



Title VI Implementation Plan

September 2021



Disclaimer

This document was prepared and published by the Denver Regional Council of Governments and is prepared in cooperation with and financial assistance from the following public entities: The Federal Highway Administration, the Federal Transit Administration and the Colorado Department of Transportation.

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Program approval

DRCOG's Title VI Implementation Plan has been developed in accordance with Federal Transit Administration Circular 4702.1B, "Title VI Requirements and Guidelines for Federal Transit Administration Recipients" and Section 2-12, "Laws and Regulations Pertaining to Title VI and Nondiscrimination and Executive Orders Pertaining to Environmental Justice and Limited English Proficiency" of the Federal Highway Administration's "Transportation Management Area Certification Review Field Manual."

This plan was adopted by the Denver Regional Council of Governments Board of Directors at its September 2021 meeting. Please see [Appendix A](#) for the Board resolution.

Acronyms

AAA: Area Agency on Aging

ACS: American Community Survey

ADA: Americans with Disabilities Act of 1990

A&F: Administration and Finance

BOD: DRCOG Board of Directors

CAM: Communications and Marketing

CDOT: Colorado Department of Transportation

CFR: Code of Federal Regulations

CMAQ: Congestion Mitigation and Air Quality Improvement Program

COG: Council of Governments

CRS: Colorado Revised Statutes

DBE: Disadvantaged Business Enterprises

DOJ: U.S. Department of Justice

DOT: U.S. Department of Transportation

DRAPP: Denver Regional Aerial Photography Project

DRCOG: Denver Regional Council of Governments

DRDC: Denver Regional Data Consortium

DRMAC: Denver Regional Mobility and Access Council

EEO: Equal Employment Opportunity

EJ: Environmental Justice

E.O.: Executive Order

FAST Act: Fixing America's Surface Transportation Act

FHWA: Federal Highway Administration

FTA: Federal Transit Administration

GIS: Geographic Information Systems

HHS: U.S. Department of Health and Human Services

HUD: U.S. Department of Housing and Urban Development

HR: Human Resources

LEP: Limited English Proficiency

MMOF: Multimodal Options Fund

MPO: Metropolitan Planning Organization

OAA: Older Americans Act

PMP: Program Management Plan

RPC: Regional Planning Commission

RPD: Regional Planning and Development

RTC: DRCOG Regional Transportation Committee

RTD: Regional Transportation District

RTP: Regional Transportation Plan

SBE: Small Business Enterprises

STBG: Surface Transportation Block Grant Program

TA: Transportation Alternatives Program

TAC: DRCOG Transportation Advisory Committee

TDM: Transportation Demand Management

TIP: Transportation Improvement Program

TMA: Transportation Management Area

TPO: Transportation Planning and Operations

UPWP: Unified Planning Work Program

USC: United States Code

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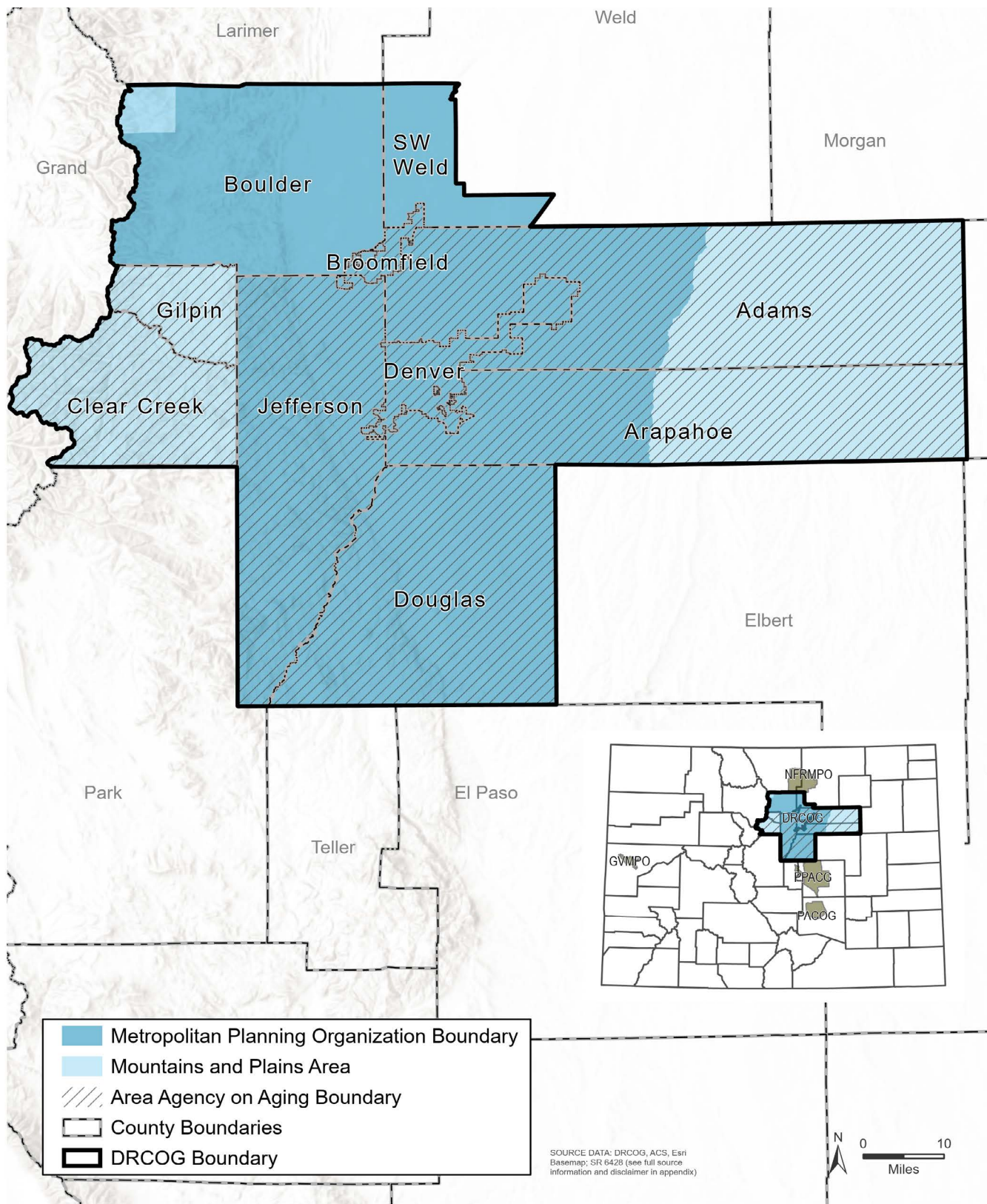
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Introduction

Map 1.1 The DRCOG planning area



Background

The Denver Regional Council of Governments is a planning organization through which local governments collaborate to establish guidelines, set policy and allocate funding in the areas of transportation and personal mobility, growth and development, and aging and disability resources.

- DRCOG is a council of governments, serving as a planning organization, technical assistance provider and forum for local member governments.
- DRCOG functions as a regional planning commission per Colorado state statute and prepares the plan for the physical development of the region, known as Metro Vision.
- DRCOG is the federally designated Area Agency on Aging, planning and providing comprehensive services to address the needs of the region's population of older adults and people living with disabilities.
- DRCOG serves as the metropolitan planning organization for the region, carrying out the metropolitan transportation planning process for four urbanized areas, encompassing slightly more than 3,600 square miles.
- DRCOG is a designated recipient of Federal Transit Administration Section 5310 program funds for the Denver-Aurora Urbanized Area.

DRCOG's planning area covers Adams, Arapahoe, Boulder, Clear Creek, Douglas, Gilpin and Jefferson counties, the City and County of Broomfield and the City and County of Denver, and southwest Weld County.

Board and committee structure

Steering the activities of the Denver Regional Council of Governments is its Board of Directors. The Board's work is informed by its committees, which involve many individuals, groups and organizations in DRCOG's decision-making process.

- Board of Directors.
- Executive Committee.
- Finance and Budget Committee.
- Performance and Engagement Committee.
- Regional Transportation Committee.
- Transportation Advisory Committee.
- Advisory Committee on Aging.

Staff divisions

DRCOG staff are divided into the following seven divisions that fulfill DRCOG's many roles and functions in the region.

- Administration and Finance.
- Area Agency on Aging.

- Communications and Marketing.
- Executive Office.
- Human Resources.
- Regional Planning and Development.
- Transportation Planning and Operations.

Major plans and programs

The following regional plans and programs are the primary focus of DRCOG’s policy work, with Metro Vision serving as the policy framework for most Board decisions.

- [Metro Vision](#).
- [Metro Vision Regional Transportation Plan](#).
- [Transportation Improvement Program](#).
- [Unified Planning Work Program](#).
- People-centered planning, projects and services (public engagement plan, find it at the [Get Involved page on the DRCOG website](#)).
- [Area Plan on Aging](#).

Nondiscrimination framework

The Denver Regional Council of Governments is a recipient of federal financial assistance. All recipients are required to comply with various nondiscrimination laws and regulations, including Title VI of the Civil Rights Act of 1964 which forbids discrimination against anyone in the U.S. because of race, color or national origin by any agency receiving federal funds. Further, DRCOG adheres to other federal nondiscrimination statutes that afford legal protection; specifically: Section 162(a) of the Federal-Aid Highway Act of 1973 (23 USC 324) (gender); Age Discrimination Act of 1975 (age); and Section 504 of the Rehabilitation Act of 1973/Americans with Disabilities Act of 1990 (disability).

Regulations and statutes guiding Title VI compliance for DRCOG include, alphabetically:

- Age Discrimination Act of 1975 (42 USC 6101-6107) “Prohibits discrimination based on age in programs or activities that receive federal financial assistance.”
- Americans with Disabilities Act of 1990 “Prohibits discrimination against individuals with disabilities in all areas of public life, including jobs, schools, transportation, and all public and private places that are open to the general public.”

- Civil Rights Restoration Act of 1987 (Pub. L. 100-159) “Clarifies the intent Title VI and other nondiscrimination requirements by restoring the broad coverage of nondiscrimination statutes and requirements to include all programs and activities that receive any portion of Federal funding.”
- Executive Order No. 12898 of Feb. 11, 1994, “Federal Actions to Address Environmental Justice in Minority Populations and Low-Income Populations.”
- Executive Order No. 13166 of Aug. 11, 2000, “Improving Access to Services for Persons with Limited English Proficiency.”
- Federal regulation 23 CFR 200 provides guidelines for implementing the Federal Highway Administration’s Title VI compliance program conducting Title VI program compliance reviews relative to the Federal-aid highway program.
- Federal regulation 49 CFR 21 “Effectuates that no person in the United States shall, on the grounds of race, color, or national origin, be excluded from participation in, be denied the benefits of, or be otherwise subjected to discrimination under any program or activity receiving Federal financial assistance from the U.S. Department of Transportation.”
- Section 162(a), Federal-Aid Highway Act (23 USC 324) “Prohibits discrimination on the basis of sex in programs and activities receiving federal assistance.”
- Section 504, Rehabilitation Act of 1973 (29 USC 794) “Prohibits discrimination on the basis of disability.”
- The Uniform Act of 1970 “Establishes minimum standards for federally funded programs and projects that require the acquisition of real property (real estate) or displace persons from their homes, businesses, or farms.”
- Title VI of the Civil Rights Act (42 USC 2000d-2003) of 1964 “Prohibits discrimination on the basis of race, color, and national origin in programs and activities receiving federal financial assistance.”
- U.S. Department of Transportation Order 1050.2 Title VI Standard Assurances.



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Demographic profile of the Denver region

Background

The Denver Regional Council of Governments maintains and analyzes statistical data on the demographic characteristics of the region. This information is used throughout DRCOG's plans and programs to inform the recommendations made to its Board of Directors and the organization's planning and programming decisions.

Every three years as part of its Title VI Implementation Plan update, DRCOG reviews its demographic data to determine whether there have been changes in the population that necessitate its staff to adjust strategies for providing meaningful access to agency programs and activities by newly identified or growing demographic groups. DRCOG's strategies may include identifying local partners to ensure that these individuals are notified about public meetings and given the opportunity to be involved in the planning process.

The region

The Denver region is home to 3.4 million people and includes 58 communities anchoring Colorado's Front Range. The region stretches from the mountain counties of Clear Creek and Gilpin in the west to the eastern plains of Adams and Arapahoe counties, and includes the diverse communities that make up the urban corridor along I-25.

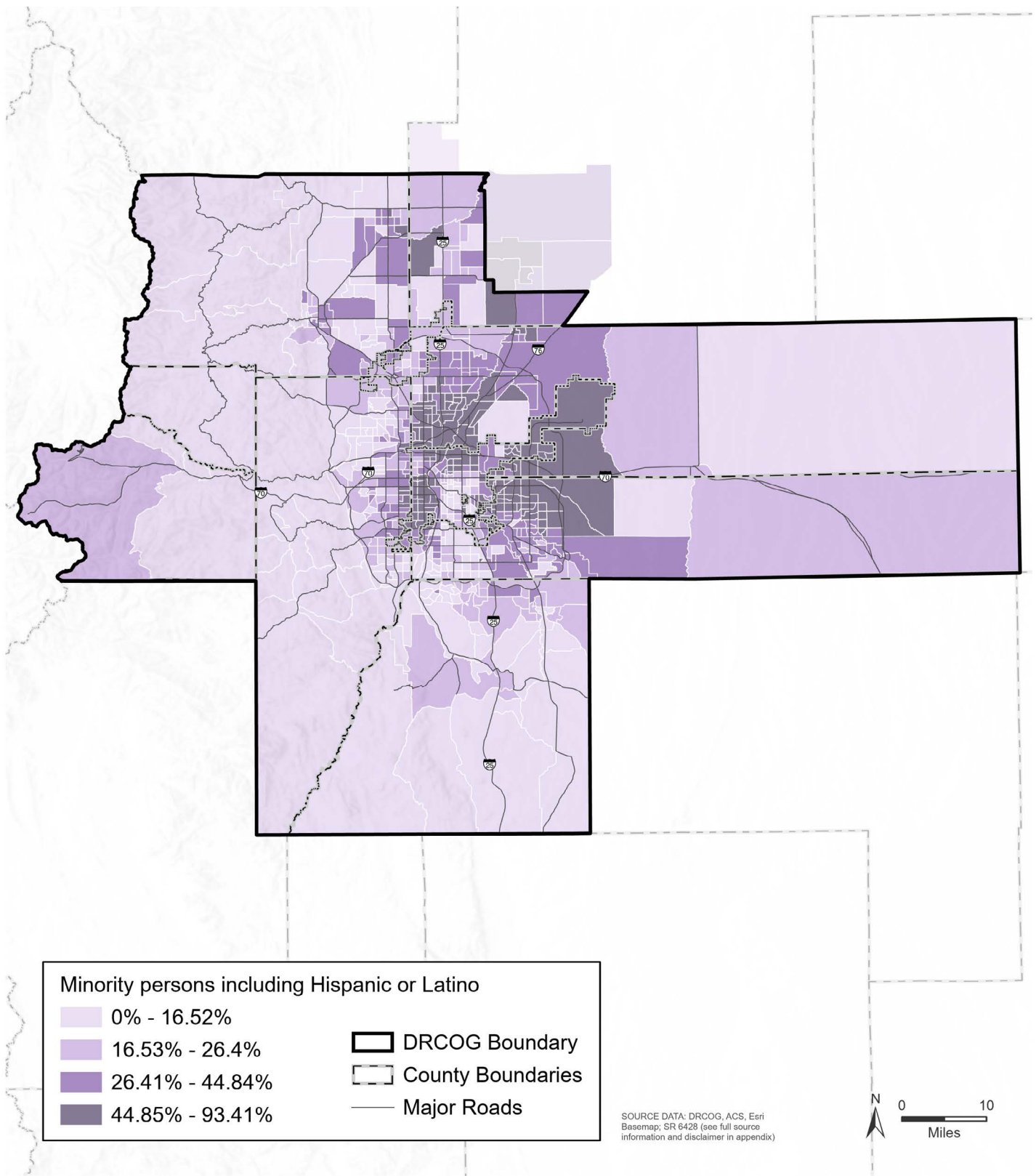
The maps on the following pages display the census tracts in the region by the percent of vulnerable populations. Census tracts generally have a population size between 1,200 and 8,000 people, with an optimum

size of 4,000 people. The spatial size of census tracts varies widely depending on population density. The vulnerable populations mapped include:

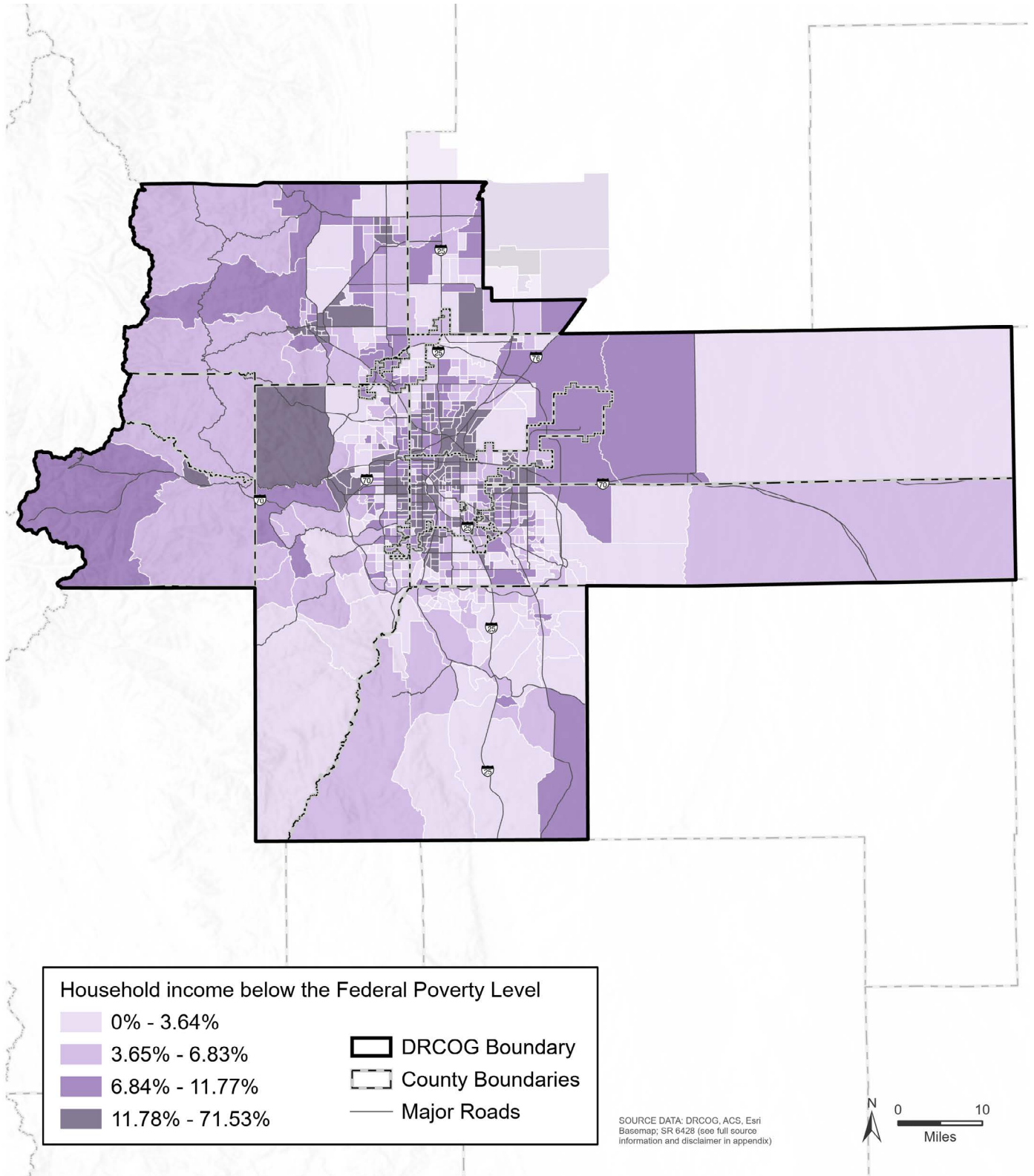
- Individuals of color (includes racial and ethnic minorities).
- Low-income households (households below the federal poverty level).
- Individuals with limited English proficiency.
- Adults age 65 and older.
- Children age 5-17.
- Individuals with a disability.
- Households without a motor vehicle.

The populations included in this plan are aligned with the Environmental Justice and Equity Analysis performed for the 2050 Metro Vision Regional Transportation Plan. The analyses in this plan, while using the same vulnerable populations in the 2050 Metro Vision Regional Transportation Plan, are intended to provide a baseline for the development and improvement of future Title VI Implementation Plans. For more information on other equity analyses, please visit the specific plan in question.

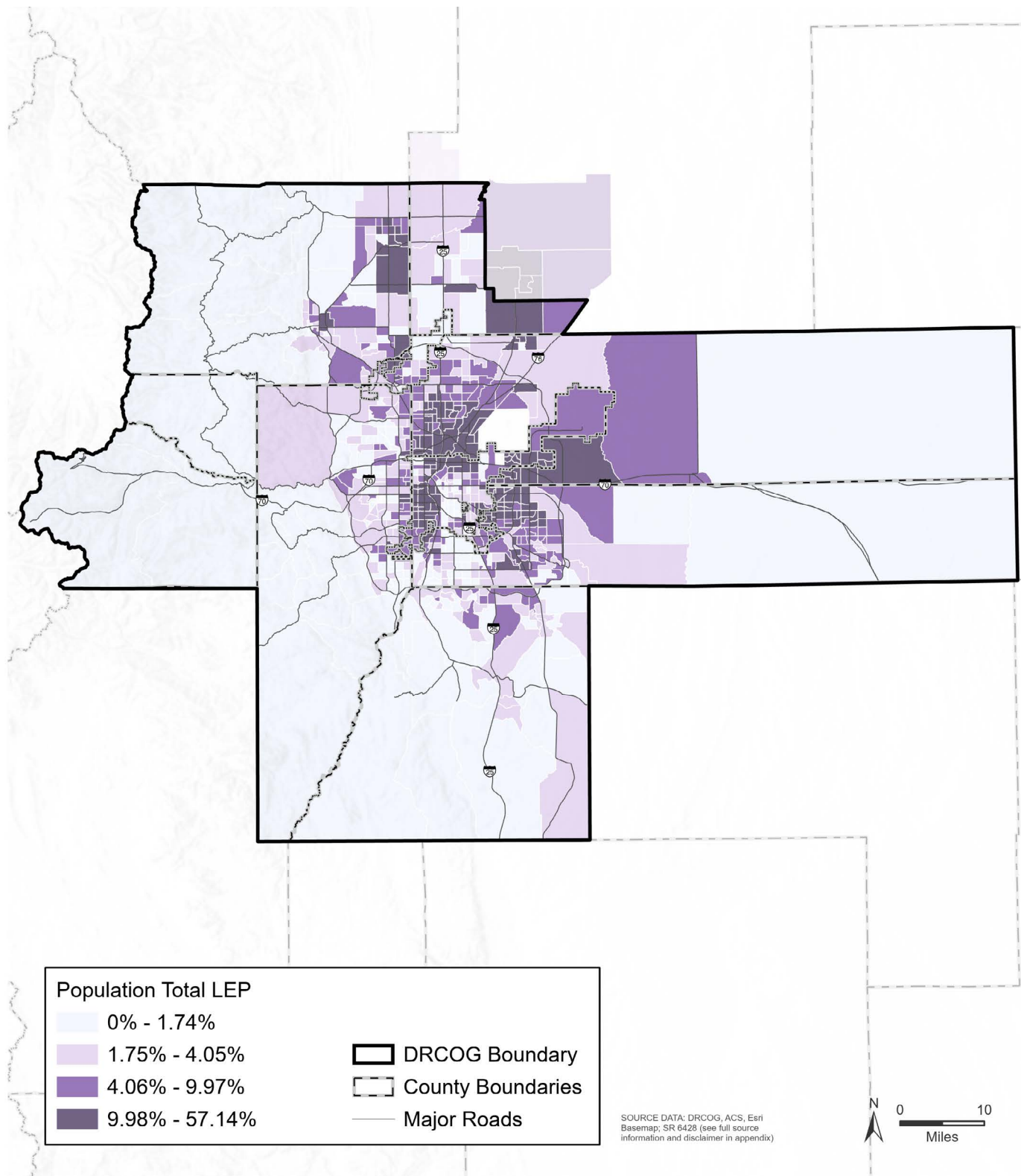
Map 2.1 Distribution of individuals of color



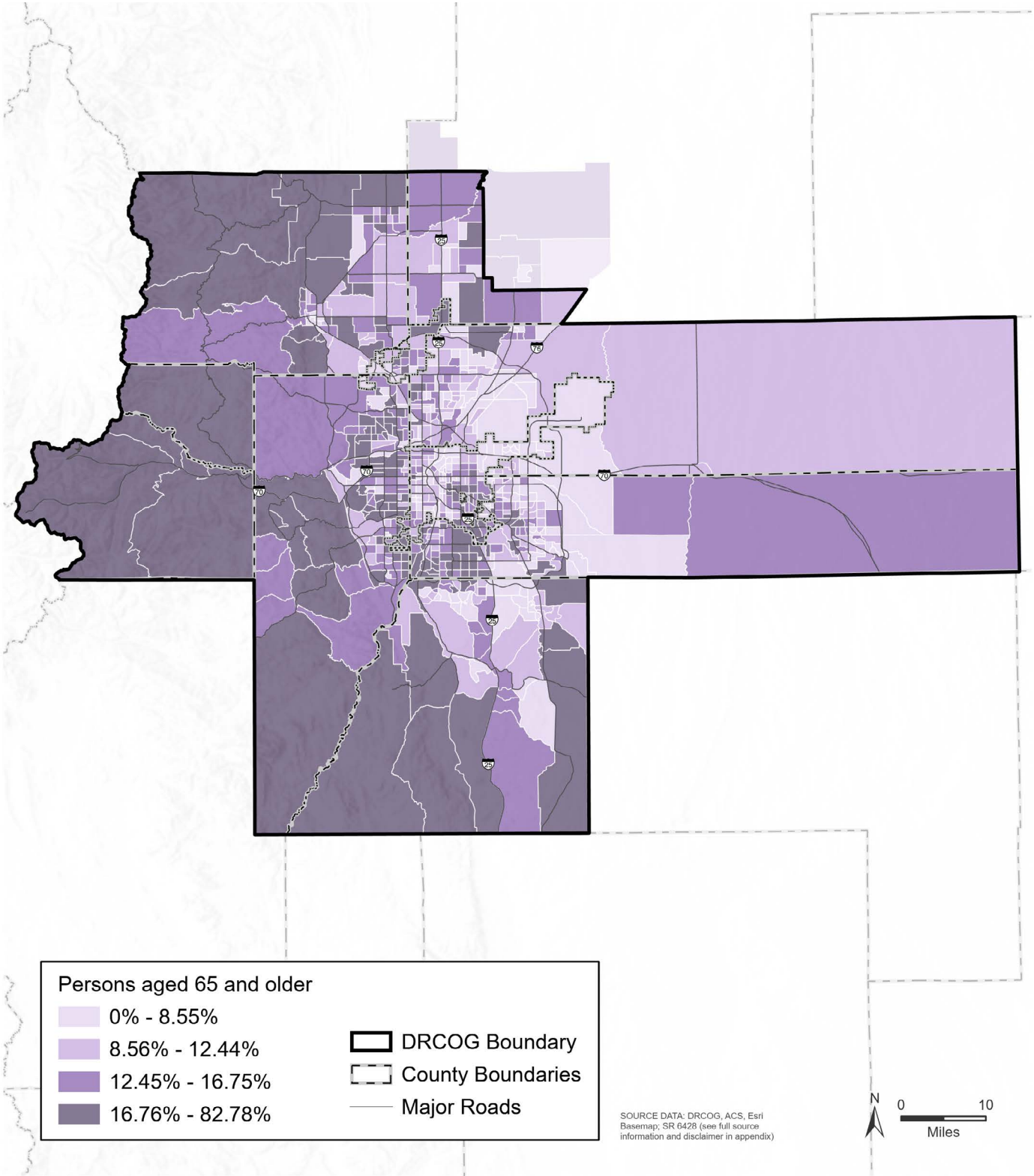
Map 2.2 Distribution of low-income households



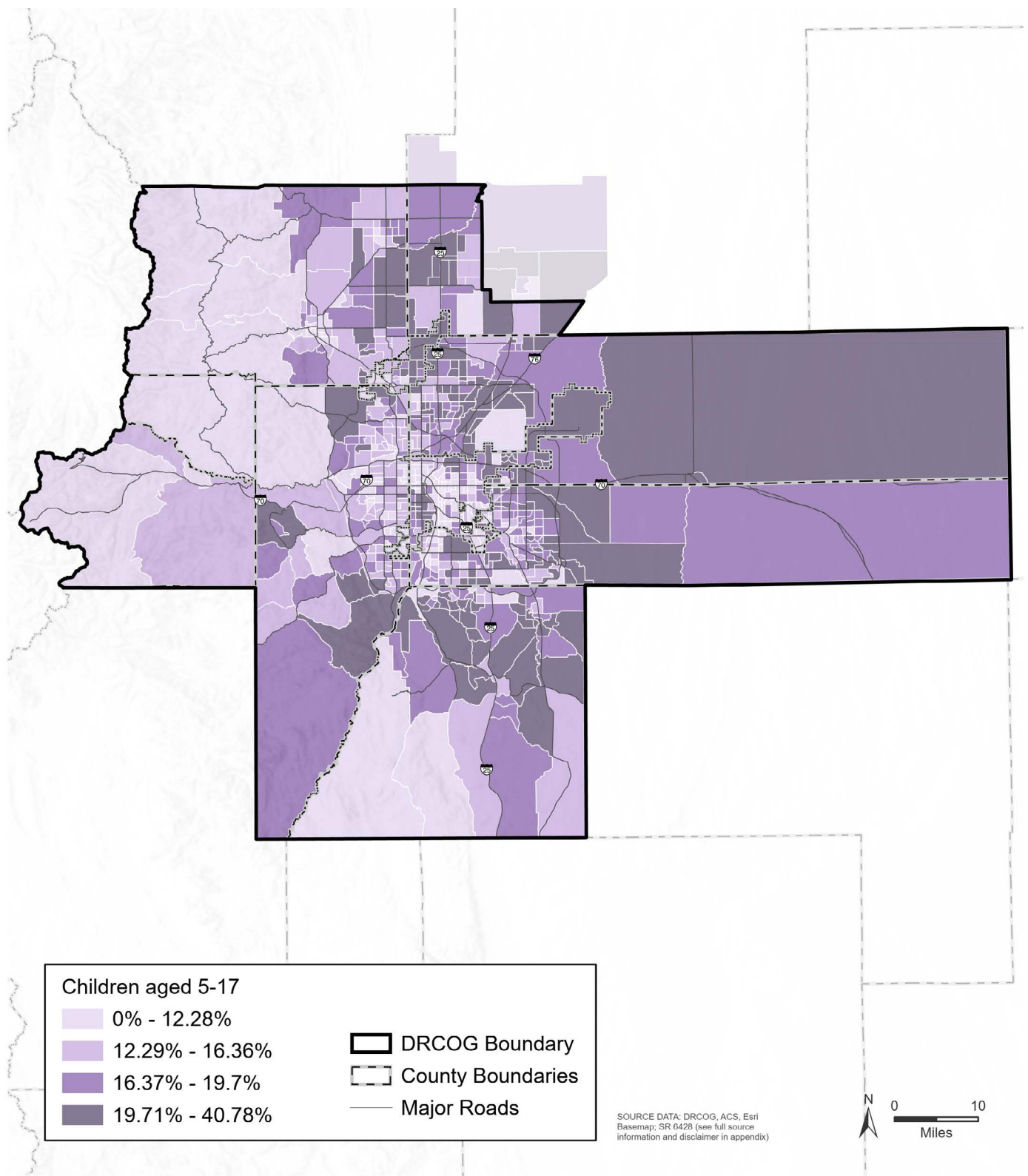
Map 2.3 Distribution of individuals with limited English proficiency



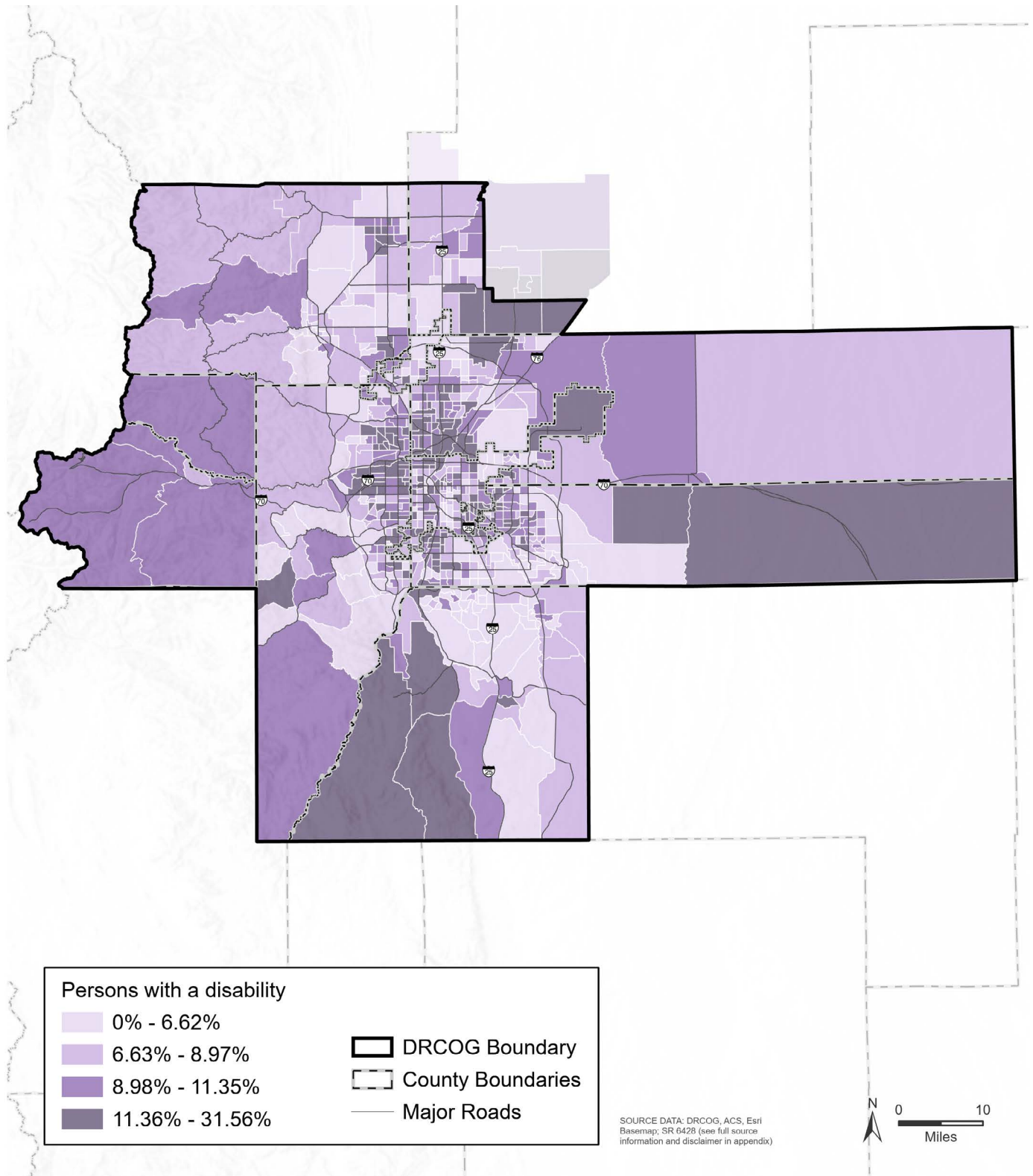
Map 2.4 Distribution of adults age 65 and older



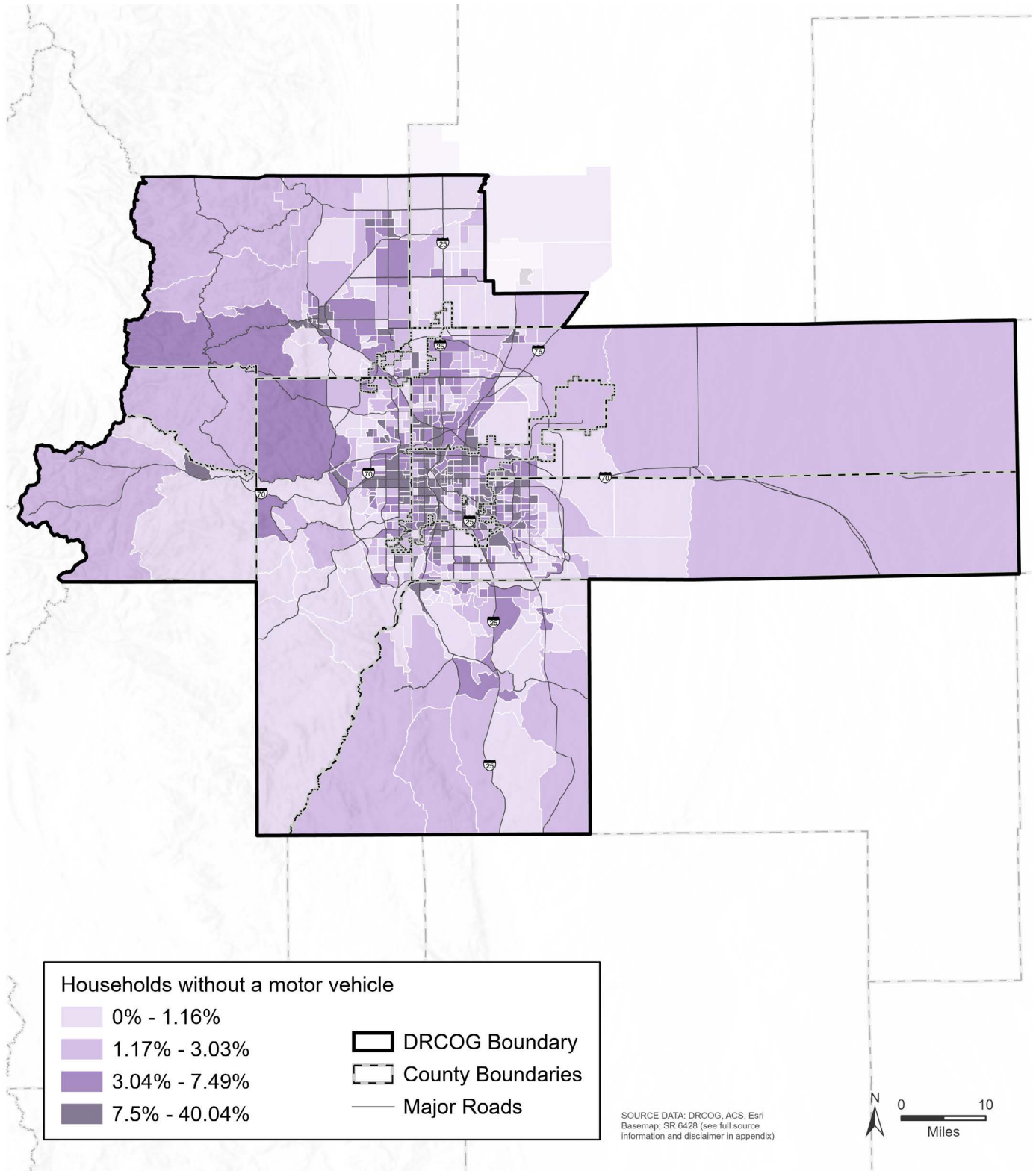
Map 2.5 Distribution of children age 5-17



Map 2.6 Distribution of individuals with a disability



Map 2.7 Distribution of households without a motor vehicle



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**Review procedures and data
collection**

The executive director is ultimately responsible for ensuring full compliance with the provisions of Title VI of the Civil Rights Act of 1964 and related statutes and has directed that nondiscrimination is required of all agency employees, contractors and agents pursuant to applicable law, including but not limited to, 23 CFR Part 200, 49 CFR Part 21, and 28 CFR Part 42, Subpart C.

Title VI responsibilities

Title VI coordinator and liaisons organization chart



Title VI coordinator

The Denver Regional Council of Governments' contracts and budget program manager in the Administration and Finance division performs the duties of Title VI coordinator and ensures implementation of DRCOG's Title VI program.

The Title VI coordinator is responsible for:

- Developing and adopting a Title VI plan every three years and submitting annual reports on the agency's behalf as requested.
- Developing procedures for the prompt processing and disposition of complaints.
- Investigating complaints, compiling a complaint log and reporting to the Colorado Department of Transportation.
- Developing procedures for the collection and analysis of statistical data.
- Developing a program to conduct Title VI reviews of program areas.
- Conducting annual Title VI assessments of pertinent program areas.
- Developing Title VI information for dissemination to the general public and staff as needed.

- Attending relevant trainings and sharing information with staff as appropriate.
- Establishing procedures for resolving deficiency status and reducing to writing the remedial action agreed to be necessary.

Title VI division liaisons

The Title VI liaisons within each of DRCOG's seven divisions are responsible for:

- Coordinating with the Title VI Coordinator on agencywide Title VI implementation.
- Maintaining dialogue with the Title VI Coordinator to inform them of their division's activities regarding Title VI implementation.

Policy statement

DRCOG pledges to adhere to Title VI of the 1964 Civil Rights Act of 1964 and other federal nondiscrimination statutes that afford legal protection. This policy statement is maintained on DRCOG's website, and a copy can also be found in [Appendix B](#).

Notice of rights

DRCOG provides a notice of rights against discrimination under Title VI of the Civil Rights Act of 1964. This notice is maintained on DRCOG's website and can also be found in [Appendix C](#).

Assurances

DRCOG hereby gives assurances that no person shall on the grounds of race, color, national origin, age, gender or disability be excluded from participation in, be denied the benefits of, or be otherwise subjected to discrimination under any program or activity conducted by DRCOG regardless of whether those particular programs and activities are federally funded. It is the responsibility of every person within DRCOG and all DRCOG's responsible agents, contractors and consultants to incorporate and implement actions consistent with nondiscrimination in programs.

See [Appendix D](#) and [Appendix E](#) for the signed Title VI Assurance and Title VI Local Agency Assurance at the time of plan adoption. In between the regular three-year updates, DRCOG signs and uploads new assurances to the website and provides copies to the Colorado Department of Transportation.

Complaint procedures and forms

Any individual that believes that they have been subjected to discrimination or retaliation, by any of DRCOG's programs, services or activities, as prohibited by Title VI of the Civil Rights Act of 1964, as amended, and related statutes may file a written complaint. All written complaints received by DRCOG shall be reviewed immediately.

See [Appendix F](#) for the full complaint procedures and forms at the time of plan adoption. Visit the DRCOG website to see the latest versions of these documents.

Complaint status

DRCOG does not have any active investigations, complaints or lawsuits. See [Appendix F](#) for the complaint log at the time of plan adoption. Visit the DRCOG website to see the latest versions of these documents.

Public accommodation and accessibility

DRCOG promotes full accommodation and access to its meetings by publishing the following statement on its meeting agendas: "Attendees can request additional aids or services, such as interpretation or assistive listening devices, by calling 303-480-6701 or emailing [meeting organizer email address]. Please notify DRCOG at least 48 hours in advance so we can coordinate your request."

Additionally, in the summer of 2021 DRCOG developed the following document accommodation statement that will be included on documents as appropriate: "To receive these documents in accessible formats, such as in languages other than English, please call 303-455-1000 or email drcog@drcog.org so DRCOG can coordinate your request."

Contract provisions

DRCOG includes provisions in every contract addressing Title VI and civil rights. See [Appendix G](#) for the full provisions.

Disadvantaged Business Enterprises and Small Business Enterprises program

DRCOG, as a condition of receiving federal financial assistance from the U.S. Department of Transportation, has signed an assurance that it will comply with Title VI of the Civil Rights Act of 1964, prohibiting discrimination based on race, color and national origin; and to adhere to 49 CFR Part 26.

It is a federal requirement, and also the policy of DRCOG, to ensure that Disadvantaged Business Enterprises, as defined in Part 26, have an equal opportunity to receive and participate in contracts.

A Disadvantaged Business Enterprise Information Request Form is included in all bid solicitations to track the interest in DRCOG programs and participation by Disadvantaged Business Enterprise firms. See [Appendix H](#) for the Disadvantaged Business Enterprises/Small Business Enterprises clauses and the Disadvantaged Business Enterprise Program Information Request Form.

DRCOG has not had any Disadvantaged Business Enterprises reporting requirements to grantors in the last three years.

Staff training

To ensure nondiscrimination in its programs and activities, DRCOG continues to offer training to its employees related to Title VI and other applicable statutes.

Board and committee structure

DRCOG committee structure



DRCOG staff provide information and administrative support to all committees and the Board. All Board and committee meetings are open to the public, and public comment is always included as an agenda item. Additionally, DRCOG accommodates and provides services for individuals with disabilities when provided notice before the hearing. DRCOG solicits attendees to provide such notice as part of every meeting agenda packet.

Authorities for these committees and their criteria for membership come from the DRCOG Articles of Association, memoranda of agreement, intergovernmental agreements, federal or state statutes, or Board authorization. For more information, see DRCOG's [Committees and Working Groups](#) section of the website.

Board of Directors

Membership

Steering the activities of DRCOG is its Board of Directors. DRCOG has 58 member governments, and each designates an elected official as its representative. In addition, the governor appoints three nonvoting representatives to the Board and the Regional Transportation District has a nonvoting representative. The Board elects officers each February.

Responsibilities

The Board establishes policies and approves projects for staff to administer or implement. The Board's purpose is to define the results the organization is to produce and to define the acceptable boundaries within which it can delegate the achievement of those

results to the Executive Director. The Board must create a vision and directives for staff that outline the desired benefits, the constituents served and the cost of delivering the desired outcomes.

The Board's governance function is distinct from the staff's management function. The Board's purpose is not to oversee staff, but rather to define the future and to ensure that this future is achieved in a legal, ethical and prudent manner.

DRCOG's Board of Directors is informed by its committees, which involve many individuals, groups and organizations in DRCOG's decision-making process.

Executive Committee

Membership

The incumbent Board officers constitute the Executive Committee.

Responsibilities

- The Executive Committee is the primary executive leadership of the Council, providing leadership to the Board and guidance to the Executive Director.
- The Executive Committee has no policy making authority.
- The Executive Committee helps set Board meeting agendas; provides guidance on resolution of conflicts; provides process guidance, and receives updates from and assures the progress of committees of the Council.

Finance and Budget Committee

Membership

Members of the Finance and Budget Committee are appointed by the Board upon recommendation of the Nominating Committee, in accordance with procedures and requirements set forth in the Articles of Association.

Responsibilities

The administrative business of the Council concerning finances, contracts and related matters is managed by the Finance and Budget Committee. The following powers and duties are vested in the Finance and Budget Committee:

- To review contracts, grants and expenditures and authorize the expenditure of funds and the entering into contracts, within the parameters of the Council budget.
- To execute official instruments of the Council.
- To review and recommend to the Board the budget as provided in Article XV of the Articles of Association.
- To review the Council's audited financial statements with the Council's auditor, and to undertake, oversee and/or review other organization audits.
- To receive and review other financial reports and provide regular updates to the Board.
- To compensate member representatives for expenses incurred in attending to the proper business of the Council.

- To exercise such other powers, duties, and functions as may be authorized by the Board.

Performance and Engagement Committee

Membership

Members of the Performance and Engagement Committee are appointed by the Board upon recommendation of the Nominating Committee, in accordance with procedures and requirements set forth in the Articles of Association.

Responsibilities

The administrative business of the Council concerning the performance and evaluation of the Executive Director, the oversight of onboarding of new Board members and related matters shall be managed by a Performance and Engagement Committee. The following powers and duties are vested in the Performance and Engagement Committee:

- To develop the process for recruitment of the Executive Director.
- To recommend appointment of the Executive Director to the Board.
- To execute an employment contract with the Executive Director, within the parameters of the Council budget.
- To develop the process for, and execute and document the annual performance evaluation for the Executive Director, including approval and execution of amendments to the Executive Director employment contract in connection therewith, within the parameters of the Council budget.

- To hold quarterly meetings with the Executive Director to provide performance feedback to the Executive Director.
- To recommend to the Board, as needed, policies and procedures for the effective administration of the Executive Director.
- To provide oversight of onboarding programs for new Board appointees.
- To implement and review Board structure and governance decisions.
- To plan the annual Board workshop.
- To review results of Board assessments and recommend improvements.
- To receive and review reports related to the business of the Committee and provide regular updates to the Board.
- To exercise such other powers, duties, and functions as may be authorized by the Board.

Regional Transportation Committee

Membership

The Regional Transportation Committee brings together representatives of the region's transportation planning partners. It consists of 16 members. Members include:

- From DRCOG, the Board chair and vice chair, two designees from the Board, and the Executive Director.
- Three metro area Transportation Commissioners and the Executive Director from CDOT.
- Three Board members and the General Manager from RTD.
- Three members appointed by the Committee chair upon unanimous recommendation of the Executive Directors of DRCOG and CDOT, and the General Manager of RTD. DRCOG's Executive Director consults with the Committee chair prior to the three agency executives forming a recommendation.

Responsibilities

Through the Regional Transportation Committee, DRCOG, as the metropolitan planning organization, administers the urban transportation planning process for the region in accordance with "Transportation Planning in the Denver Region" and applicable federal regulations. The Regional Transportation Committee is a permanent committee that prepares and forwards policy recommendations to the DRCOG Board. Accordingly, the responsibilities of the Regional Transportation Committee include:

- Overall direction of current work activities established by the Unified Planning Work Program.
- Review and approval of items to be submitted to the DRCOG Board of Directors, as the metropolitan planning organization policy body, for adoption.
- Approval of plans, programs, documents and annual endorsements related to surface transportation as outlined in the Memorandum of Agreement between DRCOG, the Colorado Department of

Transportation, and the Regional Transportation District. Should the DRCOG Board approve a policy action that differs from the Regional Transportation Committee's recommendation, the action shall be referred back to the Committee for reconsideration.

Transportation Advisory Committee

Membership

The Transportation Advisory Committee consists of 29 members. Members include:

- 15 local government representatives
- One representative each from the Colorado Department of Transportation's Region 1 and Region 4, the Division of Transportation Development and Division of Transit and Rail.
- A representative of the Regional Transportation District.
- The Director of Transportation Planning and Operations of DRCOG.
- A representative of the Regional Air Quality Council.
- One representative of each of the seven special interests — environment, freight, transportation demand management/nonmotorized, aviation,

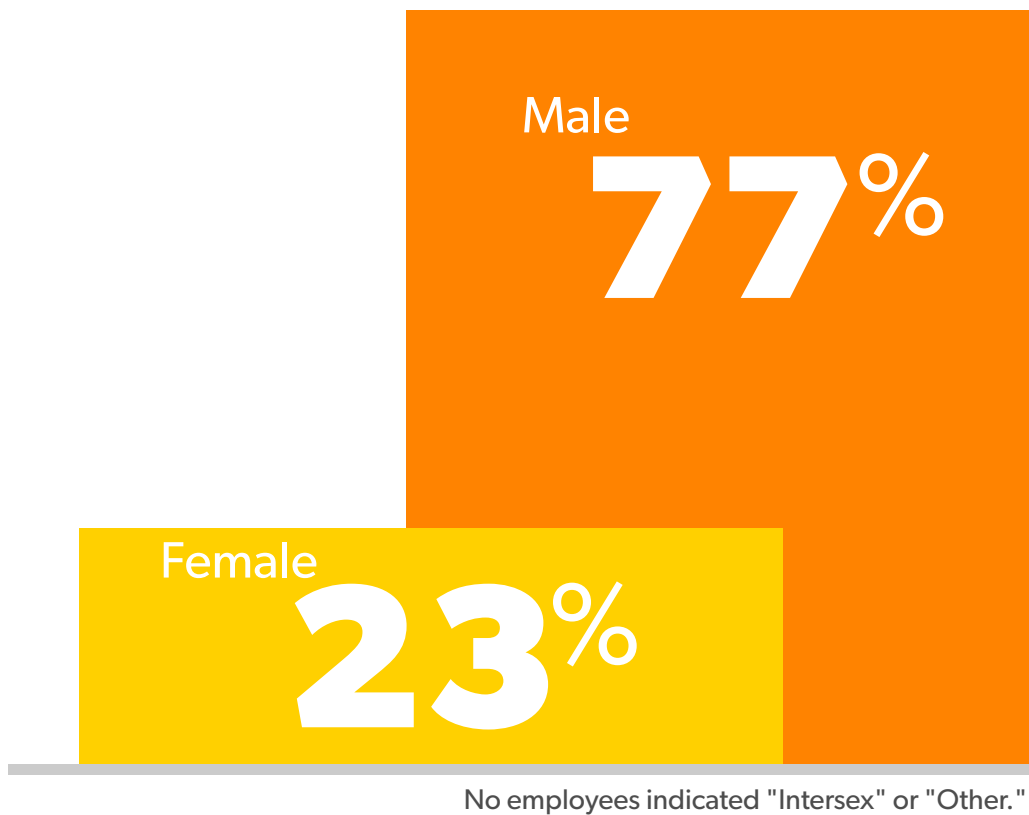
economic development, non-RTD transit and older adults.

- In an ex officio capacity, a representative from both the Federal Highway Administration and of the Federal Transit Administration. Ex-officio members are nonvoting.

The chair of the DRCOG Board of Directors makes 15 local government appointments. One representative each from the seven special interests is nominated by the DRCOG Board chair and confirmed by the Regional Transportation Committee. The DRCOG Board chair reviews membership annually in the second quarter of the calendar year. The DRCOG Board chair may take into consideration such factors as issues to be addressed, continuity of the committee, attendance and turnover in reconfirming or determining new appointments and nominations.

On the following pages are data showing the results of a voluntary anonymous survey about how the Transportation Advisory Committee members identify. The Transportation Advisory Committee is the only DRCOG committee that both advises on transit issues and has membership selected by DRCOG. The survey was conducted in May 2021 and only received 13 responses.

Transportation Advisory Committee membership by sex

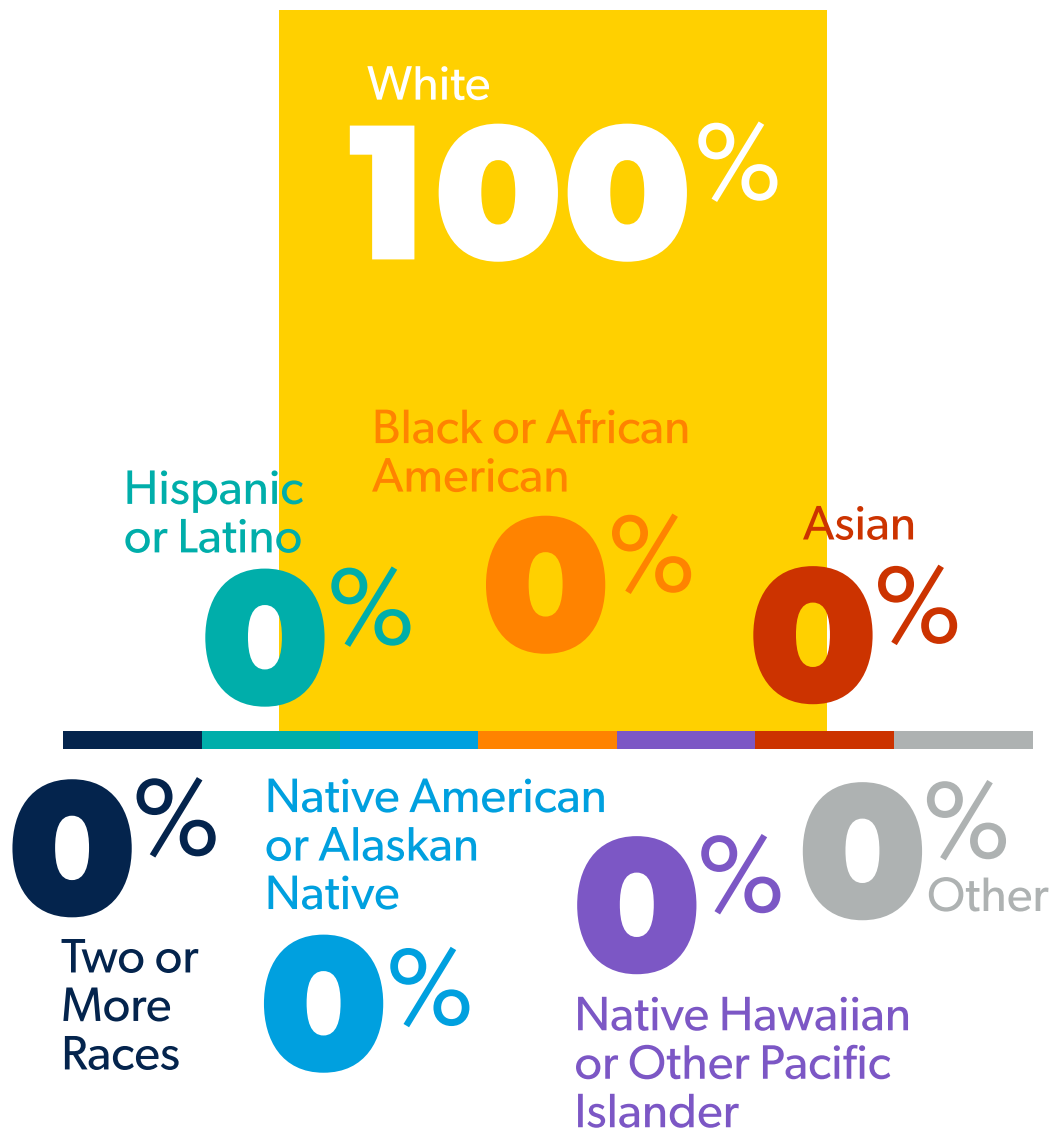


Responsibilities

The Transportation Advisory Committee assists the Board of Directors and the Regional Transportation Committee by reviewing the work of the transportation planning process, advising on methods of planning and implementation and working with staff to develop policy options and making recommendations to the Regional Transportation Committee. The Transportation Advisory Committee is a permanent committee. Specifically, the Transportation Advisory Committee:

- Establishes a dialog on regional transportation issues among local governments, regional agencies, the state and other transportation stakeholders.
- Reviews the transportation planning process.
- Provides advice and guidance on methods of planning and implementation.

Transportation Advisory Committee membership by race and ethnicity



- Assists in coordinating and facilitating implementation of Metro Vision through the transportation planning process.
- Provides advice and recommendations to the Regional Transportation Committee on transportation plans and improvement programs.
- Facilitates coordination of regional plans and programs among local government, regional agencies and the state.

Advisory Committee on Aging

Membership

Advisory Committee on Aging membership includes individuals eligible to participate in the program, minority and low-income adults, older individuals, residents of geographically isolated areas and at least three members of the DRCOG Board who are appointed by the DRCOG Board chair.

The DRCOG Board has established the goal that (1) at least one-half of the members should be age 60 and older, and (2) the Advisory Committee on Aging include at least one individual from each of the counties served by the Area Agency on Aging, and (3) include five community partner representatives from areas including, but not limited to, transportation; lifelong communities; foundations; financial institutions; aging; disability; lesbian, gay, bisexual, transgender, queer; elder rights; and developmental disability.

Members representing each of the counties served by the Area Agency on Aging shall be recommended for appointment by their respective county council or commission on aging through their respective governing body (board of county commissioners or mayor, as appropriate) and confirmed by the DRCOG Board chair. Representation shall proportionately reflect the 60-plus population within each county, and is determined using DRCOG's demographic estimates produced by the Colorado State Demography Office.

Responsibilities

- Represent the needs of individuals age 60 and older, with special emphasis on the needs of people in greatest social and/or economic need.
- Advocate for the enhancement and well-being of the region's current and future older adult populations.
- Assist DRCOG staff in assessing the strengths and needs of older adults and their caregivers.
- Assist DRCOG staff in developing and updating the Area Agency on Aging's Area Plan on Aging; make recommendations concerning the same to the DRCOG Board.
- Assist DRCOG staff in developing policies, procedures and priorities for planning and funding activities; make recommendations concerning the same to the DRCOG Board.
- Assist DRCOG staff in assessing funding proposals to serve the 60-and-older population pursuant to the Older Americans Act and Older Coloradans Act; make recommendations concerning the same to the DRCOG Board.
- Actively become and remain educated on the issues concerning the aging and their caregivers.
- Serve as an ambassador to the community and to the county councils on aging by communicating the purposes, responsibilities and functions of the Area Agency on Aging.

Additional and ad hoc committees

Transportation forums

The 2020-2023 Transportation Improvement Program process established eight transportation forums within the metropolitan planning organization boundary. Each forum is a geographic unit containing a county and all the incorporated areas within the county. Forum membership is not mandatory, but each member holds a vote, mostly established by intergovernmental agreements or memoranda of understanding. DRCOG, the Regional Transportation District, the Colorado Department of Transportation and other agencies or stakeholders are invited to participate in each forum as non-voting members.

All standing meetings identified by a subregion are required to be open to the public, and their agendas are publicly posted in a timely fashion and contain time to receive public comment. The agendas and meeting information are also posted to DRCOG's website. The forums provide flexibility for member governments to apply local values to the planning process and remain up-to-date on other countywide transportation topics, in addition to regular updates from DRCOG, the Colorado Department of Transportation and the Regional Transportation District. Most forums have continued since the 2020-2023 Transportation Improvement Program was adopted and were also leveraged in the development of the 2050 Metro Vision Regional Transportation Plan.

Youth Advisory Panel

DRCOG sought out the input of youth in the region by creating a new Youth Advisory Panel to provide feedback throughout the planning process for the 2050 Metro Vision Regional Transportation Plan. Panel members consisted of representatives of member governments' youth boards and commissions. The panel met five times during plan development.

Civic Advisory Group

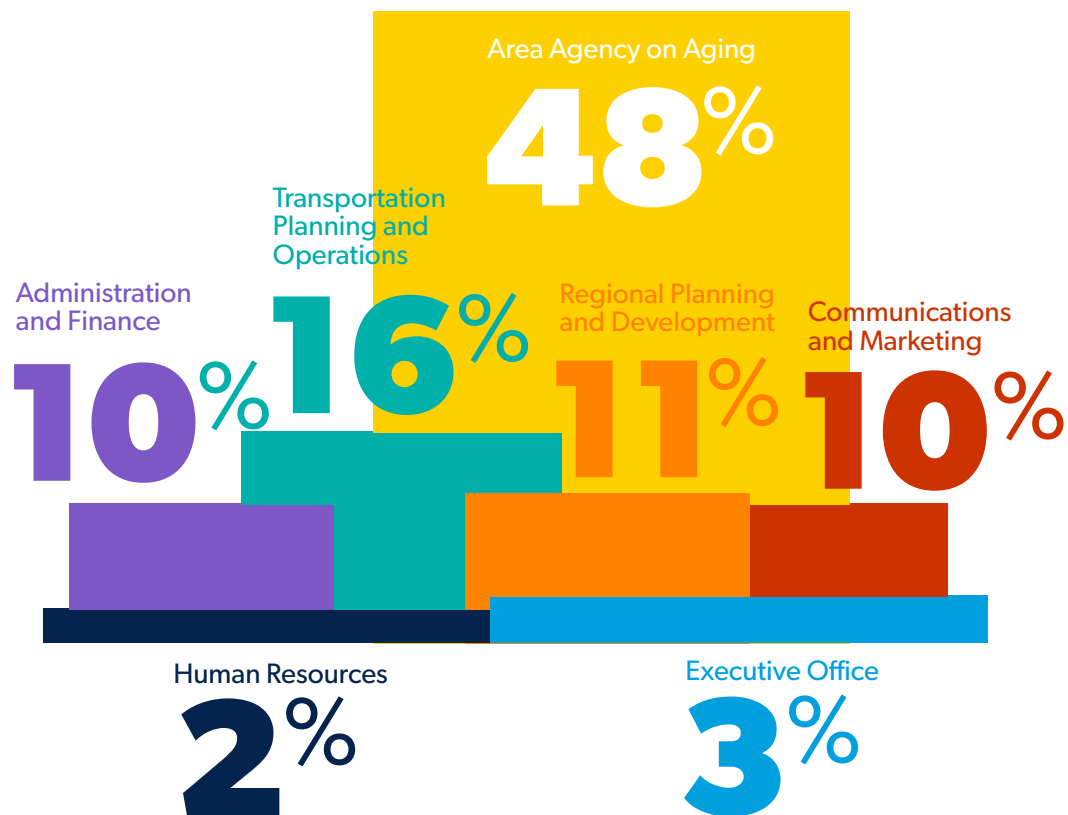
DRCOG convened a Civic Advisory Group to help guide development of the 2050 Metro Vision Regional Transportation Plan. The group represented the diversity of communities and experiences in the Denver region and provided perspectives from people who have not been previously involved in the transportation planning process. The panel met five times during plan development.

Ad hoc committees

The Board of Directors may create ad hoc committees to review and study specific issues within a specified timeframe. Ad hoc committees have a written charge or scope of work set by the Board. The number of ad hoc committees must be aligned and within available DRCOG budgetary and staffing resources.

Staff divisions and major plans and programs

Employees by division



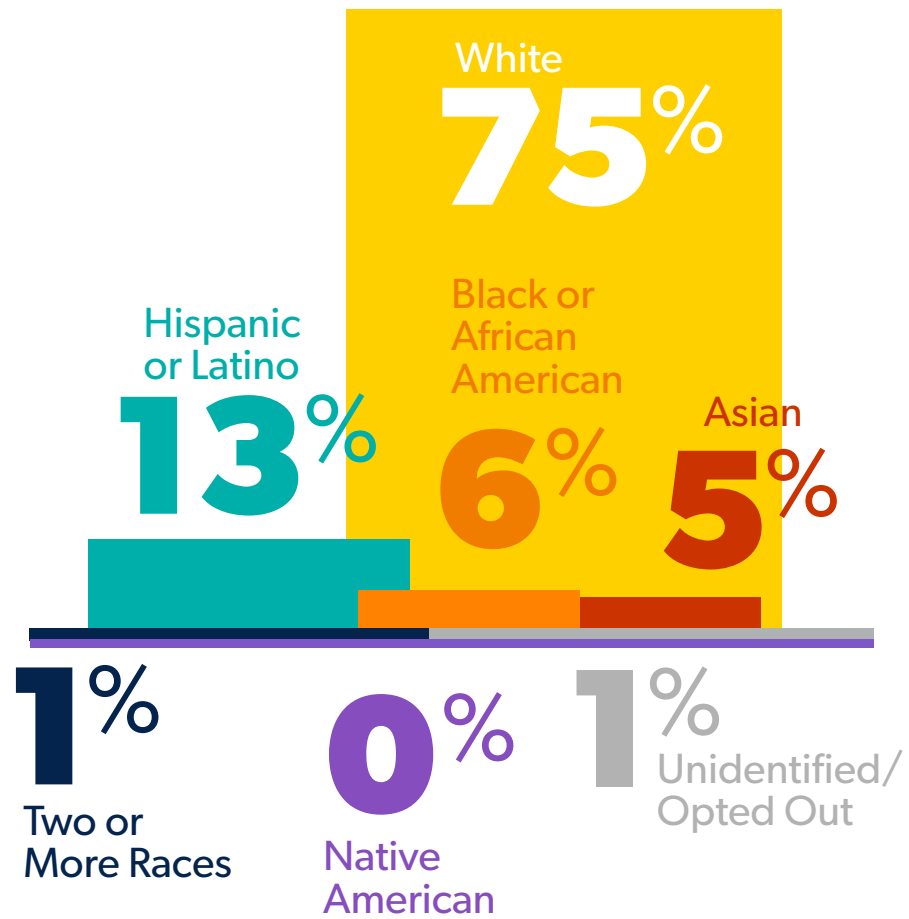
As of a May 5, 2021, Human Resources report, the Denver Regional Council of Governments employed 125 employees across seven divisions. The report only includes staff employed at the time and is not reflective of any potential vacancies at DRCOG or within divisions. The report does not include volunteers or interns working for DRCOG.

The largest division is the Area Agency on Aging with 60 employees, constituting almost half of all employees. The Transportation Planning and Operations division is the second-largest with 20 employees, 16% of all employees. The remaining third of employees are in

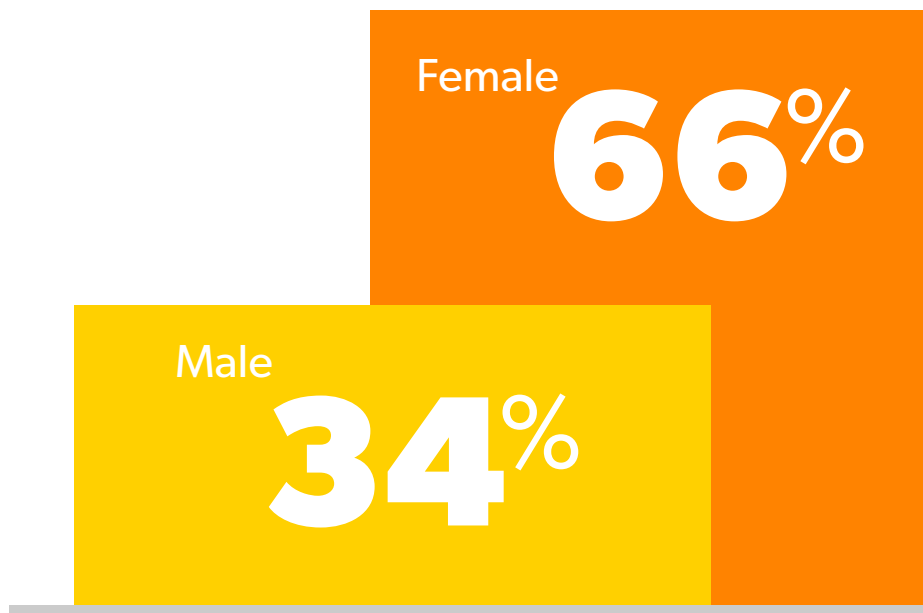
Regional Planning and Development with 14 employees, Administration and Finance and Communications and Marketing, each with 12 employees, the Executive Office with 4 employees, and Human Resources with 3 employees.

Human Resources is also capable of providing reports of employees broken down by race and ethnicity and sex. Human Resources collects staff demographic information through voluntary self-identification by new hires through the recruitment process.. The following two charts illustrate the current demographic breakdowns of DRCOG staff.

Employees by race and ethnicity



Employees by sex



Administration and Finance

The role of the Administration and Finance division is to support staff in carrying out the goals of the DRCOG Board. This includes protecting the agency from risk, ensuring grant and contractual compliance standards are met, strengthening the fiscal integrity of the organization and ensuring efficiency in all business operations.

Administration and Finance staff serve the agency through the information technology team, which equips staff with the technological tools they need to be successful in addition to keeping the network operational and secure. The accounting and contracts team assists staff with daily business operations,

collaborates on business development opportunities and helps direct the financial future of the organization.

Area Agency on Aging

The DRCOG Area Agency on Aging serves as the regional planning and coordinating agency for programs and services for older adults and their caregivers. The DRCOG Area Agency on Aging is the largest in Colorado and covers the eight-county Denver metropolitan area (excluding Boulder County, which has its own Area Agency on Aging) as mandated through both the Older Americans Act of 1965, as amended, and the Older Coloradans' Act of 1985.

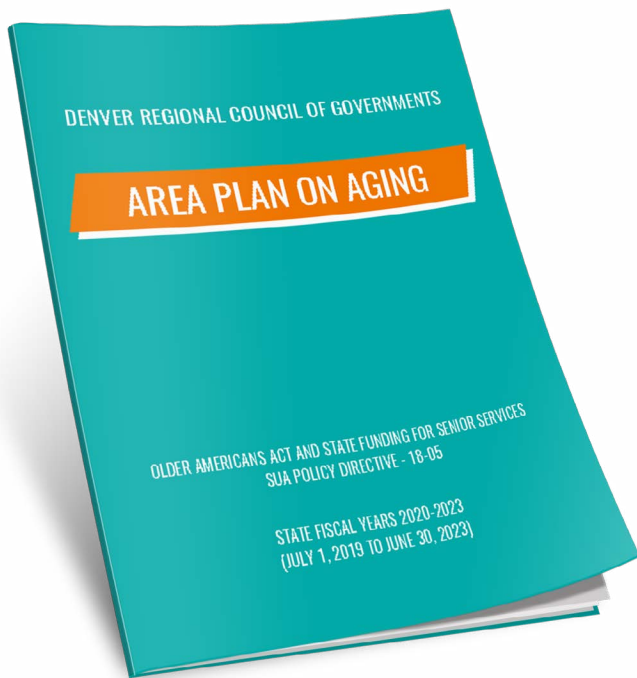
The Area Agency on Aging helps adults 60 and older remain independent in the community. Through direct services and a network of funded providers, it offers older adults, their families and caregivers information and referral services, case management, transportation, home-delivered meals, access to senior centers and legal services. The Area Agency on Aging also serves people living in the region's 96 nursing homes and 410 assisted living residences. As the regional planning entity on aging, the Area Agency on Aging is responsible for identifying the needs of older adults, identifying gaps in services, and working with community partners to address the service gaps in the region.

A key role of the Area Agency on Aging is also advocacy, as it helps ensure that lawmakers are aware of the needs of older adults and their caregivers, the benefits of community-based services and the taxpayer cost of failing to address the needs of the region's older adult population.

The Area Agency on Aging is largely funded through the Older Americans Act, a half-century-old federal program that allocates funds to states based on their 60-plus populations. Without the act, many of the programs DRCOG and its partners offer would have to secure private funding.

In addition to strengthening essential community partnerships, DRCOG works with clinical medical providers to identify social concerns that may contribute to hospital readmissions, high medical bills and poor health. With DRCOG as a bridge, nonprofit, community partners and clinical medical sites work together to reduce health care costs and improve the quality of life for the region's older adults.

DRCOG has recently started allocating available grant money to organizations that prove they're providing solutions for previously underserved communities.



Area Plan on Aging

The Area Plan on Aging guides the work of the DRCOG Area Agency on Aging during a four-year period. It reflects the needs of the region, highlights service goals and demonstrates outcomes, strategies and measures that will be used to evaluate progress and the success of the work. The plan is carried out through programs provided directly by the Area Agency on Aging and through contracts with community-based agencies to provide a continuum of services.

Public input is essential for DRCOG to understand how Area Agency on Aging services are being used, how effective they are, and what services are needed in the region to help people age better. To obtain public input, in 2018 DRCOG conducted a Community Assessment Survey of Older Adults, held 10 community conversations and 10 key informant sessions. DRCOG uses the information from the Community Assessment Survey of Older Adults to identify strengths, needs and

trends in its planning and service area, and to prioritize funding and service priorities during the plan's four years. It also helps local governments, service providers and other partners better understand the older adults living in the region, including what is going well and the areas that still need work.

For more information, visit the [Area Agency on Aging section of the DRCOG website](#).

Communications and Marketing

The Communications and Marketing division works to improve all aspects of internal and external communications, building awareness and perception of the organization and its mission. Its staff supports the success of divisions, programs, projects and initiatives by developing and designing promotional and informational communications materials for various and diverse audiences.

Communications and Marketing addresses accessibility by making the DRCOG website accessible, demonstrated by a place to click to enlarge the font, magnify text, adjust line spacing or increase contrast if needed. Website users can also choose to display the site in modes specific to the needs of people who have seizures, cognitive disabilities, ADHD or who prefer to use keyboard navigation of the site.

The Communications and Marketing division also optimizes PDF documents for accessibility, for example, by using capitalization standards best suited for text-to-speech readers; increasing contrast for people with color perception deficiencies; and indicating segment reading order.

The division also translates the Board's policy into a clear and concise message that can be easily shared with the public, policymakers, legislators, media and other stakeholders. The division works closely with other DRCOG divisions, local, state and federal agencies, and other partner organizations to develop strategies to implement the Board's priorities.

Communications and Marketing also houses the Way to Go program, a joint venture among DRCOG and seven partner agencies to offer options to driving alone. Way to Go promotes the use of transit, biking, walking, carpooling, vanpooling and telework, working with employers to reduce commute trips throughout the region. The Way to Go program is well-known throughout the region for hosting its annual Bike to Work Day event, the second largest of its kind in the country.



Public Engagement Plan

“People-Centered Planning, Projects and Services,” DRCOG’s public engagement plan, helps DRCOG employees plan, implement and evaluate effective engagement activities that invite greater public participation in the organization’s projects. DRCOG is committed to going well beyond just meeting the minimum requirements, and its employees not only inform the public of what DRCOG is doing, but also encourage and enable meaningful engagement.

The plan emphasizes engaging individuals and segments of the public who are directly affected by a project. DRCOG staff is encouraged to both reach out to groups of people traditionally underrepresented and significantly affected by the decisions a project entails. DRCOG invites participation by members of populations traditionally underrepresented in regional decision-making processes due to demographic, geographic or economic circumstances, to allow DRCOG to appropriately consider their needs. DRCOG uses demographic and stakeholder analysis to identify communities for projects for which it seeks public engagement.

For more information, visit the [Get Involved section of the DRCOG website](#).

Limited English Proficiency Plan

DRCOG is committed to engaging and involving all residents of the Denver region, including those with limited English proficiency, in its activities. Therefore, in accordance with the best practice standards for public involvement identified by state and federal partners, together with assistance from the Colorado Department

of Transportation, the Federal Highway Administration and the Federal Transit Administration, DRCOG has developed a Limited English Proficiency Plan. The goal of the Limited English Proficiency Plan is to ensure all residents of the DRCOG region can, to the fullest extent practicable, participate in DRCOG activities. DRCOG's Communications and Marketing staff maintains a record of language assistance requests so future needs may be accurately assessed.

For more information, visit the [Title VI-Civil Rights section of the DRCOG website](#).

Way to Go

Way to Go advocates for access to mobility options for all residents of the Denver region. In accordance with DRCOG's Limited English Proficiency Plan, Way to Go leverages several strategies to communicate well with people who speak a primary language other than English. Its websites use Google Translate, and phone, email or in-person inquiries include translation support if needed. Many of Way to Go's educational and marketing materials, as well as its trip-planning platform (MyWayToGo.org), are translated into Spanish.

Way to Go may be best known for organizing the region's Bike to Work Day event, the second-largest of its kind in the country. Materials, including posters and other communications, are translated into Spanish, and the 2021 event will continue the emphasis on encouraging use of various types of bikes, including adaptive models. Way to Go staff have been intentional about partnering with groups that advocate for underserved communities, with examples including the Denver Regional Mobility and Access Council, Black

Girls Do Bike, Outspokin (an LGBTQ organization) and Wish for Wheels.

Way to Go also administers and funds projects through Transportation Demand Management Set-Aside grants. Among other factors for evaluating and scoring grant project applications, it focuses on environmental justice areas, and more broadly considers access for people of all ages, incomes and abilities.

Citizens' Academy

Citizens' Academy is a program, run by staff from both the Communications and Marketing division and Regional Planning and Development division, that helps build the civic capacity of the Denver region's residents. Through a seven-week course, the academy exposes participants to regional issues like transportation, economic vitality, housing and civic engagement.

Each academy includes weekly two-hour sessions consisting of presentations from local subject matter experts, small-group interactions and networking. In addition, participants develop individual action plans to complete after the academy. Over 800 residents are alumni of Citizens' Academy.

Executive Office

The Executive Office oversees the day-to-day functions of DRCOG, as well as providing support and acting as a liaison to the Board of Directors.

Human Resources

The Human Resources division supports staff in carrying out the goals of the DRCOG Board by providing

services such as facilities management and maintaining employment records. Human Resources also provides services related to employee recruitment, onboarding and retention, such as staff training, coordinating and designing employee benefits, ensuring compliance with all employment laws, investigating and resolving employee concerns, and managing an employee safety program.

Regional Planning and Development

The Regional Planning and Development division supports DRCOG's vision and mission by enabling and facilitating regional collaboration. It provides the information, services and tools to advance a sustainable and vibrant region for all stakeholders. A major focus area for Regional Planning and Development is the Metro Vision plan, the long-range vision for the region that guides growth and development. Regional Planning and Development also is responsible for using sophisticated modeling tools to anticipate the locations of household and job growth forecast by the Colorado State Demography Office at a county level. The division is composed of service-oriented teams, providing high-quality information, tools and resources to both internal and external partners.

Metro Vision

The DRCOG Board of Directors adopted the first Metro Vision plan in 1997 and, since then, has continued the dialogue about how best to achieve the plan's evolving vision. For more than 20 years, the DRCOG Board of Directors has committed to addressing regional challenges through shared aspirations that outline its communities' desired future and integrated plans that collectively serve as a comprehensive guide for how



the region as a whole can achieve the future reflected in Metro Vision. Metro Vision outlines outcomes, objectives and initiatives established by the DRCOG Board of Directors to ensure the coordinated efforts of DRCOG's many partners meet the evolving needs of the region's existing and future residents.

Although Metro Vision's core values have been carried forward through various updates and remain valid, today's Metro Vision is markedly different than its predecessors. Metro Vision's focus has expanded from three topic-based plan elements (growth and development, transportation and environment) to a theme- and outcomes-based approach. The shift in focus reflects:

- Consideration of the region's social and economic health alongside its physical development.
- The addition of new or expanded topic areas such as housing, economy, community health and wellness, and community resilience.

- The desire for an emphasis on measuring shared achievement of regionwide goals.

The current version of Metro Vision emerged from a collaborative process that spanned more than four years. DRCOG's policy committees, member governments, partner agencies, regional stakeholders, and the community at large collaborated to create a shared vision for action for shaping the future of the Denver metro area. DRCOG used a variety of outreach opportunities to engage participants and inform the process, including Metro Vision Idea Exchanges, local government surveys, listening sessions, stakeholder interviews with public- and private-sector interest groups, online forums, neighborhood meetings and numerous engagement activities associated with DRCOG's Sustainable Communities Initiative. Residents throughout the region informed the collaborative process, identifying areas of regional success worth continuing and expanding, as well as emerging challenges for Metro Vision to address.

CRS 30-28-106(2) requires, at minimum, a well-noticed public hearing (notice has been published in a newspaper of general circulation in the region in a manner sufficient to notify the public of the time, place, and nature of the public hearing) prior to the adoption or amendment of a regional plan, though DRCOG has made a stronger commitment to nondiscriminatory engagement and involvement in Metro Vision updates and amendments through People-centered planning, projects and services (DRCOG's public engagement plan). This includes regular and routine amendment cycles so Metro Vision can remain dynamic and flexible, and respond to a wide range of issues and concerns.

For more information, visit the [Metro Vision website](#).

Boomer Bond

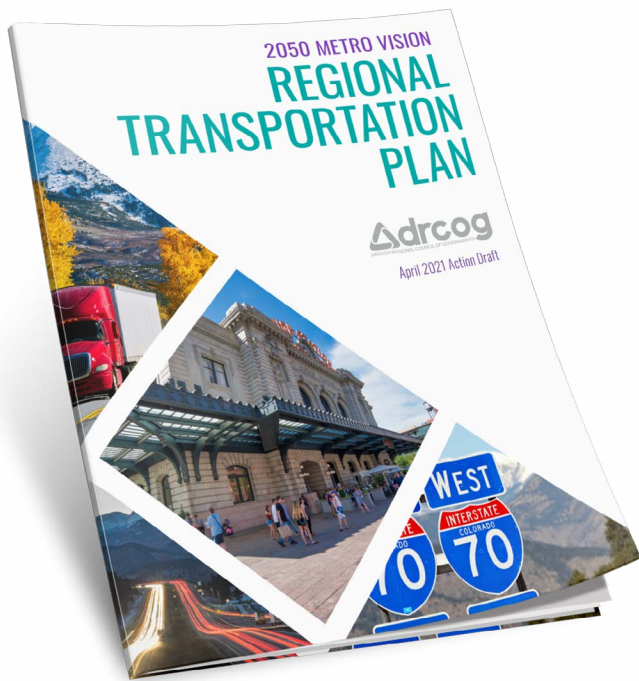
DRCOG and communities across Colorado are nationally recognized leaders for their efforts to create age-friendly communities. For more than a decade, DRCOG has been working directly with its member governments to help them prepare for the expected dramatic growth in the older adult population.

DRCOG's Boomer Bond assessment helps local governments conduct an evaluation of how their community serves older adults in the areas of housing, mobility and access, community living and support services. The assessment tool helps local governments document existing conditions, strengths and deficiencies; but also guides them in identifying short and long-term priorities and implementation strategies to ensure they support health and successful aging.

Transportation Planning and Operations

The Transportation Planning and Operations division assists the Board and local officials in planning and implementing the Regional Transportation Plan. The division also improves the operation of the region's infrastructure through traffic operations and signalization projects, a key function of which is coordinating efforts to improve traffic congestion and mobility in the region.

The primary products of the regional transportation planning process that address mobility needs are the Metro Vision Regional Transportation Plan and the Transportation Improvement Program. In addition, Transportation Planning and Operations undertakes other programs and projects that address the mobility needs of all residents in the region, including vulnerable populations. Specific programs and projects are described in DRCOG's Unified Planning Work Program, which is updated every two years.



Metro Vision Regional Transportation Plan

The Metro Vision Regional Transportation Plan outlines the region's multimodal transportation vision with a horizon of at least 20 years. The Regional Transportation Plan helps DRCOG and its numerous partners implement the shared aspirational vision of Metro Vision by identifying specific improvements to the transportation system and its operations. The multimodal plan includes roadway, transit, freight, active transportation, safety, and operational facilities and services.

DRCOG launched the Civic Advisory Group and Youth Advisory Panel as part of the 2050 RTP to increase inclusive outreach and engagement during the planning process. DRCOG committed to the 2050 RTP respecting equity issues in its project and

program investment priorities. Transportation helps address social equity issues, and transportation equity is one of the foundational themes of the 2050 planning process and the 2050 RTP. The 2050 RTP's vision for transportation connects people of all ages, incomes and abilities to housing, jobs, health care, recreation and education.

DRCOG considered the 2050 RTP's potential benefits to, and effects on, minority and low-income populations within the Denver region, especially as compared to the broader population. DRCOG staff used population and travel demand forecasting tools to determine whether the plan would result in vulnerable populations experience more hardship than the general population, especially whether they would spend more time traveling to jobs, essential services and entertainment and educational opportunities.

For more information, visit the [Metro Vision Regional Transportation Plan section of the DRCOG website](#).

Transportation Improvement Program

The Transportation Improvement Program is a staged multiyear plan of projects to implement the Regional Transportation Plan. The TIP identifies the federally funded surface transportation strategies and projects (or phases of projects) to be implemented in the DRCOG transportation management area over a four-year period. This multimodal program includes roadway, high-occupancy vehicle, transit, travel demand management, and active transportation facilities and services.



Federal law designates metropolitan planning organizations as responsible for developing and approving the TIP. DRCOG directly selects projects with federal and state funding, and reviews CDOT- and RTD-submitted projects for consistency with regional plans. Each of the three regional transportation planning partners — DRCOG, CDOT and RTD — select projects for the funds over which it has authority. DRCOG is allocated Transportation Alternatives, Surface Transportation Block Grant and Congestion Mitigation and Air Quality federal funding in addition to the state Multimodal Options Fund.

- **Surface Transportation Block Grant Program:** The most flexible of the federal funding types, the Surface Transportation Block Grant Program can be used for a variety of transportation projects and programs, including roadways, bridges, bicycle and pedestrian infrastructure, and transit.

- **Transportation Alternatives:** Federal Transportation Alternatives funds are primarily for bicycle and pedestrian infrastructure.
- **Congestion Mitigation and Air Quality:** Federal Congestion Mitigation and Air Quality funds are for projects and programs that provide an air quality benefit by reducing emissions and congestion. Roadway capacity and reconstruction projects are ineligible for Congestion Mitigation and Air Quality funds.
- **Multimodal Options Fund:** State Multimodal Options Fund funds are to be used for transit, transportation demand management programs, multimodal mobility projects enabled with new technology, studies, and bicycle and pedestrian projects.

DRCOG also includes in the TIP air quality regionally significant, local government-funded projects that require federal approval. CDOT selects projects for inclusion into the TIP using a variety of federal and state revenues to fund regional multimodal system construction, operations and maintenance. RTD selects projects using a variety of federal funds and RTD revenues to fund regional transit system construction, operations and maintenance.

DRCOG evaluates and selects projects through two calls for projects — one for the Regional Share and another for the Subregional Share. This dual-model approach provides the flexibility for member governments to apply local values to the TIP process and still maintain DRCOG's commitment to implementing a TIP process consistent with Metro Vision and the Regional Transportation Plan.

At the initiation of the Regional Share TIP call for projects, DRCOG, CDOT and RTD staff jointly conduct two mandatory training workshops across the region to describe and explain the submittal process, eligibility and evaluation, development requirements for construction projects, sponsor responsibilities, and basic requirements for implementing federal projects for the regional and subregional processes.

During the training, CDOT, RTD and DRCOG staff are available to assist jurisdictions in preparing funding request applications, as needed. As an outcome of the required training, those who attend are certified to submit TIP applications for either call. Only applications prepared by certified sponsors who attended a mandatory training are considered eligible submittals.

The TIP project selection process considers the input of residents at the local, subregional and regional levels. Resident involvement is most significant at the local level as projects were submitted to DRCOG for regional funding through the Regional Share process and to each county subregional forum through the Subregional Share process during the most recent call for projects. Local governments and agencies, such as CDOT and RTD, work directly with residents in the development of transportation projects.

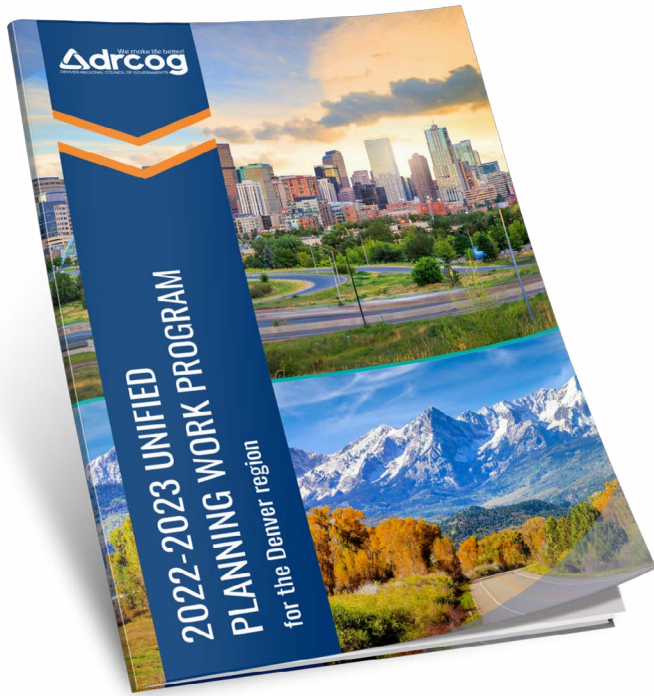
DRCOG and each county subregional forum provided public notice of each subregional technical committee and forum meeting throughout the TIP development process. In addition, each agenda contained dedicated time for public comment. Notice of public involvement activities and the time established for public review and comment on the TIP satisfy the Program of Projects requirements of the Federal Transit Administration

Section 5307 Program for RTD's Program of Projects (also referred to as RTD's Mid-Term Financial Plan).

Another important consideration by DRCOG staff for the TIP is its potential benefits to, and effects on, minority and low-income populations within the Denver region, as compared to the region as a whole. Environmental Justice is considered in the scoring of individual DRCOG-funded projects. DRCOG staff score projects on how well the project will improve mobility infrastructure and services for vulnerable populations, including improved transportation access to health service.

All projects selected for funding must go through National Environmental Policy Act environmental analysis and public involvement prior to construction. Projects in the TIP contain the best information at the time of submittal. Final details of alignment, design, multimodal treatments, and environmental mitigation, minimization, or abatement strategies are determined by project sponsors and state and federal partners before construction takes place through a project-level National Environmental Policy Act process.

The Board adopted Policy on Transportation Improvement Program Preparation covering the projects selected in the TIP provides more details. For more information, visit the [Transportation Improvement Program section of DRCOG's website](#).



Unified Planning Work Program

DRCOG addresses the region's planning priorities through its Unified Planning Work Program, which describes all transportation-related planning activities occurring in the region on a two-year cycle. It primarily identifies tasks that will be accomplished using federal transportation planning funds.

The regional partners participate in the activities of the Unified Planning Work Program, with each contributing information, effort and resources. The work program defines the nature, extent and duration of partners' participation. As a recipient of federal funding, compliance with Title VI is required. DRCOG has integrated Title VI into its planning activities as part of its transportation planning process.

For more information, visit the [Unified Planning Work Program section of the DRCOG website](#).

Additional plans and programs

Transportation Planning and Operations is also responsible for the development of other multimodal plans and programs that outline the region's vision and needs. For more information on each of the plans mentioned below, and how each addresses the needs of vulnerable populations, visit the DRCOG website.

Active Transportation Plan

The plan envisions a safe, comfortable and connected network, and highlights opportunities and implementation strategies to improve active transportation across the Denver region.

Regional Multimodal Freight Plan

The plan covers local freight issues, including challenges and opportunities for improvement, and offers a strategic framework for the region to engage in planning for the future of freight infrastructure.

Taking Action on Regional Vision Zero

Taking Action on Regional Vision Zero is a safety action plan establishing a target of zero fatalities and serious injuries on the Denver region's transportation system.

Coordinated Transit Plan

The Coordinated Transit Plan addresses federal requirements, identifies strategies to address the transportation needs of our region's older adults and individuals with disabilities, and emphasizes the region's integrated approach to coordinating an array of fixed route and human service transit services.

Federal Transit Administration Section 5310 program

Unlike other federal funding that the Denver Regional Council of Governments receives as a subrecipient, DRCOG is a designated recipient of Federal Transit Administration Section 5310 program funds for the Denver-Aurora Urbanized Area. The Program Management Plan details how DRCOG plans to administer the 5310 program to facilitate both DRCOG's management and Federal Transit Administration oversight by documenting the procedures and policies for administering the programs. The Program Management Plan details how a project is selected, incorporated into the appropriate documents for federal funding, contracted and managed.

The Fixing America's Surface Transportation Act requires projects selected for funding under Section 5310 to be "derived from a locally developed, coordinated public transit-human services transportation plan" and that the plan be "developed through a process that includes representation of public, private, and nonprofit transportation and human services providers." DRCOG produces and maintains the Coordinated Transit Plan which covers the entire Denver region, however, local entities are encouraged to develop local coordinated transit plans.

Section 5310 program management is provided by the Area Agency on Aging with support from multiple divisions within DRCOG, including the Transportation Planning and Operations division, and the Administration and Finance division. The Area Agency on Aging provides program management and general review of projects with support from Transportation Planning and Operations. Administration and Finance

provides overall program financial compliance and contract management.

The following sections are based on information in DRCOG's Section 5310 Program Management Plan [Appendix M](#) and outline how Section 5310 subrecipients meet their requirements to implement and submit Title VI programs to DRCOG. Please refer to the documents, available on the DRCOG website, for further details.

Monitoring

DRCOG continually monitors 5310 subrecipients. DRCOG staff reviews invoices from 5310 grantees to ensure they comply with applicable regulations and are submitted for eligible expenses. If invoices do not match regulations, they are rejected and further investigated. If DRCOG determines a project is no longer compliant with the 5310 program, funds are taken from the subrecipient.

DRCOG performs an annual evaluation providing program measures and other applicable information including tracking funding and the remaining apportionment balances. DRCOG uses the 5310 Program Checklist found in Appendix A of the Program Management Plan to ensure it is taking all appropriate measures in administering and managing the 5310 program. The results from the checklist are included in the annual evaluation document.

Progress reporting

Subrecipients are required to prepare progress reports on a quarterly basis. The reports begin based on the date when agreements or contracts are signed with subrecipients and continue until the project is closed out. In addition to applicable items from 2 CFR

200.328(b), progress reports also include the following Section 5310 specific program measures (C 9070.1G, p.II-2.), as applicable.

Certifications and assurances

All applicants must comply with various Federal requirements. These certifications and assurances, including the applicant's Title VI Plan, which are required to be signed by an authorized agency official, are part of the solicitation documents or application package and are to be submitted with the completed application of applicants. If an application is approved, these certifications and assurances become part of the subrecipient's contract with DRCOG.

DRCOG, when submitting a grant application to the FTA, is also required to execute certifications and assurances both on behalf of DRCOG and covering its subrecipients. DRCOG agrees to comply with all requirements of the Annual List of Certifications and Assurances for Federal Transit Administration Grants and Cooperative Agreements and pass those requirements to subrecipients as appropriate.

Site visits

DRCOG or authorized representatives perform on-site project monitoring visits with subrecipients receiving grant assistance. Site visits are conducted using checklists which outline account and record keeping requirements in compliance with Office of Management and Budget circulars A-122 and A-87 if the subrecipient received operating assistance; Office of Management and Budget 49 CFR Part 18 and Part 19 for administrative requirements; the regulatory requirements for receipt of federal funds; vehicle inventory and maintenance records if the subrecipient received capital assistance and compliance with

the Federal Transit Administration Drug and Alcohol Program testing regulations.

DRCOG complies with all applicable standards set forth in 2 CFR 200 and guidance in Federal Transit Administration circular 5010.1 – Grant Management Guidelines about financial management systems for financial reporting, accounting records, cost standards, internal controls, budget controls and audit requirements.

Additional subrecipient requirements

DRCOG requires a signed certification of compliance pertaining to applicable Certifications and Assurances from 5310 subrecipients. DRCOG, in turn, includes the documentation in the project's permanent file. DRCOG also randomly completes audits of subrecipients to ensure compliance with applicable provisions.

Civil rights

DRCOG assures the Federal Transit Administration that each third-party contractor at any tier and each subrecipient at any tier under the project is compliant with these requirements. Each subrecipient is required to attend an annual workshop on civil rights requirements.

DRCOG will seek, from all approved applicants, a written certification of compliance pertaining to Civil Rights, Title VI, Equal Employment Opportunity and Disadvantaged Business Enterprise regarding the grantee's facility and services. DRCOG also insists on being informed, in writing, of any lawsuit, litigation or civil rights complaints made against the grantee organization. Additionally, DRCOG accepts, in writing, any updates on the status or outcome of active or

pending lawsuits throughout the period of the approved grant. Furthermore, when selecting projects DRCOG prioritizes projects that serve Environmental Justice (minority and low-income) and other vulnerable populations and areas where transit-dependent populations reside but aren't currently well-served by the transit system.

DRCOG, in turn, makes all documents related to Civil Rights reporting part of the project's permanent file.

Section 504 and Americans with Disabilities Act reporting

DRCOG seeks, from all approved applicants, a written certification of compliance pertaining to Americans with Disabilities Act directives. DRCOG, in turn, makes all documents related to Americans with Disabilities Act reporting part of the project's permanent file. The documentation includes information regarding the Americans with Disabilities Act accessibility of vehicles purchased through the 5310 program and executed, contracted assurances for subrecipients. DRCOG incorporates the relevant elements Section 5310 program administration into this Title VI Plan.

Environmental protection

When determining if a particular program, policy or activity will have disproportionately high and adverse effects on minority and low-income populations, DRCOG will take into account mitigation and enhancement measures and potential offsetting benefits to the affected minority or low-income populations. Other factors DRCOG will also take into account are comparative impacts, design, and the number of similar existing system elements in nonminority and non-low-income areas. The evaluation by DRCOG

staff will determine if alternatives studied will be disadvantageous to the population considered.

However, any program, policy or activity that has the potential for disproportionately high and adverse effects on the affected populations will only be carried out by the applicant if there is a substantial need for the program, policy or activity based on overall public interest; or alternatives that would have fewer adverse effects have either adverse social, economic, environmental or human health impacts that are more severe or would involve increased costs of an extraordinary magnitude.

In addition, any federal funded projects must comply with the National Environmental Policy Act. DRCOG will work with subrecipients proposing to use Section 5310 funds for any construction-related projects to ensure that the National Environmental Policy Act requirements are met in advance of approving the project for funding.

Data

Data collection

The Denver Regional Council of Governments produces a wide array of data, information, maps and models in support of regional planning. Data and maps, addressing topics from transportation and land use to demographics and employment, are available for download from the Regional Data Catalog to inform regional and local infrastructure investment decisions. The data collected is used for data briefs, small-area forecast analysis and other performance measurement where data can be used in conjunction with demographic data to allow regional stakeholders to better understand access to opportunity. DRCOG

also engages local governments in collaborative data initiatives through the Denver Regional Data Consortium and the Denver Regional Aerial Photography Project.

Interactive maps

DRCOG creates numerous web maps each year to help with stakeholder engagement. DRCOG recently deployed a new platform that makes creating and updating maps easier and more consistent, resulting in more opportunities to create web map products to assist in the public's review of DRCOG's plans.

The new web maps have an updated user interface, additional functionality and a streamlined update process for internal management and future development. Recently, web maps have been produced to help with Census 2020 outreach to hard-to-reach populations, public review and comment on the 2050 Metro Vision Regional Transportation Plan and exploration of all-day volume at traffic count locations around the region.

Regional Data Catalog

The Regional Data Catalog is a repository of open data managed by the Denver Regional Council of Governments. The datasets in the catalog support communities in making informed, data-driven decisions in areas including mobility, land use and changing demographics. Annually, DRCOG develops and compiles data sourced from local governments, data companies, the land use and travel models, and DRCOG-facilitated data acquisition projects. DRCOG focuses on regional forecasts, transportation projects and planimetric data. The data in the catalog is regional in scale and may be updated less frequently than authoritative local sources.

Denver Regional Data Consortium

The Denver Regional Data Consortium is an open and voluntary committee made up of geographic information system professionals interested in collaborative data initiatives. The regionwide group meets two to three times a year and issues a quarterly newsletter to encourage the exchange of data, information and ideas. Past issues of the Denver Regional Data Consortium newsletter are available on the DRCOG website.

Regional Aerial Photography Project

DRCOG facilitates the Denver Regional Aerial Photography Project for the benefit of local and regional partners. Since 2020 its goal has been to acquire high resolution aerial imagery of the Denver region every two years. Project partners consistently describe the project as valuable because it shares cost savings among partners, increases collaboration in the region and reduces duplication of effort.

Data Privacy Policy

To make informed decisions, DRCOG has determined it is necessary to collect, store, analyze, visualize and report data — some of which may be of a sensitive nature. DRCOG staff recognizes it must balance the need for information with the needs of the public, vendors and partners to maintain the privacy of their personal or proprietary data.

The Data Privacy Policy notifies the public of DRCOG's intentions to use data responsibly. It also provides a framework for DRCOG staff to handle protected data by outlining guiding principles and strategies.

Visit DRCOG's website to see the full Data Privacy Policy.



4

Meaningful public participation

The following are excerpts from *People-centered planning, projects and services* (DRCOG's public engagement plan) and its Limited English Proficiency Plan. Please refer to the documents, available on the DRCOG website, for further details.

DRCOG's commitment to engagement

The public engagement plan provides the vision, the framework and the process for meaningfully engaging the public in regional decision-making. DRCOG is committed to transparency and access to services, information and the decision-making process for people throughout the region. Because planning is about people and the communities they call home, it is about where and how the region's residents live, work and play, making life better for people of all ages, incomes and abilities. Community participation improves the relevance of plans, policies, services and projects, and helps DRCOG meet people's needs today and into the future.

Throughout the plan, there is an emphasis on engaging individuals and segments of the public who are directly affected by a project. DRCOG staff is encouraged to both reach out to groups of people traditionally

underrepresented and significantly affected by the decisions a project entails. However, leveraging DRCOG's existing, robust relationships with the jurisdictions where members of the public reside will also be useful. Many DRCOG employees (especially within the Regional Planning and Development and Transportation Planning and Operations divisions) are in regular conversation with jurisdiction staff. Colleagues should approach one another for their insights and for help reaching out to their established connections at member governments. In addition, employees in the Executive Office can help discern the best ways to reach out to elected officials from our member governments.

DRCOG is committed to an engagement model that fosters shared problem-solving, supportive partnerships and reciprocal relationships. DRCOG believes that the region's decision-makers need to hear its residents' full range of perspectives to better understand issues, explore alternatives and create a shared action plan. Through the principles outlined in the public engagement plan, DRCOG intends to demonstrate that it provides clear and concise information, is responsive to the people of the region and addresses ideas and concerns raised.

Principles

To support the commitment described above, DRCOG uses the following principles to guide engagement:

Early engagement

DRCOG engages the public toward the beginning of each project, or when members of the public can have the greatest effect on shaping the direction of DRCOG's efforts.

Ongoing engagement

DRCOG engages the public throughout development of a project, or at specific phases identified early in the process. DRCOG provides members of the public with clear and specific timelines and methods for providing their perspectives.

Timely and adequate notice

DRCOG ensures that the public receives timely and adequate notice of opportunities for public engagement.

Consistent access to information

DRCOG follows state, federal and funding partner requirements, as well as organization policies, regarding making supporting material available for topics on which it has invited members of the public to provide their perspectives.

Invitation for public review and comment

DRCOG invites public review of, and comment on, essential plans and programs. Invitations are made no later than is required by federal and state requirements or funding partners (typically 30 to 45 days). For projects lacking specific partner requirements for public engagement, DRCOG determines the appropriate length of the review period. Copies of public review drafts are made available at DRCOG's office and website. Comments are accepted by mail, email and via the DRCOG website (drcog.org). Although DRCOG maintains a robust social media presence and promotes opportunities for public involvement through social media, comments are not directly accepted through social media (such as Facebook, Twitter or Instagram).

Invitation and consideration of perspectives from those traditionally underrepresented

DRCOG invites participation by members of populations traditionally underrepresented in regional decision-making processes due to demographic, geographic or economic circumstances, to allow DRCOG to appropriately consider their needs. Such populations include, but are not limited to, individuals who speak languages other than English, individuals representing diverse cultural backgrounds, low-income individuals, people with disabilities, older adults and young adults. DRCOG uses demographic and stakeholder analysis to identify communities for projects for which it seeks public engagement. Specific engagement strategies for seeking out and considering the needs of those

traditionally underserved groups are detailed in appendices D, E and F of Person-centered planning, projects and services. DRCOG's Limited English Proficiency plan guides staff in providing customer service to, and facilitating participation by, members of the public whose proficiency in English is limited.

Regular review of public engagement processes

DRCOG regularly reviews the implementation of the plan and the ability of the principles, steps, techniques and tools in the public engagement plan to advance meaningful public engagement. DRCOG uses a variety of means to determine the effectiveness of engagement strategies including data collection, feedback from participants at public events, review of attendance at public events and evaluation of the implementation of a variety of techniques and tools. The outcomes of such evaluations will inform future engagement, and successful activities will be continued while those that underperform will be eliminated. DRCOG staff compiles a routine evaluation summary of engagement activities to share results of the organization's recent engagement efforts and review areas of success and potential improvement.

In addition to DRCOG's commitment to continuous improvement and evaluation of its public engagement activities, the organization's efforts are periodically reviewed by funding partners and agencies such as the Federal Highway Administration and Federal Transit Administration during every four-year "metropolitan planning organization" planning process certification reviews.

Implementation

Whether a project includes a formal process or engagement is related to a DRCOG project without federal, state or partner requirements, implementation can take many forms. To start, staff must determine the appropriate level of public engagement and carefully consider the goals for the project as well as the purpose of public engagement.

DRCOG staff should consider the techniques and tools that might best encourage the appropriate level of public engagement for the project. The selected techniques and tools that are chosen can facilitate the level of engagement to be achieved. For example, an eblast announcing a new report is informational. A

Levels of public engagement



poster announcing a public hearing is not consultative on its own, but facilitates consultation at the hearing it promotes. An email announcing that the public is invited to submit their community's five most serious challenges represents the "involve" level. A focus group at which members of the public suggest alternatives for how to spend limited funds on transportation projects represents the "collaborate" level. Very few techniques or tools, in and of themselves, result in participation that is collaborative. Collaborative opportunities for organizations structured like DRCOG, which operates under priorities established by a board of directors, are rare. However, in some circumstances it's appropriate to consider greater decision-making involvement by the public.

Techniques

Techniques represent tactics for approaching public involvement. They always involve interaction among people – usually representatives of DRCOG (employees, committee members, Board directors) and members of the public. Discern the techniques that will be used for public engagement before thinking about the tools that will be used to support it.

Tools

Tools are what can be used as part of the public engagement techniques. A tool's success depends on how well it is a) designed to support its corresponding technique and b) how effectively it is deployed. Not every tool will be relevant for every technique. However, every tool requires an employee to take responsibility for using it and measuring how its use contributes to the success of its corresponding technique.

The medium is not the message

Simply using a technique or tool won't guarantee meaningful results. Consider how the techniques will be refined and tools will be developed to ensure meaningful public engagement. For tools that are static materials, such as posters, postcards and other printed matter, create a clear call to action that will allow staff to measure how many people saw the collateral and how they responded. DRCOG staff is encouraged to consult the Planner – Public Engagement staff member for help developing techniques and tools at any stage of a project process.

Potential participants

Although staff may have a well-defined idea about the types of people to engage in a project, staff should consider other types of organizations, professionals and members of the public with whom DRCOG has not previously interacted — or who may have provided input in the past but who have not recently been actively engaged.

Demonstrating results and evaluation

During development of a project, the purpose, goals and results of the project were considered. The elements that would contribute to its success — or the success of its public engagement component — were also considered. The groups of people who have been historically underrepresented in similar efforts were specifically considered. And the ideal level of public engagement for the project was determined.

Evaluating the success of engagement strategies is critical to improving the overall effectiveness of

engagement in the future. Criteria includes three major objectives:

- Provide meaningful opportunities to participate.
- Involve under-represented communities.
- Communicate complete, accurate, understandable and timely information.

Some criteria, but perhaps not all, will be relevant to the project. Before data is collected, determine which criteria are relevant to the project.

The project team should designate a member to coordinate how the team will gather, compile and report on criteria and measurements throughout all project stages. By measuring progress toward goals throughout the project, corrections may be made while the efforts are still underway.

Because collecting and evaluating data may require collaboration across DRCOG divisions, be sure to allow adequate time for employees in other divisions to help. The results of these evaluations are vital for the continual improvement of engagement efforts.

Language assistance

The Denver Regional Council of Governments is committed to engaging and involving all residents of the Denver region, including those with limited English proficiency, in its activities. Therefore, in accordance with the best practice standards for public involvement identified by state and federal partners, together with assistance from the Colorado Department of

Transportation, Federal Highway Administration and Federal Transit Administration, DRCOG has developed a Limited English Proficiency Plan. The goal of the Limited English Proficiency Plan is to ensure all residents of the DRCOG region can, to the fullest extent practicable, participate in DRCOG activities.

Department of Transportation and limited English proficiency policy guidance

In accordance with Executive Order No. 13166, the U.S. Department of Transportation, on Dec. 14, 2005, issued its Policy Guidance Concerning Recipients' Responsibilities to Limited English Proficient Persons. Adopting the framework established by the Department of Justice in its Aug. 11, 2000, guidance, the U.S. Department of Transportation identifies four factors that should be considered by a recipient of federal funds in assessing the needs of individuals with limited English proficiency and implementing a plan to address those needs.

The four factors include:

- 1) The number or proportion of LEP persons served or encountered in the eligible service population.
- 2) The frequency with which LEP individuals come in contact with the programs, activities, or services.
- 3) The nature and importance to LEP persons of your programs, activities, and services.
- 4) The resources available to the recipient and costs.

The greater the number or proportion of eligible individuals with limited English proficiency, the greater the frequency with which they will have contact with a program, activity or service and the more likely enhanced language services will be needed. The intent is to strike a balance ensuring individuals with limited English proficiency have meaningful access to critical services without unduly burdening the local agency.

Older Americans Act guidance on “targeting” services

In accordance with the Older Americans Act and the Colorado Department of Health and Human Services, State Unit on Aging Rule Manual Volume 10, area agencies on aging are required to target older adults who are in some way socially or economically disadvantaged. This includes, but is not limited to, giving “preference and priority in the delivery of services ... to older adults with limited English proficiency.” It is expected that each contracted service provider has a policy in place detailing how to do so.

Summary of engagement

Over the past three years, Denver Regional Council of Governments staff have been engaged in the development, update and implementation of major plans and programs. Following are highlights summarizing the engagement completed for DRCOG’s major plans and programs.

Metro Vision

DRCOG held a public hearing at the April 17, 2019, Board of Directors meeting on proposed amendments and updates to the Metro Vision plan, the Metro Vision Regional Transportation Plan and associated air quality conformity documents. The hearing was noticed in The Denver Post and posted on the DRCOG website 30 days before the hearing to allow for public comment on the proposed changes.

An eblast was sent to about 1,000 recipients when the 30-day comment period opened; approximately one-third of recipients opened the email and about a dozen people clicked on the available documents. DRCOG sent postcards to several hundred recipients to notify them of the upcoming public hearing and opportunity to comment through the website, by email or mail.

DRCOG used social media posts with visual content to promote the public comment period on Facebook and Twitter, but received minimal interaction. It sent a press release two weeks prior to the hearing.

2050 Metro Vision Regional Transportation Plan

The two-year planning process for the 2050 Metro Vision Regional Transportation Plan began in the summer of 2019 and culminated with the DRCOG Board of Directors adopting the 2050 Metro Vision Regional Transportation Plan in April 2021.

Public and stakeholder engagement was integral to the development of the 2050 Metro Vision Regional Transportation Plan. The plan is a collective vision that represents the input of the public and DRCOG's stakeholders and partners. Over the two-year process of developing the plan, DRCOG staff divided engagement into four distinct phases, each of which each served a different purpose and was built upon the previous phases.

- The first phase, visioning and education, focused on the general transportation priorities of the general public and guided all later work in the plan.
- Phase two, investment priorities and scenario options, tested scenarios to study the regional mobility outcomes of investment types and learn more about the investment priorities of stakeholders and the public.
- The third phase, plan development, was primarily focused on stakeholder engagement and the development of a shared strategy of projects and programs for the plan.
- The fourth and final phase involved the public review of the draft plan to ensure that the draft is consistent with the input received throughout the process.

In addition to the general public, creating the 2050 Metro Vision Regional Transportation Plan involved three regional agencies, 10 counties, 48 cities and towns, elected officials, transit operators, local government staff, community-based organizations, business groups and nonprofits. DRCOG brought together two advisory groups to consider perspectives from those traditionally underrepresented in transportation planning processes. Some examples include individuals who speak languages other than English, people representing diverse cultural backgrounds, low-income individuals, people with disabilities and young adults.

During the 30-day public comment period, DRCOG gave 27 presentations to regional partners; the 2050 Metro Vision Regional Transportation Plan recorded more than 1,000 views on YouTube video; DRCOG staff sent 13 eblasts were sent; more than 8,900 visits were logged to the online engagement site; staff posted to social media 116 times; and there were over 2,500 plan website visits. The engagement resulted in DRCOG receiving 282 comments on the draft 2050 Metro Vision Regional Transportation Plan.

For more details about the engagement strategies staff used to develop the 2050 Metro Vision Regional Transportation Plan, see its [Appendix C](#) on the DRCOG website.

2020-2023 Transportation Improvement Program

The 2020-2023 Transportation Improvement Program was adopted by the Board of Directors on Aug. 21, 2019, following a public hearing held on July 17. The hearing was preceded by a 30-day public comment period, with public notice posted in The Denver Post and on the DRCOG website. The public was invited to submit comments through the website, by email or by mail.

For the first time, DRCOG developed a map commenting application using ArcGIS Online that allowed the public to see the locations of proposed projects and leave comments directly on the map. DRCOG received 102 comments on 75 projects through the map.

DRCOG solicited additional feedback in person at DRCOG's booth at Civic Center Park on Bike to Work Day. Several people submitted comments regarding individual projects on the interactive map and about 30 people talked with DRCOG staff to learn more about the TIP program and projects.

Engagement staff sent an eblast to about 1,000 recipients announcing the 30-day comment period, with an open rate of just over one-third. The eblast led nearly 50 people to view the TIP document and about a dozen to the comment map. DRCOG sent a reminder eblast to the original recipients the day before the hearing.

Staff used several social media posts to promote the public comment period and the interactive map on Instagram, Twitter and Facebook. Considering that only about a dozen people found the map through the eblast, DRCOG staff assumes that more of the map traffic was driven by social media posts. The posts with photos of the booth at Bike to Work Day received the most interaction.

DRCOG received 107 comments on the 2020-2023 TIP, including the map comments, web and email comments, and two attendees who testified at the public hearing.

Public engagement plan

The DRCOG Board of Directors adopted a public engagement plan, *People-centered planning, projects and services*, on May 15, 2019. The plan was the culmination of nearly two years of effort to update the previous public involvement plan which had focused only on transportation planning.

DRCOG held a public hearing on the draft plan on March 20, 2019. DRCOG provided notice of the public hearing in The Denver Post on Jan. 17, 2019, and posted it on the DRCOG website to allow for more than 45 days of public comment. The public was invited to submit comments through the DRCOG website, by email or by mail. Social media posts with graphics were used to promote the public comment period on Instagram, Twitter and Facebook.

DRCOG engagement staff gave informational presentations to the Transportation Advisory Committee, Regional Transportation Committee and the Board of Directors during the public comment period. Staff sent toolkit of social media posts, email copy and the plan draft to Board directors to share within their networks.

Area Plan on Aging

A public hearing was held at the March 15, 2019, Advisory Committee on Aging meeting. DRCOG provided notice of the public hearing 15 days prior to the hearing in The Denver Post, on the DRCOG website and advertised through social media posts on LinkedIn, Facebook and Twitter. DRCOG accepted public comments on the draft plan were through its website, by email and by mail.

Additional engagement work

In addition to these major plans and programs, DRCOG participated in other engagement activities throughout the year. For more information on the following plans and programs, visit the DRCOG website.

- Regional Multimodal Freight Plan.
- Taking Action on Regional Vision Zero.
- Regional Complete Streets Toolkit.
- Coordinated Transit Plan.
- Small-Area Forecasts.
- Citizens' Academy.
- Census Hard to Count Grant.
- Quadrennial Certification Review.

Public engagement annual reports

Since the adoption of the public engagement plan, *People-centered planning, projects and services*, in 2019, staff has produced annual public engagement reports. The annual reports document the major engagement efforts by DRCOG staff during the development and implementation of various plans and programs.

For more information, visit the DRCOG website to see the most recent annual reports.

A photograph of a modern high-speed train, likely a Shinkansen, stopped at a station platform. The train is white with grey accents and has multiple windows. The platform has a yellow tactile paving strip along the edge. The background shows the station's roof structure and some blurred lights.

5

Transportation investment analysis

Background

As part of the transportation programming and planning process, the Denver Regional Council of Governments examines the distribution of transportation funding throughout the region in order to identify any disparate or disproportionate effect on its vulnerable populations.

A detailed profile of the region's demographic characteristics is provided in the following sections. DRCOG staff conducted a mapping exercise for each of the following demographic groups: individuals of color (includes racial and ethnic minorities), low-income households, individuals with limited English proficiency, adults age 65 and older, children age 5-17, individuals with a disability, and households without a motor vehicle. The data used for these groups were drawn from 2015-2019 Five-Year American Community Survey conducted by the U.S. Census Bureau.

The maps in this plan, while using the same vulnerable populations in the 2050 Metro Vision Regional Transportation Plan, are intended to provide a baseline for the development and improvement of future Title VI Implementation Plans. For more information on other equity analyses, such as the population-based approach taken for the 2050 Metro Vision Regional Transportation Plan, please visit the specific plan in question.

Analysis

DRCOG created Map 4.1 through Map 4.7 using geographic information system mapping to display the census tracts in the region with a percent of vulnerable

populations that exceed each group's regional average. Census tracts generally have a population size between 1,200 and 8,000 people, with an optimum size of 4,000 people. The spatial size of census tracts varies widely depending on population density. In addition, the following maps compare the location and concentration of vulnerable populations in relation to projects included in the 2022-2025 Transportation Improvement Program.

- All tracts with the percentage of their populations identified by DRCOG as a vulnerable population exceeding the regional average for each specific demographic group are shaded in teal.
- All tracts with the percentage of their populations identified by DRCOG as a vulnerable population at or below the regional average for each specific demographic group remain unshaded.

Map 4.1 through Map 4.7 exemplify the types of maps that DRCOG uses to determine proportional geographic distribution of transportation investments across the diverse communities in the Denver region.

Any project, regardless of project type or mode, can have potential construction and implementation effects. Similarly, any project can potentially provide travel and mobility benefits. The investments shown do not negatively affect vulnerable populations more than others.

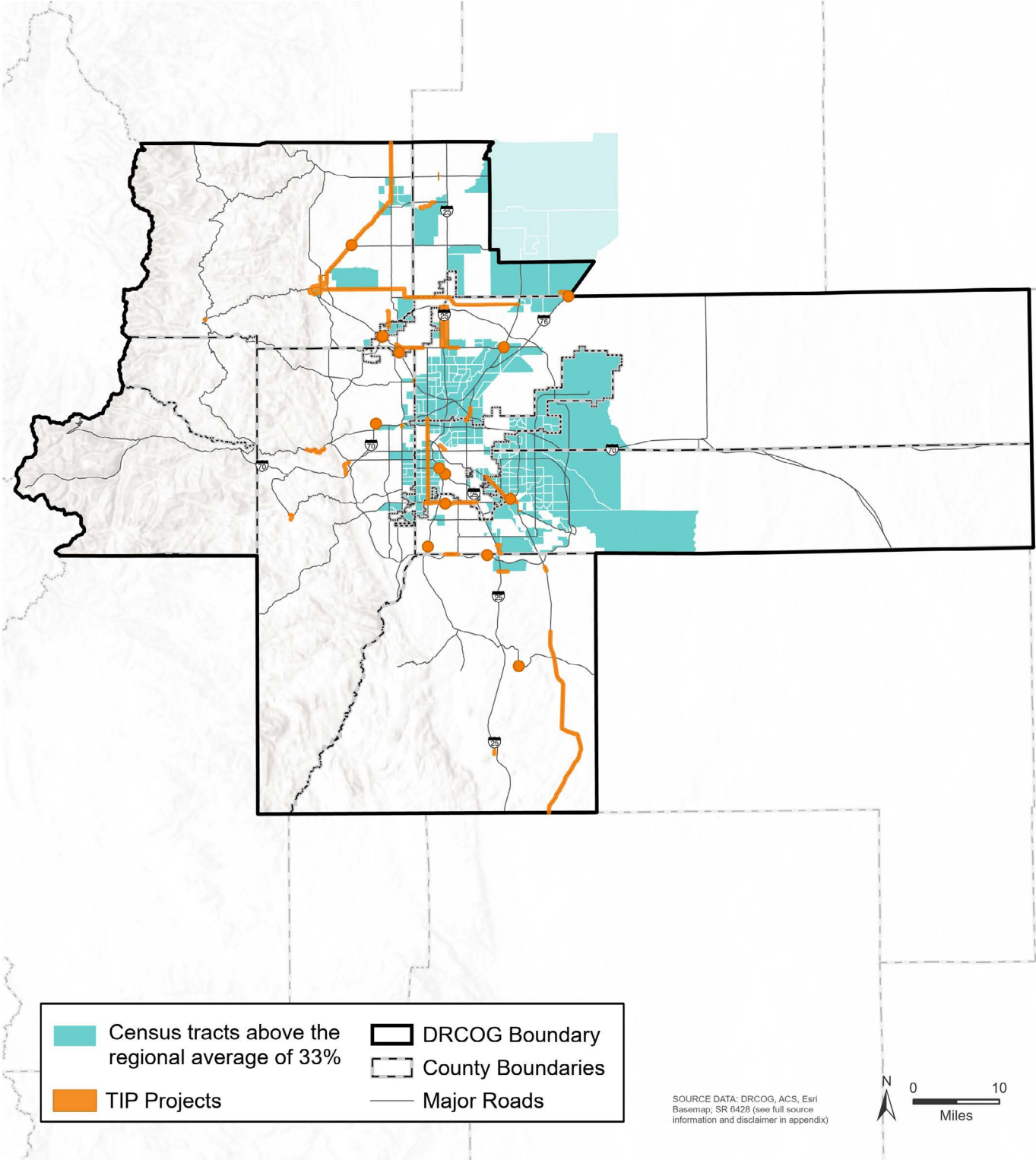
Individuals of color

The U.S. Census Bureau defines racial categories generally as “a social definition of race recognized in this country and not an attempt to define race biologically, anthropologically, or genetically.” An individual can report as white, Black or African American, Asian, American Indian and Alaska Native, Native Hawaiian and other Pacific Islander, some other race or multiple races. Ethnicity is used to determine

whether an individual is of Hispanic origin or not, so an individual of Hispanic origin may report as any race.

Map 4.1 illustrates information related to individuals of color (including racial and ethnic minorities), for the population within the Denver region. This information was collected at the census tract level. Individuals of color account for approximately 33% of the total population within the region.

Map 4.1 Transportation investments compared with concentrations of individuals of color



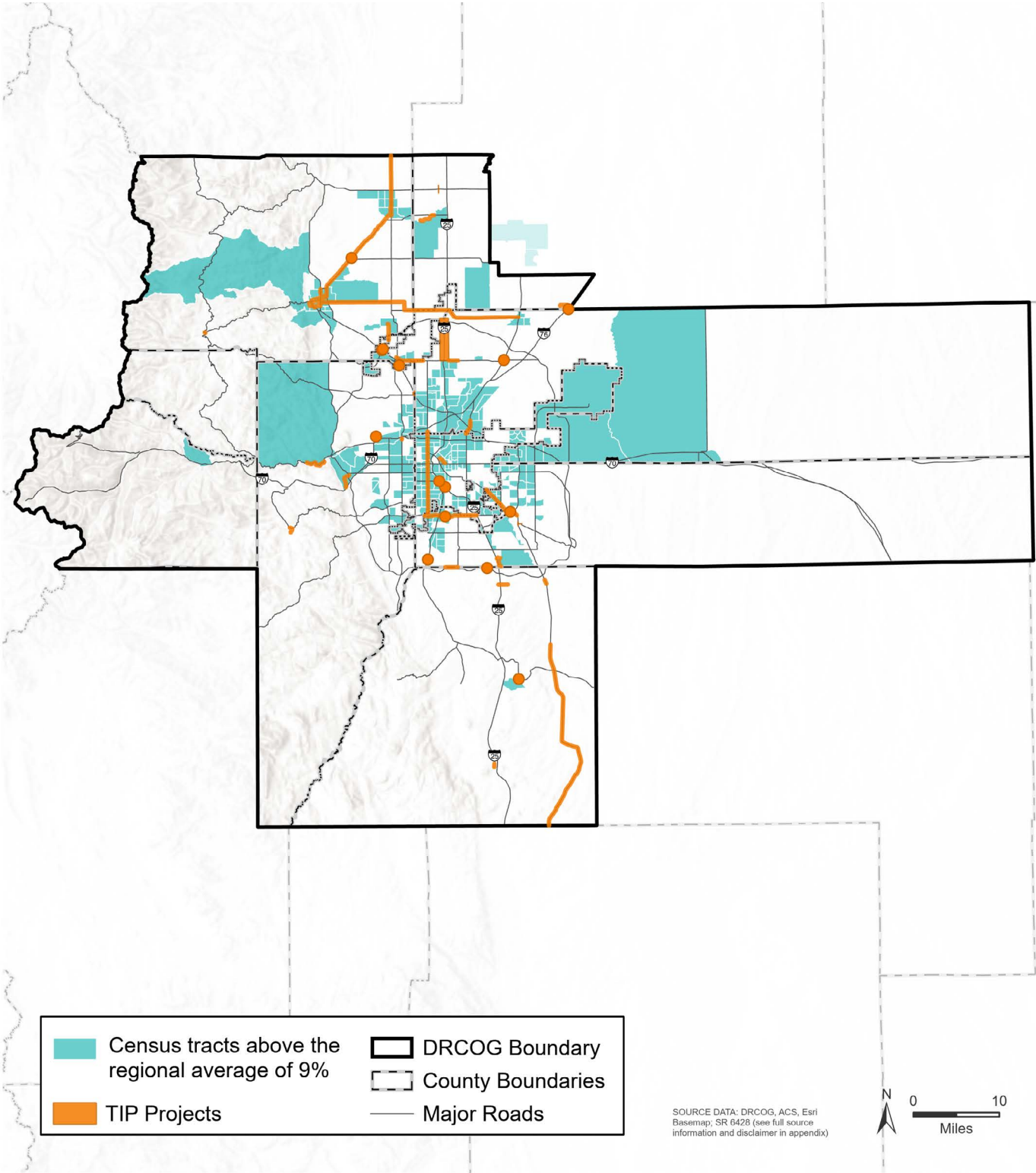
Low-income households

Following the Office of Management and Budget's Statistical Policy Directive 14, the U.S. Census Bureau uses a set of money income thresholds that vary by family size and composition to determine who is in poverty. If a family's total income is less than the

family's threshold, then the family and every individual in it is considered in poverty.

Map 4.2 displays the census tracts where the percentage of households below the federal poverty level is above the regional average. Approximately 9% of the households are below the poverty level.

Map 4.2 Transportation investments compared with concentrations of low-income households





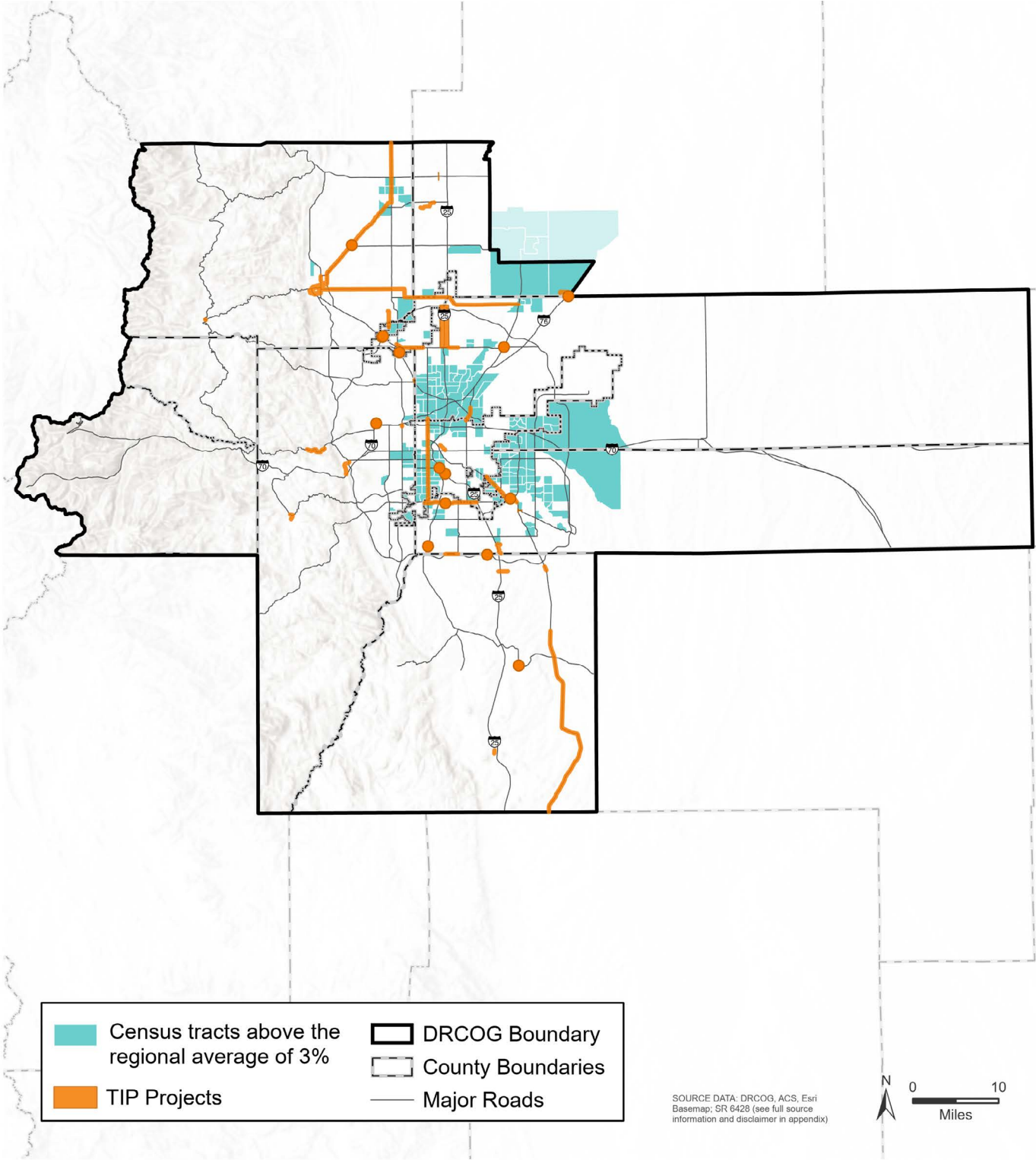
Individuals with limited English proficiency

The Department of Justice and the Federal Interagency Working Group on Limited English Proficiency define people with limited English proficiency as: “Individuals who do not speak English as their primary language and who have a limited ability to read, speak, write, or understand English” The U.S. Census Bureau currently collects data on limited English-speaking households and individuals 5 years and older through the American Community Survey, and DRCOG used this data to identify the Limited English Proficiency population within the region. The top five non-English languages or language groups spoken in the Denver region include:

- Spanish or Spanish Creole.
- Vietnamese.
- Chinese (including Mandarin and Cantonese).
- African languages.
- Korean.

Map 4.3 contains information regarding the Limited English Proficiency population within the region. Approximately 3% of the total population within the region are considered individuals with limited English proficiency. In addition, approximately 69% of the Limited English Proficiency population speaks Spanish or Spanish Creole.

Map 4.3 Transportation investments compared with concentrations of individuals with limited English proficiency

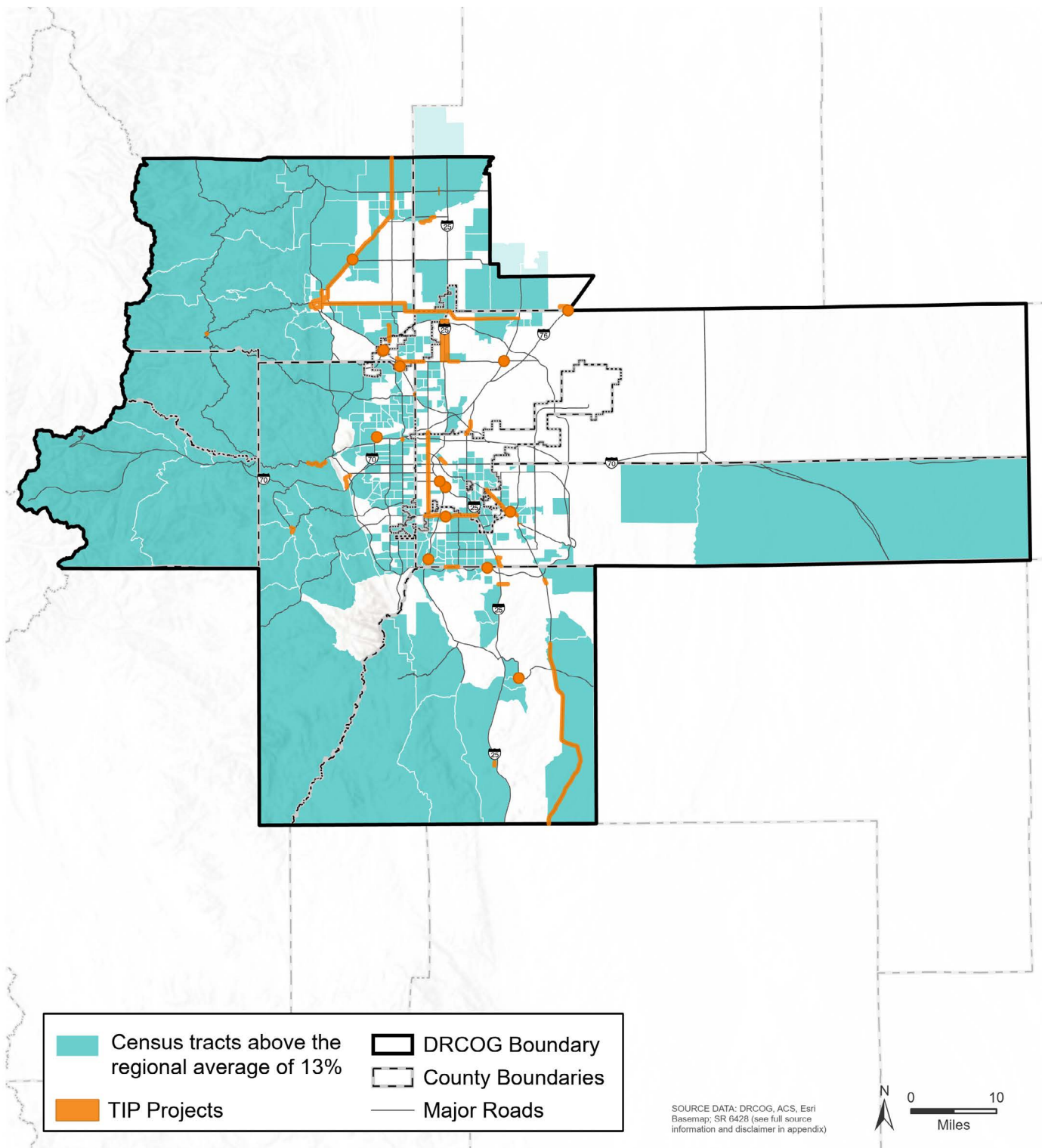




Adults age 65 and older

Map 4.4 displays the census tracts in the region where the percentage of adults age 65 and older is above the regional average. According to the 2015-2019 American Community Survey estimates, approximately 13% of the population within the region is at least age 65 or older.

Map 4.4 Transportation investments compared with concentrations of adults age 65 and older

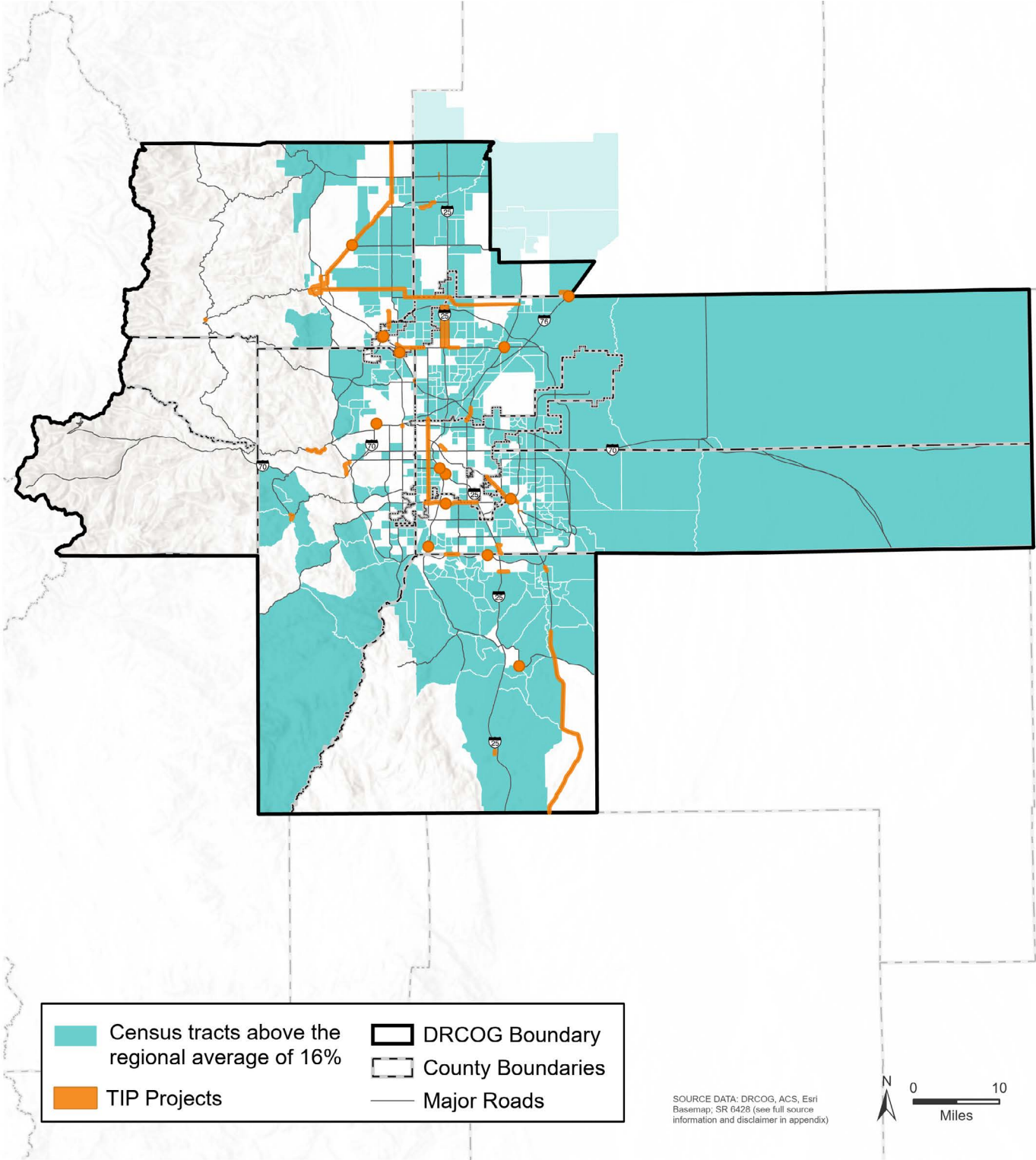




Children age 5-17

Map 4.5 illustrates information related to children within the Denver region. Information was collected at the census tract level. The estimated population of children accounts for approximately 16% of the total population within the region.

Map 4.5 Transportation investments compared with concentrations of children age 5-17





Individuals with a disability

The U.S. Census Bureau uses the definition selected by the U.S. Department of Health and Human Services to define individuals with disabilities, and the definition is outlined in Section 4302 of the Affordable Care Act. The six-item set of yes-no questions used in the American Community Survey to identify the portion of the population with at least one disability, asks participants if they:

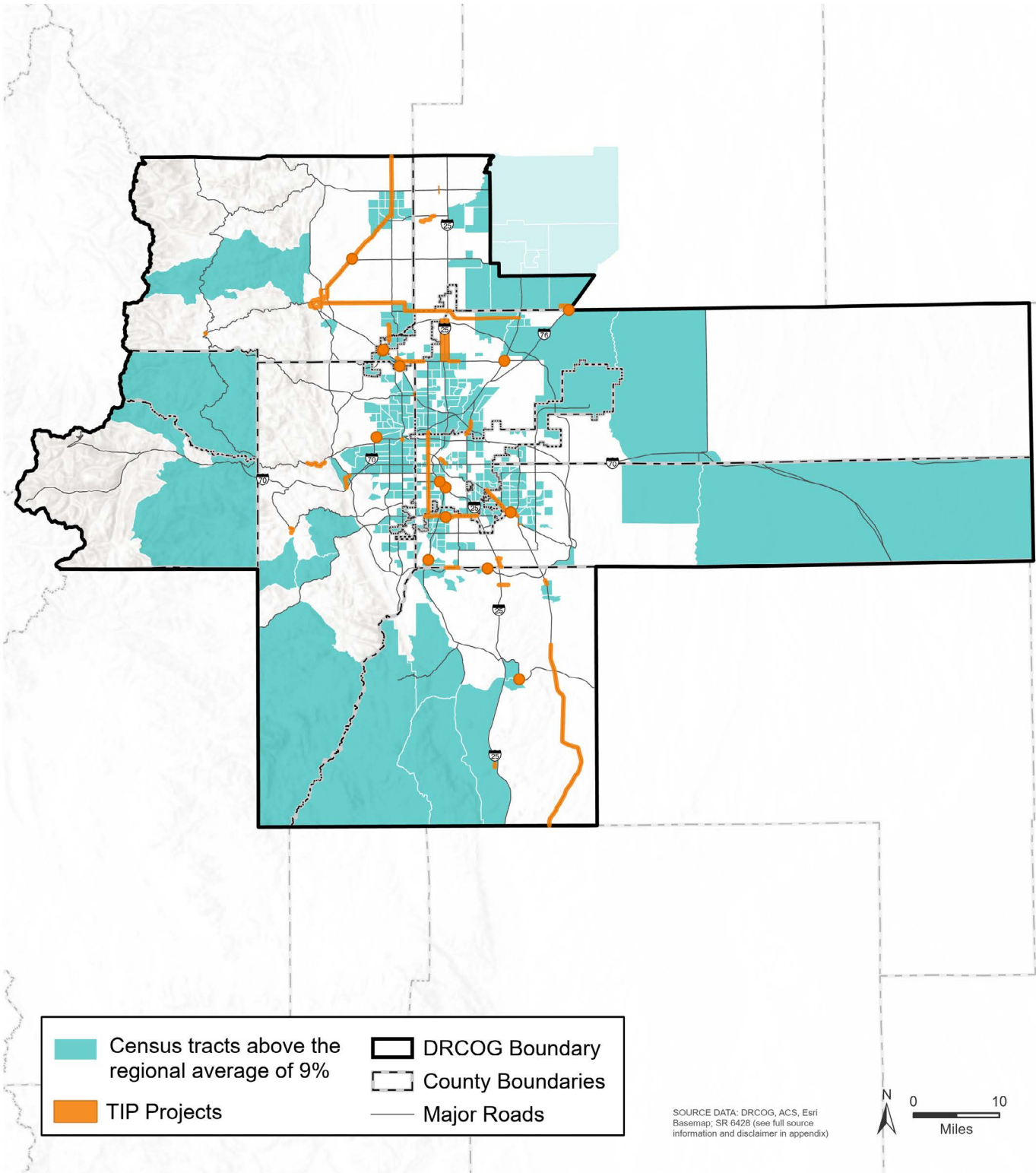
- Are deaf or have serious difficulty hearing.
- Are blind or have serious difficulty seeing, even when wearing glasses.
- Have serious difficulty concentrating, remembering, or making decisions because of a physical, mental, or emotional condition (5 years old and older).

- Have serious difficulty walking or climbing stairs (5 years old and older).
- Have difficulty dressing or bathing (5 years old or older).
- Have difficulty doing errands alone such as visiting a doctor's office or shopping because of a physical, mental or emotional condition (15 years old or older).

If a participant answers “yes” to any of the questions, that participant is recognized as a person with a disability.

Map 4.6 contains information regarding the total civilian noninstitutionalized population with disabilities within the region. Approximately 9% of the population within the region has at least one of the disabilities listed above.

Map 4.6 Transportation investments compared with concentrations of individuals with a disability

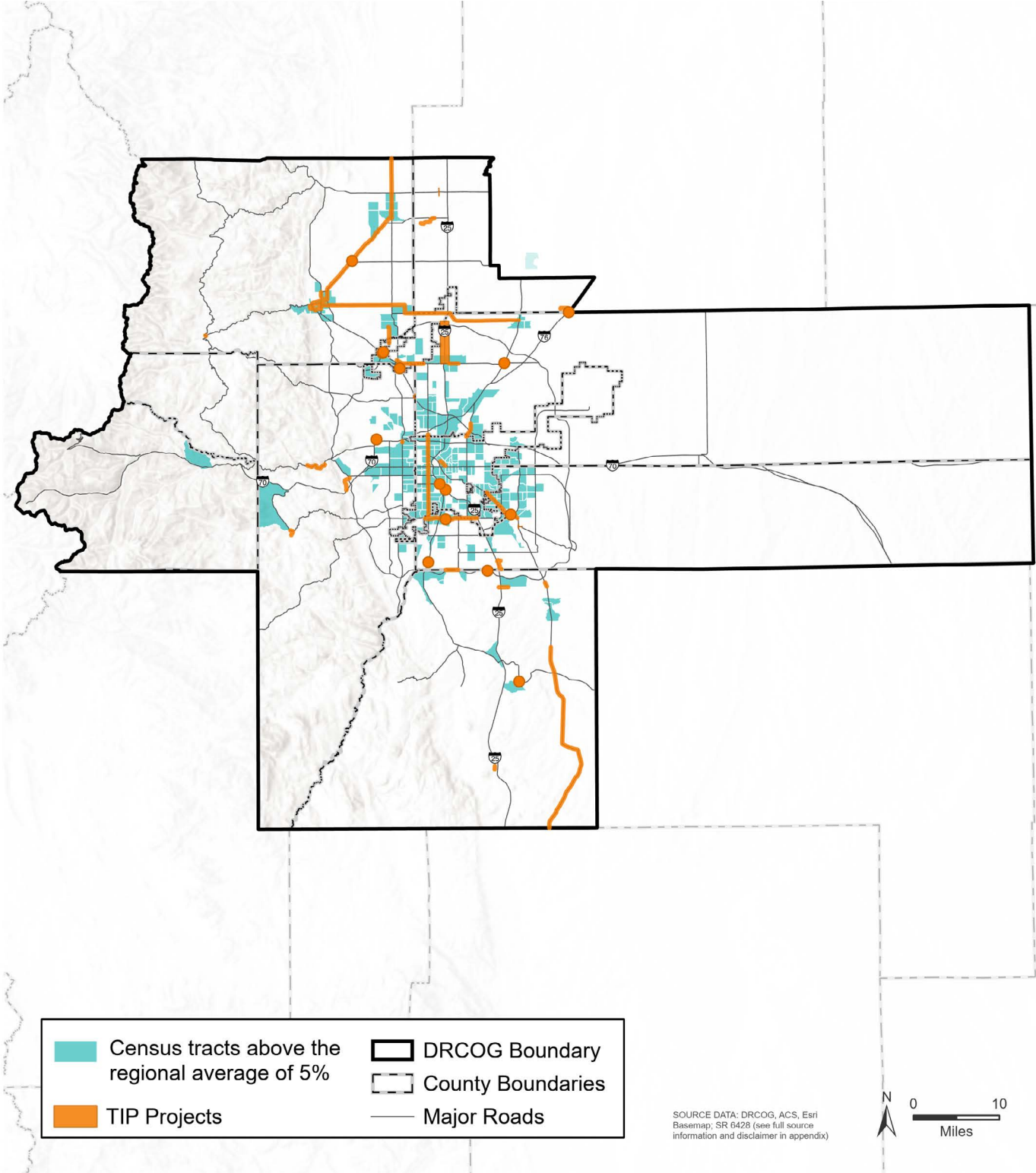




Households without a motor vehicle

Map 4.7 illustrates information related to households without a motor vehicle within the Denver region. The information was collected at the census tract level. The estimated population without access to a motor vehicle accounts for approximately 5% of the total population within the region.

Map 4.7 Transportation investments compared with concentrations of households without a motor vehicle



The top half of the page features a background of a blue geometric pattern composed of various shades of blue triangles and squares. In the upper left corner, there are three larger, solid blue squares of different sizes, some of which are slightly offset from the grid.

Appendix A: Board resolution

DENVER REGIONAL COUNCIL OF GOVERNMENTS

STATE OF COLORADO

BOARD OF DIRECTORS

RESOLUTION NO. 10, 2021

A RESOLUTION TO ADOPT THE *TITLE VI IMPLEMENTATION PLAN*, AND THE
*ASSOCIATED LIMITED ENGLISH PROFICIENCY PLAN AND AMERICANS WITH
DISABILITIES ACT PROGRAM ACCESS PLAN*.

WHEREAS, the Denver Regional Council of Governments, as the Metropolitan Planning Organization, is responsible for carrying out and maintaining the continuing, cooperative, and comprehensive transportation planning process designed to prepare and adopt regional transportation plans and programs; and

WHEREAS, the transportation planning process within the Denver region is carried out by the Denver Regional Council of Governments through a cooperative agreement with the Regional Transportation District (RTD) and the Colorado Department of Transportation (CDOT); and

WHEREAS, the U.S. Department of Transportation (DOT) requires that all recipients of federal funding develop and implement a program that ensures that the federal-aid recipient is implementing programs and activities in a nondiscriminatory manner and in compliance with the Civil Rights Act of 1964 and other statutes, regulations, executive orders, and guidance that mandate nondiscrimination; and

WHEREAS, the Federal Transit Administration (FTA) has issued guidance that describes the requirements and content of these nondiscrimination programs known as Title VI Programs; and

WHEREAS, the Denver Regional Council of Governments is a recipient of federal financial assistance, including U.S. Department of Transportation (DOT) funding, and is committed to ensuring that no person or persons shall, on any statutorily prescribed basis, be excluded from participation in, be denied the benefits of, or be otherwise subjected to discrimination under any program or activity administered by DRCOG; and

WHEREAS, the *Title VI Implementation Plan*, the *Limited English Proficiency Plan*, and the *Americans with Disabilities Act Program Access Plan* were prepared by the Denver Regional Council of Governments in cooperation with the Regional Transportation District (RTD), the Colorado Department of Transportation (CDOT), the Federal Highway Administration (FHWA), and the Federal Transit Administration (FTA); and

WHEREAS, the *Title VI Implementation Plan*, the *Limited English Proficiency Plan*, and the *Americans with Disabilities Act* describe the policies and procedures for implementing programs and activities in a nondiscriminatory manner and responds to

A RESOLUTION TO ADOPT THE *TITLE VI IMPLEMENTATION PLAN*, AND THE
ASSOCIATED LIMITED ENGLISH PROFICIENCY PLAN AND *AMERICANS WITH
DISABILITIES ACT PROGRAM ACCESS PLAN*.

Resolution No. 10, 2021

Page 2

state and federal statutes, regulations, executive orders, and guidance pertaining to nondiscrimination; and

WHEREAS, a 30-day public review and comment period was held, and comments received on the *Title VI Implementation Plan*, the *Limited English Proficiency Plan*, and the *Americans with Disabilities Act Program Access Plan* were addressed; and

WHEREAS, the Transportation Advisory Committee and the Regional Transportation Committee have recommended that the Board of Directors adopt the *Title VI Implementation Plan*, the *Limited English Proficiency Plan*, and the *Americans with Disabilities Act Program Access Plan*.

NOW, THEREFORE, BE IT RESOLVED that, pursuant to its *Articles of Association*, the Denver Regional Council of Governments hereby adopts the *Title VI Implementation Plan*, and the associated *Limited English Proficiency Plan*, and the *Americans with Disabilities Act Program Access Plan*.

RESOLVED, PASSED AND ADOPTED this 15th day of September, 2021 at Denver, Colorado.



Ashley Stolzmann, Chair
Board of Directors
Denver Regional Council of Governments

ATTEST:



Douglas W. Rex, Executive Director



Appendix B: Nondiscrimination policy statement

The Denver Regional Council of Governments (“DRCOG”) adheres to Title VI of the Civil Rights Act of 1964, a nondiscrimination law which provides that no person shall, on the grounds of race, color or national origin, be excluded from participation in, be denied the benefits of, or be subjected to discrimination under any program or activity receiving federal financial assistance. Further, DRCOG adheres to other federal nondiscrimination statutes that afford legal protection; specifically: Section 162(a) of the Federal-Aid Highway Act of 1973 (23 USC 324) (gender); Age Discrimination

Act of 1975 (age); and Section 504 of the Rehabilitation Act of 1973/Americans with Disabilities Act of 1990 (disability). DRCOG is committed to ensuring that no person or persons shall, on any statutorily prescribed basis, be excluded from participation in, be denied the benefits of, or be otherwise subjected to discrimination under any program or activity administered by DRCOG.

DRCOG has established a discrimination complaint procedure and form for handling complaints of discrimination (located on the DRCOG website).



Appendix C: Notice of rights

Your rights against discrimination under Title VI of the Civil Rights Act of 1964

The Denver Regional Council of Governments (“DRCOG”) operates its programs and services without regard to race, color, national origin, sex, age and disability. Anyone who believes they have been excluded from participation in, denied the benefits of, or otherwise subjected to discrimination under any DRCOG program or activity because of their race, color, national origin, age, sex or disability may file a discrimination complaint with DRCOG or the Colorado Department of Transportation.

To file a Title VI discrimination complaint, contact:

Denver Regional Council of Governments
Title VI Coordinator
1001 17th St., Suite 700
Denver, CO 80202
Phone: 303-455-1000

CDOT Civil Rights and Business Resource Center
Title VI Coordinator
2829 W. Howard Pl., 1st Floor
Denver, CO 80204
Email: dot_civilrights@state.co.us
Phone: 800-925-3427
Fax: 303-952-7088



Appendix D: Title VI assurance

**DENVER REGIONAL COUNCIL OF GOVERNMENTS
(DRCOG)
TITLE VI ASSURANCE
FISCAL YEAR 2019-2020**

1. There have been no lawsuits or complaints alleging discrimination on the basis of race, color, or national origin filed against the Denver Regional Council of Governments during the period of October 1, 2019 through September 30, 2020.
2. In addition to funding from the Federal Transit Administration, DRCOG routinely receives federal funds from the Federal Highway Administration and has also received funds from the Department of Health and Human Services, the Environmental Protection Agency, the U. S. Geological Survey, the Department of Agriculture, the Department of Housing and Urban Development, and the Department of State.
3. There were no civil rights compliance reviews performed on DRCOG by any local, state, or federal agency during the period of October 1, 2019 through September 30, 2020.
4. Title VI will be enforced by DRCOG for all of its contractors. All contracts with DRCOG include compliance measures which, in effect, state that failure to comply with Title VI requirements will result in termination of the contract.

This certification is a material representation of fact upon which reliance is placed when this transaction was made or entered into.

Executed this 16th day of April, 2021

By: 
Douglas W. Rex
Executive Director

ATTEST: 
Jenny Dock
Division Director
Administration and Finance



Appendix E: Title VI local agency assurance

**THE DENVER REGIONAL COUNCIL OF GOVERNMENTS
("DRCOG")**

**TITLE VI
LOCAL AGENCY ASSURANCE**

Title VI of the Civil Rights Act of 1964 prohibits discrimination on the basis of race, color, or national origin in programs or activities receiving federal financial assistance. Related statutes and Presidential Executive Orders under the umbrella of Title VI address Environmental Justice (EJ) in minority and low-income populations, services to those individuals with Limited English Proficiency (LEP), and the protected bases of gender, age and disability. The Civil Rights Restoration Act of 1987 clarified the intent of Title VI to include all programs and activities of federal aid recipients and sub-recipients whether those programs and activities are federally funded or not. **Title VI refers to the umbrella of related authorities that require recipients (and sub-recipients) of federal financial assistance to assure nondiscrimination on the basis of race, color, national origin, age, gender, or disability.**

DRCOG is a recipient of federal financial assistance and as such it, as well as all of its responsible agents, contractors and consultants, is required to assure nondiscrimination. This assurance is required by the United States Department of Transportation Title VI Regulations at 49 CFR Part 21 (hereinafter referred to as the Regulations).

DRCOG hereby gives assurances that no person shall on the grounds of race, color, national origin, age, gender or disability be excluded from participation in, be denied the benefits of, or be otherwise subjected to discrimination under any program or activity conducted by DRCOG regardless of whether those particular programs and activities are federally-funded. It is the responsibility of every person within DRCOG and all DRCOG's external agents to incorporate and implement actions consistent with nondiscrimination in programs.

More specifically, and without limiting the above general assurance, DRCOG hereby gives the following specific assurances:

1. That it will promptly take any measures necessary to effectuate this agreement.
2. That each of DRCOG's programs, activities, and facility will be conducted and or operated in compliance with nondiscrimination requirements under all Federal laws and regulations.
3. That these assurances are given in consideration of and for the purpose of obtaining any and all federal grants, loans, contracts, property, discounts or other federal financial assistance extended by the United States Department of

Transportation. These assurances are binding on DRCOG, its recipients, sub-grantees, contractors, subcontractors, transferees, successors in interest, and other participants.

4. That DRCOG will insert a notification in all solicitations for bids for work or material subject to the Regulations that notifies all bidders that it will affirmatively ensure that disadvantaged business enterprises will be afforded full opportunity to submit bids in response to all invitations and will not be discriminated against on the grounds of race, color, national origin, age, gender or disability in consideration for an award. DRCOG will also adapt this notification for all proposals for negotiated agreements.
5. That DRCOG will insert appropriate nondiscrimination clauses in every contract subject to Title VI and the Regulations.
6. DRCOG will display Title VI information for employees and the public. This information shall include DRCOG's Nondiscrimination Policy, obligations and protections under Title VI, procedures on how to file a Title VI complaint, and contact information for DRCOG's Title VI Coordinator. This information shall be translated into languages other than English as needed and consistent with the Limited English Proficiency (LEP) requirements of Title VI.
7. DRCOG shall seek out and consider the input of minority, low income and LEP populations in the course of conducting public outreach and involvement activities. Public participation shall be encouraged early and often in consideration of social, economic and environmental impacts on all populations.



Signature of Authority

April 16, 2021

Date

Douglas W. Rex

Name of Authority (please print)

Executive Director

Title of Authority (please print)

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Appendix F: Complaint procedures and forms

Nondiscrimination complaint procedures

The Denver Regional Council of Governments (“DRCOG”) follows Title VI of the Civil Rights Act of 1964, a nondiscrimination policy in which 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 federally funded program activity.

Herein follows the DRCOG complaint procedure to assist anyone who believes they have been negatively impacted.

DRCOG’s Title VI Coordinator (“Coordinator”) is available to review any concerns about potential violations.

In order to file a formal Title VI complaint against DRCOG or a recipient of federal funds from DRCOG, the following steps need to be followed:

- 1) The complainant will contact the Coordinator. If a complaint is received by any other DRCOG staff member, that staff member will refer the complaint to the Coordinator.
- 2) The Coordinator will conduct an initial determination of the sufficiency of the complaint to be a potential violation of Title VI.
- 3) If it is determined that the complaint does not meet the basic criteria to be a violation of Title VI, then a determination will be made on whether the issue can be informally resolved or administratively closed. That determination will be communicated to the complainant.
- 4) If it is determined that the complaint meets the basic criteria of a potential violation of Title VI, then an investigation will be conducted by an investigator. The investigation will be completed within 60 days from the date it is determined the complaint is sufficient. A formal notice will be sent to the complainant.
- 5) The level and method of investigation will be determined on a case-by-case basis and is at the discretion of the investigator. A final report of findings from the investigation will be prepared by the investigator. A final notice of findings will be sent to the complainant by DRCOG. If the investigation is conducted by a Regional Civil Rights Specialist, a copy of the report and final notice of findings will be sent to the Coordinator. The final notice will include the process for filing an appeal of the decision.
- 6) A complainant may appeal a decision by submitting a request in writing within 30 days of the final notice. The request should include information detailing why the complainant believes the decision was made in error. The complainant will be given information on how to appeal this decision directly with the state or federal funding agency in the final notice.

How to file a complaint:

If you believe that you and/or any person(s) under your care have been discriminated against by any organization that receives funds from DRCOG for any of its programs, services, facilities or activities, please complete a discrimination complaint form as found attached. Please provide:

- 1) Your full name, address, telephone number and the name of the person who you believe has discriminated against you.
- 2) The name of the organization that you believe has discriminated, its address and telephone number, and any other identifying information.
- 3) A description of the actions that you believe were discriminatory (dates of actions, names of those who you believe discriminated, and witnesses).
- 4) Any other information that you believe necessary to support your complaint. Please send copies of relevant documents, and keep originals.

To file with DRCOG:

Denver Regional Council of Governments
Title VI Coordinator
1001 17th St., Suite 700
Denver, CO 80202
Phone: 303-455-1000

The following resources are available:

Colorado Department of Transportation
Civil Rights and Business Resource
Center Title VI Coordinator
2829 W. Howard Pl., 1st Floor
Denver, CO 80204
Email: dot_civilrights@state.co.us
Phone: 800-925-3427
Fax: 303-952-7088

Federal Highway Administration, Colorado Division
12300 West Dakota Avenue, Suite 180
Lakewood, CO 80228
Phone: 720-963-3000
Fax: 720-963-3001

Federal Transit Administration
Office of Civil Rights
Attention: Complaint Team
East Building, 5th Floor – TCR
1200 New Jersey Avenue, SE
Washington, DC 20590
Phone: 888-446-2511

In some cases, DRCOG must forward complaints to either the Federal Highway Administration or Federal Transit Administration, or the Colorado Department of Transportation for investigation. If your complaint is forwarded to one of these agencies, you will be provided the name and contact information of the federal employee handling your complaint.

Nondiscrimination complaint form

Section I				
Name:				
Address:				
Home phone:			Work phone:	
Email:				
Accessible format requirements?	Large print		Audiotape	
	TDD		other	
Section II				
Are you filing this complaint on your own behalf?			<input type="checkbox"/> Yes*	<input type="checkbox"/> No
*If you answered "yes" to this question, go to Section III				
If you answered "no", please state the name and relationship of the person for whom you are filing this complaint:	Name:			
	Relationship:			
Please explain why you have filed for a third party:				
Please confirm that you have obtained the permission of the aggrieved party if you are filing on behalf of a third party.			<input type="checkbox"/> Yes*	<input type="checkbox"/> No
Section III				
I believe the alleged discrimination I experienced was based on (check all that apply):				
Title VI			Other Federal Non-Discrimination Statutes	
<input type="checkbox"/> Race	<input type="checkbox"/> Color	<input type="checkbox"/> National Origin	<input type="checkbox"/> Gender	<input type="checkbox"/> Age <input type="checkbox"/> Disability
Date of Alleged Discrimination (Month, Day, Year):				

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 you believe discriminated against you (if known) as well as names and contact information of any witnesses. If more space is needed, please use a separate page and attach it to this form.

Name of agency complaint is against:

Contact person:

Title:

Phone:

Explanation:

Section IV

You may attach any written materials or other information that you think are relevant to your complaint. By signing below you acknowledge that the information in this complaint is true and accurate to the best of your knowledge and belief.
Signature and date required below:

Signature

Date

Please submit this form in person at the address below or mail this form to:

Denver Regional Council of Governments

Title VI Coordinator

1001 17th St., Suite 700

Denver, CO 80202

Phone: 303-455-1000

Procedimiento de demanda contra la discriminación

El Consejo de Gobierno Regional de Denver ("DRCOG") se adhiere al Título VI del Acta de Derechos Civiles de 1964, una ley para la no discriminación que establece que ninguna persona, por motivos de raza, color o nacionalidad, deberá ser excluida de participar, recibir el rechazo de los beneficios, o estar sujeta a la discriminación bajo ningún programa o actividad que reciba asistencia financiera Federal.

A continuación, aparece el procedimiento del Consejo de Gobierno Regional de Denver (DRCOG) para presentar demandas y asistir a cualquier persona que sienta que haya sido impactada de manera negativa.

El Coordinador de demandas contra la Discriminación del DRCOG ("Coordinador") está disponible para revisar cualquier preocupación sobre posibles violaciones.

Para presentar una demanda formal bajo el Título VI contra el DRCOG o un receptor de fondos federales de DRCOG, se deberán seguir los siguientes pasos:

- 1) El demandante debe comunicarse con el coordinador. Si se formula una demanda a cualquier otro miembro del personal del DRCOG, ese miembro del personal derivará al demandante al Coordinador.
- 2) El Coordinador realizará una determinación inicial de la suficiencia de la demanda para determinar si es una potencial violación del Título VI.
- 3) Si se determina que la demanda no cumple con los criterios básicos para ser una potencial violación del

Título VI, entonces se determinará si el problema se puede resolver de manera informal o cerrar a nivel administrativo. Esta determinación será comunicada al demandante.

- 4) Si se determina que la demanda cumple con los criterios básicos de una posible violación del Título VI, entonces se llevará a cabo una investigación con un investigador. La investigación se completará dentro de los 60 días a partir de la fecha en que se determine que la demanda es suficiente. Se enviará una notificación formal al demandante.
- 5) El nivel y el método de investigación se determinarán caso por caso, y quedarán a discreción del investigador. Un informe final de los resultados de la investigación será preparado por el investigador. Una notificación final de todos los hallazgos le será enviada al demandante por parte de DRCOG. Si la investigación es llevada a cabo por un especialista regional de derechos civiles, entonces una copia del reporte y la notificación final de los hallazgos será enviada al coordinador. La notificación final incluirá detalles del proceso para apelar la decisión.
- 6) Todo demandante puede apelar la decisión presentando una solicitud por escrito dentro de un plazo de 30 días de haber recibido la notificación final. Dicha solicitud deberá incluir información detallada sobre el por qué el demandante considera que la decisión se tomó de manera equivocada. En la notificación final, el demandante recibirá información en cuanto a cómo apelar la decisión directamente ante la agencia financiera estatal o federal.

Cómo presentar una demanda :

Si considera que usted o cualquier persona bajo su cuidado ha sido discriminada por cualquier organización que recibe fondos del DRCOG para cualquiera de sus programas, servicios, instalaciones o actividades, por favor complete el Formulario de Queja contra la Discriminación adjunto. Favor de proveer:

- 1) Su nombre completo, dirección y número telefónico, y el nombre de la persona que usted considera que ha sido discriminada.
- 2) El nombre de la organización que usted considera que ha sido discriminadora, la dirección y teléfono de dicha entidad y cualquier otro tipo de información que ayude a identificar dicho sitio;
- 3) Una descripción de las acciones que usted considera discriminatorias (fechas de tales acciones, nombres de las personas que han discriminado, y testigos)
- 4) Cualquier otro tipo de información que usted crea necesaria para sustentar su queja. Favor de enviar copias de documentos relevantes, y mantenga los originales con usted.

Para presentarla con DRCOG:

Consejo de Gobierno Regional de Denver
Coordinador del Título VI
1001 17th St., Suite 700
Denver, CO 80202
Phone: 303-455-1000

Los siguientes recursos están disponibles:

Departamento de Transportación de Colorado
Centro de Recursos para Negocios y Derechos Civiles
Coordinador del Título VI
2829 W. Howard Pl., 1st Floor
Denver, CO 80204
Email: dot_civilrights@state.co.us
Phone: 800-925-3427
Fax: 303-952-7088

Administración Federal de Carreteras -
División de Colorado
12300 West Dakota Avenue, Suite 180
Lakewood, CO 80228
Phone: 720-963-3000
Fax: 720-963-3001

Administración Federal de Tránsito
Oficina de Derechos Civiles
Atención: Equipo de quejas
East Building, 5th Floor – TCR
1200 New Jersey Avenue, SE
Washington, DC 20590
Phone: 888-446-2511

Formulario de queja contra la discriminación

Sección I				
Nombre:				
Dirección:				
Teléfono particular:			Teléfono laboral:	
Correo electrónico:				
¿Requisitos Formato Accesibles?	Letras grandes		Cinta de Audio	
	TDD		Otro	
Sección II				
¿Presenta esta demanda por usted?			<input type="checkbox"/> Si*	<input type="checkbox"/> No
*Si respondió "sí" a esta pregunta, vaya a la Sección III				
Si respondió "no", por favor indique el nombre y parentesco de la persona por la que presenta esta queja:	Nombre:			
	Relación:			
Favor de explicar el motivo por el que presenta la demanda por un tercero:				
Favor de confirmar que usted obtuvo el permiso de la persona agraviada para completar esta demanda en nombre de un tercero			<input type="checkbox"/> Si	<input type="checkbox"/> No
Sección III				
Creo que la discriminación que he sufrido se basó en (marcar todos los que correspondan):				
Titulo VI			Other Federal Non-Discrimination Statutes	
<input type="checkbox"/> Raza	<input type="checkbox"/> Color	<input type="checkbox"/> Nacionalidad	<input type="checkbox"/> Genero	<input type="checkbox"/> Edad <input type="checkbox"/> Discapacidad
Fecha de la supuesta discriminación (Mes, día, año):				

Explique tan claramente como le sea posible lo que sucedió y el motivo por el que usted cree que lo discriminaron. Describa todas las personas que hayan estado involucradas. Incluya el nombre e información de contacto de la(s) persona(s) que considere que lo han discriminado (si lo sabe) como también nombres e información de contacto de cualquier testigo. Si necesita más espacio, por favor use otra hoja y adjúntela a este formulario.

Nombre de la agencia contra la cual se presenta la demanda:

Persona de contacto:

Cargo:

Teléfono:

Explicación:

Sección IV

Puede adjuntar todos los materiales escritos u otra información que usted considere importante para sustentar su demanda.

Al firmar abajo, usted reconoce que la información de esta demanda es verídica y de buena fe según su entender y conocimiento.

Firma y fecha a continuación:

Signature

Date

Favor de presentar este formulario en persona a la dirección a continuación, o envíelo por correo a: Consejo Regional de Gobiernos de Denver
Coordinador de Título VI
1001 17th St., Suite 700
Denver, CO 80202
Phone: 303-455-1000

Nondiscrimination complaint log

DRCOG does not have any active investigations, complaints or lawsuits and has not received any complaints in the last three years.

Case #	Date received	Alleged division	Complainant's name	Complaint category	Disposition	Date closed



Appendix G: Contract provisions

The following provisions are attached to every applicable contract:

Civil Rights Act

During the performance of this contract, the Contractor, for itself, its assignees, and successors in interest, agrees as follows:

a. Nondiscrimination. In accordance with Title VI of the Civil Rights Act, as amended, 42 USC § 2000d, section 303 of the Age Discrimination Act of 1975, as amended, 42 USC § 6102, section 202 of the Americans with Disabilities Act of 1990, 42 USC § 12132, and Federal transit law at 49 USC § 5332, Contractor agrees that it will not discriminate against any employee or applicant for employment because of race, color, creed, national origin, sex, age, or disability. In addition, Contractor agrees to comply with applicable Federal implementing regulations and other implementing requirements FTA may issue.

b. Equal Employment Opportunity. The following equal employment opportunity requirements apply to the Contract:

1) Race, Color, Creed, National Origin, Sex. In accordance with Title VII of the Civil Rights Act, as amended, 42 USC § 2000e, and Federal transit laws at 49 USC § 5332, Contractor agrees to comply with all applicable equal employment opportunity requirements of U.S. Department of

Labor (U.S. DOL) regulations, "Office of Federal Contract Compliance Programs, Equal Employment Opportunity, Department of Labor," 41 CFR Parts 60 et seq., (which implement Executive Order No. 11246, "Equal Employment Opportunity," as amended by Executive Order No. 11375, "Amending Executive Order 11246 Relating to Equal Employment Opportunity," 42 USC § 2000e note), and with any applicable Federal statutes, executive orders, regulations, and Federal policies that may in the future affect activities undertaken in the course of this Contract. Contractor agrees to take affirmative action to ensure that applicants are employed, and that employees are treated during employment, without regard to their race, color, creed, national origin, sex, or age. Such action shall include, but not be limited to, the following: employment, upgrading, demotion or transfer, recruitment or recruitment advertising, layoff or termination; rates of pay or other forms of compensation; and selection for training, including apprenticeship. In addition, Contractor agrees to comply with any implementing requirements FTA may issue.

2) Age. In accordance with section 4 of the Age Discrimination in Employment Act of 1967, as amended, 29 USC § 623 and Federal transit law at 49 USC § 5332, Contractor agrees to refrain from discrimination against present and prospective employees for reason of age. In addition,

Contractor agrees to comply with any implementing requirements FTA may issue.

- 3) Disabilities. In accordance with section 102 of the Americans with Disabilities Act, as amended, 42 USC § 12112, Contractor agrees that it will comply with the requirements of U.S. Equal Employment Opportunity Commission, "Regulations to Implement the Equal Employment Provisions of the Americans with Disabilities Act," 29 CFR Part 1630, pertaining to employment of persons with disabilities. In addition, Contractor agrees to comply with any implementing requirements FTA may issue.
- 4) Contractor shall comply with the appropriate areas of the Americans with Disabilities Act of 1990 as enacted and from time to time amended and any other applicable federal, state, or local laws and regulations.

The parties hereby incorporate the requirements of 41 CFR § 60-1.4(a) and 29 CFR § 471, Appendix A to Subpart A, if applicable.

This contractor and subcontractor shall abide by the requirements of 41 CFR 60-300.5(a) and 41 CFR 60 741.5(a), if applicable. These regulations prohibit discrimination against qualified protected veterans and qualified individuals with disabilities, and require affirmative action by covered prime contractors and subcontractors to employ and advance in employment qualified protected veterans and qualified individuals with disabilities.

The following provisions are attached to every applicable Area Agency on Aging contract:

Assurance of compliance with the Department of Health and Human Services regulation under Title VI of the Civil Rights Act of 1964 and Section 504 of the Rehabilitation Act of 1973

The Contractor HEREBY AGREES to comply with Title VI of the Civil Rights Act of 1964 (P.L. 88 352) and all requirements imposed by or pursuant to Regulations of the Department of Health and Human Services (HHS) (45 CFR Part 80) issued pursuant to that title, and to comply with Section 504 of the Rehabilitation Act of 1973 (P.L. 93 112) and all requirements imposed by or pursuant to the Regulations of the HHS (45 CFR Part 84) issued pursuant to the Act, all as from time to time amended, to the end that, in accordance with Title VI, the Act and Regulations, no person in the United States shall, on the grounds of race, color, national origin, or nonqualified handicap, be excluded from participation in, be denied the benefits of, or be otherwise subjected to discrimination under any program or activity for which the Contractor receives Federal financial assistance from DRCOG, a recipient of Federal financial assistance from HHS; and HEREBY GIVES ASSURANCE THAT it will immediately take any measures necessary to effectuate this agreement.

If any real property or structure thereon is provided or improved with the aid of Federal financial assistance extended to the Contractor by DRCOG, this assurance

shall obligate the Contractor, or in the case of any transfer of such property, any transferee, for the period during which the real property or structure is used for a purpose for which the Federal financial assistance is extended or for another purpose involving the provision of similar services or benefits. If any personal property is so provided, this assurance shall obligate the Contractor for the period during which it retains ownership or possession of the property. In all other cases, this assurance shall obligate the Contractor for the period during which the Federal financial assistance is extended to it by DRCOG.

THIS ASSURANCE is given in consideration of and for the purpose of obtaining any and all Federal grants, loans, contracts, property, discounts or other Federal financial assistance extended after the date hereof

to the Contractor by DRCOG, including installment payments after such date on account of applications for Federal financial assistance which were approved before such date. The Contractor recognizes and agrees that such Federal financial assistance will be extended in reliance on the representations and agreements made in this assurance, and that DRCOG or the United States or both shall have the right to seek judicial enforcement of this assurance. This assurance is binding on the Contractor, its successors, transferees, and assignees.



Appendix H: Disadvantaged Business Enterprises and Small Business Enterprises

It is the policy of the Denver Regional Council of Governments (“DRCOG”) that equal opportunity to participate in its procurements is provided to disadvantaged business enterprises as provided by applicable law. The selected respondent(s) shall carry out applicable requirements of 49 CFR Part 26 in the award and administration of contracts.

DRCOG includes Disadvantaged Business Enterprise clauses in all applicable contracts and requests for proposal (RFPs). These clauses are provided for reference:

- Procedures to ensure that DBEs are afforded opportunity to participate in federal-aid highway programs and activities

- “It is declared to be in the national interest to encourage and develop the actual and potential capacity of small businesses and to utilize this important segment of our economy to the fullest practicable extent in construction of Federal-aid highway systems, including the Interstate System. In order to carry out that intent and encourage full and free competition, the Secretary should assist, insofar as feasible, small business enterprises in obtaining contracts in connection with the prosecution of the highway program.” (23 USC § 304) and (49 CFR 26, effective February 2011)

All applicable respondents must complete and return with their response the “Disadvantaged Business Enterprise Program Information Request Form” provided on the next page.

**DENVER REGIONAL COUNCIL OF GOVERNMENTS DISADVANTAGED BUSINESS
ENTERPRISE PROGRAM INFORMATION REQUEST FORM**

General Information

Business Name: _____

Business Address: _____

Phone: _____ Fax: _____

E-mail: _____

This firm was established
on:

MM/DD/YYYY

Specify the gross annual receipts of the firm: ☐ Under \$100,000
☐ \$100,000-\$500,000
☐ \$500,000-\$1,000,000
☐ Over \$1,000,000

Is your company certified as a Disadvantaged Business Enterprise ☐ Yes
under the Colorado Unified Certification Program (UCP)? ☐ No

RESPONDENT

TITLE

DATE

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Appendix I: Map information

Disclaimer

DRCOG makes no claims, representations or warranties, express or implied, concerning the validity (express or implied), the reliability or the accuracy of the data herein, including the implied validity of any uses of such data. DRCOG shall have no liability for the data or lack thereof, or any decisions made or action not taken in reliance upon any of the data.

Map information

Distribution of individuals of color

DRCOG Vulnerable Populations Data (American Community Survey (ACS) 2015-2019), Table B02001 & B03002

Distribution of low-income households

DRCOG Vulnerable Populations Data (American Community Survey (ACS) 2015-2019), Table C 17002

Distribution of individuals with limited English proficiency

DRCOG Vulnerable Populations Data (American Community Survey (ACS) 2015-2019), Table B16001, Language spoken at home by ability to speak english for the population 5 years and over

Distribution of adults age 65 and older

DRCOG Vulnerable Populations Data (American Community Survey (ACS) 2015-2019), Table B0101

Distribution of children age 5-17

DRCOG Vulnerable Populations Data (American Community Survey (ACS) 2015-2019), Table B0101

Distribution of individuals with a disability

DRCOG Vulnerable Populations Data (American Community Survey (ACS) 2015-2019), Table S1810, Disability type; hearing difficulty, vision difficulty, cognitive difficulty, ambulatory difficulty, self-care difficulty, independent-living difficulty

Distribution of households without a motor vehicle

DRCOG Vulnerable Populations Data (American Community Survey (ACS) 2015-2019), Table B25044



Appendix J: Public Engagement Plan



Click the image above to be taken to the Public Engagement Plan or visit drcog.org for more information.



Appendix K: Limited English Proficiency Plan





Appendix L: Americans with Disabilities Act Program Access Plan




Click the image above to be taken to the Americans with Disabilities Act Program Access Plan or visit drcog.org for more information.

The top half of the page features a background of a blue geometric pattern composed of various shades of blue triangles and squares. In the upper left corner, there are three distinct diamond shapes of different sizes, also in shades of blue, overlapping the pattern.

Appendix M: Program Management Plan



Click the image above to be taken to the DRCOG Section 5310 Program Management Plan or visit drcog.org for more information.



Appendix N: Federal Transit Administration Circular 4702.1B Checklist Annotated

APPENDIX A**TITLE VI PROGRAM CHECKLIST**

Every three years, on a date determined by FTA, each recipient is required to submit the following information to the Federal Transit Administration (FTA) as part of their Title VI Program. Subrecipients shall submit the information below to their primary recipient (the entity from whom the subrecipient receives funds directly), on a schedule to be determined by the primary recipient.

General Requirements (Chapter III)

All recipients must submit:

- Appendix C** ☐ Title VI Notice to the Public, including a list of locations where the notice is posted
- Appendix F** ☐ Title VI Complaint Procedures (i.e., instructions to the public regarding how to file a Title VI discrimination complaint)
- Appendix F** ☐ Title VI Complaint Form
- Appendix F** ☐ List of transit-related Title VI investigations, complaints, and lawsuits
- Appendix J** ☐ Public Participation Plan, including information about outreach methods to engage minority and limited English proficient populations (LEP), as well as a summary of outreach efforts made since the last Title VI Program submission
- Appendix K** ☐ Language Assistance Plan for providing language assistance to persons with limited English proficiency (LEP), based on the DOT LEP Guidance
- Pages 27-34** ☐ A table depicting the membership of non-elected committees and councils, the membership of which is selected by the recipient, broken down by race, and a description of the process the agency uses to encourage the participation of minorities on such committees
- Pages 47-49** ☐ Primary recipients shall include a description of how the agency monitors its subrecipients for compliance with Title VI, and a schedule of subrecipient Title VI Program submissions
- Not applicable** ☐ A Title VI equity analysis if the recipient has constructed a facility, such as a vehicle storage facility, maintenance facility, operation center, etc.
- Appendix A (Pending)** ☐ A copy of board meeting minutes, resolution, or other appropriate documentation showing the board of directors or appropriate governing entity or official(s) responsible for policy decisions reviewed and approved the Title VI Program. For State DOT's, the appropriate governing entity is the State's Secretary of Transportation or equivalent. The approval must occur prior to submission to FTA.
- MPO, see below** ☐ Additional information as specified in chapters IV, V, and VI, depending on whether the recipient is a transit provider, a State, or a planning entity (see below)

Requirements of Transit Providers (Chapter IV)

All Fixed Route Transit Providers must submit:

- ☐ All requirements set out in Chapter III (General Requirements)
- ☐ Service standards

- Vehicle load for each mode
- Vehicle headway for each mode
- On time performance for each mode
- Service availability for each mode
- ☐ Service policies
 - Transit Amenities for each mode
 - Vehicle Assignment for each mode

Transit Providers that operate 50 or more fixed route vehicles in peak service and are located in an Urbanized Area (UZA) of 200,000 or more people must submit:

- ☐ Demographic and service profile maps and charts
- ☐ Demographic ridership and travel patterns, collected by surveys
- ☐ Results of their monitoring program and report, including evidence that the board or other governing entity or official(s) considered, was aware of the results, and approved the analysis
- ☐ A description of the public engagement process for setting the “major service change policy,” disparate impact policy, and disproportionate burden policy
- ☐ Results of service and/or fare equity analyses conducted since the last Title VI Program submission, including evidence that the board or other governing entity or official(s) considered, was aware of, and approved the results of the analysis

Requirements of States (Chapter V)

States must submit:

- ☐ All requirements set out in Chapter III (General Requirements)
- ☐ The requirements set out in Chapter IV (Transit Provider) if the State is a provider of fixed route public transportation
- ☐ Demographic profile of the State
- ☐ Demographic maps that show the impacts of the distribution of State and Federal funds in the aggregate for public transportation projects
- ☐ Analysis of the State’s transportation system investments that identifies and addresses any disparate impacts
- ☐ A description of the Statewide planning process that identifies the transportation needs of minority populations
- ☐ Description of the procedures the agency uses to ensure nondiscriminatory pass-through of FTA financial assistance
- ☐ Description of the procedures the agency uses to provide assistance to potential subrecipients, including efforts to assist applicants that would serve predominantly minority populations

Requirements of MPOs (Chapter VI)

Metropolitan Planning Organizations and other planning entities must submit:

- ☐ All requirements set out in Chapter III (General Requirements)

- Not applicable** ☐ The requirements set out in Chapter IV (Transit Provider) if the MPO is a provider of fixed route public transportation
- Chapter 2** ☐ Demographic profile of the metropolitan area
- Pages 37-47** ☐ A description of the procedures by which the mobility needs of minority populations are identified and considered within the planning process
- Chapter 5** ☐ Demographic maps that show the impacts of the distribution of State and Federal funds in the aggregate for public transportation projects
- Chapter 5** ☐ Analysis of the MPO's transportation system investments that identifies and addresses any disparate impacts
- Pages 47-49, Appendix M** ☐ Description of the procedures the agency uses to ensure nondiscriminatory pass-through of FTA financial assistance (if requested)
- Pages 47-49, Appendix M** ☐ Description of the procedures the agency uses to provide assistance to potential subrecipients in a nondiscriminatory manner (if requested)



Title VI Implementation Plan

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