south to E Ave NW, has between 46 and 86 percent minorities.

Households below the poverty line generally live in the central part of the MPO’s planning boundary, near the Downtown Cedar Rapids area. The greatest concentration of households below the poverty line near downtown are located in the Moundview, Taylor, and Wellington Heights neighborhoods. There are pockets on the edges of the metro area with a higher concentration of households below the poverty line. The area in north central Cedar Rapids, between and including small portions of Hiawatha and Robins between Boyson Road and Blairs Ferry Road between C Avenue and North Center Point Road, has between 394 and 726 households below the poverty line. A large concentration of households below the poverty line exists in the eastern part of the City of Marion and north central Cedar Rapids, generally in the area between C Ave NE and Alburnett Road and south of East Robins Rd and north of Boyson Road/Brentwood Drive NE. In this location there are between 727 to 1260
households below the poverty line per square mile.

Median incomes in the MPO’s planning area generally tend to grow larger further away from Downtown Cedar Rapids. The pockets with the lowest median household income (between $18,000 and $37,500) include the Oakhill Jackson, Taylor, and Westdale neighborhoods. The areas with the highest median income ($120,600 to $160,900) are located in the northern part of the region: the Seminole Valley area in Cedar Rapids and the Bowman Woods area (south of East Robins Rd, north of Boyson Road, west of C Avenue NE, and east of Alburnett Road).

2.)

Please describe the procedures by which the mobility needs of minority populations are identified and considered within the planning process.

When determining where the public open houses and meetings are held, the MPO tries to hold events in locations accessible by transit. For our MPO Policy Board and Executive Committee meetings, we have at least one meeting per year in each member jurisdiction. For this reason, not every MPO Policy Board or Executive Committee meeting is accessible by fixed-route transit. However, the Corridor MPO now hosts all of our meetings on Facebook live, so citizens have the opportunity to view the meetings there. Citizens will also be notified of which Cedar Rapids Transit route is accessible to the location of our meetings on the agenda. If a citizen has interest in attending one of our meetings in person, but is unable to access the meeting location via fixed-route transit, that citizen has the option to call for a taxi or ridehailing service to get them to our meeting location.

Our TIP open houses have been held at the NewBo City Market the last three years. This location is ideal for getting the public’s input on the TIP because it is a central location accessible by fixed-route transit. Additionally, during the 2016 Transit Study, the Corridor MPO held two open houses: one at the Ground Transportation Center (GTC) and the Cedar Rapids Downtown Public Library. These locations were ideal for hosting open houses for a number of reasons: first, we were able to speak directly to transit users by going where they already were; second, these spaces are accessible by fixed-route transit; and third, these locations are located within areas of high minority populations and the lowest median income households in the region.

The MPO provides public outreach services for Cedar Rapids Transit. In July of 2017, Cedar Rapids Transit made changes to the fixed-route system based on findings from the Corridor MPO’s Transit Study. We ensured we reached the populations using public transportation by going to where they were, at the GTC. Also for the 2019 update to the Passenger Transportation Plan, an open house was hosted by the MPO again at the GTC. This open house was held from 8:00 am - 6:00 pm to allow the public, specifically transit users, to be able to provide their input either before getting on or after getting off the bus.
3.) Please attach demographic maps that show the impacts of the distribution of State and Federal funds in the aggregate for public transportation projects.
Smarter Transportation, Better Community

Households Below Poverty Line per Square Mile

Title VI Plan
Percentage of LEP Persons within each Census Tract

- Corridor MPO Boundary
- Bus Route
- Municipal Boundaries
- Water
- Limited English Proficiency (LEP) by Census Tracts
- Percentage of LEP Persons in each Census Tract:
  - 0.0%
  - 0% - 0.7%
  - 0.8% - 2.4%
  - 2.5% - 5.2%
  - 5.3% - 7.4%
  - 7.5% - 10.7%
  - 10.8% - 15.6%
  - 15.7% - 27.8%
4.)

Please attach analysis of the planning agency’s transportation system investments that identifies and addresses any disparate impacts.

List adverse social, environmental, economic or demographic impact identified in the planning process:

The Corridor MPO has mapped out where TIP projects (STGB and TAP) are located in relation to poverty, minority populations, and LEP populations and have determined that there are no negative impacts upon these populations. The maps on pages 20, 21, and 22 show the locations of our FFY19-22 TIP projects in relation to minority, LEP, and poverty populations.
Percent of Minorities by Census Block Group
Households Below Poverty Per Square Mile
DECLARATION OF THE RESPONDENT

I declare that I have provided information as a part of the Title VI Program to the best of my knowledge and believe it to be true, correct, and complete.

Hilary Hershner, Regional Transportation Planner & Title VI Coordinator
Respondent

October 4th, 2018
Date

DECLARATION OF THE ADMINISTRATIVE HEAD

I declare that I have reviewed and approved the information provided in the Title VI Program and to the best of my knowledge believe it to be true, correct, and complete.

Bill Micheel, MPO Manager
Respondent

October 4th, 2018
Date
The Corridor Metropolitan Planning Organization (Corridor MPO) hereby gives public notice that it is the policy of the Corridor MPO to assure full compliance with Title VI of the Civil Rights Act of 1964, related statutes and regulation provide that no person shall on the ground of race, color, or national origin be excluded from participation in, be denied the benefits of, or be subjected to discrimination under any program or activity receiving federal financial assistance. The Civil Rights Restoration Act of 1987 amended Title VI to specify that entire institutions receiving federal funds, whether schools, colleges, government entities, or private employers, must comply with Federal civil rights laws, rather than just the particular programs or activities that receive federal funds.

The Corridor MPO is concerned with the impacts of our programs, projects, and activities on low-income and minority populations (“Environmental Justice”) under the Title VI. Any person who believes that they are being denied participation in a project, denied benefits of a program, or otherwise being discriminated against because they identify with one of the listed characteristics or protected classes, please contact:

Hilary Hershner
Regional Transportation Planner & Title VI Coordinator
Corridor Metropolitan Planning Organization
319-286-5161
h.hershner@corridormpo.com

YOU SHOULD CONTACT THE TITLE VI COORDINATOR ABOVE AS SOON AS POSSIBLE, BUT NO LATER THAN 180 DAYS AFTER THE ALLEGED DISCRIMINATION OCCURRED, OR IF THERE HAS BEEN A CONTINUING COURSE OF CONDUCT, NO LATER THAN 180 DAYS AFTER THE ALLEGED DISCRIMINATION WAS DISCONTINUED.

For more information about Title VI, visit the Iowa DOT’s Civil Rights website at http://www.iowadot.gov/civilrights/ or contact the Corridor MPO’s Title VI Coordinator.
The process to file Title VI complaint is as follows:

1. Persons wishing to file a formal discrimination complaint may do so by completing the Corridor MPO’s Title VI Complaint Form. It must be submitted within 180 days of the alleged discrimination, date when the person(s) became aware of the alleged discrimination, or date on which the conduct was discontinued, if there has been a continuing course of conduct.

2. Within 10 calendar days of receiving the complaint form, the Corridor MPO will log the complaint and forward this form, including any additional information, to the Iowa Department of Transportation (Iowa DOT) Title VI Coordinator. The Corridor MPO will also issue an initial notice of receipt to the complainant within 10 days of receiving the complaint form.

3. The Iowa DOT will provide the information to the Federal Highway Administration (FHWA). The FHWA will make the final determination on whether the Iowa DOT or Corridor MPO will investigate the complaint.

4. The Iowa DOT and the Corridor MPO will inform the person filing the complaint of the final determination once it is received by the Corridor MPO Title VI Coordinator.
TITLE VI OF THE CIVIL RIGHTS ACT OF 1964
DISCRIMINATION COMPLAINT FORM

Please fill out this form completely and legibly in ink or type. Sign and return to the Corridor MPO Title VI Coordinator at the address listed at the end of this form. Upon request, an alternate means of filing a complaint (for example, a personal interview or audio recording) can be accommodated.

Section I: Your Contact Information

Name: ___________________________________________________________________________
Address: __________________________________________________________________________
City, State, Zip Code: _____________________________________________________________________
Telephone (circle one): HOME  WORK  MOBILE  Telephone Number: __________________________
Electronic Mail Address: __________________________________________________________________
Accessible Format Requirements? (circle one): LARGE PRINT  TDD  AUDIO TAPE  OTHER: ____________

Section II: Filing Complaint for Third Party

Are you filing this complaint on your own behalf*? (circle one): YES  NO

*If you answered “yes” to this question, please skip to Section III of this form

If you answered NO to the question above, please supply the name and relationship of the person for whom you are filing a complaint:

Name(s): ____________________________________________________________________________
Relationship: __________________________________________________________________________
Address: ______________________________________________________________________________
Telephone (circle one): HOME  WORK  MOBILE
Telephone Number: __________________________
Section III: Information about the Discrimination Incident(s)

What was the discrimination based on? (circle one): RACE  COLOR  NATIONAL ORIGIN  OTHER: __________

Date(s) of alleged discrimination (month, day, year): _____________________________________________

Location of discrimination: ________________________________________________________________

Explain as clearly as possible what happened and why you believe you were discriminated against. Describe all persons who were involved. Include the name and contact information of the person(s) who discriminated against you, if known. Please include the name and contact information of any witnesses. If more space is needed, use the back of the form or add additional sheets of paper, as necessary:

______________________________________________________________________________________
______________________________________________________________________________________
______________________________________________________________________________________
______________________________________________________________________________________
______________________________________________________________________________________
______________________________________________________________________________________

Section IV: Other Filing Information

Have you previously filed a Title VI complaint with this agency? (circle one): YES  NO

Have you filed this complaint with any other Federal, State, or Local Agency (circle one): YES  NO

If you answered YES to the question above, then please provide the following information about a contact person at the agency or court where the complaint was filed:

Agency Name: ________________________________________________________________

Contact Person: _____________________________ Title: ________________________________
Attachment 3: Corridor MPO’s Title VI Complaint Form

Address: ______________________________________________________________________________

City, State, Zip Code: _____________________________________________________________________

Telephone Number: _____________________________________________________________________

Date Filed: _____________________________________________________________________________

Please sign and date below. The complaint will not be accepted if it has not been signed.

You may attach any written materials, or other supporting information that you believe to be relevant to your complaint, along with this form to the Title VI Coordinator below.

Signature: _______________________________________     Date: __________________

Please return form and supplemental materials to:

Hilary Hershner, Regional Transportation Planner & Title VI Coordinator
Corridor Metropolitan Planning Organization
101 First Street SE
Cedar Rapids, Iowa  52401

OR

Email form and supplemental materials to:

h.hershner@corridormpo.com

Creating Sustainable Communities Through Regional Planning & Civic Engagement

Title VI Plan: Attachments
Title VI Plan: Attachments

Attachment 4: Minority Outreach Plan in Public Participation Plan

This attachment only shows the portion of the Corridor MPO’s PPP with the Minority Outreach Plan. These are pages 22 and 23 in the PPP.

has set a rule that changes to the FCP and VP may only occur in July of each calendar year.

In order to make a request to amend a project into the FCP or VP, the project sponsor or member jurisdiction must provide a written request to MPO staff by July 1st. Verbal requests are not allowed because MPO staff must be able to provide the request in writing.

Most amendments to the FCP or VP should fall in line with the amendment process. Occasionally member jurisdictions will need amend the MPO’s LRTP to include a project in order to receive Iowa Clean Air Attainment Program (ICAAP) funds. If an ICAAP project is being amended into the LRTP and would like to also be eligible for MPO funds, then the normal process to amend the FCP would apply.

If an ICAAP project is only seeking inclusion into the VP, and therefore the project is not interested in also being eligible MPO funds, then the ICAAP project sponsors or member jurisdiction may seek inclusion into the VP outside of the regular amendment process with an affirmative vote by the Policy Board.

Upon adoption by the Policy Board of any LRTP amendments, other than amending the FCP or VP, MPO staff will work to incorporate the changes as soon as possible and will provide the updated plan online. The process for making amendments to the LRTP are described in Table 6 on page 21.

Access and Outreach

The Corridor MPO is committed to nondiscrimination in all of its policies, programs, plans, and activities and strives to ensure fair treatment and meaningful regardless of race, color, national origin, gender, disability, or income. Efforts will be made, consistent with Federal requirements, to consider the needs and include traditionally underserved populations by:

- Offering accommodations to citizens who require an auxiliary aid or service for effective communication
- Providing translated materials when requested
- Utilizing a variety of visual aids to assist with the public’s understanding of a project or concept

Any public notice issued by the Corridor MPO will explicitly state that the MPO satisfies the Section 5307 Program of Projects (POP) requirements. The following statement is located at the bottom of all Corridor MPO meeting agendas:

“Anyone who requires an auxiliary aid or translation service for effective communication, or a modification of policies or procedures to participate in a MPO program, service, or activity, should contact the Hilary Hershner at (319) 286-5161 or email h.hershner@corridormpo.com as soon as
possible, but no later than 48 hours before the event. This public announcement satisfies Section 5307 program of projects requirements for transit project public review and comment.”

It is a priority of the Corridor MPO to include the following traditionally underserved or disadvantaged populations in our public participation process:

- Minorities
- Low-income individuals
- Persons with limited English proficiency
- Persons with disabilities
- Senior (65+) citizens

The Corridor MPO will ensure we adequately access and provide these populations a chance to participate in our public process by:

- Issuing media releases to local stakeholder groups and local non-profit organizations representing those populations
- Issuing media releases to the Corridor MPO’s Media Contact (see Media Contact list in Appendix 3)
- Developing a LEP plan
- Considering hosting a third open house during the development of the TIP if a project seeking MPO funds will have a significant, negative impact upon any of the populations above

Agency Consultation and Partnerships

The Corridor MPO will occasionally consult and partner with other entities and agencies for the development of plans, studies, and programs. The list below includes several organizations the Corridor MPO has recently worked with:

- Cedar Rapids Transit
- Linn County LIFTS
- East Central Iowa Council of Governments
- Linn County Public Health
- Linn County Trails Association
- Neighborhood Transportation Service (NTS)
- Marion Independent School District (MISD)

Figure 6: The Corridor MPO had an open house with Cedar Rapids Transit for the 2016 Transit Study. This open house included a demonstration on how to use the new Cedar Rapids Transit app and website, www.ridecrt.com. This event was held on February 16th, 2016 at the CRT’s Ground Transportation Center.
Attachment 5: MPO Media/Press Release Contact List

Corridor MPO Media Contact Group as of January 23, 2020

- **Local non-profits (staff & general) and special interest groups**
  - **AARP**
    - AARP State Director, Brad Anderson
    - Connie Eastman
  - **UWECI**
    - Leslie Wright, Senior Vice President of Community Building
    - Shannon Hanson, Vice President of Marketing & Communications
  - **Willis Dady Homeless Services**
    - General: services@willisdady.org
  - **African American Museum of Iowa**
    - Director of Operations, Brianna Kim
    - Communications Associate, Veronica Weeks
  - **NAACP of Cedar Rapids**
    - dedricdoolin@gmail.com
  - **HACAP (includes WIC office)**
    - Chris Ackman, Communications and Volunteers Manager
  - **Solid Waste Agency**
    - Communications Director, Joe Horaney
    - Executive Director, Karmin McShane
  - **Cedar Rapids Metro YMCA**
    - Marketing Director, Shannon Brendengen
    - Helen G. Nassif Branch Executive, Eric Petersen
    - Marion Branch Executive, Sarah Hoeger
    - Director of Healthy Living at MIDS Fitness Center Staff and Mercy Health Plaza, Naomi Engelken
    - Stoney Point Associate Branch Director, Dale Emerson
  - **Big Brothers Big Sisters of Cedar Rapids and East Central Iowa**
    - Program Director, Erin Koehn
    - Operations Specialist, Brittani Albright
  - **Greater Cedar Rapids Community Foundation**
    - Director of Marketing and Communications, Corinne Ramler
    - Director of Development Services, Josie Velles
    - Senior Vice President, Programs and Community Investment, Karla Twedt-Ball
  - **Neighborhood Development Corporation of Cedar Rapids (NDCCR)**
    - General: ndccedarrapids@gmail.com
  - **Go Cedar Rapids**
    - General: info@gocedarrapids.com
  - **Iowa Culture Corridor Alliance**
    - General: info@culturalcorridor.org
  - **ICR Iowa**
    - President and CEO, Jennifer Daly
  - **PFLAG CR**
    - General: pflagcr@gmail.com
  - **US Freedom Foundation**
    - General: elias@usfreedomfoundation.org
  - **Peer Action Disability Support (PADS)**
    - General: power2pwd@yahoo.com
  - **Iowa Compass (Center for Disabilities and Development)**
    - General: iowa-compass@uiowa.edu
  - **ARC of East Central Iowa**
    - Anne Armknecht, Executive Director
  - **Community Hands/Intercultural Center of Iowa**
    - President and CEO, Rama Muzo
    - Director of Community Hands Deaf Services, Jennifer Keaton
Attachment 5: MPO Media/Press Release Contact List

- Eastern Iowa Health Center
  - Outreach Coordinator, Diane Buffo

- REM Iowa (Hiawatha Locations)
  - shawna.wallerich@thementornetwork.com
  - katarina.lacina@thementornetwork.com
  - jessica.burns@thementornetwork.com
  - staci.siddell@thementornetwork.com
  - shay.andersen@thementornetwork.com
  - darla.iburg@thementornetwork.com
  - danielle.smith@thementornetwork.com
  - Shelby.janes@thementornetwork.com

- Area Substance Abuse Council (ASAC)
  - General: info@asac.us

- Churches
  - Churches (with what appears to include large minority congregation or has services in languages besides English)
    - Mt. Zion Missionary Baptist Church (2nd oldest black congregation in CR)
      - General email, mtzionmbchurch@msn.com
    - St Paul’s United Methodist Church (offers worship in Swahili and Kirundi)
      - Director of Communications, Holli Schneekloth
      - Front Desk, Hospitality, & Events Coordinator, Kristin Simon
    - Calvary Baptist Church
      - Associate Pastor for Worship & Administration, Michael Frey
      - Senior Pastor, Jay Jentink
    - Immanuel Baptist Church (have services in Korean and Spanish)
      - General email, office@immanuelcr.org
    - Bethel Ame Church (black church in CR, National Historic Place)
      - Reverend, Leoma Leigh-Williams
    - King of Kings Lutheran Church (has “African Worship”)
      - General, office@kingofkingscr.org
      - Pastor, Mark Halvorson
    - New City Church
      - General, info@newcitycr.org
    - First Church of the Open Bible
      - Pastor, Harris Holsapple VI
      - General, info@firstopenbible.com
    - Immaculate Conception Catholic Church (has noon Sunday service in Spanish)
      - Pastoral Associate, Hispanic Ministry, Nadia Garza
      - Reverend, Christopher Podhajsky
    - Islamic Center of Cedar Rapids
      - General, info@crmosque.com
    - Cedar Rapids Zen Center (Buddhist)
      - General, crzc@cedarrapidszencenter.org
    - Unity Center of Cedar Rapids
      - General, office@unitycr.org
    - Peoples Church Unitarian Universalist
      - General, office@peoplesuu.org
    - Hindu Temple Association of Eastern Iowa
      - General, econtact@iowahindutemple.org
    - Temple Judah
      - General/office, office@templejudah.org
      - Rabbi Todd, rabbi@templejudah.org
Attachment 5: MPO Media/Press Release Contact List

- **Local media**
  - Local TV Media
    - KGAN
    - KWWL
    - KCRG
  - Radio
    - Iowa Public Radio
    - AM 600 WMT
    - KCCK
    - RadioZ 95.5 (Spanish radio station)
  - Print/Online
    - Marion Times
      - news@mariontimesonline.com
      - Robyn Ireland, robyn.ireland@wcinet.com
    - Corridor Business Journal
      - news@corridorbusiness.com
    - The Gazette
      - General
      - Brian Morelli
      - Mitchell Schmidt

- **Local member jurisdictions**
  - Policy Board representatives
  - Executive Committee representatives
  - TTAC representatives
  - Relevant jurisdiction staff (not on MPO Committee/Board)
    - **Engineering**
      - Marion
      - Assistant City Engineers, Tim Mroch & Darin Andresen
    - **Planning (staff)**
      - Hiawatha
        - Community Development Director, Patrick Parsley
        - Administrative Assistant / Community Development Clerk, Jennifer Goerg
      - Cedar Rapids
        - General Planning Contact, CD-Plan@cedar-rapids.org
      - Marion
        - Community Development Director, Tom Treharne (In Policy Board contact)
      - Linn County
        - Planning and Development Director, Les Beck
    - **Planning (Non-MPO Board/Committee reps whose contact info I can find or already have)**
      - Cedar Rapids
        - City Planning Commission Chair, Jim Halverson
      - Marion
        - Planning & Zoning Commission Staff Contact, David N. Hockett
    - **City manager/administrators/General**
      - Marion
        - City Manager, Lon Pluckhon (in Policy Board contact)
      - Hiawatha
        - City Administrator, Kim Downs
    - **Communications**
      - Cedar Rapids
        - Development Services Communications Coordinator, Emily Breen
        - Communications Division Manager, Maria Johnson
Attachment 5: MPO Media/Press Release Contact List

- Marion
  - Amber Bisinger
  - Other (City Clerks/City Hall/Library)
  - Hiawatha
    - General Email: cityclerk@hiawatha-iowa.com
    - Deputy City Clerk, Kari Graber
    - City Clerk, Kelly Kornegor
    - Library Director, Jeaneal Weeks
  - Robins
    - General City Hall robinscityhall@fmtcs.com
    - Deputy Clerk, Liz Schura
  - Cedar Rapids
    - Library Director, Dana Schmidt
    - General Library, info@crlibrary.org
    - Police Chief, Wayne Jerman
    - Community Outreach Officer, Laura Faircloth
    - Civil Rights Commission
      - General, civilrights@cedar-rapids.org
      - Executive Director/Chief Diversity Officer, LaSheila Yates, lyates@cedar-rapids.org
      - Administrative Assistant/Intake Specialist, Alicia Abernathey, a.abernathey@cedar-rapids.org
    - Sustainability Coordinator, Eric Holthaus
    - Utilities Director, Steve Hershner (in TTAC contact)
  - Marion
    - General Library: info@marionpubliclibrary.org
    - Staff contact for Marion Civil Rights Commission, Amanda Kaufman, akaufman@cityofmarion.org
  - Linn County
    - Public Health, general, health@linncounty.org
    - Community Services – Core Services, general, lccs-core@linncounty.org
    - Veterans Affairs, general: veteran@linncounty.org
    - Elected officials (not on MPO Committee/Board, whose info. I can find)
      - Cedar Rapids City Council
        - General email - CityCouncil@cedar-rapids.org
      - Marion City Council
        - General email - council@cityofmarion.org

- Local State Legislators/General Assembly
  - Iowa House (serve 2 year terms, elections in even years, no term limits)
    - Liz Bennett, House District 65
    - Art Staed, House District 66
    - Ashley Hinson, House District 67
    - Molly Donahue, House District 68
    - Kristin Running-Marquardt, House District 69
    - Tracy Ehlert, House District 70
    - Amy Nielsen, House District 77
    - Louie Zumbach, House District 95
  - Iowa Senate (serve 4 year terms, no term limits)
    - Robert Hogg, Senate District 33 – up for reelection 20??
    - Liz Mathis, Senate District 34 – up for reelection 2020
    - Todd E. Taylor, Senate District 35 – up for reelection 2022
    - Zach Wahls, Senate District 37 – up for reelection 2022
    - Kevin Kinney, Senate District 39 – up for reelection 20??
Attachment 5: MPO Media/Press Release Contact List

- **Linn County Supervisors**
  - Stacey Walker, District 1
  - Ben Rogers, District 2
  - Brent Oleson, District 3

- **Neighborhood Association Presidents/Contacts**
  - Cleveland Area Neighborhood Association, George Heeren
  - Harbor Neighborhood Association, Don Steichen
  - Kenwood Park Neighborhood Association, Erica Yoder
  - Mound View Neighborhood Association, Carol Sindelar
  - Noelridge Park Neighborhood Association, Tim Stevens
  - Northwest Neighbors Neighborhood Association, Al Pierson
  - Oak Hill Jackson Neighborhood Association, Lynette Richards
  - Taylor Area Neighborhood Association (TANA), Steve Nylin
  - Wellington Heights Neighborhood Association, Robin Kash
  - Westdale Area Neighborhood Association, Stephanie Neff

- **Local Housing Authority (Cedar Rapids’ Housing Services Dept)**
  - Housing Services Manager, Sara Buck

- **Local chambers of commerce/economic development groups/business groups**
  - Cedar Rapids Metro Economic Alliance – general email: economicalalliance@cedarrapids.org
  - MEDCO – President, Nick Glew
  - HEDCO – general email: info@HEDCO.org
  - Uptown District (Marion) - brooke@marioncc.org
  - Robins Economic Development Initiative (REDI) - TBD

- **Local transportation groups/organizations**
  - Eastern Iowa Airport
    - General: info@crairport.org
  - East Central Iowa Council of Governments (ECICOG)
    - Transportation Director, Mary Rump
    - Transit Administrator/Planner, Brock Grenis
    - Public Information Specialist, Natalie Fraehlich
    - Executive Assistant, Gina Peters
  - LIFTS
    - General: lifts@linncounty.org
    - Tom Hardecopf, tom.hardecopf@linncounty.org
    - Mobility Manager, Terry Bergen

- **Local Businesses**
  - Raygun, contact@raygunsite.com
  - Hall Bicycle, info@hallbicycle.com
  - Northtowne Cycling and Fitness, Info@NorthtowneBikes.com
  - Goldfinch Cyclery, INFO@GOLDFINCHCYCLERY.COM

- **Schools**
  - Higher Education
    - Kirkwood
      - Associate Director of Marketing, Justin Hoehn
    - Coe College
Attachment 5: MPO Media/Press Release Contact List

- Director of Marketing, Natalie Milke
  - Mount Mercy College
  - TBD

  o K-12
    - Cedar Rapids Community School District
      - Communications Director, Akwi Nji
      - Communications Secretary, Pat Szymanek
    - College Community School District
      - Communications Director, Steve Doser
    - Linn Mar Community School District
      - Communications & Media Coordinator, Matthew May
    - Marion Independent School District
      - Superintendent Secretary, Stephanie Viner
    - Holy Family Xavier Catholic Schools (Xavier, St Jude, Lasalle)
      - Business Office, Nancy Appel
      - Business Office Manager, Julie Dorenkamp
      - Regis Middle School, Principal’s Administrative Assistant, Dianne Clarke
      - Regis Middle School, Receptionist/Activities Administrative Assistant, Tracie Chute
Limited English Proficiency Plan

Introduction

This Limited English Proficiency Plan has been prepared to address the Corridor Metropolitan Planning Organization’s (Corridor MPO) responsibilities as a potential recipient of federal financial assistance as they relate to the needs of individuals with limited English language skills accessing the services offered by the Corridor MPO. The plan has been prepared in accordance with Title VI of the Civil Rights Act of 1964, 42 U.S.C. 2000d, et seq, and its implementing regulations, which states that no person shall be subjected to discrimination on the basis of race, color or national origin.

Executive Order 13166, titled Improving Access to Services for Persons with Limited English Proficiency, indicates that differing treatment based upon a person’s inability to speak, read, write or understand English is a type of national origin discrimination. It directs each federal agency to publish guidance for its respective recipients clarifying their obligation to ensure that such discrimination does not take place. This order applies to all state and local agencies that receive federal transit funds, including the Corridor MPO.

The MPO has developed this Limited English Proficiency Plan to help identify reasonable steps for providing language assistance to persons with limited English proficiency (LEP) who wish to access services. As defined in Executive Order 13166, LEP persons are those who do not speak English as their primary language and have limited ability to read, speak, write or understand English.

This plan outlines how to identify a person who may need language assistance, the ways in which assistance may be provided, staff training that may be required, and how to notify LEP persons that assistance is available.

Four Factor Analysis

In order to prepare this plan, the Corridor MPO completed the four factor LEP analysis, provided by the U.S. DOT for formulating LEP Plans, that considers the following factors:

1. **Portion of LEP people.** The number or proportion of LEP persons in the service area who may be served or are likely to encounter an MPO program, activity or service.
2. **Frequency of contact.** The frequency with which LEP persons come in contact with Corridor MPO programs, activities or services.
3. **Nature and importance of service provided.** The nature and importance of programs, activities or services provided by the MPO to the LEP population.
4. **Resources available and cost.** The resources available to the Corridor MPO and overall cost to provide LEP assistance.
Four Factor Analysis for Corridor MPO:

1. Portion of LEP people

MPO staff reviewed 2012-2016 5-year estimates from the American Community Survey and determined the following information in the table about the LEP population in the Corridor. Information about the languages spoken, other than English, are provided in the graph. There are 3,525 LEP persons in all of Linn County, which has a larger geographic extent than the Corridor MPO Planning Boundary.

<table>
<thead>
<tr>
<th></th>
<th>Cedar Rapids</th>
<th>Ely</th>
<th>Fairfax</th>
<th>Hiawatha</th>
<th>Marion</th>
<th>Palo</th>
<th>Robins</th>
<th>Linn County</th>
</tr>
</thead>
<tbody>
<tr>
<td>Total Population</td>
<td>120,601</td>
<td>1,951</td>
<td>2,214</td>
<td>6,709</td>
<td>34,804</td>
<td>944</td>
<td>3,366</td>
<td>204,039</td>
</tr>
<tr>
<td>Speak English Only</td>
<td>113,896</td>
<td>1,925</td>
<td>2,135</td>
<td>6,363</td>
<td>33,826</td>
<td>931</td>
<td>3,142</td>
<td>194,856</td>
</tr>
<tr>
<td>Limited English Proficiency (LEP)*</td>
<td>2,856</td>
<td>6</td>
<td>20</td>
<td>81</td>
<td>328</td>
<td>0</td>
<td>46</td>
<td>3,525</td>
</tr>
<tr>
<td>LEP %</td>
<td>2.37%</td>
<td>0.31%</td>
<td>0.90%</td>
<td>1.21%</td>
<td>0.94%</td>
<td>0.00%</td>
<td>1.37%</td>
<td>1.73%</td>
</tr>
</tbody>
</table>

*Speaking another language and speak English less than “very well”

Source: U.S. Census Bureau, American Community Survey 5-year estimates (2012-2016)

![Most Spoken Languages in Corridor MPO](image)

Source: U.S. Census Bureau, American Community Survey 5-year estimates (2011-2015)

2. Frequency of contact

Corridor MPO staff assessed the frequency with which staff have, or could have, contacted with LEP persons. This included a survey of staff and documenting phone inquiries. Staff has reported no knowledge of any contacts, as far back as 2002, with LEP persons via phone, email, or in-person. To date, the Corridor MPO staff has no knowledge of requests for interpreters or requests for translated documents.

3. Nature and importance of service provided

The overwhelming majority of the region’s population speaks English as a first language or as a second language and “very well.” With no requests for translation or known contacts with LEP persons, the importance of this service being provided is deemed minimal.
4. Resources available and cost
The MPO assessed available resources that could be used for providing LEP assistance, including determining how much a professional interpreter and translation service would cost on an as-needed basis, which of the MPO documents would be the most valuable to be translated if the need should arise, and taking an inventory of available organizations that the MPO could partner with for outreach and translation efforts. The amount of staff training that would be needed was also considered.

Conclusion from Four Factor Analysis
Based on the Four Factor Analysis, the MPO developed its LEP Plan as outlined in the following section. Note that the DOT provides a Safe Harbor Provision (see Chap. III-9(c) of FTA C 4702.1B) for recipients regarding translation of written materials for LEP populations, if it is deemed necessary by the recipient based on the Four Factor Analysis.

Limited English Proficiency Plan Outline
The MPO will develop several options to be available to assist LEP individuals to utilize services. These options include:
- Utilize the Census Bureau’s “I Speak” Cards within the office and on the Corridor MPO’s website.
- Provide translation services on request and document these requests for future reference.
- Continue to monitor LEP persons and reevaluate LEP Plan as population changes.
- Continue to survey staff about contacts with LEP Populations and document any phone interactions with these individuals.

Language Assistance
Although there is a very low percentage in the Corridor MPO of LEP individuals, the Corridor MPO will ensure that the following measures are in place:
- The Corridor MPO Title VI Policy and Limited English Proficiency Plan will be posted on the agency website, www.corridormpo.com.
- When an interpreter is needed, in person or on the telephone, staff will attempt to determine what language is required and then access language assistance services.

Staff Training
The following training has been provided to the Corridor MPO Title VI Coordinator, and may be provided to all Corridor MPO staff in the future:
- Information on the Corridor MPO’s Title VI Policy and LEP responsibilities.
- Description of language assistance services offered to the public.
- Documentation of language assistance requests.
- Use of “I Speak” Cards.
- How to handle a potential Title VI/LEP complaint.
- CTS Language Link.
Attachment 6: Corridor MPO Limited English Proficiency Plan

Outreach Techniques
Due to the small local LEP population, the Corridor MPO will initiate an outreach procedure as of 2019. Translation resources are also very limited in this region. However, when and if the need arises for LEP outreach, the Corridor MPO will consider the following options:

- When staff prepares a document, or schedules a meeting, for which the target audience is expected to include LEP individuals, then documents, meeting notices, flyers, and agendas will be printed in an alternative language based on the known LEP population.
- Bus schedules, maps, and other transit publications will be made available online in an alternative language when and if a specific and concentrated LEP population is identified.
- Staff will seek to increase communication with LEP persons by coordinating with the transportation official at the Catherine McAuley Center, which is a local non-profit education center utilized by many non-English speaking individuals.

Monitoring and Updating the LEP Plan
The Corridor MPO will update the LEP as required by U.S. DOT or other federal funding sources. Updates will include the following:

- The number of documented LEP person contacts encountered annually.
- How the needs of LEP persons have been addressed.
- Determination of the current LEP population in the service area.
- Determination as to whether the need for translation services has changed.
- Determine whether the Corridor MPO has fully complied with this LEP Plan.
- Determine whether complaints have been received concerning the agency’s failure to meet the needs of LEP individuals.

Dissemination of the LEP Plan
The LEP Plan will be made available as a part of the Title VI Plan on the Corridor MPO’s website. Copies of the LEP Plan will be provided, upon request, to any person(s) requesting the document via phone, in-person, by mail or email. LEP persons may obtain copies/translations of the plan upon request. Any questions or comments regarding this plan should be directed to the Title VI Coordinator.

Questions or comments regarding the LEP Plan may be submitted to the Corridor MPO as follows:

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