

MID-REGION COUNCIL OF GOVERNMENTS'

TITLE VI PROGRAM



Submitted to the

Federal Transit Administration
Region VI
Civil Rights Office

By the

Mid-Region Council of Governments
809 Copper NW
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August 21, 2013

Table of Contents

| | |
|---|-----------|
| Title VI General Requirements | Section 1 |
| 1.1 Certification and Assurance | 4 |
| 1.2 Complaint Procedures | 4 |
| 1.3 Record of Investigations, Complaints, Lawsuits | 4 |
| 1.4 Meaningful LEP Access | 5 |
| 1.5 Beneficiary Notifications | 5 |
| 1.6 Provision of Additional Information | 5 |
| 1.7 Prepare/Submit Program | 5 |
| 1.8 Analysis of NEPA Projects | 5 |
| 1.9 Public Participation Process | 5 |
| Title VI Supplement: Agency and Services Overview | Section 2 |
| 2.1 MRCOG Organizational Overview | 7 |
| 2.2 MRCOG Services | 8 |
| 2.3 Monitoring of FTA Program Funded Recipients | 12 |
| Title VI Appendices: General and Program Requirements | Section 3 |
| Appendix 1: Certification and Assurance..... | 15 |
| Appendix 2: Complaint Procedures..... | 17 |
| Appendix 3: Investigations, Complaints and Lawsuits..... | 20 |
| Appendix 4: Providing Meaningful Access to Limited English Proficient (LEP) Persons..... | 22 |
| Appendix 5: Beneficiary Notification..... | 33 |
| Appendix 6: Public Participation Plan..... | 36 |
| Appendix 7: Title VI Approval Resolution..... | 41 |
| Appendix 8: MRCOG TAC ACS Ethnic/Race Data..... | 44 |
| Title VI Exhibits: General Requirement Forms | Section 4 |
| Exhibit A: Complaint Form..... | 48 |
| Exhibit B: Letter Acknowledging Receipt of Complaint..... | 49 |
| Exhibit C: Written Response – Complaint Not Substantiated..... | 50 |
| Exhibit D: Written Response – Complaint Substantiated..... | 51 |
| Exhibit E: Public Notification..... | 52 |
| Exhibit F: Employee Notification..... | 53 |
| Exhibit G: American Community Survey 2007-2011, Estimates of the number of People who Speak English Less than “Very Well” (LEP Individuals..... | 54 |
| Exhibit H: Mid Region Council of Governments Service Area..... | 59 |
| Exhibit I: Census Tracts with Concentration of LEP Persons..... | 60 |

Title VI General Requirements

Mid Region Council of Governments

Section 1

Introduction

The purpose of this submission is to present the Title VI Program of the Mid Region Council of Governments (MRCOG), a current recipient for Federal Transit Administration (FTA) financial assistance. This program was developed to guide the MRCOG in its administration and management of Title VI related activities as specified in Federal Transit Administration (FTA) Circular 4702.1.B. This submission hereby provides assurance that the MRCOG has not had a Title VI compliance review for previous funding received from another federal agency. Further, the MRCOG has not applied to any other federal agency for funding. Pursuant to FTA Circular 4702.1B reporting requirements, this Title VI Program will be effective through 2016.

FTA Circular 4702.1B Chapter IV General Requirements

Title VI Circular 4702.1B general requirements are itemized below and include the following items: certification and assurance, complaint procedures, list of investigations, complaints and lawsuits, meaningful Limited English Proficient (LEP) access, beneficiary notifications, NEPA project analysis and public participation activities. The section on beneficiary notifications also includes a list of current outreach activities that relates to the MRCOGs public participation efforts. Appendices and exhibits included in this document provide detailed information and data for the fulfillment of each specified general requirement.

1.1 Title VI Certification and Assurance

In accordance with 49 CFR 21.7, the MRCOG hereby assures that it will carry out the Title VI Program in compliance with the Civil Rights Act of 1964, 42 U.S.C. Section 2000d *et seq.* Further, this document is the submission of the MRCOG's Title VI Program and serves as the 2013 certification. Appendix 1 provides the required signed certification and assurance.

1.2 Title VI Complaint Procedures

The program specifies the procedures, which are available for public review upon request, for investigating and tracking Title VI complaints filed with the MRCOG. Appendix 2 details the complaint procedure for the MRCOG's Title VI Program.

1.3 Record Title VI Investigations, Complaints and Lawsuits

MRCOG hereby confirms that there have not been any Title VI investigations, complaints or lawsuits filed with the Region. Appendix 3 reaffirms compliance with this requirement.

1.4 Provide Meaningful Access to Limited English Proficient (LEP) Persons

This submission follows the Federal Transit Administration's "*Implementing the U.S. Department of Transportation's Policy Guidance Concerning Recipients' Responsibilities to Limited English Proficiency (LEP) Persons*" prepared by the Federal Transit Administration Office of Civil Rights April 13, 2007. The MRCOG provides a LEP Plan which specifies activities to ensure meaningful access to the benefits, services and information for individuals with limited English abilities. Appendix 4 provides the LEP Plan which details the Four Factor Analysis implemented by the MRCOG. The 2007-2011 American Community Survey demographic data and related mapping are also included.

1.5 Notify Beneficiaries of Title VI Protections

MRCOG notifications are and will continue to be geared toward the following four audiences: customers, the general public, employees and contractors. All are afforded Title VI protections and employees and contractors have Title VI obligations under the Region's Title VI Program. Details related to each of these protected groups are provided in Appendix 5 of this submission, which also includes a summary of the Region's public involvement activities.

1.6 Provide Additional Information Upon Request

MRCOG is fully prepared to provide additional information upon request regarding its Title VI Program.

1.7 Prepare and Submit a Title VI Program

The Title VI Program for the MRCOG is provided herein and includes Title VI general and program specific requirements. Specific general requirements are addressed in this document's appendices and forms developed to meet the general Title VI requirements may be reviewed in the exhibits section of this document.

1.8 Conduct Analysis of Construction Projects

FTA Title VI guidelines detailed in Circular 4702.1B require the integration of an environmental justice analysis into National Environmental Policy Act (NEPA) documentation during the scoping phase of construction projects. Currently and in the last three years, the MRCOG has not had any FTA construction projects which require National Environmental Policy Act (NEPA) documentation. Assurance is hereby provided, however, that in that event, the MRCOG will adhere to all NEPA requirements.

1.9 Public Participation

The MRCOG offers early and continuous opportunities for public involvement in identifying social, economic and environmental impacts of proposed changes in transit services. More detailed information related to the MRCOG's public participation process and community outreach efforts is presented in the Beneficiary Notifications section and Appendix 6 of this submission.

Title VI Supplements: Agency and Services

Mid Region Council of Governments

Section 2

2.1 MID REGION COUNCIL OF GOVERNMENTS ORGANIZATIONAL OVERVIEW

1. DESIGNATION AS THE DESIGNATED RECIPIENT FOR FEDERAL TRANSIT ADMINISTRATION JOB ACCESS AND REVERSE COMMUTE AND NEW FREEDOM PROGRAM FUNDS FOR THE ALBUQUERQUE TRANSPORTATION MANAGEMENT AREA

A. Establishment

The parties to the Articles of Agreement establishing the Mid-Region Council of Governments (formerly named the “Middle Rio Grande Council of Governments”) are governmental units in the State of New Mexico located within State Planning and Development District No. 3, as established by Executive Order No. 1 of the Governor of the State of New Mexico on January 2, 1969, and are authorized to enter into this Agreement by virtue of the provisions of local legislative action and the Regional Planning Act of the State of New Mexico, and under the Joint Powers Act.

The primary purpose of the agreement is the establishment of an association of local governments through which local governments and other appropriate organizations may work together as a regional comprehensive planning, development and coordinating body in achieving sound and orderly development of urban and rural areas in concert with the various federal, state and local agencies operating within and adjacent to State Planning and Development District No. 3.

B. Request that the Mid-Region Council of Governments be the Designated Recipient for Federal Transit Administration Job Access and Reverse Commute, and New Freedom Funds for the Albuquerque Transportation Management Area

On March 8, 2007, the Board of Directors of the Mid-Region Council of Governments approved Resolution R-07-02. This Resolution expressed the desire of the Board that the Governor of New Mexico designate the Mid-Region Council of Governments as the designated recipient of Federal Transit Administration Job Access and Reverse Commute, and New Freedom program funds.

C. The Governor Designates the Mid-Region Council of Governments as the Designated Recipient for Federal Transit Administration Job Access and Reverse Commute and New Freedom Funds for the Albuquerque Transportation Management Area

April 11, 2007, then Governor Richardson sent a letter to Robert Patrick, Regional Administrator, Region VI, Federal Transit Administration, in which he designated the Mid Region Council of Governments as the recipient of Federal Transit Administration’s Job Access and Reverse Commute, and New Freedom program funds for the Albuquerque Transportation Management Area.

D. Authorization of Moving Ahead for Progress in the 21st Century (MAP-21)

On July 6, 2012 President Obama signed into law a new two-year transportation authorization, entitled Moving Ahead for Progress in the 21st Century (MAP-21). Activities eligible under the former Job Access and Reverse Commute (JARC) program, which focused on providing service to low-income individuals to access jobs, are now eligible under the Urbanized Area Formula program (5307). The former New Freedom program (5317) is now folded into the Enhanced Mobility of Seniors and Individuals with Disabilities (5310). The New Freedom provided grants for services for individuals with disabilities that went above and beyond the requirements of the Americans with Disabilities Act (ADA).

As a result of this new authorization, MRCOG is currently in dialogue with the City of Albuquerque – ABQ Ride (Section 5307 Designated Recipient) administration to develop a MOU allowing MRCOG to administer the distribution (in a Sub-recipient capacity) for the low income portion of these funds. If approved, MRCOG will make these funds available to applicants in the Albuquerque Metropolitan Planning Area (AMPA).

The current designated recipient in the State of New Mexico for the Enhanced Mobility of Seniors and Individuals with Disabilities (5310) is the New Mexico Department of Transportation (NMDOT). Interested applicants in the AMPA will be referred to the NMDOT for further information as how to apply for such funding.

2.2 MID REGION COUNCIL OF GOVERNMENTS SERVICES

1. NOTIFICATION OF THE AVAILABILITY OF FTA PROGRAM FUNDS

A. Legal Notice

A legal notice is published in the Albuquerque Journal and the local Spanish New Paper, etc. This notice contains the following information:

1. The specific FTA program funds for which grant applications are being solicited
2. The date, time and location of an informational meeting regarding the application process
3. A definition of the Albuquerque Metropolitan Planning Area
4. A description of the purpose of the funding program
5. A description of the eligible recipients of the program funds
6. The date, time and location of the training session to explain how to complete the grant application
7. Information concerning where the grant applications can be obtained
8. Contact information, telephone number and e-mail address for the MRCOG Program Administrator
9. The MRCOG web site address; where project information is posted
10. Information if requiring special accommodations

B. E-mail Notification

The MRCOG program administrator sends an e-mail notification to a list of individuals who represent organizations (government, non-profit, for profit, individual citizens) that participated in the development of the Coordinated Transportation Plan. This e-mail notification list continues to be modified as these representatives refer the names of contacts of other organizations to the Program Administrator.

The content of the e-mail notification is:

1. Notice that a request for grant applications will be published
2. A copy of the legal notice
3. A request that the e-mail be forward to any appropriate entity and/or agency
4. Program Administrator's contact information

2. INFORMATIONAL MEETING

The purpose of this meeting is to provide program information to the attendees so that they can determine if they have projects that are eligible for funding. The content of this meeting is taken from the appropriate FTA circular. The information provided is:

1. Statutory authority for the funding program
2. Program goals
3. Program measures
4. Eligible recipients
5. Eligible program activities
6. Local fund matching requirements
7. Information concerning the Coordinated Public Transit – Human Services Transportation Plan
8. Application availability
9. FTA payment procedures
10. Process timeline – legal notice through funding of award letters

3. GRANT APPLICATION TRAINING

This training session provides information on how to fill out the grant application. The grant application is a modified version of the form that the New Mexico Department of Transportation uses for FTA Section 5316 and Section 5317 funding requests. The content of the training program is as follows:

1. Distribution of the Application Guide and Funding Application
2. Applicant's organization type:
 - A. private non-profit
 - B. state or local government
 - C. operator of public transportation service
3. Provide information for and the signature of:
 - A. contact person
 - B. individual authorized to sign the grant application
3. Project description and justification information
4. Project financial information
 - A. operating line item expenses

- B. capital line item expenses
- C. local funding matching requirements
- 5. Organization information needed, as appropriate
 - A. copy of Article of Incorporation
 - B. copy of 501 (c) 3 certification
 - C. copy of most recent audit, transportation / transit portion
- 6. Support letter from board / council / commission
- 7. Description of current service being provided
- 8. Description of the proposed service area
- 9. Legal compliance
 - A. no discrimination
 - B. list of any active law suits or complaints alleging discrimination
 - C. list of any civil rights compliance review activities conducted during the past three years
- 10. Compatibility with the Coordinated Transportation Plan
- 11. Deadline for application submittal

4. PROJECT ELIGIBILITY SCREENING

The Transportation Advisory Committee (TAC) is comprised of individuals from local government, state government and the non-profit / private sector entities who assist the MRCOG staff in developing draft policies, procedures and other items necessary to support the Transportation Management Area Committee (TMAC) and the fulfilling of its duties and responsibilities. The TAC members are appointed by the entity's administration.

The TAC meets to review each application and then determine whether the proposed project is eligible under the proposed program funding criteria.

Content of the Project Eligibility Screening form:

- 1. Is the applicant an eligible organization?
 - a. Private, non-profit organization
 - b. State or local government
 - c. Operator of public transportation service
- 2. What type of transportation service or transportation project would be provided and is this an eligible service or project?
- 3. Does the proposed transportation service or transportation project tie to the Coordinated Transportation Plan?
- 4. Is this an eligible project?

5. PROJECT EVALUATION SCORE SHEET

After determining project eligibility, the TAC then scores the eligible projects. The score sheet has four questions with possible scores of 5 points for "High", 3 points for "Medium", and 1 point for "Low". The questions are:

- 1. Does the applicant address gaps in the current service provision for targeted communities as defined in the local Coordinated Transportation Plan?

2. Does it make use of available resources and leverage resources to the extent possible?
3. Does it coordinate with other federal programs (e.g., coordinated services, financial partnership)?
4. Can this application plan be achieved with the given technical capacity of the project sponsor?

6. PROJECT FUNDING RECOMMENDATIONS

Prior to the TAC meeting, the MRCOG Program Administrator prepares a spreadsheet that shows the available fund balance for each FTA program. After the application screening process is completed, the program manager determines the requested funding from each FTA program. The amount of available program funds and the amount of requested funds is provided to the TAC members.

Based on the project score, the project description, the funding request and the amount of available funds, the committee members make a recommendation regarding the amount of funds to be allocated for each project.

7. PROJECT AND PROJECT FUNDING APPROVAL

The TAC submits its project and project funding recommendations to the TMAC.

The TMAC was established by the Mid-Region Council of Governments Board of Directors to approve policies, procedures, documents, and items necessary for the carrying-out of the MRCOG's responsibility as the designated recipient for JARC and New Freedom program funds.

The membership is comprised of one member each from the governmental entities (ten total) on the MRCOG Board of Directors that are within the Albuquerque Transportation Management Area, except for the City of Albuquerque, which has two members, the mayor of Albuquerque, or his/her designee, and the president of the Albuquerque City Council. The TMAC members are appointed by the entity's administration.

The MRCOG Program Administrator prepares a project and project funding approval resolution. This resolution is presented to the committee along with available funding, project description, project funding requested and project funding recommended information. A legal notice that provides the date, time and location of the meeting, and the projects that are listed for financial assistance as published.

Committee procedures allow for public comment and committee discussion of the resolution; when the discussion has concluded the committee votes on the resolution or the amended resolution.

2.3 MONITORING OF FTA PROGRAM FUNDED RECIPIENTS

CIVIL RIGHTS LAW SUITS OR COMPLAINTS

General

MRCOG has developed the following requirements and procedures to ensure that no person in the State of New Mexico shall on the basis 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 assistance. Prior to approval of any grant award, all potential Sub-contractors shall submit to MRCOG the following information:

- A list of any active lawsuits or complaints naming the potential sub-contractor that allege discrimination on the basis of race, color, sexual preference or national origin with respect to service or other transit benefits.
- A list of all pending applications for financial assistance and all financial assistance currently provided by other federal agencies.
- A summary of all civil rights compliance review activities conducted during the last three (3) years. The summary shall include:
 - a. Purpose or reason for review
 - b. Name of organization performing the review
 - c. Summary of findings and recommendations of the review
 - d. Report on the findings and recommendations of the review

MRCOG maintains a file of all such reports and requires that the sub-contractor have records available for review by MRCOG or FTA.

Signed FTA Civil Rights Assurances guarantee that all such records and other information required by FTA Circular 4702.1B are compiled as appropriate and maintained by MRCOG and the sub-contractor. These are then forwarded to FTA.

In addition, a signed MRCOG Title VI Standard Assurance will be maintained as part of the FTA annual submission file.

MRCOG is responsible for providing information about the grant programs to all potential Sub-contractors. In order to ensure that Title VI requirements are met, an email list is compiled and funding information is sent to potential sub-contractors. In addition to the email list, a legal notice is placed in local newspapers in the Albuquerque area to announce the availability of funding and the application process.

MRCOG will monitor each sub-contractor through site visits and desk audits to assure that each Sub-contractor is in compliance with the Title VI requirements such as:

1. Requirement to provide an Annual Title VI Certification and Assurance.

2. Requirement to develop Title VI Complaint Procedures.
3. Requirement to record Title VI investigations, Complaints, and lawsuits.
4. Requirement to provide meaningful access to LEP persons.
5. Requirement to notify beneficiaries of protection under Title VI.
 - a. Contents
 - i. A statement that the agency operates programs without regard to race, color, and national origin.
 - ii. A description of the procedures that members of the public should follow in order to request additional information regarding the Sub-contractor's or Sub Sub-contractor's nondiscrimination obligations.
 - iii. A description of the procedures that members of the public should follow in order to file a discrimination complaint against the Sub-contractor or Sub Sub-contractor.
6. Requirement to provide additional information upon request. Sub-contractors will be forwarded a written evaluation of their program within two (2) weeks of a site visit. If it is determined that any Sub-contractor is in non-compliance, the Sub-contractor will have 30-days to correct areas of concern. If corrections are not made within 30-days, funds may be withheld until corrections are addressed.

Title VI Program Appendices

Mid Region Council of Governments

Section 3

Appendix 1
Title VI Certification and Assurance

Appendix 1

Title VI Certification and Assurance

Policy Statement

The Mid Region Council of Governments (MRCOG) is committed to ensuring that no person is excluded from participation in, or denied the benefits of, or be subject to discrimination in the receipt of its services or programs on the basis of race, color, national origin or any other characteristics protected by law, including Title VI of the Civil Rights Act of 1964, as amended. Further, under the Americans with Disability Act (ADA) of 1990, no entity shall discriminate against an individual with a physical or mental disability in connection with the provision of transportation service. To obtain more information on the Mid Region Council of Government's nondiscrimination obligations or the Title VI complaint procedure, please contact:

Thaddeus Lucero, Title VI Coordinator
809 Copper NW, Albuquerque, New Mexico 87102
1-505-247-1750

Recipient Certification and Assurance

In accordance with 49 CFR 21.7, the Mid Region Council of Governments (MRCOG) hereby certifies and assures that it will carry out the Title VI Program in compliance with the Civil Rights Act of 1964, 42 U.S.C. Section 2000d *et seq.*, codified in U.S. Department of Transportation (USDOT) 49 CFR Part 21 and detailed in Federal Transit Administration (FTA) Circular 4702.1B.

Below signatories are duly authorized to take action on the MRCOG's Title VI Program, which was approved by the MRCOG Board of Directors, on March 8, 2007, as Resolution: R-07-02.

MID REGION COUNCIL OF GOVERNMENTS

Dewey V. Cave, Executive Director

Date: _____

APPROVED AS TO FORM

Larry Horan, MRCOG General Counsel

Date: _____

Appendix 2
Title VI Complaint Procedures

Appendix 2

Title VI Complaint Procedures

How to file a Title VI Complaint?

The complainant may file a signed, written complaint up to one hundred eighty (180) business days from the date of the alleged discrimination. The complaint should include the following information:

- Name, mailing address, and how to contact you (i.e., telephone number, email address, etc.)
- How, when, where and why you believe you were discriminated against to include the location, names and contact information of any witnesses.
- Other information that you deem significant.

The Title VI Discrimination Complaint form, a representation of which is presented in Exhibit A, should be used to submit the complaint information. The complaint must be filed in writing with the Mid Region Council of Governments (MRCOG) at the following address:

Thaddeus Lucero, Title VI Coordinator
Mid Region Council of Governments
809 Copper NW
Albuquerque, NM 87102

The MRCOG encourages all complainants to certify mail that is sent through the U.S. Postal Service to ensure that all written correspondence can be tracked easily. An original, signed copy of the complaint must be received by the Title VI Coordinator as soon as possible, but no later than one hundred eighty (180) business days from the alleged date of discrimination.

What happens to the complaint after it is submitted?

All written complaints alleging discrimination based on race, color or national origin in a service or benefit provided by the MRCOG will be directly addressed by the Title VI Coordinator in writing. The MRCOG will provide, to the maximum extent feasible, appropriate assistance to complainants, including assistance to those persons with disabilities, or to those who are limited in their ability to communicate in English. Additionally, the MRCOG will make every effort to address all complaints in an expeditious and thorough manner as described below.

A Letter Acknowledging Receipt of Complaint will be mailed within seven (7) business days of receipt of the complaint, a representation of which is presented in Exhibit B. At this time, the Title VI Coordinator will conduct a preliminary investigation into the complaint through follow up written interviews with parties involved. Written documentation of the preliminary investigation will be maintained on file in the Title VI Coordinator's office.

The MRCOG may request additional information from the complainant in the Letter Acknowledging Receipt of Complaint. A complainant's failure to provide the requested information may result in the administrative closure of the complaint and no further action will be required by the MRCOG.

How will the complainant be notified of the outcome of the complaint?

The MRCOG will send a Written Response (see Exhibits C and D) to the complainant as to whether the complaint is not substantiated or the complaint is substantiated. The MRCOG's Title VI Coordinator will make every effort to send a Written Response to the complainant within ninety (90) business days of receipt of the complaint.

As presented in Exhibit C Written Response - Complaint Not Substantiated, the complainant will be advised of his or her right to 1) appeal within seven (7) business days of receipt of the Written Response and 2) within 180 days of the alleged discrimination, file a complaint externally with the Federal Transit Administration of the U.S. Department of Transportation. The complainant has the right to appeal the Written Response. Appeals in this instance must be submitted to the Title VI Coordinator in writing and must include new information not previously considered in the original complaint. Contingent upon the specifics related to the complaint, appeal investigations may include further findings of fact, a hearing or other appropriate mechanisms, which will result in a final written determination rendered, if feasible, within ninety (90) business days of receipt of the appeal request.

In the case where the complaint is substantiated, the Written Response will indicate that remedial efforts are being developed and implemented in order to mitigate disparate treatment. The complainant will be notified in a manner similar to that which is presented in Exhibit D Complaint Substantiated, conceivably within ninety (90) business days of receipt of the appeal request.

Appendix 3
Record Title VI Investigations, Complaints and Lawsuits

Appendix 3

Record Title VI Investigations, Complaints and Lawsuits

Mid Region Council of Governments (MRCOG) hereby confirms that there have not been any Title VI investigations, complaints or lawsuits filed with the MRCOG. In the event that Title VI filings do occur, the MRCOG is prepared to maintain a list of any active investigations, lawsuits or complaints alleging discrimination on the basis of race, color, or national origin. The list will include the date of the investigation, lawsuit or complaint was filed; a summary of allegation(s); the status of the investigation, lawsuit or complaint; and actions taken by the MRCOG in response to the investigation, lawsuit or complaint.

Appendix 4
Provide Meaningful Access to
Limited English Proficient (LEP) Persons

Appendix 4

Providing Meaningful Access to Limited English Proficient (LEP) Persons

Four Factor Analysis

This document follows the Federal Transit Administration's *'Implementing the U.S. Department of Transportation's Policy Guidance Concerning Recipient's Responsibilities to Limited English Proficiency (LEP) Persons'* prepared by the Federal Transit Administration Office of Civil Rights April 13, 2007. The Mid-Region Council of Government's Job Access Reverse Commute (MRCOG –JARC) program seeks to improve access and services for individuals that have a limited ability to read, write, speak or understand English. The purpose of this analysis is to ensure that no persons 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 from the FTA.

MRCOG-JARC subcontracts with service providers to provide eligible clients, people with income at or below 150% of poverty level, have a documented disability or participate in Temporary Assistance for Needy Families, with transportation between work and home.

Factor 1: The number and Proportion of LEP Persons Served or Encountered in the Eligible Service Population:

Task 1, Step 1: Examine prior experiences with LEP Individuals.

MRCOG-JARC service providers report infrequent encounters with LEP individuals seeking services where an interpreter was needed and one was not available. Most often people seeking MRCOG-JARC services are referred by a social worker to service providers. In the cases where a person seeking service is not proficient in English, the social worker provides interpretation and translation.

Task 1, Step 2: Become familiar with data from the U.S. Census.

The American Community Survey collects the estimated number of people who speak languages other than English and who report to speak English "less than very well." The numbers of LEP individuals by language spoken are listed below for the MRCOG-JARC service area (Albuquerque Metropolitan Planning Area).

TABLE 1

American Community Survey 2007-2011 Estimates for Language Spoken at Home
for Population 5 Years and Older (Table B16001)

| Language Spoken | Number of People over 5 Years Old who Speak English Less than "very well" | Percent of Service Area Total Population Five Years and Older from 2007-2011 ACS (791,530) |
|--------------------------------------|--|---|
| Spanish | 56,874 | 7.2% |
| Vietnamese | 1,784 | 0.2% |
| Chinese | 1,357 | 0.2% |
| Other Native North American Language | 1,108 | 0.1% |
| Navajo | 747 | 0.1% |
| Korean | 500 | 0.1% |
| Japanese | 379 | < 0.05% |
| Laotian | 308 | < 0.05% |
| Tagalog | 289 | < 0.05% |
| German | 271 | < 0.05% |
| Persian | 265 | < 0.05% |
| Arabic | 260 | < 0.05% |
| French | 212 | < 0.05% |
| Italian | 183 | < 0.05% |
| Other Pacific Island Language | 166 | < 0.05% |
| Russian | 162 | < 0.05% |
| Other Indo European Language | 160 | < 0.05% |
| Thai | 151 | < 0.05% |
| Gujarati | 127 | < 0.05% |
| Other Asian Language | 110 | < 0.05% |
| Other Slavic Language | 92 | < 0.05% |
| Hindi | 68 | < 0.05% |
| Greek | 53 | < 0.05% |
| Other Indic Language | 52 | < 0.05% |
| Urdu | 41 | < 0.05% |
| Serbo Croatian | 35 | < 0.05% |
| Portuguese or Portuguese Creole | 32 | < 0.05% |

TABLE 1 (Continued)

American Community Survey 2007-2011 Estimates for Language Spoken at Home
for Population 5 Years and Older (Table B16001)

| Language Spoken | Number of People over 5 Years Old who Speak English Less than "very well" | Percent of Service Area Total Population Five Years and Older from 2007-2011 ACS (791,530) |
|--|--|---|
| Polish | 30 | < 0.05% |
| Hungarian | 23 | < 0.05% |
| Other West Germanic Language | 21 | < 0.05% |
| Other Unspecified Language | 19 | < 0.05% |
| Yiddish | 13 | < 0.05% |
| Scandinavian | 13 | < 0.05% |
| Hebrew | 10 | < 0.05% |
| Khmer Cambodian | 9 | < 0.05% |
| African Language | 9 | < 0.05% |
| French or French Creole | 0 | 0% |
| Armenian | 0 | 0% |
| Hmong | 0 | 0% |
| Total Limited English Proficiency Individuals | 65,933 | 8.3% |

The three largest groups of Limited English Proficiency individuals speak Spanish, Vietnamese and Chinese. Data by Census tract is shown in Exhibit G.

Task 1, Step 2A: Identify the geographic boundaries of the area that your agency serves.

MRCOG-JARC's service area is the Albuquerque Metropolitan Planning Area (AMPA) which includes all of Bernalillo County and approximately 23 census tracts in Sandoval County, 18 census tracts in Valencia County, and one census tract in Tarrant County. A map showing the service area is in Exhibit H.

Task 1, Step 2B: Obtain Census data on LEP population in your service area.

Table 1 contains Census data on English proficiency in the MRCOG-JARC service area. In the 2007-2011 American Community Survey, if a person reports speaking a language other than English, he/she is given four categories of English proficiency to choose from: speaking English "very well", "well", "not well" and "not at all." Following the *"Implementing the Department of Transportation's Policy Guidance Concerning Recipients' Responsibilities To LEP Persons"*, a LEP person is one that reports on American Community Survey as speaking English less than "very well" (speaking English "well", "not well" or "not at all").

Task 1, Step 2C: Analyze the data you have collected.

In the MRCOG-JARC service area, approximately, 8.3% of the population are LEP individuals. The majority of LEP individuals (56,874 out of 65,933 or 86%) speak Spanish. The next most common language spoken by LEP individuals is Vietnamese.

Task 1, Step 2D: Identify any concentrations of LEP persons within your service area.

The MRCOG-JARC service area has concentrations of LEP individuals mostly in the southern river valley area. However, notably, there are two census tracts in the eastern portion of Valencia County with high percentages of Spanish speaking LEP individuals. Exhibit I.

Task 1 Step 3: Consult state and local sources of data.

The Department of Labor provides a special tabulation of Limited English Proficient people and households by several different labor factors. Although these data come from the 2000 Census, they provide extra insight into the population that MRCOG-JARC serves. Although LEP individuals who speak Chinese are the third most common LEP language group, this group also shows the best economic advantage in terms of not being unemployed and having a higher median income than English speakers. These data also show that LEP Spanish speakers comprise the majority (86%) of unemployed LEP individuals. Although a small group, Navajo LEP individuals appear to be the most economically disadvantaged.

TABLE 2

Census 2000: Central New Mexico

| <u>Language Group</u> | <u>Unemployed</u> | <u>Percent of Language Group</u> | <u>Median Household Income in 1999</u> |
|--|-------------------|----------------------------------|--|
| Speak Only English | 11,600 | 3.2 | 42,076 |
| LEP Population ¹ (All Languages) | 1,200 | 5.3 | 22,167 |
| Spanish | 1,030 | 5.3 | 21,861 |
| Vietnamese | 40 | 5.2 | 32,736 |
| Chinese | 4 | 1.5 | 62,717 |
| Navajo | 75 | 10.6 | 9,281 |
| Other Native North American Language | 10 | 4.4 | 19,167 |

¹ Here Limited English Proficient (LEP) population and households are those that report as speaking English "not well" or "not at all." Elsewhere in the report, following different guidelines, LEP individuals also include those who report speaking English "well."

Data from: <http://www.doleta.gov/reports/CensusData/>

Task 1 Step 4: Reach out to community organizations that serve LEP persons.

MRCOG-JARC service providers work with several organizations that serve LEP persons. These are mostly community organizations, government organizations and religious organizations.

Task 1, Step 4A: Identify community organizations:

Specifically, the organizations in MRCOG-JARC's service provider outreach and marketing efforts are:

- A Peaceful Habitation
- Adelante
- Albuquerque Opportunity Center
- ABQ Rescue Mission
- ARCA
- Barrett Foundation
- Catholic Charities
- DVR
- Diersen Charities
- Dismas House
- Joy Junction
- Life Roots
- NM Dept. of Senior Affairs
- NM Recovery Center
- NMVA
- PB&J
- Safe House
- Senior Companion Program
- St. Martin's
- Temporary Assistance for Needy Families (TANF)

Task 1, Step 4B: Contact relevant community organizations

Social workers at Catholic Charities have agreed to help MRCOG-JARC service providers with interpretation services with less common languages. Also, as of March 2013 MRCOG- JARC program has staffing to assist with Spanish speaking applicants and clients.

Task 1, Step 4C: Obtain information

MRCOG-JARC service providers work closely with the organizations listed above by providing details on transportation services and maintaining key contacts at each organization. MRCOG-JARC has referred these organizations to participate in the survey associated in the current update of the Coordinated Transportation Plan (CTP).

Factor 2: The frequency with which LEP individuals come into contact with your programs, activities, and services.

Task 2, Step 1: Review the relevant programs, activities, and services you provide.

MRCOG-JARC service providers determine a person's eligibility for job-to-work and job-to-home transportation services and determine appropriate and efficient transportation services for eligible people. Transportation service includes taxi cab service for individuals whose schedule cannot be accommodated by currently available transit and ADA paratransit services or assisting clients on using currently existing public transportation. In addition, utilizing other funding sources (non-FTA funds), the MRCOG-JARC service provides bus passes to TANF, WIA/WCCNM and JARC participants.

Task 2, Step 2: Review information obtained from community organizations.

The results from the agency survey were used to develop the 2012-2013 Coordinated Transportation Plan. Details about survey results can be found starting on page 12 of the plan. The plan was released on July 9, 2013 and can be found at:

<http://www.mrcog-nm.gov/news-blog/909-updated-coordinated-transportation-plan-released>

Agencies indicated that they provide transportation services for work, medical, human services and job training.

Task 3, Step 3: Consult directly with LEP persons.

The results from the client survey were used to develop the 2012-2013 Coordinated Transportation Plan. Details about survey results can be found starting on page 16 of the plan. The plan was released on July 9, 2013 and can be found at:

<http://www.mrcog-nm.gov/news-blog/909-updated-coordinated-transportation-plan-released>

For the client survey, 298 people responded and five people completed the Spanish language version.

Factor 3: The importance to LEP persons of your program, activities and services.

Task 3, Step 1: Identify your agency's most critical services.

MRCOG-JARC's transportation providers report the most critical service is the taxi cab service that bridges gaps in the public transportation system, as well as demand response transportation which includes ADA Para transit services.

The application service providers use to determine eligibility and begin the process of finding the appropriate and efficient services for qualified individuals is also a key gateway to receiving service.

The client survey conducted as part of the 2012-2015 Coordinated Transportation Plan included the following question: “How can the public transportation system be improved for you? Check all that apply.” One of the answer options was “Provide more bi-lingual service.” Of the 172 people who answered this question 3.5% (6 respondents) marked “Provide more bi-lingual services.”

Also from the client survey, people indicated the most common services needed were transportation to work, shopping, medical/pharmacy services, food/meal sites (grocery included), recreation and entertainment, school, and access to government services. It was assumed that transportation service to all of these destinations, except for recreation and entertainment are important services.

MRCOG-JARC service providers report infrequent encounters with LEP individuals seeking services where an interpreter was needed and one was not available.

Task 3, Step 2: Review input from community organizations and LEP persons.

Determining a systematic way to query community organizations and LEP persons on key points of the MRCOG-JARC services will be important to include in the LEP plan. Fortunately, MRCOG-JARC service providers have a good foundation with routine contact with organizations. Results from the currently conducted Transportation Service Survey will be key as well.

Factor 4: The resources available to the recipient and costs.

Task 4, Step 1: Inventory language assistance measures currently being provided, along with associated costs.

- MRCOG-JARC service provider staff are proficient in Spanish. (no extra cost)
- Service providers have an excellent relationship with Catholic Charities social workers who have agreed to help with interpretation when MRCOG-JARC staff cannot overcome a language barrier with a LEP individual. (Free)
- MRCOG-JARC recently purchased “Basic Spanish for Transit Employees” from the Colorado Department of Transportation and produced by the Roaring Fork Transit Authority and Colorado Mountain College. (Approximately \$40)
- MRCOG-JARC has a staff member whose work includes developing relationships with pueblos in the service area, a type of tribal liaison. This involves pueblo administration granting permission to coordinate with key people in social service areas such as Head Start, senior centers, WIC, etc. This permission gives the liaison access to the local community network that in turn provides information how to use MRCOG-JARC services to the wider community. Given that each of the pueblos have different languages and they rely on this community network for a variety of information, MRCOG-JARC has relied on community relations to communicate information about services. (Approximately \$15,000 per year)

- MRCOG staff do not report instances of Vietnamese speakers and Chinese speakers needing language assistance. After looking at the data with language spoken at home and income data, we realized the reason for no request for language assistance is due to low-income criteria for services. Eligible clients for MRCOG-JARC services are people with income at or below 150% of poverty level, have a documented disability or participate in Temporary Assistance for Needy Families. In general, people who speak Asian languages tend not to meet the low income requirement. This is evident in Table 2, page 26, of the Four Factor Analysis showing LEP Vietnamese speakers with nearly 1.5 times the median household income of all LEP populations and LEP Chinese speakers with 2.8 times the median household income of all LEP populations. Although there are over 1,000 LEP Vietnamese and Chinese speakers in the geographic service area, not all of them would be eligible for services due to the low income criteria.

Task 4, Step 2: Determine what, if any, additional services are needed to provide meaningful access.

Given that Spanish language LEP persons are the clear majority of LEP persons, MRCOG-JARC plans to translate the following documents into Spanish.

- Job Access Reverse Commute application
- Critical information on website
- Program of Projects
- Title VI information posters
- Title VI Complaint form

Task 4, Step 3: Analyze your budget.

MRCOG-JARC anticipates the largest cost associated with the additional services to be printing Title VI information posters. MRCOG-JARC will rely on bilingual MRCOG staff to translation services free of charge.

Task 4, Step 4: Consider cost effective practices for providing language services.

MRCOG-JARC and its service providers are fortunate to have many resources for translation and interpretation services. In addition, community organizations that work with service providers have been very willing and helpful with other translation and interpretation needs.

Plan for Implementation

The Mid-Region Council of Governments Job Access Reverse Commute (MRCOG-JARC) program is reviewing for adoption the following plan for implementation to improve access for people with limited English proficiency (LEP) to meet requirements under Title VI of the Civil Rights Act of 1964. The purpose is to ensure 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 from the FTA.

Plan for Implementation

I. Identifying LEP Individuals who Need Language Assistance

The approximate number of LEP individuals in the MRCOG-JARC service area is 8.3%. Most of these LEP individuals speak Spanish. The approximate percentage of Spanish speaking LEP persons in the MRCOG-JARC service area is 7.2%. In order to qualify for JARC services, the individual's income must be at or below 150% of poverty level. The approximate percentages of families that meet this requirement in the MRCOG-JARC service area is 19%.

MRCOG-JARC service providers report infrequent contact with LEP persons.

II. Language assistance measures

MRCOG-JARC service provider staff are proficient in Spanish. If service providers encounter a person who does not speak English or Spanish, social workers at an agency that frequently refer individuals to MRCOG-JARC service providers are available to provide interpretation services.

MRCOG-JARC and/or service providers will provide written translation of the following:

- Job Access Reverse Commute application
- Critical information on website
- Program of Projects
- Title VI information posters
- Title VI Complaint form

III. Training staff

MRCOG-JARC has recently purchased "Basic Spanish for Transit Employees" from the Colorado Department of Transportation and produced by the Roaring Fork Transit Authority and Colorado Mountain College. This guide will be good review for service providers that already proficient in Spanish and an important resource in the future.

MRCOG-JARC will provide training and guidance to service providers on compliance with Title VI in other areas as well as accommodating LEP persons.

IV. Providing notice to LEP persons

By translating written materials MRCOG-JARC and/or service providers will expand its means to let LEP persons know that language assistance is available. These materials are:

- Job Access Reverse Commute application
- Critical information on website
- Program of Projects
- Title VI information posters
- Title VI Complaint form

V. Monitoring and updating LEP plan

MRCOG-JARC will obtain results from the Transportation Services Survey to guide improvements for LEP individuals. In addition internal monitoring will be done to see how many individuals complete applications for service in Spanish and how many times translated websites are visited. Demographic changes will be monitored to further inform MRCOG-JARC on language assistance is needed.

Based on this feedback MRCOG-JARC will make changes to assistance in order to provide meaningful access for LEP persons.

Appendix 5
Title VI Beneficiary Notification

Appendix 5

Title VI Beneficiary Notification

The Mid Region Council of Governments (MRCOG) notifications are and will continue to be disseminated to customers, the general public, employees and contractors. Further, details regarding ongoing public outreach activities are provided under the Community Outreach section presented below.

Title VI Beneficiary Notification – Customers

Title VI information posters will be prominently and publicly displayed in MRCOG facilities. A sample of the Public Title VI Notification is included in Exhibit E. Such notices will specify that the MRCOG operates a Title VI Program without regard to race, color, or national origin; describe how to request additional information about the MRCOG's Title VI Program; and explain how to file a discrimination complaint. This statement will be disseminated in English and Spanish. Further beneficiary notification will be provided by posting the Title VI Program Statement on the MRCOG's website.

Title VI Beneficiary Notification – General Public (Community Outreach)

As a requirement of Title VI, the MRCOG continually has engaged the public in its planning and decision-making processes, as well as its marketing and community outreach activities. Since its inception to the present time, the public routinely has been invited by the MRCOG to participate in a wide variety of public outreach activities, including but not limited to:

Transportation Improvement Plan (TIP). The Albuquerque Metropolitan Planning Area (AMPA) TIP is six-year planning document that encompasses all federally funded or regionally significant transportation projects and programs including those related to federal, state and local highways, transit, ridesharing, bike paths and pedestrian facilities. All MRCOG's federally funded projects are subjected to the TIP process, which includes rigorous vetting through a process comprised of a well-established schedule for public hearings and public comment periods.

FTA Grant Application Process. As a part of the FTA grant application process, the MRCOG makes every attempt to publish its annual Program of Projects (POP) in English and Spanish speaking newsprint which provides another avenue for beneficiary notification and bilingual outreach. This effort also enhances the MRCOG's ability to reach out to persons with limited English abilities and therefore, further strengthens the LEP Plan.

Board Meetings. The MRCOG holds monthly meetings of which the public is invited to attend via notices posted on the MRCOG's website and published in local newspapers.

Public Meetings. When new or revised service is proposed, information is disseminated to the affected users, all revisions are posted on the MRCOG's website, notifications are sent to email users and public meetings are scheduled in advance. All such revisions

require presentations to the MRCOG for formal adoption, which provides another avenue to inform the public as mentioned above.

Smart Business Partnership Program. The MRCOG utilizes the Smart Business Partnership Program to reach out to businesses in order to enhance employee participation in Region programs and services. This outreach effort is ongoing and widespread throughout the four counties constituting the MRCOG's service area. MRCOG staff work with employer coordinators in disseminating information and collecting data about employee commute habits. For this purpose, employee surveys are offered in English and Spanish in order to assist individuals with limited English abilities.

Information Displays, Booths, Fairs. Marketing staff regularly schedule opportunities to interact with the general public to provide information about transit services throughout the community. That effort includes the dissemination of schedules and other informational items about transit services, some of which are offered in English and Spanish versions.

Bilingual Outreach. As an important element of the LEP Plan, MRCOG has staff available to readily provide responses in Spanish to transit service inquiries. Many transit schedules include Spanish translations. Bilingual translation assistance is utilized in outreach programs, and if requested, offered during program and public meetings. Notices are provided in both Spanish and English in newsprint, on facilities, and in vehicles. The MRCOG takes a comprehensive approach to its bilingual outreach efforts.

Title VI Beneficiary Notification – Contractors and Subcontractors

All contracts awarded by the MRCOG, where funding originates from any federal assistance, are subject to the provisions of Title VI of the Civil Rights Act of 1964.

MRCOG contracts will contain clauses specifying requirements for non-discrimination and related certifications, as applicable, either directly through the contract or through the bid specifications, which become an associated component of the contract and all second tier subcontracts that may be issued.

Title VI Beneficiary Notification – Employees

As provided in Exhibit F, Employee Title VI Notification, this statement or a similar representation thereof, will be included in the Personnel Policy manual, updates for which are provided to existing employees as they occur and to new hires during new employee orientation. The statement serves to remind employees of the MRCOG's Title VI Program and of Title VI responsibilities in the performance of daily employment-related tasks and duties.

Appendix 6
Title VI Public Participation Plan

Appendix 6

Public Participation Plan

Introduction

This proposed *Public Participation Plan* establishes the procedures to enhance public involvement in the provision of transit services among beneficiaries of the MRCOG's services, including but not limited to, low income and minority individuals as well as those with limited English proficiency. The MRCOG offers early and continuous opportunities for public involvement in identifying social, economic and environmental impacts of transit services. The depth of the MRCOG's public participation plan is well demonstrated by the variety of information and materials developed and disseminated as a part of MRCOG's community outreach effort.

Federal Regulation

In accordance with Federal Transit Administration (FTA) Title VI Circular 4702.1B, *Promoting Inclusive Public Participation*, this submission details the MRCOG's public participation plan which offers early and continuous opportunities for the public to be involved in the identification of social, economic and environmental impacts of transit services. Further, Federal Highway Administration (FHWA) and FTA joint regulation for planning assistance and standards, codified as 23 CFR 450 and 49 CFR 613 respectively, formulates a robust process for providing citizens, public agencies, public transportation employees, freight shippers, private transportation providers, users of public transportation, pedestrian walkways and bicycle facilities with reasonable opportunities to be involved in the metropolitan transportation planning process. To this end, the MRCOG's service area is also served by the designated Metropolitan Planning Organizations (MPO): the Mid-Region Metropolitan Planning Organization (MRMPO), responsible for surface transportation planning in the Albuquerque Metropolitan Planning Area (AMPA). The MPO is responsible for developing long-range transportation plans and short-term Transportation Improvement Program (TIP) for their defined area. As such, the MRCOG projects are publically vetted in a wide variety of venues through the public participation processes associated with the MPO so as to ensure a continuing, cooperative and comprehensive planning process. This submission has an additive value in defining public participation requirements necessary to encourage active and meaningful public involvement in reviewing and commenting on policies and provisions affecting transit services.

Goals and Objectives

The goal of the MRCOG's public participation plan is to support proactive inclusive public involvement at all stages of planning and project development. The performance standards for proactive public involvement include early and continuous involvement; reasonable public availability of vital information with meaningful access; collaborative input on alternatives, evaluation criteria and mitigation needs; open public meetings in accessible locations; and open access to the decision-making process.

To achieve these objectives, the MRCOG will:

- Ensure that the public is actively involved in the development of transit services;

- Provide community outreach efforts to ensure meaningful public involvement; and
- Employ a wide variety of outreach techniques in a myriad of venues to convey vital information throughout the MRCOG's service area.

Public Participation Tools and Activities

As a requirement of Title VI, the MRCOG continually engages the public in its planning and decision-making processes, as well as its marketing and community outreach activities. Since its inception to the present time, the public routinely has been invited by the MRCOG to participate in a wide variety of public outreach activities, including but not limited to:

Transportation Improvement Plan (TIP). The Albuquerque Metropolitan Planning Area (AMPA) TIP is six-year planning document that encompasses all federally funded or regionally significant transportation projects and programs including those related to federal, state and local highways, transit, ridesharing, bike paths and pedestrian facilities. All MRCOG federally funded projects are subjected to the TIP process, which includes rigorous vetting through a process comprised of a well-established schedule for public hearings and public comment periods.

FTA Grant Application Process. As a part of the FTA grant application process, the MRCOG makes every attempt to publish its annual Program of Projects (POP) in English and Spanish speaking newsprint which provides another avenue for beneficiary notification and bilingual outreach. This effort also enhances the MRCOG's ability to reach out to persons with limited English abilities and therefore, further strengthens the LEP Plan.

Board Meetings. The MRCOG Board holds monthly meetings of which the public is invited to attend via notices posted on the MRCOG's website and published in local newspapers.

Public Meetings. When new or revised service is proposed, information is disseminated to the affected users, all revisions are posted on the MRCOG's website, notifications are sent to email users and public meetings, if required, are scheduled in advance. All such revisions require presentations to the MRCOG Board for formal adoption, which provides another avenue to inform the public.

Smart Business Partnership Program. The MRCOG utilizes the Smart Business Partnership Program to reach out to businesses in order to enhance employee participation in MRCOG programs and services. This outreach effort is ongoing and widespread throughout the four counties constituting the MRCOG's service area. MRCOG staff work with employer coordinators in disseminating information and collecting data about employee commute habits. For this purpose, employee surveys are offered in English and Spanish in order to assist individuals with limited English abilities.

Information Displays, Booths, Fairs. Marketing staff regularly schedule opportunities to interact with the general public to provide information about transit services throughout the community. That effort includes the dissemination of schedules and other informational items about transit services, some of which are offered in English and Spanish versions.

Bilingual Outreach. As an important element of the MRCOG's LEP Plan, MRCOG has staff available to readily provide responses in Spanish to transit service inquiries. Many transit

schedules include Spanish translations. Bilingual translation assistance is utilized in outreach programs, and if requested, offered during program and public meetings. Notices are provided in both Spanish and English in newsprint, on facilities, and in vehicles. The MRCOG takes a comprehensive approach to its bilingual outreach efforts.

Identification of Need

Minority populations constitute a significant percentage of the overall population, both within the MRCOG’s service area as well as the State of New Mexico as a whole. Results from the 2010 Census indicate that, at 58 percent of the total population, both the entire state of New Mexico as well as the MRCOG’s specific service area have the highest percentages of persons of Hispanic or Latino Origin among the 50 states.

As indicated on the Table which is summarized below, Hispanics/Latinos make up the largest minority, with more than 48% of the total population of the service area. American Indian and Black persons account for 3.24% and 2.12% of the population, respectively. Asians and Pacific Islanders constitute 1.93% and 0.07% respectively. Those reporting Other Race (none of the above) were 0.22% and 1.63% identified with two or more races in the 2010 Census.

| | % | Actual |
|-------------------|-------------|---------------|
| Hispanic/Latino | 48.89 | 413,040 |
| American Indian | 3.24 | 27,390 |
| Black | 2.12 | 17,934 |
| Asian | 1.93 | 16,332 |
| Pacific Islander | 0.07 | 607 |
| Other Race | 0.22 | 1,893 |
| Two or More Races | <u>1.63</u> | <u>13,796</u> |
| Totals | 58.10 | 490,992 |

Low income individuals, as defined as less than 150 percent of the local poverty level, account for more than 117,000 people, or almost 15%, of residents in the MRCOG service area. The low income population of the MRCOG service area should be afforded every reasonable opportunity for meaningful access of the MRCOG’s services. As with minority populations, additional measures may be instituted to reach out to this segment of the population. Some of those measures may include contacting public and non-profit agencies and distributing vital service information through those venues where such individuals may frequent. These agencies also may be able to provide additional insight into the transportation needs of their clients and may have recommendations as to ways in which the MRCOG may overcome barriers to accessible service for this population group.

Ensure Meaningful Access

The MRCOG strives to provide meaningful access to low income, minority and Limited English Proficiency (LEP) persons. The LEP Plan presented as a part of this Title VI submission includes provisions for written and oral interpretation services provided in addition to the MRCOG's community outreach effort.

Appendix 7
Title VI Approval Resolution
Transportation Management Area Committee

Appendix 7
Title VI Approval Resolution
Transportation Management Area Committee

RESOLUTION

of the

TRANSPORTATION MANAGEMENT AREA COMMITTEE

of the

MID-REGION COUNCIL OF GOVERNMENTS OF NEW MEXICO

(R-2013-04)

APPROVING TITLE VI REPORT FOR FEDERAL TRANSIT ADMINISTRATION

SECTION 5316 AND SECTION 5317 PROGRAM

WHEREAS, the Mid-Region Council of Governments has been designated as the recipient of Federal Transit Administration Section 5316 (Job Access and Reverse Commute) and Section 5317 (New Freedom) program funds for the Albuquerque transportation management area; and

WHEREAS, the Transportation Management Area Committee of the Mid-Region Council of Governments' Board of Directors was created by MRCOG R-07-02 to approve policies, procedures, necessary documents, and items necessary to the implement the Mid-Region Council of Governments' responsibility as the designated recipient for Job Access and Reverse Commute (JARC) and New Freedom program funds; and

WHEREAS, the Mid-Region Council of Governments Executive Director or his designee is authorized by the Mid-Region Council of Governments Board of Directors to execute and file applications with the Federal Transit Administration for federal assistance. In addition the Executive Director or his designee is authorized to execute and file with its application the annual certification and assurance and other documents the Federal

Transit Administration requires before awarding a Federal assistance grant or cooperative agreement.

NOW, THEREFORE BE IT RESOLVED BY THE TRANSPORTATION MANAGEMENT AREA COMMITTEE OF THE MID-REGION COUNCIL OF GOVERNMENTS OF NEW MEXICO THAT;

The Title VI Report submitted to the Federal Transit Administration Region VI on April 1, 2013 by the Mid Region Council of Governments was prepared to comply with the requirements of FTA C 4702.1B, effective October 1, 2012.

PASSED, APPROVED, AND ADOPTED this 3th day of April, 2013 by the Transportation Management Area Committee of the Mid-Region Council of Governments of New Mexico.

Leonard Rivera, Transportation Management Area
Committee Chair

ATTEST:

Dewey V. Cave, Executive Director

Larry Horan, Attorney

Appendix 8
MRCOG Transportation Advisory Committee
ACS Ethnic/Race Data

**Appendix 8
 Title VI MRCOG Transportation Advisory Committee
 ACS Ethnic/Race Data**

Transportation Management Area Committee (TMAC)

The TMAC was established by the Mid-Region Council of Governments Board of Directors to approve policies, procedures, documents, and items necessary for the carrying-out of the MRCOG’s responsibility as the designated recipient for JARC and New Freedom program funds.

The membership is comprised of one member each from the governmental entities (ten total) on the MRCOG Board of Directors that are within the Albuquerque Transportation Management Area, except for the City of Albuquerque, which has two members, the mayor of Albuquerque, or his/her designee, and the president of the Albuquerque City Council. The TMAC members are appointed by the entity’s administration and/or are elected officials. No Ethnic and Race data will be collected on this committee due to the Elected Officials status.

Transportation Advisory Committee (TAC)

The TAC is comprised of individuals (six total) from local government, state government and the non-profit / private sector entities who assist the MRCOG staff in developing draft policies, procedures and other items necessary to support the TMAC and the fulfilling of its duties and responsibilities. The TAC members are appointed by the entity’s administration.

The MRCOG used the American Community Survey, of the United States Census 2010, questions #5 and #6 to compile the required Ethnic and Race data requested in FTA Circular 4702.1B. The attached chart compares the ethnic and racial background of the TAC to the Service Area Population.

Comparison of the Ethnic and Racial Background of the Technical Advisory Committee (TAC) and the Service Area Population

| | Number of TAC Members | Percent of TAC Group | Percent of Service Area Population (2007-2011 ACS) |
|----------------------------------|-----------------------|----------------------|--|
| Ethnicity | | | |
| Hispanic or Latino | 3 | 50% | 47% |
| Race | | | |
| White | 3 | 50% | 70% |
| Black or African American | 1 | 17% | 3% |
| American Indian or Alaska Native | 1 | 17% | 5% |

| | | | |
|---|---|-----|-----|
| Asian | 0 | 0% | 2% |
| Native Hawaiian and Other Pacific Islander | 0 | 0% | 0% |
| Two or More Races or Some Other Race | 1 | 17% | 20% |

The MRCOG's TAC currently reflects the diversity of the service area population. MRCOG will continue to communicate to participating agencies to appoint new members (as needed) to the committee that reflect the diversity and ethnic makeup of the service delivery area.

Title VI Exhibits

General Requirement

Forms

Mid Region Council of Governments

Section 4

Exhibit A

Sample Title VI Complaint Form *(posted in MRCOG Website and available from the MRCOG Title VI Coordinator)*

Contact Information

Name: _____ Address: _____

City: _____ State: _____ Zip: _____

Home Phone: _____ Work Phone: _____

Email: _____

Discrimination Complaint

Nature of Discrimination Complaint: _____

Date of Alleged Incident: _____

You were discriminated because of: Race Color National Origin Other

Explain as briefly and clearly as possible what happened, where it happened and how you were discriminated against. Indicate who was involved. Be sure to include how other persons were treated differently than you. Also attach any written material pertaining to your case:

Signature: _____

Date: _____

Exhibit B
Sample of Letter Acknowledging Receipt of
Complaint

Today's Date

Ms. Jo Doe
1234 Main St.
Any City, NM 88888

Dear Ms. Doe:

This letter is to acknowledge receipt of your complaint against Mid Region Council of Governments alleging

An investigation will begin immediately. If you have additional information you wish to convey or questions concerning this matter, please feel free to contact this office by writing to the Mid Region Council of Governments, 809 Copper NW, Albuquerque, NM 87102.

Sincerely,

Thaddeus Lucero, Title VI Coordinator
Mid Region Council of Governments
809 Copper NW
Albuquerque, NM 87102

Exhibit C
Sample of Written Response - Complaint Not Substantiated

Today's Date

Ms. Jo Doe
1234 Main St.
Anywhere, NM 88888

Dear Ms. Doe,

The matter referenced in your complaint of _____ (date) against the Mid Region Council of Governments (MRCOG) alleging _____ has been investigated.

The results of the investigation did not indicate that the provisions of Title VI of the Civil Rights Act of 1964 had in fact been violated. As you know, Title VI prohibits discrimination based on race, color, or national origin in any program receiving federal assistance.

The MRCOG has analyzed the materials and facts pertaining to your case for evidence of the district's failure to comply with any part of the civil rights law. There was no evidence that any part of the law had been violated. I, therefore, advise you that your complaint has not been substantiated and that I am closing this matter in our files.

You have the right to 1) appeal to the MRCOG within seven (7) business days of receipt of this final written decision, and 2) file a complaint externally within 180 days from the date of the alleged discrimination with the Federal Transit Administration (FTA) of the U.S. Department of Transportation at:

Federal Transit Administration, Office of Civil Rights
Attention: Title VI Program Coordinator
East Building, Fifth Floor – TRC
1200 New Jersey Ave., SE
Washington, D.C. 20590

Thank you for taking the time to contact us. If I can be of assistance to you in the future, please do not hesitate to contact me.

Sincerely,

Thaddeus Lucero, Title VI Coordinator
Mid Region Council of Governments
809 Copper NW
Albuquerque, NM 87102

Exhibit D
Sample of Written Response - Complaint Substantiated

Today's Date

Ms. Jo Doe
1234 Main St.
Anywhere, NM 88888

Dear Ms. Doe,

The matter referenced in your complaint of _____ (date) against the Mid Region Council of Governments (MRCOG) alleging _____ has been investigated.

Apparent violation (s) of Title VI of the Civil Rights Act of 1964, including those mentioned in your letter, was/were identified. Efforts are underway to correct any and all deficiencies.

Thank you for calling this important matter to our attention. You were extremely helpful during our review of the program. You may be hearing from our office, or from federal authorities, if your services should be needed during the administrative hearing process if required.

Sincerely,

Thaddeus Lucero, Title VI Coordinator
Mid Region Council of Governments
809 Copper NW
Albuquerque, NM 87102

Exhibit E

Sample of Public Notification (*posted in MRCOG reception area, meeting rooms and public areas, including the MRCOG website*)

The Mid Region Council of Governments (MRCOG) is committed to ensuring that no person is excluded from participation in, or denied the benefits of, or be subject to discrimination in the receipt of its services or programs on the basis of race, color, national origin or any other characteristics protected by law, including Title VI of the Civil Rights Act of 1964, as amended. Further, under the Americans with Disability Act (ADA) of 1990, no entity shall discriminate against an individual with a physical or mental disability in connection with the provision of transportation service. To obtain more information on the MRCOG's nondiscrimination obligations or Title VI complaint procedure, please contact:

Thaddeus Lucero, Title VI Coordinator
Mid Region Council of Governments
809 Copper NW, Albuquerque, NM 87102
505-247-1750

For more information, visit our website at www.mrcog-nm.gov

Exhibit F

Sample of Employee Title VI Notification (*posted on MRCOG's employee bulletin boards and public areas, also referenced in the MRCOG Personal Policies*)

The Mid Region Council of Governments (MRCOG) is committed to ensuring that no person is excluded from participation in, or denied the benefits of, or be subject to discrimination in the receipt of its services or programs on the basis of race, color, national origin or any other characteristics protected by law, including Title VI of the Civil Rights Act of 1964, as amended. Further, under the Americans with Disability Act (ADA) of 1990, no entity shall discriminate against an individual with a physical or mental disability in connection with the provision of transportation service. If you feel you are being discriminated against at the workplace, you may contact your supervisor or the Human Resources Manager for more information about the Title VI Program and the complaint process.

All employees are expected to consider, respect, and observe this policy in their daily work and duties. If a customer approaches you with a question or complaint about disparate treatment, direct him or her to Title VI Coordinator, who can provide a copy of the Title VI Program and a Title VI Discrimination Complaint form.

For more information, visit our website at www.mrcog-nm.gov

Exhibit G

American Community Survey 2007-2011

Estimates of the number of People who Speak English Less than “Very Well” (LEP Individuals) ACS Table B16001

Note: Census tracts are in order of the highest percent LEP individual. Tract with percent LEP individuals higher than the overall service area (8.3%) are highlighted.

| Language Spoken at Home by People who Speak English Less than "Very Well" | | | | | | | | | |
|---|--------------|--------------------------------------|---------|------------|---------|--------------------------------------|--------|---|---|
| County | Census Tract | Total Population (5 Years and Older) | Spanish | Vietnamese | Chinese | Other Native North American Language | Navajo | Total Limited English Proficiency Individuals | Percent Limited English Proficiency Individuals |
| Bernalillo | 13 | 3,993 | 1,309 | 0 | 0 | 0 | 0 | 1,309 | 32.8% |
| Bernalillo | 47.36 | 1,142 | 358 | 0 | 0 | 0 | 6 | 364 | 31.9% |
| Valencia | 9703 | 6,082 | 1,912 | 0 | 0 | 0 | 3 | 1,923 | 31.6% |
| Bernalillo | 47.34 | 6,233 | 1,819 | 0 | 0 | 0 | 16 | 1,864 | 29.9% |
| Bernalillo | 47.38 | 5,409 | 1,469 | 0 | 0 | 38 | 0 | 1,558 | 28.8% |
| Bernalillo | 14 | 2,898 | 782 | 0 | 0 | 0 | 0 | 782 | 27.0% |
| Bernalillo | 47.15 | 4,558 | 1,215 | 0 | 0 | 0 | 0 | 1,227 | 26.9% |
| Bernalillo | 43 | 5,034 | 1,342 | 0 | 0 | 0 | 0 | 1,342 | 26.7% |
| Bernalillo | 47.35 | 1,698 | 442 | 0 | 0 | 0 | 0 | 442 | 26.0% |
| Bernalillo | 45.01 | 3,099 | 759 | 0 | 0 | 0 | 0 | 759 | 24.5% |
| Bernalillo | 6.03 | 4,298 | 1,014 | 7 | 0 | 0 | 9 | 1,042 | 24.2% |
| Bernalillo | 9.01 | 5,510 | 1,237 | 55 | 0 | 0 | 0 | 1,292 | 23.4% |
| Valencia | 9701 | 5,444 | 1,240 | 0 | 0 | 0 | 0 | 1,240 | 22.8% |
| Bernalillo | 24.02 | 7,237 | 1,490 | 0 | 0 | 23 | 103 | 1,628 | 22.5% |
| Bernalillo | 7.07 | 5,319 | 974 | 8 | 0 | 0 | 22 | 1,084 | 20.4% |
| Bernalillo | 37.33 | 3,023 | 604 | 0 | 0 | 0 | 0 | 610 | 20.2% |
| Bernalillo | 40.01 | 4,087 | 754 | 0 | 0 | 0 | 0 | 807 | 19.7% |
| Bernalillo | 47.12 | 6,191 | 1,144 | 0 | 0 | 0 | 35 | 1,188 | 19.2% |
| Bernalillo | 6.04 | 3,613 | 605 | 0 | 13 | 0 | 26 | 668 | 18.5% |
| Bernalillo | 23 | 7,081 | 1,296 | 0 | 0 | 0 | 0 | 1,296 | 18.3% |
| Bernalillo | 44.01 | 3,564 | 641 | 0 | 0 | 0 | 0 | 641 | 18.0% |
| Bernalillo | 47.33 | 6,651 | 1,117 | 0 | 0 | 0 | 0 | 1,141 | 17.2% |
| Bernalillo | 9.04 | 3,740 | 492 | 44 | 39 | 30 | 26 | 641 | 17.1% |
| Bernalillo | 47.39 | 6,035 | 942 | 91 | 0 | 0 | 0 | 1,033 | 17.1% |
| Bernalillo | 34 | 4,389 | 637 | 0 | 0 | 74 | 0 | 739 | 16.8% |
| Bernalillo | 47.13 | 5,722 | 898 | 0 | 0 | 0 | 0 | 930 | 16.3% |
| Bernalillo | 44.02 | 3,967 | 633 | 0 | 0 | 0 | 0 | 633 | 16.0% |
| Bernalillo | 46.02 | 4,440 | 704 | 0 | 0 | 0 | 0 | 704 | 15.9% |
| Valencia | 9711 | 1,422 | 211 | 0 | 0 | 10 | 0 | 221 | 15.5% |
| Bernalillo | 45.02 | 4,258 | 635 | 0 | 0 | 0 | 0 | 645 | 15.1% |
| Bernalillo | 12 | 5,988 | 821 | 27 | 14 | 0 | 0 | 902 | 15.1% |
| Bernalillo | 7.14 | 4,318 | 411 | 144 | 14 | 0 | 5 | 645 | 14.9% |
| Sandoval | 105.03 | 3,085 | 440 | 0 | 0 | 0 | 0 | 440 | 14.3% |
| Sandoval | 9405 | 4,079 | 560 | 0 | 0 | 14 | 0 | 581 | 14.2% |
| Bernalillo | 46.04 | 5,085 | 700 | 0 | 0 | 0 | 0 | 718 | 14.1% |
| Bernalillo | 47.41 | 6,019 | 776 | 38 | 13 | 0 | 0 | 827 | 13.7% |
| Bernalillo | 35.01 | 5,612 | 683 | 0 | 0 | 0 | 0 | 730 | 13.0% |

Language Spoken at Home by People who Speak English
Less than "Very Well"

| County | Census Tract | Total Population (5 Years and Older) | Spanish | Vietnamese | Chinese | Other Native North American Language | Navajo | Total Limited English Proficiency Individuals | Percent Limited English Proficiency Individuals |
|------------|--------------|--------------------------------------|---------|------------|---------|--------------------------------------|--------|---|---|
| Bernalillo | 9.03 | 5,135 | 611 | 22 | 0 | 0 | 0 | 647 | 12.6% |
| Bernalillo | 15 | 2,608 | 326 | 0 | 0 | 0 | 0 | 326 | 12.5% |
| Bernalillo | 47.4 | 6,472 | 791 | 0 | 0 | 0 | 8 | 799 | 12.3% |
| Bernalillo | 1.21 | 5,893 | 393 | 0 | 170 | 0 | 0 | 705 | 12.0% |
| Bernalillo | 7.08 | 5,266 | 455 | 0 | 0 | 0 | 25 | 618 | 11.7% |
| Bernalillo | 1.23 | 5,226 | 564 | 32 | 0 | 0 | 0 | 606 | 11.6% |
| Bernalillo | 36 | 5,677 | 657 | 0 | 0 | 0 | 0 | 657 | 11.6% |
| Bernalillo | 32.02 | 4,940 | 551 | 0 | 0 | 1 | 0 | 552 | 11.2% |
| Bernalillo | 47.43 | 2,661 | 201 | 96 | 0 | 0 | 0 | 297 | 11.2% |
| Bernalillo | 7.12 | 3,810 | 203 | 40 | 18 | 0 | 0 | 421 | 11.0% |
| Sandoval | 9407 | 3,256 | 45 | 0 | 0 | 304 | 0 | 349 | 10.7% |
| Valencia | 9709 | 4,520 | 479 | 0 | 0 | 0 | 0 | 484 | 10.7% |
| Bernalillo | 46.03 | 3,267 | 305 | 0 | 0 | 0 | 36 | 341 | 10.4% |
| Bernalillo | 29 | 3,508 | 352 | 0 | 0 | 4 | 10 | 366 | 10.4% |
| Valencia | 9709 | 2,138 | 213 | 0 | 7 | 0 | 0 | 220 | 10.3% |
| Sandoval | 110 | 1,662 | 86 | 0 | 0 | 46 | 0 | 166 | 10.0% |
| Bernalillo | 32.01 | 2,797 | 260 | 0 | 0 | 0 | 0 | 276 | 9.9% |
| Bernalillo | 30.01 | 4,669 | 441 | 0 | 0 | 0 | 0 | 454 | 9.7% |
| Bernalillo | 24.01 | 4,872 | 425 | 0 | 29 | 0 | 13 | 467 | 9.6% |
| Sandoval | 9402 | 2,905 | 17 | 0 | 0 | 255 | 0 | 272 | 9.4% |
| Bernalillo | 47.37 | 3,512 | 289 | 14 | 0 | 19 | 0 | 322 | 9.2% |
| Bernalillo | 2.07 | 3,174 | 212 | 40 | 0 | 8 | 0 | 285 | 9.0% |
| Bernalillo | 7.04 | 3,510 | 245 | 42 | 0 | 0 | 0 | 313 | 8.9% |
| Bernalillo | 25 | 1,902 | 169 | 0 | 0 | 0 | 0 | 169 | 8.9% |
| Bernalillo | 37.07 | 4,253 | 272 | 25 | 48 | 0 | 0 | 376 | 8.8% |
| Bernalillo | 47.44 | 4,513 | 339 | 0 | 0 | 0 | 0 | 383 | 8.5% |
| Bernalillo | 20 | 2,304 | 193 | 0 | 0 | 0 | 0 | 193 | 8.4% |
| Sandoval | 107.15 | 3,780 | 274 | 0 | 0 | 0 | 0 | 316 | 8.4% |
| Bernalillo | 1.15 | 2,887 | 193 | 0 | 0 | 0 | 18 | 236 | 8.2% |
| Bernalillo | 38.06 | 3,392 | 15 | 256 | 0 | 0 | 0 | 271 | 8.0% |
| Bernalillo | 47.29 | 3,554 | 136 | 21 | 0 | 0 | 12 | 282 | 7.9% |
| Valencia | 9704.1 | 1,612 | 88 | 0 | 0 | 0 | 1 | 127 | 7.9% |
| Bernalillo | 16 | 2,602 | 82 | 0 | 83 | 0 | 0 | 202 | 7.8% |
| Bernalillo | 11.02 | 3,085 | 222 | 0 | 0 | 0 | 0 | 234 | 7.6% |
| Bernalillo | 37.14 | 6,796 | 445 | 0 | 0 | 0 | 0 | 513 | 7.5% |
| Bernalillo | 22 | 2,916 | 211 | 0 | 0 | 0 | 0 | 220 | 7.5% |
| Bernalillo | 35.02 | 4,503 | 323 | 0 | 0 | 0 | 0 | 339 | 7.5% |
| Bernalillo | 47.5 | 6,431 | 359 | 90 | 0 | 0 | 14 | 477 | 7.4% |
| Bernalillo | 1.25 | 4,106 | 96 | 191 | 0 | 0 | 0 | 301 | 7.3% |
| Valencia | 9703 | 6,334 | 457 | 0 | 0 | 0 | 0 | 457 | 7.2% |
| Bernalillo | 4.01 | 4,426 | 181 | 0 | 75 | 0 | 0 | 316 | 7.1% |
| Bernalillo | 30.02 | 3,819 | 264 | 0 | 0 | 0 | 0 | 264 | 6.9% |
| Bernalillo | 21 | 1,525 | 95 | 0 | 0 | 0 | 0 | 104 | 6.8% |
| Bernalillo | 1.11 | 2,855 | 26 | 59 | 89 | 3 | 0 | 193 | 6.8% |
| Bernalillo | 7.13 | 5,946 | 357 | 0 | 0 | 0 | 0 | 374 | 6.3% |
| Bernalillo | 1.24 | 3,779 | 180 | 0 | 0 | 0 | 0 | 237 | 6.3% |

Language Spoken at Home by People who Speak English
Less than "Very Well"

| County | Census Tract | Total Population (5 Years and Older) | Spanish | Vietnamese | Chinese | Other Native North American Language | Navajo | Total Limited English Proficiency Individuals | Percent Limited English Proficiency Individuals |
|------------|--------------|--------------------------------------|---------|------------|---------|--------------------------------------|--------|---|---|
| Bernalillo | 2.08 | 2,321 | 108 | 35 | 0 | 0 | 0 | 143 | 6.2% |
| Valencia | 9708 | 4,556 | 240 | 0 | 0 | 0 | 0 | 278 | 6.1% |
| Bernalillo | 6.01 | 3,413 | 168 | 12 | 26 | 0 | 0 | 206 | 6.0% |
| Bernalillo | 26 | 824 | 49 | 0 | 0 | 0 | 0 | 49 | 5.9% |
| Bernalillo | 1.17 | 2,211 | 77 | 13 | 27 | 12 | 0 | 129 | 5.8% |
| Bernalillo | 47.17 | 7,103 | 235 | 23 | 28 | 0 | 23 | 413 | 5.8% |
| Bernalillo | 47.52 | 3,570 | 207 | 0 | 0 | 0 | 0 | 207 | 5.8% |
| Sandoval | 107.2 | 6,012 | 233 | 17 | 17 | 0 | 0 | 346 | 5.8% |
| Bernalillo | 5.01 | 2,789 | 114 | 33 | 0 | 0 | 11 | 158 | 5.7% |
| Valencia | 9704 | 4,822 | 257 | 0 | 0 | 0 | 0 | 266 | 5.5% |
| Bernalillo | 47.42 | 6,269 | 316 | 0 | 0 | 0 | 0 | 341 | 5.4% |
| Sandoval | 107.12 | 5,240 | 282 | 0 | 0 | 0 | 0 | 282 | 5.4% |
| Bernalillo | 1.13 | 2,842 | 70 | 0 | 0 | 0 | 29 | 152 | 5.3% |
| Valencia | 9703 | 2,255 | 118 | 0 | 0 | 0 | 0 | 118 | 5.2% |
| Sandoval | 107.21 | 4,078 | 203 | 0 | 0 | 0 | 0 | 203 | 5.0% |
| Sandoval | 107.13 | 4,663 | 197 | 0 | 0 | 11 | 0 | 231 | 5.0% |
| Sandoval | 107.18 | 4,309 | 211 | 0 | 0 | 0 | 0 | 211 | 4.9% |
| Bernalillo | 2.05 | 3,165 | 113 | 6 | 0 | 0 | 0 | 153 | 4.8% |
| Bernalillo | 37.35 | 5,644 | 175 | 34 | 49 | 0 | 0 | 268 | 4.7% |
| Bernalillo | 27 | 3,497 | 139 | 0 | 0 | 0 | 16 | 165 | 4.7% |
| Sandoval | 107.14 | 4,412 | 85 | 50 | 20 | 0 | 0 | 208 | 4.7% |
| Bernalillo | 1.18 | 2,525 | 61 | 0 | 0 | 0 | 0 | 119 | 4.7% |
| Bernalillo | 37.3 | 4,760 | 32 | 62 | 20 | 0 | 0 | 224 | 4.7% |
| Bernalillo | 1.14 | 3,183 | 68 | 0 | 0 | 0 | 13 | 147 | 4.6% |
| Valencia | 9403 | 673 | 0 | 0 | 9 | 18 | 0 | 31 | 4.6% |
| Bernalillo | 37.26 | 2,151 | 46 | 0 | 17 | 0 | 0 | 99 | 4.6% |
| Sandoval | 107.22 | 3,375 | 122 | 0 | 0 | 0 | 8 | 154 | 4.6% |
| Bernalillo | 9406 | 5,241 | 149 | 0 | 0 | 0 | 87 | 236 | 4.5% |
| Bernalillo | 37.22 | 5,955 | 139 | 24 | 20 | 0 | 0 | 268 | 4.5% |
| Bernalillo | 37.24 | 3,323 | 94 | 0 | 26 | 0 | 1 | 149 | 4.5% |
| Bernalillo | 37.19 | 5,445 | 223 | 0 | 0 | 0 | 0 | 241 | 4.4% |
| Bernalillo | 37.32 | 6,665 | 101 | 56 | 95 | 0 | 0 | 294 | 4.4% |
| Bernalillo | 37.25 | 3,967 | 87 | 0 | 0 | 0 | 1 | 174 | 4.4% |
| Sandoval | 107.05 | 5,480 | 196 | 0 | 0 | 0 | 0 | 229 | 4.2% |
| Bernalillo | 47.2 | 3,695 | 123 | 0 | 0 | 0 | 0 | 154 | 4.2% |
| Bernalillo | 47.49 | 4,084 | 170 | 0 | 0 | 0 | 0 | 170 | 4.2% |
| Bernalillo | 1.27 | 2,696 | 67 | 11 | 29 | 0 | 0 | 110 | 4.1% |
| Bernalillo | 1.2 | 2,795 | 105 | 0 | 0 | 0 | 0 | 113 | 4.0% |
| Bernalillo | 1.26 | 2,590 | 83 | 0 | 0 | 0 | 0 | 103 | 4.0% |
| Sandoval | 106.01 | 3,935 | 114 | 0 | 0 | 0 | 5 | 155 | 3.9% |
| Bernalillo | 47.45 | 6,043 | 238 | 0 | 0 | 0 | 0 | 238 | 3.9% |
| Valencia | 9710 | 4,806 | 158 | 0 | 17 | 0 | 0 | 185 | 3.8% |
| Sandoval | 107.03 | 7,456 | 202 | 0 | 0 | 26 | 1 | 280 | 3.8% |
| Bernalillo | 37.36 | 1,826 | 45 | 0 | 0 | 22 | 0 | 67 | 3.7% |
| Sandoval | 107.23 | 7,618 | 257 | 0 | 0 | 0 | 22 | 279 | 3.7% |
| Bernalillo | 47.23 | 6,577 | 229 | 0 | 0 | 0 | 0 | 237 | 3.6% |

Language Spoken at Home by People who Speak English
Less than "Very Well"

| County | Census Tract | Total Population (5 Years and Older) | Spanish | Vietnamese | Chinese | Other Native North American Language | Navajo | Total Limited English Proficiency Individuals | Percent Limited English Proficiency Individuals |
|------------|--------------|--------------------------------------|---------|------------|---------|--------------------------------------|--------|---|---|
| Bernalillo | 2.04 | 2,901 | 79 | 0 | 0 | 0 | 14 | 102 | 3.5% |
| Bernalillo | 18 | 1,805 | 45 | 0 | 0 | 0 | 10 | 63 | 3.5% |
| Sandoval | 106.02 | 4,062 | 126 | 0 | 0 | 0 | 0 | 137 | 3.4% |
| Bernalillo | 47.26 | 2,229 | 74 | 0 | 0 | 0 | 0 | 74 | 3.3% |
| Valencia | 9707 | 5,803 | 166 | 0 | 0 | 0 | 2 | 191 | 3.3% |
| Bernalillo | 47.47 | 4,671 | 121 | 0 | 0 | 0 | 7 | 153 | 3.3% |
| Bernalillo | 38.05 | 2,540 | 83 | 0 | 0 | 0 | 0 | 83 | 3.3% |
| Bernalillo | 47.46 | 6,398 | 154 | 0 | 22 | 0 | 0 | 209 | 3.3% |
| Bernalillo | 1.1 | 3,432 | 90 | 0 | 8 | 0 | 0 | 111 | 3.2% |
| Bernalillo | 37.28 | 4,519 | 51 | 0 | 17 | 0 | 0 | 146 | 3.2% |
| Valencia | 9701 | 6,690 | 215 | 0 | 0 | 0 | 0 | 215 | 3.2% |
| Bernalillo | 47.51 | 2,124 | 44 | 0 | 0 | 0 | 0 | 65 | 3.1% |
| Bernalillo | 7.1 | 5,053 | 78 | 12 | 25 | 0 | 0 | 151 | 3.0% |
| Bernalillo | 47.48 | 8,106 | 224 | 0 | 0 | 0 | 0 | 239 | 2.9% |
| Bernalillo | 31 | 2,559 | 45 | 0 | 18 | 0 | 0 | 75 | 2.9% |
| Bernalillo | 3 | 5,681 | 78 | 0 | 31 | 0 | 0 | 166 | 2.9% |
| Sandoval | 107.19 | 3,595 | 89 | 5 | 0 | 0 | 0 | 105 | 2.9% |
| Bernalillo | 47.24 | 2,776 | 62 | 0 | 0 | 0 | 0 | 81 | 2.9% |
| Bernalillo | 1.29 | 3,749 | 65 | 0 | 0 | 0 | 0 | 108 | 2.9% |
| Bernalillo | 37.37 | 2,416 | 15 | 0 | 40 | 0 | 0 | 69 | 2.9% |
| Bernalillo | 1.12 | 1,965 | 22 | 0 | 10 | 0 | 0 | 56 | 2.8% |
| Sandoval | 107.17 | 8,698 | 204 | 0 | 0 | 33 | 0 | 247 | 2.8% |
| Valencia | 9704 | 5,049 | 135 | 0 | 0 | 0 | 0 | 143 | 2.8% |
| Bernalillo | 47.28 | 4,425 | 115 | 0 | 0 | 0 | 0 | 124 | 2.8% |
| Bernalillo | 47.22 | 4,428 | 91 | 0 | 0 | 0 | 3 | 124 | 2.8% |
| Sandoval | 111 | 7,478 | 102 | 0 | 0 | 96 | 3 | 203 | 2.7% |
| Bernalillo | 2.06 | 2,838 | 67 | 0 | 0 | 0 | 0 | 76 | 2.7% |
| Bernalillo | 11.01 | 5,034 | 132 | 0 | 0 | 0 | 0 | 132 | 2.6% |
| Valencia | 9702 | 3,639 | 85 | 0 | 0 | 0 | 0 | 94 | 2.6% |
| Bernalillo | 17 | 4,377 | 33 | 0 | 29 | 0 | 22 | 113 | 2.6% |
| Bernalillo | 19 | 1,100 | 27 | 0 | 0 | 0 | 0 | 27 | 2.5% |
| Bernalillo | 47.16 | 2,090 | 41 | 0 | 0 | 0 | 0 | 51 | 2.4% |
| Bernalillo | 37.18 | 2,366 | 7 | 0 | 10 | 0 | 0 | 56 | 2.4% |
| Bernalillo | 38.04 | 5,419 | 117 | 0 | 0 | 0 | 0 | 128 | 2.4% |
| Bernalillo | 37.31 | 3,540 | 32 | 0 | 0 | 0 | 0 | 78 | 2.2% |
| Bernalillo | 37.23 | 5,993 | 47 | 31 | 0 | 0 | 54 | 132 | 2.2% |
| Sandoval | 107.16 | 5,749 | 88 | 0 | 9 | 0 | 0 | 125 | 2.2% |
| Bernalillo | 4.02 | 3,387 | 40 | 0 | 32 | 0 | 0 | 72 | 2.1% |
| Bernalillo | 47.53 | 2,809 | 49 | 0 | 0 | 0 | 10 | 59 | 2.1% |
| Sandoval | 107.02 | 6,007 | 70 | 0 | 25 | 18 | 10 | 123 | 2.0% |
| Bernalillo | 1.16 | 3,057 | 62 | 0 | 0 | 0 | 0 | 62 | 2.0% |
| Bernalillo | 9407 | 2,138 | 0 | 0 | 0 | 43 | 0 | 43 | 2.0% |
| Bernalillo | 1.28 | 3,088 | 51 | 0 | 0 | 0 | 0 | 62 | 2.0% |
| Bernalillo | 5.02 | 4,458 | 56 | 0 | 0 | 0 | 0 | 89 | 2.0% |
| Bernalillo | 1.22 | 3,756 | 30 | 18 | 7 | 0 | 0 | 72 | 1.9% |
| Bernalillo | 37.38 | 4,885 | 32 | 0 | 0 | 0 | 0 | 88 | 1.8% |

Language Spoken at Home by People who Speak English
Less than "Very Well"

| County | Census Tract | Total Population (5 Years and Older) | Spanish | Vietnamese | Chinese | Other Native North American Language | Navajo | Total Limited English Proficiency Individuals | Percent Limited English Proficiency |
|------------|--------------|--------------------------------------|---------|------------|---------|--------------------------------------|--------|---|-------------------------------------|
| Valencia | 9714 | 2,556 | 42 | 0 | 0 | 0 | 0 | 42 | 1.6% |
| Bernalillo | 47.27 | 1,911 | 24 | 0 | 0 | 0 | 7 | 31 | 1.6% |
| Bernalillo | 37.21 | 6,496 | 37 | 0 | 0 | 0 | 0 | 104 | 1.6% |
| Bernalillo | 38.07 | 4,297 | 32 | 0 | 0 | 0 | 0 | 63 | 1.5% |
| Bernalillo | 1.08 | 2,793 | 26 | 0 | 0 | 0 | 0 | 40 | 1.4% |
| Bernalillo | 37.17 | 5,260 | 14 | 0 | 0 | 0 | 0 | 75 | 1.4% |
| Bernalillo | 7.11 | 4,684 | 44 | 0 | 0 | 0 | 0 | 62 | 1.3% |
| Bernalillo | 37.29 | 1,724 | 12 | 0 | 0 | 0 | 0 | 22 | 1.3% |
| Valencia | 9713 | 1,964 | 21 | 0 | 0 | 0 | 0 | 21 | 1.1% |
| Bernalillo | 9405 | 3,088 | 21 | 0 | 12 | 0 | 0 | 33 | 1.1% |
| Bernalillo | 1.07 | 2,563 | 27 | 0 | 0 | 0 | 0 | 27 | 1.1% |
| Bernalillo | 37.15 | 4,160 | 8 | 0 | 29 | 0 | 0 | 43 | 1.0% |
| Bernalillo | 1.09 | 2,459 | 0 | 0 | 0 | 0 | 0 | 25 | 1.0% |
| Bernalillo | 37.12 | 5,075 | 0 | 0 | 21 | 0 | 0 | 51 | 1.0% |
| Bernalillo | 38.03 | 3,314 | 21 | 0 | 0 | 0 | 0 | 21 | 0.6% |
| Bernalillo | 47.25 | 3,539 | 20 | 0 | 0 | 0 | 0 | 20 | 0.6% |
| Bernalillo | 1.19 | 1,763 | 6 | 0 | 0 | 0 | 0 | 9 | 0.5% |
| Bernalillo | 8.01 | 3,315 | 10 | 0 | 0 | 0 | 0 | 14 | 0.4% |
| Bernalillo | 2.03 | 1,707 | 0 | 0 | 0 | 0 | 0 | 2 | 0.1% |

Exhibit H Mid-Region Council of Governments Job Access Reverse Commute Service Area

Mid-Region Council of Governments Service Area: Albuquerque Metropolitan Planning Area

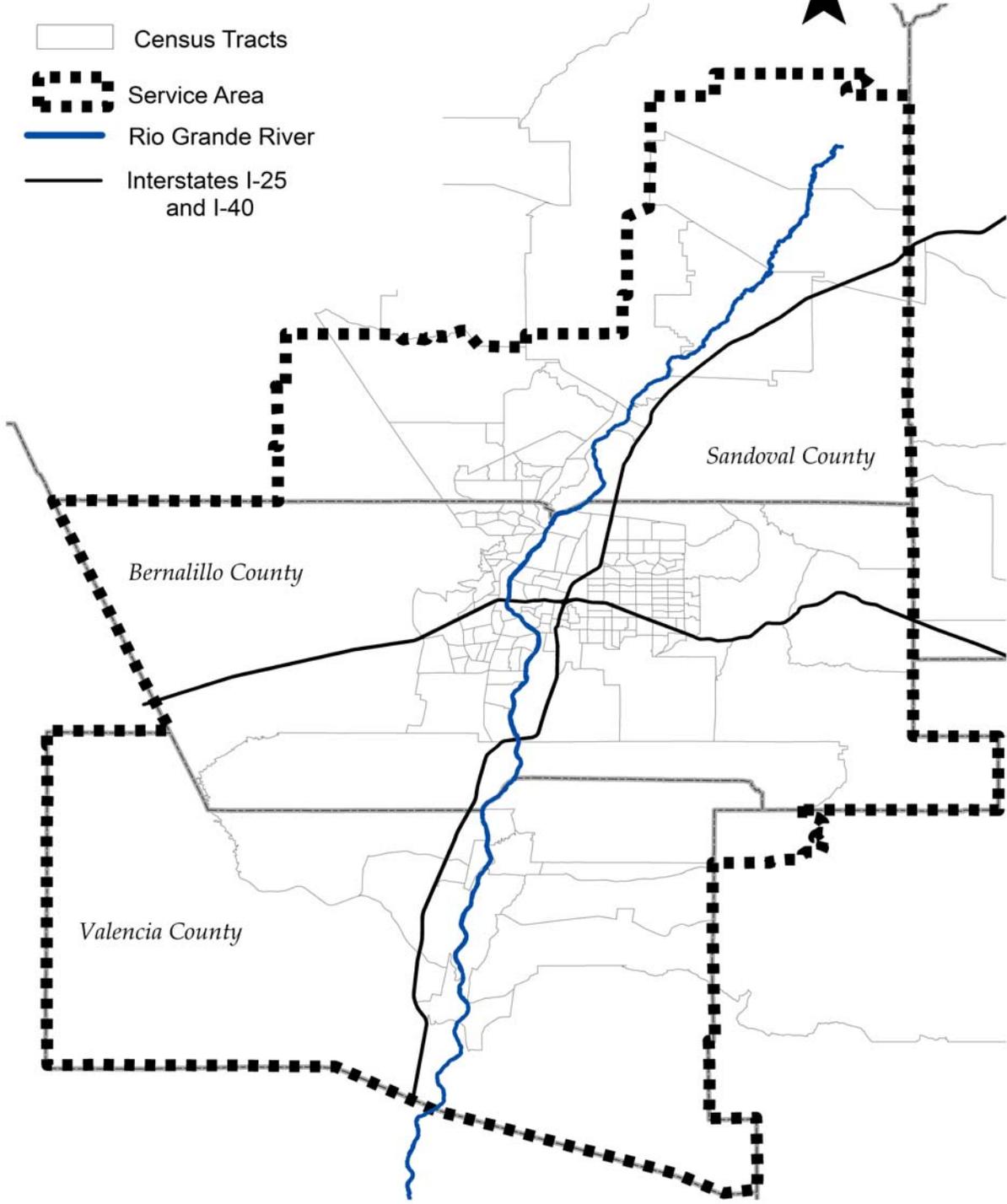


Exhibit I

Census Tracts with Concentrations of LEP persons – Individuals who speak English less than “very well.”

Mid-Region Council of Governments

Service Area: Albuquerque Metropolitan Planning Area

