



FTA Title VI Program



Planning Agency

Iowa Department of Transportation
800 Lincoln Way
Ames, IA 50010

Revised 3.30.21

*This program to be submitted every three years to the Iowa Department of Transportation. *

Date: [July 1, 2021](#)

Recipient Profile

Recipient: [Des Moines Area Metropolitan Planning Organization](#)

Administrative Head: [Todd Ashby, CEO and Executive Director](#)

Recipient Title VI Coordinator: [Tracey Deckard, Office Manager](#)

Address: [420 Watson Powell Jr. Way, Suite 200](#)

City/State: [Des Moines](#) Zip Code/County: [50309](#)

Phone: [515-334-0075](#) Fax: [515-334-0098](#)

Email: info@dmampo.org

Website: www.dmampo.org

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

Our MPO reviews Title VI requirements periodically to ensure staff is kept apprised of new procedures. Staff also undertakes a self-certification process annually, which includes review of compliance with Title VI. Staff works to ensure Title VI notification is included on the MPO's website, agendas, and other pertinent documents.

General Requirements

1.

Attach a copy of recipient's Title VI Notice to the Public.

Required elements:

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

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

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

List locations where the notice is posted:

The home page of the MPO's website includes a statement committing itself to Title VI and provides a link to the full notice. The full notice includes a statement that the MPO operates without regard to race, color, or national origin; the instructions for filing a complaint; and how to contact the MPO for any questions or more information. Additionally, a statement is included on all MPO agendas that includes the non-discrimination statement and provides a phone number and website to find more information or to file a complaint. Similar notices are included on public meeting sign-in sheets and in documents summarizing public input provided on plans. The full notice is also posted on the MPO public notice board located in the public space outside the entrance to the office.

2.

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

Are complaint procedures and the complaint form posted on the recipient's website? Please provide the URL: <http://www.dmampo.org/title-vi/>

3.

Please list and describe any transit-related Title VI investigations, complaints, or lawsuits filed with, concerning, or naming the recipient in the last three years.

No complaints or lawsuits have been filed.

	Date Filed (Month, Day, Year)	Summary (include basis of complaint: race, color, or national origin)	Status	Action(s) Taken
Investigations				
1.				
2.				
Lawsuits				
1.				
2.				
Complaints				
1.				
2.				

4.



Please attach a public participation plan that includes an outreach plan to engage minority and limited English proficient populations, as well as a summary of outreach efforts made in the last three years.

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

The MPO includes media outlets that serve minority and limited English proficient populations on all press releases and public notices when announcing public meetings on planning projects. In addition, the MPO has established relationships with African American organizations, organizations that serve refugee populations, and Latino organizations and work with these organizations to identify the best opportunities to engage minority and limited English proficient populations on a case-by-case basis. The MPO also invites staff members from its member communities who work on equity issues to serve on steering committees and roundtables when possible.

In 2018, the MPO embarked on a notable new outreach effort called Feedback 4 Equity, in conjunction with a handful of regional partners, including Capital Crossroads, the Great Outdoors Foundation and the Community Foundation of Greater Des Moines. Feedback 4 Equity is a small group of representatives from the African American community, who have started meeting quarterly with a small number of staff from the above-mentioned partners. At the meetings, the group discusses various topics, most recently the topics of parks and water trails, through the lens of equity and inclusion. The goals are not only to improve equity and inclusion in the topic-areas, but also to build bridges of trust among community members in effort to improve overall outreach efforts to minority and limited English proficiency populations.

List minority and/or community media utilized to ensure notification of public meetings or public review of recipient documents for residents in minority and low-income areas:

Notifications are sent to all television and radio media in the Des Moines metro area, as well as The Des Moines Register, and the Des Moines Business Record. Additional media specifically targeted to minority and low-income areas include Urban City Magazine, Black Iowa News, Hola America News and the Urban Experience Magazine. The Facebook outlet for EMBARC is another resource.

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

MPO staff reviews the Public Participation Plan is reviewed on an intermittent basis, to coincide with the start of planning activities, to ensure that it adequately reflects the MPO's engagement process as well as federal requirements. If necessary, the MPO asks the board to formally update the plan. The most recent plan was adopted in April 2021, and was an update to the previous plan that was adopted in 2018. We conclude that the plan remains up to date.

5.



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

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

As outlined in the Language Assistance Plan, the MPO has analyzed LEP populations throughout the planning area using ACS data. The ACS classified persons speaking a language other than English in their homes and if they spoke English "very well" or "less than very well." Those individuals that speak English "less than very well" are classified as Limited English Proficient persons according to FTA C 4702.1B. The MPO has identified languages that meet the Department of Justice's definition of a Safe Harbor threshold, as 1,000 persons OR 5% of the total population in the planning area, whichever is less, as these groups are likely candidates for translation services. The MPO has taken the following steps to provide access to these LEP groups:

- The MPO's website, www.dmampo.org, includes a link at the bottom written in the LEP languages for more information on translation. This takes the user to a page with information in the LEP language informing the user on how to request additional information from the MPO.
- The MPO's website notifies the user that it offers translation services to those who wish to participate. Upon request, the MPO has translation services available to translate documents, provide real-time translation via phone, or provide real-time translation at public meetings.
- The MPO has flashcards available in multiple languages that allow a non-English speaker to point to the language they speak, thereby enabling MPO staff to obtain the translation services they require.

6.

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

The MPO's formal decision-making bodies (Transportation Technical Committee, Executive Committee, and Policy Committee) are appointed by the city councils and county boards of supervisors of the MPO member governments and are not selected by the MPO. These decision-making bodies have subcommittees which are made up of members from the larger committees

and are appointed by the board chair. The MPO also facilitates a number of roundtables and working groups that are open to any interested parties.

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

The MPO includes a note on our membership form that encourages our member governments to consider diversity when making representative selections.

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

The MPO surveyed the members of its committees to inquire about individuals' genders and ethnicities. The survey received 90 responses.

Group	Number
Male	62
Female	28
White	81
Black or African American	2
Hispanic or Latino	4
American Indian or Alaskan Native	0
Asian	0
Native Hawaiian or other Pacific Islander	0
Other	3*

*Among the "Other" category, responses included:

"American"

"I am white with a Hispanic last name and a darker skin, dark hair and eyes which many times causes individuals to view me as Hispanic"

"Mixed"

7.

If applicable, describe the efforts the recipient uses to ensure subrecipients are complying with Title VI:

Not applicable to the MPO.

Include a schedule of subrecipient Title VI program submissions:

(insert table or list)

8.

Has the recipient constructed a facility, such as a vehicle storage facility, maintenance facility, operation center, etc., with Federal Transit Administration funds? ____ Yes X No

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

9.

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

Requirements of Planning Agencies

1.

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

Yes. The information is attached.

2.

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

The MPO's long-range transportation plan, *Mobilizing Tomorrow*, includes a goal to "further the health, safety, and well-being of all residents in the region." This goal includes the evaluation of potential impacts to environmental justice (EJ) areas, with an objective of ensuring conditions within EJ areas are not worse than in non-EJ areas.

The MPO's EJ analysis includes the identification of seven disadvantaged population groups. These seven groups include: non-white populations, households in poverty, households with persons over 65, single head of household with children, carless households, persons with disabilities, and limited English proficiency populations. Census tracts that have four to five degrees of disadvantage are classified as EJ areas of moderate concern, and six to seven degrees of disadvantage are classified as EJ areas of highest concern.

The MPO routinely analyzes different performance measures from the LRTP. Included in these analyses are breakdowns of performance in EJ and non-EJ areas. Additionally, the MPO has revised its Surface Transportation Block Grant Program (STBG) scoring to award more points to projects that are both within EJ areas and are working to improve conditions in those areas. The MPO also compiles a list and maps of all transportation projects, both federally and non-federally funded, from throughout the region and evaluates the projects based on whether they are within EJ areas.

3.

- Please attach demographic maps that show the impacts of the distribution of State and Federal funds in the aggregate for public transportation projects.

Please note that the MPO awards funds to the Des Moines Area Regional Transit Authority (DART) for bus purchases, which are used systemwide. As such, the impacts of these funds cannot be shown on any specific geographic location.

4.



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

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

Ever since the development of the 2014 iteration of Mobilizing Tomorrow, the MPO's long-range transportation plan that was updated in 2019, the MPO has integrated the analysis of Environmental Justice (EJ) impacts into many of its reports and plans. The most recently Environmental Justice report was completed in 2021 and is included below.

As noted in the various analysis, the EJ areas tend to have worse performing conditions than in non-EJ areas. The MPO is continuing to track performance in these areas. The MPO had previously altered the Surface Transportation Block Grant scoring to award more points to projects that address these disparities in EJ areas, and is reviewing the scoring criteria again as part of its continual improvements.

Declaration of the Respondent

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

Respondent

Date

Declaration of the Administrative Head

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

Respondent

Date

MPO TITLE VI PUBLIC NOTICE

The Des Moines Area MPO, by virtue of accepting federal funding, pledges to not discriminate against anyone on the basis of race, color, national origin, sex, minority status, or income level.

Background

Title VI of the Civil Rights Act of 1964 prohibits discrimination on the basis of race, color, or national origin. In addition, other statutes, laws, regulations, executive orders and the U.S. Constitution provide guidance for the effective execution of the objectives of Title VI. These include:

- Section 324 of the Federal Aid Highway Act, the enabling legislation of the Federal Highway Administration (FHWA), which prohibits discrimination based on sex;
- The 1994 Presidential Executive Order which directed every federal agency to make Environmental Justice (EJ) a part of its mission by identifying and addressing the effects of all programs, policies, and activities on minority populations and low-income populations.

The Des Moines Area MPO commits to upholding the principles of Title VI of the Civil Rights Act of 1964 and related guidance. The Des Moines Area MPO's policies and programs should not discriminate against people based on race, color, national origin or sex. The MPO's policies and programs should avoid disproportionately negative effects on minority and low-income populations. The Des Moines Area MPO seeks to involve as broad a cross-section of region's population, in addition to the population segments and certain organizations with special interests in transportation.

Public Participation Plan

The MPO aims to provide citizens, stakeholder groups, and other interested parties with reasonable opportunities to be involved in planning processes. These efforts are outlined in the Public Participation Plan. For more information, please call or email staff at 515-334-0075 or info@dmampo.org. The Public Participation Plan is also available online at www.dmampo.org/public-participation.

Complaint Process

Members of the public can file complaints if with the Des Moines Area MPO does not meet the expectations of Title VI of the Civil Rights Act of 1964, Section 324 of the Federal Aid Highway Act, or the 1994 Presidential Executive Order regarding Environmental Justice. The process of filing a complaint is as follows:

- Persons wishing to file a formal discrimination complaint may do so by completing the Title VI Complaint Form and submitting it within 180 days of the alleged discrimination. The complaint should first be filed with the MPO. The complainant can also file the complaint directly with the Iowa DOT or the FTA.
 - To get a Title VI Complaint Form, please call or email MPO staff at 515-334-0075 or info@dmampo.org.
 - The Title VI Complaint is also available in printable PDF and online form formats at www.dmampo.org/title-vi-complaint-form.
- Within 10 calendar days, the MPO will forward this form and any additional information to the Iowa Department of Transportation (Iowa DOT) Title VI Coordinator.
- The Iowa DOT will conduct an investigation into the complaint and make a recommendation to the Federal Highway Administration (FHWA), which will make the final determination.
- The Iowa DOT and the MPO will inform the person filing the complaint of the final determination. More information from the Iowa DOT is available online at <http://www.iowadot.gov/civilrights/subrecipient.html>.

Staff Contact

For more information about Title VI or the Title VI complaint process, please contact MPO Title VI Coordinator at 515-334-0075 or info@dmampo.org.



TITLE VI DISCRIMINATION COMPLAINT FORM

Name: _____

Address: _____

Telephone: _____

Basis of Complaint (e.g., race, disability, sex): _____

Date(s) of alleged discrimination: _____

Name and position (if known) of person(s) that discriminated against you:

Address: _____

Please provide a detailed description of the circumstances of the incident(s) and how you were discriminated against. Please provide, if applicable, names and contact information of individuals who may have knowledge of the incident or are perceived as parties in the complained of incident Include any additional information supporting your complaint (please use additional pages as necessary):

Signature _____

Date _____

The Title VI Complaint form may be submitted directly to the following agencies:

Iowa Department of Transportation
Office of Employee Services – Civil Rights
800 Lincoln Way
Ames, Iowa 50010
515-239-1422
515-817-6502 (fax)
dot.civilrights@dot.iowa.gov

Title VI Compliance Manager
Des Moines Area Metropolitan Planning Organization
420 Watson Powell, Suite 200
Des Moines, IA 50309
(515)-334-0075



MPO Public Participation Plan

2021 Update

April 2021

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The Des Moines Area Metropolitan Planning Organization (MPO) prepared this report with partial funding from the U.S. Department of Transportation’s Federal Highway Administration and Federal Transit Administration, and in part with local matching funds provided by the MPO member governments. The contents of this report are the responsibility of the MPO. The United States government and its agencies assume no liability for the contents of this report or for the use of its contents.

INTRODUCTION

The Des Moines Area Metropolitan Planning Organization (MPO) provides a continuous, cooperative, and comprehensive (3-C) transportation planning process for greater Des Moines metropolitan area. As part of a successful 3-C transportation planning process, the MPO solicits public review and comment on the work, projects, and products proposed and created by the MPO.

The MPO's *Public Participation Plan* (PPP) intends to promote this effort by defining a process that provides citizens, stakeholder groups, and other interested parties with reasonable opportunities to be involved in the transportation planning process.

The MPO developed this PPP in consultation with the public and other interested parties. Draft documents were published online with requests for public feedback, and these were publicized via newsletter, social media, and MPO committee meetings. Feedback was reviewed and incorporated in this document following a 45-day comment period. Included in this PPP are the MPO's policies and procedures for conducting public outreach, scheduling public meetings, and incorporating public input into the transportation planning process.

ABOUT THE MPO

The MPO acts as the formal transportation planning body for the greater Des Moines metropolitan area, carrying out the intent of 23 CFR 450. In 1983, the Governor of Iowa designated the MPO as the official MPO for the Des Moines Urbanized Area, as defined by the U.S. Census Bureau. The MPO functions as the Transportation Management Area, as well, because its population exceeds threshold of 200,000 persons, as established in 23 CFR 450.104. The MPO is committed to implementing a comprehensive, coordinated, and continuing multimodal transportation planning process for the greater Des Moines metropolitan area.

The MPO provides a regional forum to ensure coordination between the public and local, state, and federal agencies in regard to planning issues and to prepare transportation plans and programs. The MPO develops both long- and short-range multimodal transportation plans, selects and approves projects for federal funding based upon regional priorities, and develops methods to reduce traffic congestion.

In 2021, the MPO is comprised of 16 cities; the Des Moines Area Regional Transit Authority (DART); four associate, non-voting cities; unincorporated portions of three counties in central Iowa; and one associate, non-voting county. The MPO's planning area encompasses more than 500 square miles. Collaborating with the Iowa Department of Transportation (DOT), DART, the Federal Highway Administration (FHWA), the Federal Transit Administration (FTA), and many other cooperating agencies, the members of the MPO seek to provide an efficient and equitable surface transportation system for the greater Des Moines metropolitan area.

The MPO consists of three main committees:

- Representatives to the **MPO Transportation Technical Committee (TTC)** include city engineers, county engineers, public works directors, community planning directors, Des Moines International Airport staff, DART staff, and advisors from the Iowa DOT, FHWA, and FTA. This committee makes technical recommendations to the MPO Executive Committee.
- The MPO Executive Committee is comprised of 11 members with geographical representation, including two members from Des Moines, two from a northwest subarea, two from a southwest subarea, two from an east subarea, as well as one member from Polk County, one from Ankeny, and one from West Des Moines. From these, there are three officer positions, including the chair, vice chair, and secretary/treasurer, as well as an ex-officio member. This body reviews transportation policy-related topics and recommends action to the MPO.
- The **MPO Policy Committee** – referred to as the MPO – acts on the recommendations of the MPO Executive Committee. Representatives to the MPO are primarily local elected officials, city administrators, city managers, and advisors from the Des Moines International Airport, DART, the Iowa DOT, FHWA, and FTA.

A full-time professional planning staff makes recommendations to the TTC and supports these three committees in addition to a number of roundtables and working groups. Staff also coordinates and prepares committee meetings, informs the committees of projects and programs, and develops the final MPO work products and reports.

REGULATIONS and REQUIREMENTS

Title VI of the Civil Rights Act of 1964

Title VI of the Civil Rights Act of 1964 prohibits discrimination based on race, color, and natural origin in programs and activities that receive federal financial assistance. As President John F. Kennedy said in 1963, “Simple justice requires that public funds, to which all taxpayers of all races [colors, and national origins] contribute, not be spent in any fashion which encourages, entrenches, subsidizes, or results in racial [color or national origin] discrimination.” Per the US Department of Justice:

If a recipient of federal assistance is found to have discriminated and voluntary compliance cannot be achieved, the federal agency providing the assistance should either initiate fund termination proceedings or refer the matter to the Department of Justice for appropriate legal action. Aggrieved individuals may file administrative complaints with the federal agency that provides funds to a recipient, or the individuals may file suit for appropriate relief in federal court. Title VI itself prohibits intentional discrimination. However, most funding agencies have regulations implementing Title VI that prohibit recipient practices that have the effect of discrimination on the basis of race, color, or national origin.

To assist federal agencies that provide financial assistance, the wide variety of recipients that receive such assistance, and the actual and potential beneficiaries of programs receiving federal assistance, the US Department of Justice has published a Title VI Legal Manual. The Title VI Legal Manual sets out Title VI legal principles and standards. Additionally, the Department has published an Investigation Procedures Manual to give practical advice on how to investigate Title VI complaints. Also available on the Federal Coordination and Compliance Website are a host of other materials that may be helpful to those interested in ensuring effective enforcement of Title VI.

Executive Order #12898

The U.S. Environmental Protection Agency (EPA) defines environmental justice as “the fair treatment and meaningful involvement of all people regardless of race, color, national origin, or income with respect to the development, implementation, and enforcement of environmental laws, regulations, and policies. EPA has this goal for all communities and persons across this Nation. It will be achieved when everyone enjoys the same degree of protection from environmental and health hazards and equal access to the decision-making process to have a healthy environment in which to live, learn, and work.”

In February 1994, President Bill Clinton signed Executive Order #12898 – Executive Order on Federal Actions to Address Environmental Justice in Minority Populations and Low-Income Populations. The order is intended to focus federal attention on the “environmental and human health conditions in minority communities and low-income communities with the goal of achieving environmental justice. That order is intended to promote nondiscrimination in federal programs substantially affecting human health and the environment, and to provide minority

communities and low-income communities with access to public information on, and an opportunity for public participation in, matters relating to human health or the environment.”

Open Meetings Law

The State of Iowa established the Open Meetings Law in 1999. It states that meetings should be open to the public; however, the Open Meetings Law does permit some closed meetings. The Open Meetings Law applies to the MPO Policy Committee, the MPO Executive Committee, and such other subgroups as may be directed by the MPO Policy Committee.

Where Open Meetings Law applies, the MPO keeps minutes as public records that show the date, time, members present, and the actions taken during the meeting. Staff may keep additional records from the meetings that also are public records.

Public Records Law

The State of Iowa also established the Public Records Law in 1999. This legislation, with certain statutory exceptions, ensures that every person has a right to examine public records and to copy them.

Nondiscrimination Obligations

The MPO is obligated to manage its programs and provide planning services to Greater Des Moines without regard to race, color, and national origin. The MPO is further obligated to avoid discrimination based on handicap or disability.

Accommodations

The MPO schedules public-input meetings at convenient and accessible locations, and at times and facilities compliant with the Americans with Disabilities Act. The MPO sends news releases to foreign language media outlets in the region as well as to stakeholder groups representing low-income, minority, and disabled populations.

As part of its environmental justice analysis, the MPO has identified seven degrees of disadvantage, or groups of traditionally disadvantaged populations, as the analytic basis for ensuring compliance with Title VI. The seven degrees of disadvantage include:

- Limited English Proficiency (LEP)
- Non-white population
- Households in poverty
- Carless households
- Persons with a disability
- Single heads of households with children
- Households with persons over 65

By mapping the U.S. Census Bureau data for each degree of disadvantage and overlaying them to find concentrations, the MPO is better able to understand and illustrate the location and density of these population groups throughout the greater Des Moines metropolitan area. This allows the MPO, its members, and its partner organizations to improve planning process components like public outreach to ensure engagement and create more impactful mobility solutions for the most vulnerable populations. The MPO also incorporates this data into its funding scoring criteria for transportation project. The MPO calls for the identification of both positive and negative effects of transportation projects on the community when projects are in early stages.

With these concerns in mind, the MPO is committed to providing its materials to all citizens within the MPO planning area. The MPO developed a Language Assistance Plan to ensure individuals with limited English proficiency have meaningful access to the transportation planning process. For example, the MPO encourages LEP persons to contact the MPO for translation services of MPO documents. Upon request, the MPO works with local organizations to obtain translations of the desired documents within a reasonable period. The MPO also ensures that a notice of the availability of translation services is included in relevant MPO documents and written in the language of large LEP populations. More details on LEP accommodations can be found in the MPO's Language Assistance Plan, available online at www.dmampo.org/public-participation/.

Complaint Procedures

Persons wishing to file a formal discrimination complaint may do so by completing the Title VI Complaint Form available by contacting the MPO. Complaint forms are also available on the MPO website at www.dmampo.org/title-vi-complaint-form/ in printable PDF and online form formats. Persons should send the form to the MPO's designated Title VI Coordinator. Within 10 calendar days, the MPO will forward this form and any additional information to the Iowa DOT Title VI Coordinator. The Iowa DOT will conduct an investigation into the complaint and make a recommendation to the FHWA, who will make the final determination. The Iowa DOT and the MPO will inform the person filing the complaint of the final determination. For more information, please visit <http://www.iowadot.gov/civilrights/subrecipient.html>.

Record Keeping

The MPO's civil rights specialist maintains a log of all complaints and the disposition of those complaints. The MPO maintains files of each complaint for a period of no less than seven years. Annually, the MPO staff provides a summary of discrimination complaints to the MPO Policy Committee. At the time of this publication, the MPO has yet to receive any discrimination complaints.

STAKEHOLDERS AND PUBLIC GROUPS

The MPO considers all who live, work, learn, and play in the greater Des Moines metropolitan area to be stakeholders. With its long-range focus, the MPO even has responsibilities to generations not yet born. Staff works to balance this spectrum of needs and desires throughout the development of the many plans and programs the MPO undertakes.

To fully capture the pulse of the public, the MPO has identified a number of groups and individuals as having potential interest in public input and involvement opportunities. These groups are included in email distribution groups for staff to use in communications with stakeholders.

- Neighborhood organizations;
- Homeowner associations;
- The Greater Des Moines Partnership, chambers of commerce, and other business groups;
- Private transportation providers;
- Groups working within the transportation industry, including those working in trucking, rail, and transit, and on bicycle and pedestrian issues;
- Advocacy groups for disadvantaged, disabled, and/or minority groups;
- Transportation providers for groups that lack access to private vehicles;
- The media, including television, radio, print, and electronic means;
- Young professionals;
- Governmental agencies;
- Schools;
- Environmental organizations + other social action groups;
- Hospitals; and
- Organizations or individuals interested in public hearings for major projects, or organizations and individuals that provide comments relating to public hearings for major projects.

Roundtables + Working Groups

The MPO establishes and supports subcommittees focused on issues relevant to the MPO's activities and responsibilities from time to time. Stakeholder organizations and citizens serve on these committees as appropriate. Currently, the MPO supports the following committees:

- **Central Iowa Bicycle and Pedestrian Roundtable**, which facilitates the development, maintenance, and promotion of a world-class commuter and recreational bicycle and pedestrian system in central Iowa;
- **Freight Roundtable**, which works with local, regional, national, and international partners to assist with the efficient movement of freight in the region;
- **Transportation Advisory Group (TAG)**, which discusses human service and transportation coordination needs in the region;
- **Traffic Management Advisory Committee**, which provides a forum to discuss incident management, traffic management, and intelligent transportation systems issues;
- **Environmental Roundtable**, which is comprised of local experts who advise the MPO on the environmental aspects of planning activities;
- **Smart City Roundtable**, which explores how technology could be used to enhance urban systems, service delivery, and citizen engagement. This roundtable is a joint effort between the MPO and Capital Crossroads, a regional planning initiative.

OUTREACH STRATEGIES

The MPO implements a variety of techniques to reach the populations outlined at the beginning of this section. As work on documents such as the long-range transportation plan (LRTP) or the Transportation Improvement Program (TIP) commences, staff has a general outline of public engagement strategies to be implemented. It is important to note, however, that these strategies are designed to be responsive to public feedback and may be modified to enhance the engagement.

Public Meetings and Events

The TTC, Executive Committee, and MPO Policy Committee all meet on a monthly basis. All of these meetings are open to the public, per the State of Iowa's Open Meetings Law.

The MPO also hosts a number of roundtables and subcommittees that hold regular meetings. These roundtables and subcommittees are outlined on the previous page. All the roundtable and subcommittee meetings are open to the public, as well.

The MPO schedules single-purpose public input meetings several planning activities, including the LRTP, the PPP, TIP annual updates, and Surface Transportation Block Grant (STBG) Program application reviews. Additionally, the MPO includes a public-comment period at the beginning of every MPO Policy Committee meeting, which covers any TIP amendments throughout the year. When practical and feasible, the MPO supplements public input meetings with other outreach techniques, such as publicly circulated surveys regarding current issues and concerns. The MPO provides the results of any such surveys to the public.

Finally, the MPO hosts special events on an as-needed basis. The MPO co-hosts The Tomorrow Plan Speaker series with community partners.

The MPO seeks to engage all ages. The materials at the events present information both textually and visually, making it easier to understand for all. The MPO seeks to incorporate engaging elements that residents will remember into its events. In the past, this has included an interactive art piece at the 80/35 music festival that invited participants to imagine what amenities they would like along waterways in Greater Des Moines.

The MPO also seeks to engage all socioeconomic groups. One strategy has been to partner or consult with organizations such as the Polk County Continuum of Care Board (representing homeless populations), the African American Leadership Forum (AALF), and young professional groups.

The MPO also participates in other organizations' efforts with relevancy to the MPO's role in the region. For example, staff serve on a Transportation Advisory Group, comprised of leaders from various sectors working collaboratively on transportation issues. Similarly, the MPO participates in the United Way of Central Iowa's Mobility Coalition, which likewise seeks to understand and breakdown residents' barriers to transportation.

Publications

Press releases are issued throughout the year on the many planning efforts, studies and other activities of the MPO. Topics include reports on progress the region is making in meeting the performance measures of the long-range transportation plan, events related to planning activities, and public input opportunities. Media releases go to media outlets throughout the region, including those with LEP and minority audiences.

On occasion, the MPO publishes other documents and informational brochures that provide summary information regarding important planning issues and activities.

To subscribe to the MPO distribution list, contact MPO staff at 515-334-0075 or info@dmampo.org.

Online Presence

Over the past few years, the MPO has significantly bolstered its online presence. The MPO website – accessible at www.dmampo.org – provides an overview of upcoming meetings along with agendas, committee representatives, staff information, news, maps, plans, and publications produced by the MPO. Relevant links are included on the website, too.

Beyond the website, the MPO maintains an online presence through social media sites Facebook, Twitter, LinkedIn, YouTube, and Google Business Page. The MPO regularly updates these sites to engage residents and to build a better understanding of the MPO and the projects the organization takes on.

The MPO has employed several additional online engagement tools over the past several years. For example, the MPO recently utilized Adobe Spark to hold a virtual public meeting.

The MPO makes every effort to provide adequate notice for public review and comment, particularly as these activities relate to proposed drafts of the LRTP, the TIP, and the PPP. The MPO makes notifications and announcements of upcoming public-input meetings for the LRTP, the TIP, and the PPP approximately four weeks in advance of the scheduled meeting through publications and online. Approximately one week in advance, the MPO publishes legal notice of public meetings and public review and comment periods in the Des Moines Register. The MPO also posts meeting agendas and minutes in accordance with the State of Iowa's Open Meetings Law. The MPO issues press releases of upcoming public input meetings to local media outlets and encourages them to advertise the dates, times, and locations of public meetings and public review and comment periods. These release go to a broad range of media outlets, including several with LEP and minority audiences.

From time to time, member governments request amendments to the LRTP and to the TIP. In conducting revisions to the approved TIP, the MPO notifies the public of the MPO's intent to discuss and potentially vote on revisions at least one week prior to the meeting, when possible.

Availability of Information

In order to provide reasonable access to information about transportation issues and processes, the MPO posts all of its publications, meeting notices, and other related information online at www.dmampo.org. The MPO posts most publications in PDF format, which uses the free, downloadable Adobe Reader software. The MPO will provide hard copies of any document upon request. Additionally, the MPO staff is available to make presentations on relevant topics to local citizens, organizations, and other interested parties. The MPO also employs the use of videos to relay information related to regionally significant planning initiatives. The MPO also posts copies of all presentations to its MPO Policy Committee on the website, as well as copies of presentations from guest speakers. To request a hard copy of a document or to schedule a presentation call 515.334.0075, fax 515.334.0098, or email info@dmampo.org.

Public Review and Comment

The MPO provides a public review and comment period of 30 calendar days prior to the adoption of the LRTP, the TIP, and the PPP. The MPO hosts public meetings across the greater Des Moines metropolitan area to discuss these documents with the public. In an effort to provide information to the public and to solicit public input, public-input meetings take place during the development of the LRTP, and during the review periods of the draft LRTP, draft TIP, and draft PPP. Additional public-input meetings take place as needed.

The MPO provides the public an opportunity to comment on proposed revisions to the approved TIP. The MPO considers two types of revisions in the TIP development process. An amendment to the TIP involves major changes to an approved project or the addition of a new project. Amendments to the approved TIP require formal MPO approval. Amendments are required under the following conditions:

- **Project cost:** Projects in which the recalculated project costs increase federal-aid by more than 30 percent or increase total federal-aid by more than \$2 million from the original amount.
- **Schedule changes:** Projects added or deleted from the TIP.
- **Funding sources:** Projects receiving additional federal funding sources to a project.
- **Fiscal constraint:** Changes that result in the TIP no longer being fiscally constrained (makes any of the four federal fiscal years not fiscally constrained).
- **Scope changes:** Changing the project termini, the amount of through traffic lanes, type of work from an overlay to reconstruction, or a change to include widening of the roadway.

Administrative modifications involve minor changes to existing projects in the approved TIP. Administrative modifications do not require formal MPO approval and often are conducted administratively by the MPO staff. Administrative modifications that involve moving Surface

Transportation Program (STP) or Transportation Alternative Program (TAP) funds forward require MPO approval to ensure that the MPO's TIP remains fiscally constrained. Administrative modifications involve:

- **Project cost:** Projects in which the recalculated project costs do not increase federal-aid by more than 30 percent and do not increase total federal-aid by more than \$2 million from the original amount.
- **Schedule changes:** Changes in schedules to projects included in the first four years of the TIP.
- **Funding sources:** Changes to funding from one source to another.
- **Scope changes:** All changes to a project's scope require an amendment.

The public is invited to MPO Policy Committee meetings to provide comments on these revisions prior to the MPO vote. While the MPO strives to be as open to public comment as possible, the MPO may elect to place limits or requirements on the public comment period if reasonably necessary for an effective meeting.

Visualization Techniques

The MPO makes every reasonable effort to incorporate visualization techniques into its public outreach activities. The MPO creates large, legible maps for public meetings regarding the development of the LRTP and the TIP to help demonstrate the location and impact of possible transportation improvements and various network alternatives. Other useful visual aids used by the MPO may include graphs representing various types of data and flow charts to depict the transportation planning process. The MPO also works to provide an online interactive map demonstrating the location of various planning activities and transportation projects in the greater Des Moines metropolitan area.

Accommodations for Special Populations

The MPO works to reach out to special populations traditionally underserved by existing transportation systems that may face challenges accessing employment and other services. These populations may include low-income and minority households, persons with disabilities, and persons with limited English proficiency. The MPO schedules public-input meetings at Americans with Disabilities Act compliant facilities, and at convenient and accessible locations and times. The Des Moines Area Regional Transit Authority (DART) conducted a survey to identify the best ways to engage with minority and limited English proficiency populations. The survey was completed by 405 people who identified as being either low-income, minority, or individuals with Limited English Proficiency. The survey indicated that meetings held in the evening (6-8 PM) or late afternoon (4-6 PM) were the preferred times, best serving these populations. The survey also found that meetings held in downtown Des Moines or at suburban or Des Moines branch libraries were the preferred locations.

The MPO sends its news releases to foreign language media outlets in the greater Des Moines metropolitan area as well as to stakeholder groups representing low-income, minority, and disabled populations. The MPO also works with the Iowa DOT to provide translation services, which are publicized on the MPO's website at www.dmampo.org/translation-services/. To request translation services, people can call or email MPO staff at 515-334-0075 or info@dmampo.org. The public is asked to provide the MPO staff with as much notice as possible, so they can best provide for any special accommodations that may be necessary in order for them to participate in any public events. Additional information on the MPO's nondiscrimination obligations and procedures for investigating and tracking Title VI complaints can be found elsewhere in this document, or is available upon request by calling 515.334.0075 or by visiting www.dmampo.org/title-vi.

Adaptations for Pandemic Period

Like most organizations, the MPO has had to adapt its work processes during the COVID-19 pandemic. These steps have been taken to ensure the safety of its staff and committee members, as well as to remain in compliance with public-meeting limitations ordered by local and state jurisdictions.

Generally, the MPO's approach to public participation has remained the same as outlined in this document. However, the implementation of the approach has had to change to accommodate social distancing. These include:

- **Virtual committee work:** All the MPO's committee meetings have moved to the virtual platform Zoom, which was selected for its widespread adoption and ease of use. Log-in details are included in agendas, including both the web-based and phone-based information.
- **Virtual public meetings:** The MPO has also offered public meetings in a virtual setting. Some of these have been held using Zoom. Others have utilized platforms that allow for "self-led" public meetings, wherein the visitor can navigate through a presentation, then answer a series of questions to provide feedback. For example, the MPO utilized Adobe Spark to conduct an online public meeting to review project designs relating to a water trails project funded through a BUILD Grant from the U.S. Department of Transportation.

These adaptations are not intended to be permanent, though there is no clear end date as of this writing. At the same time, some adaptations have proven useful and will likely continue in some degree in perpetuity.

PLANNING DOCUMENT OR ACTIVITY	PUBLIC PARTICIPATION PROCEDURES
<p>Long-Range Transportation Plan (LRTP)</p>	<ul style="list-style-type: none"> ● The official multimodal transportation plan addressing no less than a 20-year planning horizon that the MPO develops, adopts, and updates through the metropolitan transportation planning process, including a fiscally constrained list of projects. ● The development process includes an analysis of local trends, review of local transportation needs, and available funding, and is overseen by a Steering Committee of stakeholders. ● The document is reviewed by the Steering Committee, MPO roundtables and committees, the general public, the Iowa Department of Transportation, the Federal Highway Administration, and the Federal Transit Administration. ● Updated every four years. ● The MPO Policy Committee adopts the Final LRTP after considering and incorporating state and federal comments. ● Public input meetings held during the development of the LRTP ● Draft + final LRTP available on MPO website ● Legal notice published in <i>The Des Moines Register</i> one week prior to public meeting ● Public input opportunities published on MPO calendar and social media. ● 30 calendar day public comment and review period. ● Adopted by MPO committees. ● Revisions also require public notice, public comment period, and adoption by the MPO committees ● At least one public input meeting held for completed draft LRTP. ● The final product can be found on the MPO’s website at https://dmampo.org/mobilizing-tomorrow/.

Unified Planning Work Program	<ul style="list-style-type: none">• An annual or biennial statement of work identifying the planning priorities and activities to be carried out within a metropolitan planning area. At a minimum, a UPWP includes a description of the planning work and resulting products, who will perform the work, time frames for completing the work, the cost of the work, and the source(s) of funds.• Updated annually.• The MPO Policy Committee adopts the Final UPWP after considering and incorporating state and federal comments; the FHWA and FTA affirm the Final UPWP.• The development process includes staff evaluating its planning funding availability and regional planning tasks and needs with MPO communities and members to advance a draft UPWP.• The UPWP is reviewed for compliance with regulations by Iowa DOT, FHWA, and FTA. Public and stakeholder review is not required for the UPWP.• Available on MPO website.• Developed with input from MPO committees and member governments via regular meetings and direct conversations.• Adopted by MPO committees.• MPO staff works with members, as well as state and federal governments, to monitor the UPWP implementation and process modifications and amendments as needed. Specific revision and amendment requirements can be found in the UPWP.• The final product can be found on the MPO's website at https://dmampo.org/organization/.
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<p>Passenger Transportation Plan</p>	<ul style="list-style-type: none">• Long-term plan for the active management of passenger transportation services for the region.• Developed with oversight and input from the Transportation Advisory Group.• Updated every four years.• Public input meetings held during its development.• Legal notice published in <i>The Des Moines Register</i> one week prior to public meeting.• Public input opportunities published on MPO calendar and social media.• Available on MPO website.• 45 calendar day public comment and review period.• Adopted by MPO committees.• Revisions also require public notice, public comment period, and adoption by the MPO committees.• The final product is available on the MPO's website at https://dmampo.org/wp-content/uploads/2018/03/Passenger-Transportation-Plan-FY-2019-2023-Draft-DOT.pdf.
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<p>Bicycle and Pedestrian Plan</p>	<ul style="list-style-type: none"> ● Action plan for the improvement of bicycle and pedestrian access and facilities throughout the region. ● Updated as needed. ● Public input meetings held during development. ● 30 calendar day public comment and review period its development. ● Legal notice published in <i>The Des Moines Register</i> one week prior to public meeting. ● Public input opportunities published on MPO calendar and social media. ● Final product is available on the MPO website at https://dmampo.org/connect-bike-ped-transportation-plan/. ● Adopted by MPO Committees.
<p>Transportation Improvement Program (TIP)</p>	<ul style="list-style-type: none"> ● A detailed list of regionally significant, federally funded transportation projects by all jurisdictions and transit agencies in the MPO planning area, covering a period of at least four years and including capital and non-capital surface transportation projects, bicycle and pedestrian facilities and other transportation enhancements, and safety projects included in the State’s Strategic Highway Safety Plan. Updated annually. ● The development process includes the solicitation of eligible projects for inclusion from all jurisdictions and transit agencies within the MPO planning area, an analysis of fiscal capacity, and feedback from MPO committees. ● The document is reviewed by the MPO committees, the Iowa Department of Transportation, the Federal Highway Administration, and the Federal Transit Administration. ● The MPO Policy Committee adopts the Final TIP after considering and incorporating state and federal comments; the FHWA and FTA approve the Final UPWP. ● Public input meetings held during development. ● Legal notice published in <i>The Des Moines Register</i> one week prior to public meeting. ● 30 calendar day public comment and review period. ● Adopted by MPO Committees.

<p>TIP Revisions</p>	<ul style="list-style-type: none"> ● Updates to the TIP based on changing status of projects during implementation. ● Revisions occur as needed. ● Adopted through MPO Committees. ● Public comment for proposed TIP revisions can be made at the MPO Policy Committee meeting prior to the MPO’s formal action on the request.
<p>LRTP Amendments</p>	<ul style="list-style-type: none"> ● Proposed LRTP amendments made available on MPO website. ● Legal notice published in <i>The Des Moines Register</i> one week prior to the public meeting. ● Public input opportunities published on MPO calendar and social media. ● Amendments occur as needed. ● Adopted through MPO committees. ● 30 calendar day public comment and review period. ● At least one public input meeting held. ● Public comment for proposed LRTP revisions can be made at the MPO Policy Committee meeting prior to the MPO’s formal action on the request.

<p>Public Participation Plan (PPP)</p>	<ul style="list-style-type: none"> ● A documented participation plan that defines a process for providing individuals, affected public agencies, representatives of public transportation employees, public ports, freight shippers, providers of freight transportation services, private providers of transportation (including intercity bus operators, employer-based commuting programs, such as carpool program, vanpool program, transit benefit program, parking cash-out program, shuttle program, or telework program), representatives of users of public transportation, representatives of users of pedestrian walkways and bicycle transportation facilities, representatives of the disabled, and other interested parties with reasonable opportunities to be involved in the metropolitan transportation planning process. ● Updated every five years or as needed. ● The development process includes a review of past and potential new engagement practices to ensure the plan fits the needs of the community. ● The document is reviewed by MPO committees, the general public, the Iowa Department of Transportation, the Federal Highway Administration, and the Federal Transit Administration. ● The MPO Policy Committee adopts the Final PPP. ● Draft and final PPP available on MPO website at https://dmampo.org/public-participation/. ● Legal notice published in <i>The Des Moines Register</i> one week prior to public meeting. ● Public input opportunities published on MPO calendar and social media. ● 45 calendar day public comment and review period. ● At least one public input meeting held.
<p>Additional Public Comment Period, as necessary</p>	<ul style="list-style-type: none"> ● Relevant documents and plans available on MPO website ● Legal notice published in <i>The Des Moines Register</i> one week prior to public meeting ● Public input opportunities published on MPO calendar and social media. ● At least a 15 calendar day public comment and review period

MEETING SCHEDULE

Regularly scheduled meetings of the MPO committees are as follows:

- The TTC meets on the first Thursday of every month at 9:30 a.m. in the Burnham Conference Room of the MPO office;
- The Executive Committee meets on the second Wednesday of every month at 11:30 a.m. in the Burnham Conference Room of the MPO office;
- The MPO meets on the third Thursday of every month at 4:00 p.m. in the Burnham Conference Room of the MPO Office; and,
- The various roundtables and subcommittees meet at the MPO office, though meeting times and dates vary.
- NOTE: During the COVID-19 pandemic, these meetings have moved to virtual settings, namely Zoom.

The MPO posts meeting times, agendas and minutes on its website at www.dmampo.org.

All meetings of the TTC, Executive Committee, MPO Policy Committee, roundtables, and subcommittees are open to the public. Members of the public may request time on the agenda at the TTC or the MPO Policy Committee to comment on specific subjects of interest to the representatives. Additionally, the MPO Chair may appoint new subcommittees and working groups to address specific transportation-related topics or areas of interest.

The MPO hosts an annual public meeting for comment on the proposed TIP. The TIP is an annual document identifying transportation projects that MPO member governments and agencies intend to implement using federal funds over the next four years. The MPO holds public comment periods at the beginning of Policy Committee meetings to allow comment on proposed revisions to the approved TIP.

Several public input meetings occur in conjunction with the update of the LRTP. The LRTP addresses transportation planning issues over at least a 20-year period and undergoes updates every five years. Amendments to the approved LRTP also require a public input meeting. Because these meetings are infrequent, the MPO schedules them on an as-needed basis.

PUBLIC INPUT

The MPO accepts input and comments from the public through a variety of means. Members of the public may make comments by calling the MPO at 515-334-0075. Written comments may be:

Presented at public meetings

Faxed to the MPO at 515-334-0098

Submitted online at www.dmampo.org/public-comment-form/

Mailed to the MPO, 420 Watson Powell Jr., Way, Suite 200, Des Moines, Iowa 50309

The public may submit comments to their respective TTC or MPO representatives for transmittal to the respective full committees. Citizens can make comments on MPO plans, reports, and programs at public-input meetings. Additionally, members of the public or a representative of a group with expressed comments on a particular topic may request of the MPO Chair an appointment to serve as a citizen representative on the appropriate subcommittee of the TTC or the MPO. Citizens or representatives of special interest groups may request time on an MPO TTC or MPO agenda to offer input to the full committees as well. The MPO staff shares all public comments and input with the TTC, the Executive Committee, and the MPO in verbal and/or written form.

The MPO accepts and considers public input and comments received during the public participation process. When the MPO receives significant written or oral comments regarding the draft LRTP, the draft TIP, or the draft PPP through the public participation process, the MPO includes a summary, analysis, and report on those comments in the final document. In those instances where a final LRTP, TIP, or PPP differs significantly from the version that was made available for public comment, the MPO provides an additional opportunity for further public comment on the final version. Additional public comment periods are at least 15 calendar days.

COORDINATION AND CONSULTATION

The MPO coordinates its public participation efforts with the statewide transportation planning public involvement and consultation process, as necessary. The LRTP, the TIP, and PPP are developed with due consideration of other related planning activities in the greater Des Moines metropolitan area, and the MPO consults and/or coordinates with other agencies and officials responsible for other planning activities that may be impacted or affected by transportation. Additionally, the MPO involves the appropriate federal land management agencies in the development of the LRTP and TIP, as necessary.

EVALUATION

The MPO periodically reviews the PPP in order to monitor the effectiveness of the procedures outlined in this document. Following evaluation of the outputs and outcomes of the PPP, the MPO may revise these procedures to incorporate new and innovative ways to involve the public and ensure a full and open participation process. In particular, the MPO documents information regarding public attendance at public input meetings, records the number of requests or complaints associated with special populations, and solicits feedback on the use of visual aids at public meetings. The MPO reviews this information every year and evaluates the need to revise these procedures.

CONTACT INFORMATION

The MPO understands that, without the public, the planning process is not nearly as strong as it could be. As such, the MPO encourages residents to submit comments to the MPO. This can be accomplished by contacting the MPO by:

Mail: MPO
420 Watson Powell, Jr., Way, Suite 200
Des Moines, Iowa 50309

Phone: 515-334-0075

Fax: 515-334-0098

Email: info@dmampo.org

Web: www.dmampo.org

Facebook: www.facebook.com/dmampo

Twitter: www.twitter.com/dmampo

YouTube: www.youtube.com/dmampo



Language Assistance Plan

Des Moines Area Metropolitan Planning Organization

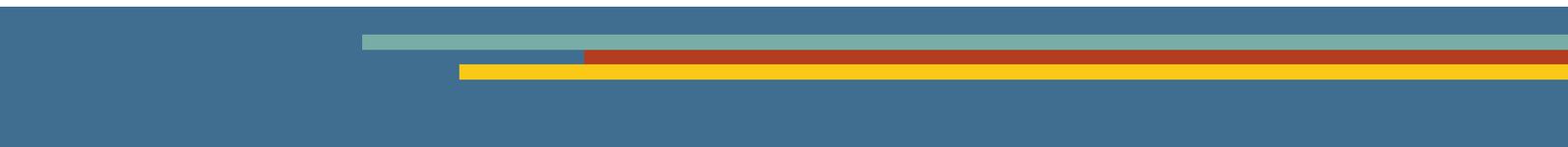
April 2021



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The Des Moines Area Metropolitan Planning Organization (MPO) has prepared this document with partial funding from the United States Department of Transportation’s Federal Highway Administration and Federal Transit Administration, and in part through local matching funds provided by the MPO member governments. These contents are the responsibility of the MPO. The United States Government and its agencies assume no liability for the contents of this report or for the use of its contents.



Introduction

The Des Moines Area Metropolitan Planning Organization (MPO) is responsible for planning and prioritizing transportation projects and funding allocation in Greater Des Moines. The MPO works with the public, planning organizations, government agencies, elected officials, and community groups to develop transportation plans and programs through a continuing, cooperative, and comprehensive planning process. This planning process guides the use of federal and state dollars spent on existing and future transportation projects and programs. The **Language Assistance Plan** plays an important part in that process. It ensures individuals with limited English proficiency have meaningful access to the transportation planning process.

Background

The U.S. Department of Transportation (DOT) requires that DOT recipients take responsible steps to ensure meaningful access to the benefits, services, information, and other important portions of their programs and activities for individuals who are Limited English Proficient. Executive Order 13166, "Improving Access to Services for Persons with Limited English Proficiency," reprinted at 65 FR 50121 (August 16, 2000), directs each Federal agency to examine the services it provides and develop and implement a system by which persons with limited English proficiency can meaningfully access those services. The Executive Order states that recipients must take reasonable steps to ensure meaningful access to their programs and activities by persons with limited English proficiency.

Title VI of the Civil Rights Act of 1964, 42 U.S.C. 2000d et seq., and its implementing regulations provide 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 that receives Federal financial assistance. The Supreme Court, in *Lau v. Nichols*, 414 U.S. 563 (1974), interpreted Title VI regulations promulgated by the former Department of Health, Education, and Welfare to hold that Title VI prohibits conduct that has a disproportionate effect on persons with limited English proficiency because such conduct constitutes national origin discrimination.

Federal agencies have published guidance for their respective recipients in order to assist them with their obligations to persons with limited English proficiency under Title VI. This order applies to all state and local agencies that receive federal dollars. The Language Assistance Plan outlined below is based on the federal guidance provided by U.S. DOT.

Who is a Limited English Proficient Person? Individuals who do not speak English as their primary language and who have a limited ability to read, speak, write, or understand English are considered limited English proficient. The U.S. Census Bureau does not define limited English proficiency or non-limited English proficient populations. It reports data based on the four categories of English-speaking ability: very well, well, not well, and not at all.



Language Assistance Needs Assessment – Four Factor Analysis

This plan outlines how to identify a person who may require language assistance, the ways in which the MPO provides such assistance, any staff training that may be required to provide such services, and the resources available to reach out to the people who may need language assistance service. To prepare the Language Assistance Plan, a needs assessment was conducted utilizing the four-factor analysis, as recommended by U.S. DOT. The four factors are:

- Factor 1: The number or proportion of persons with limited English proficiency who are eligible to be served or likely to be encountered by MPO services and programs.
- Factor 2: The frequency with which persons with limited English proficiency come into contact with MPO services and programs.
- Factor 3: The nature and importance of the MPO's services and programs in people's lives.
- Factor 4: The resources available to the MPO for outreach to persons with limited English proficiency, as well as the costs associated with the outreach.

Factor 1: The number or proportion of persons with limited English proficiency eligible to be served or likely to be encountered by MPO services and programs

The planning and programming decisions made by the MPO will affect the future economic health of the region and the transportation options available to residents. An effective Language Assistance Plan program is the only way of determining the extent to which the transportation needs of the limited English proficiency population mirror those of the community at large and the extent to which persons with limited English proficiency have different needs that should be addressed through the planning and project development process.

As indicated in the table below, the latest Census data shows a steady growth of the increasingly diverse population in the region. For the purposes of the Language Assistance Plan, we have defined the region as the four counties – Dallas, Madison, Polk and Warren – that are straddled by the greater Des Moines metropolitan area. The region has experienced a substantial increase in non-English speaking population or people who speak a language “other than English” (see Table 1).

Table 1: English Proficiency

MPO	2000	2010	2013	2019	Percent Change (2000-2019)
Language Spoken At Home	4-County Total				
Population 5 years and Over	434,830	500,375	527,485	587,868	35%
Language Other Than English	34,558	51,416	57,270	69,703	102%
Speak English Less than "very well"	16,994	24,434	26,033	29,146	72%
Spanish	16,132	26,413	28,305	30,027	86%
Speak Spanish Less than "very well"	8,135	13,373	13,919	12,148	49%
Other Indo-European Languages	9,609	10,499	11,968	15,067	57%
Speak English Less than "very well"	3,993	3,984	4,093	5,091	27%
Asian and Pacific Island languages and Other languages	8,817	14,531	16,997	24,609	179%
Speak English Less than "very well"	4,798	7,066	7,769	11,907	148%

Source: U.S. Census Bureau American Community Survey (ACS) 5-Year Estimates

The ACS classified persons speaking a language other than English in their homes and if they spoke English “very well” or “less than very well.” Those individuals that speak English “less than very well” are classified as Limited English Proficient persons according to FTA C 4702.1B. Table 2 shows the languages spoken at home for all persons 5 years old and older, with number and percentage of persons broken out by language within the MPO planning area.

The Department of Justice defines the Safe Harbor threshold as 1,000 persons OR 5% of the total population in the MPO planning area, whichever is less, for vital document translation. As shown in Table 2, Spanish; Russian, Polish, other Slavic languages, other Indo-European languages, Vietnamese, and other Asian and Pacific Islander languages, Arabic, and other African languages pass the threshold for speaking English “less than very well.” The MPO will continue to monitor the Census data and ensure that the Language Assistance Plan is updated in a timely manner when the threshold population is reached in any additional language groups.

Table 2: Detailed Breakdown of English Proficiency

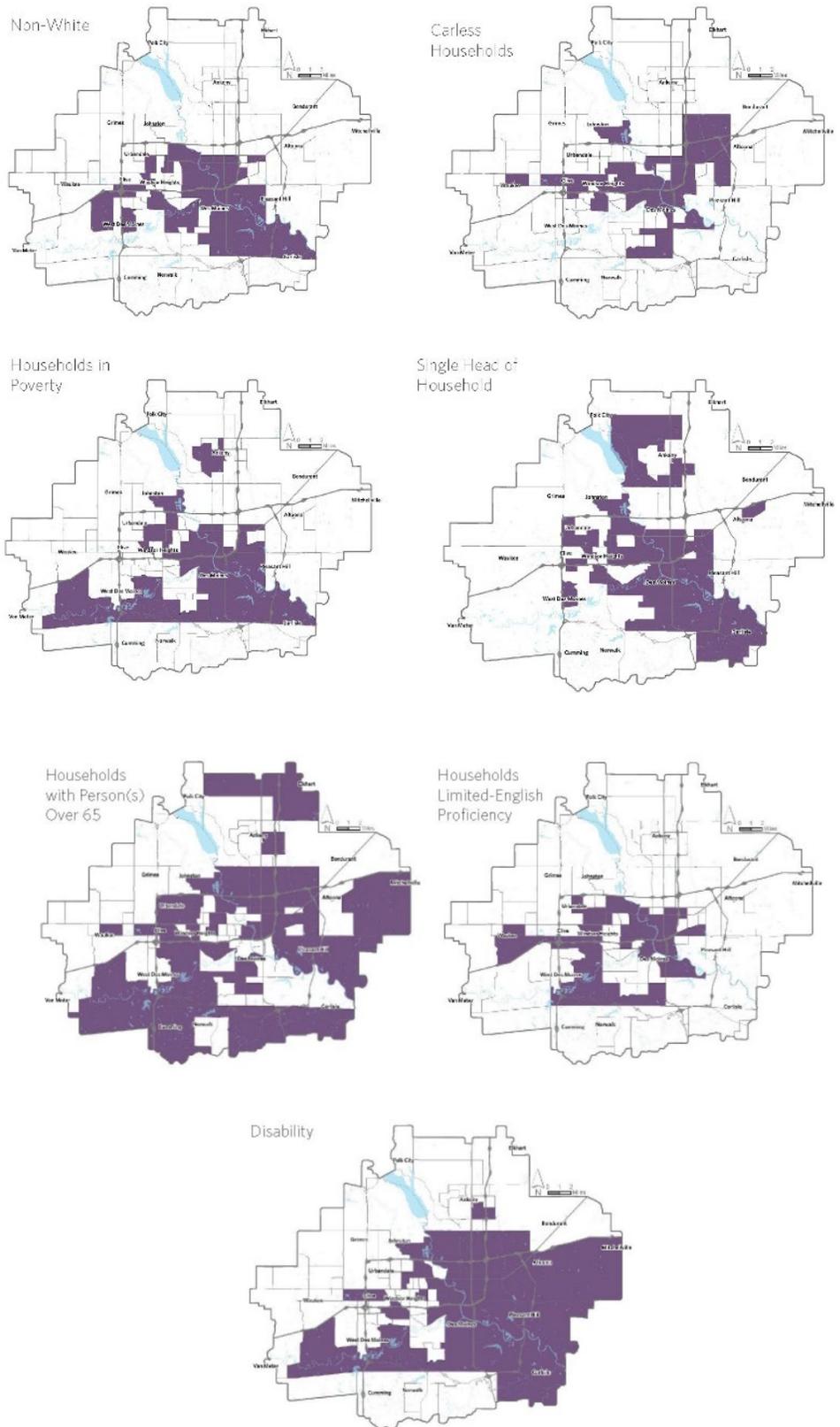
	Total	Percent of Total
Total:	587,868	100%
Speak only English	518,165	88.1%
Spanish:	30,027	5.1%
Speak English "very well"	17,879	3.0%
Speak English less than "very well"	12,148	2.1%
French, Haitian, or Cajun:	1,677	0.3%
Speak English "very well"	1,262	0.2%
Speak English less than "very well"	415	0.1%
German or other West Germanic languages:	1,222	0.2%
Speak English "very well"	985	0.2%
Speak English less than "very well"	237	0.0%
Russian, Polish, or other Slavic languages:	6,694	1.1%
Speak English "very well"	4,072	0.7%
Speak English less than "very well"	2,622	0.4%
Other Indo-European languages:	5,474	0.9%
Speak English "very well"	3,657	0.6%
Speak English less than "very well"	1,817	0.3%
Korean:	307	0.1%
Speak English "very well"	166	0.0%
Speak English less than "very well"	141	0.0%
Chinese (incl. Mandarin, Cantonese):	1,570	0.3%
Speak English "very well"	840	0.1%
Speak English less than "very well"	730	0.1%
Vietnamese:	4,302	0.7%
Speak English "very well"	1,772	0.3%
Speak English less than "very well"	2,530	0.4%
Tagalog (incl. Filipino):	1,029	0.2%
Speak English "very well"	488	0.1%
Speak English less than "very well"	541	0.1%
Other Asian and Pacific Island languages:	8,735	1.5%
Speak English "very well"	4,521	0.8%
Speak English less than "very well"	4,214	0.7%
Arabic:	3,516	0.6%
Speak English "very well"	2,200	0.4%
Speak English less than "very well"	1,316	0.2%
Other and unspecified languages:	5,150	0.9%
Speak English "very well"	2,715	0.5%
Speak English less than "very well"	2,435	0.4%

Source: U.S. Census Bureau American Community Survey (ACS) 5-Year Estimates 2019

The Des Moines Area MPO works to ensure the fair treatment and meaningful involvement of all residents in the region. This means that no group, including a racial, ethnic, or socioeconomic, should bear a disproportionate share of negative health or environmental consequences of any project. To ensure fair treatment, the MPO studies seven Degrees of Disadvantage to identify Environmental Justice areas, or those areas with large populations of traditionally underserved individuals.

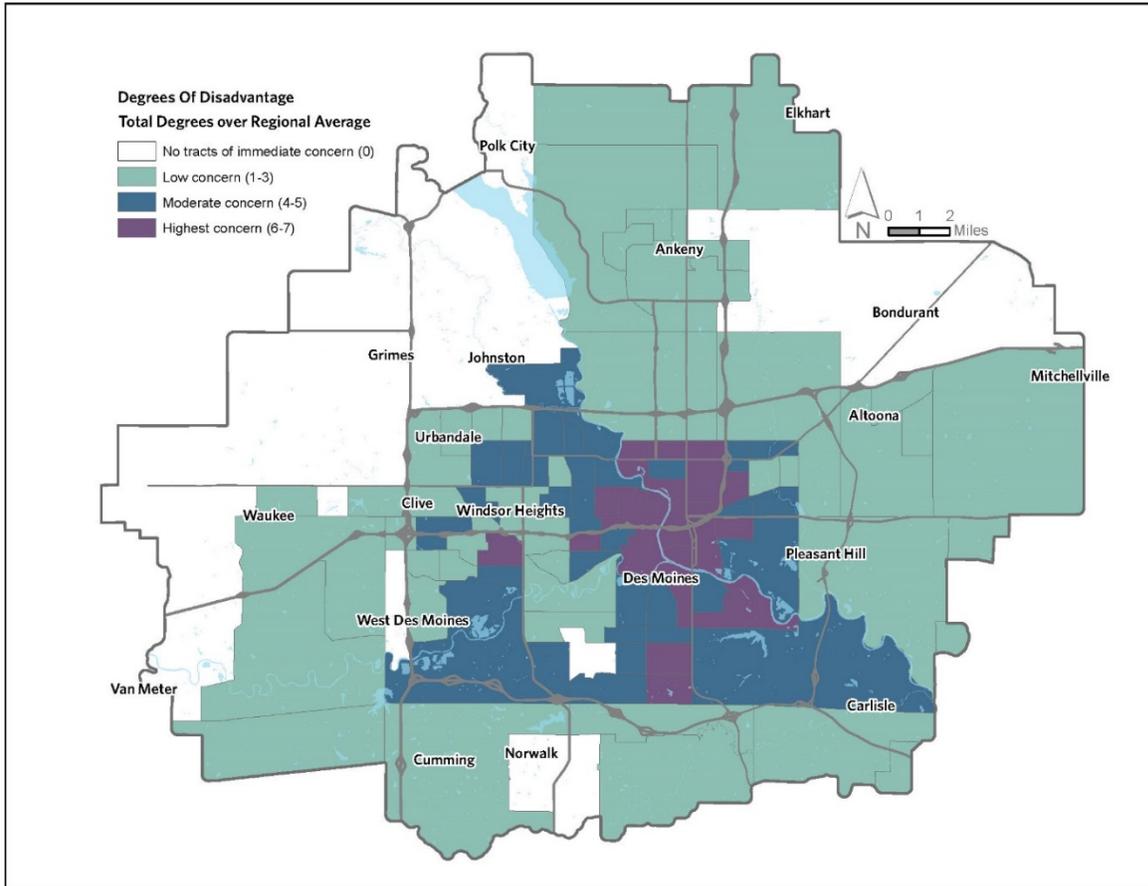
The Degrees of Disadvantage methodology looks at U.S. Census Bureau data at the tract level to locate Environmental Justice areas within the region. Data are obtained for seven population groups, including non-white population, car-less households, persons in poverty, single heads of households with children, persons over 65, limited English proficiency, and persons with a disability. A regional average for the percent of people in each of the population groups is then determined.

Figure 1: Degrees of Disadvantage



These Degrees of Disadvantaged are mapped to show the number of degrees of disadvantage exist within each tract of the region. The darker the shade of purple in this map represents a higher degree of disadvantaged populations. Environmental Justice areas in the region can be seen in Figure 2 below.

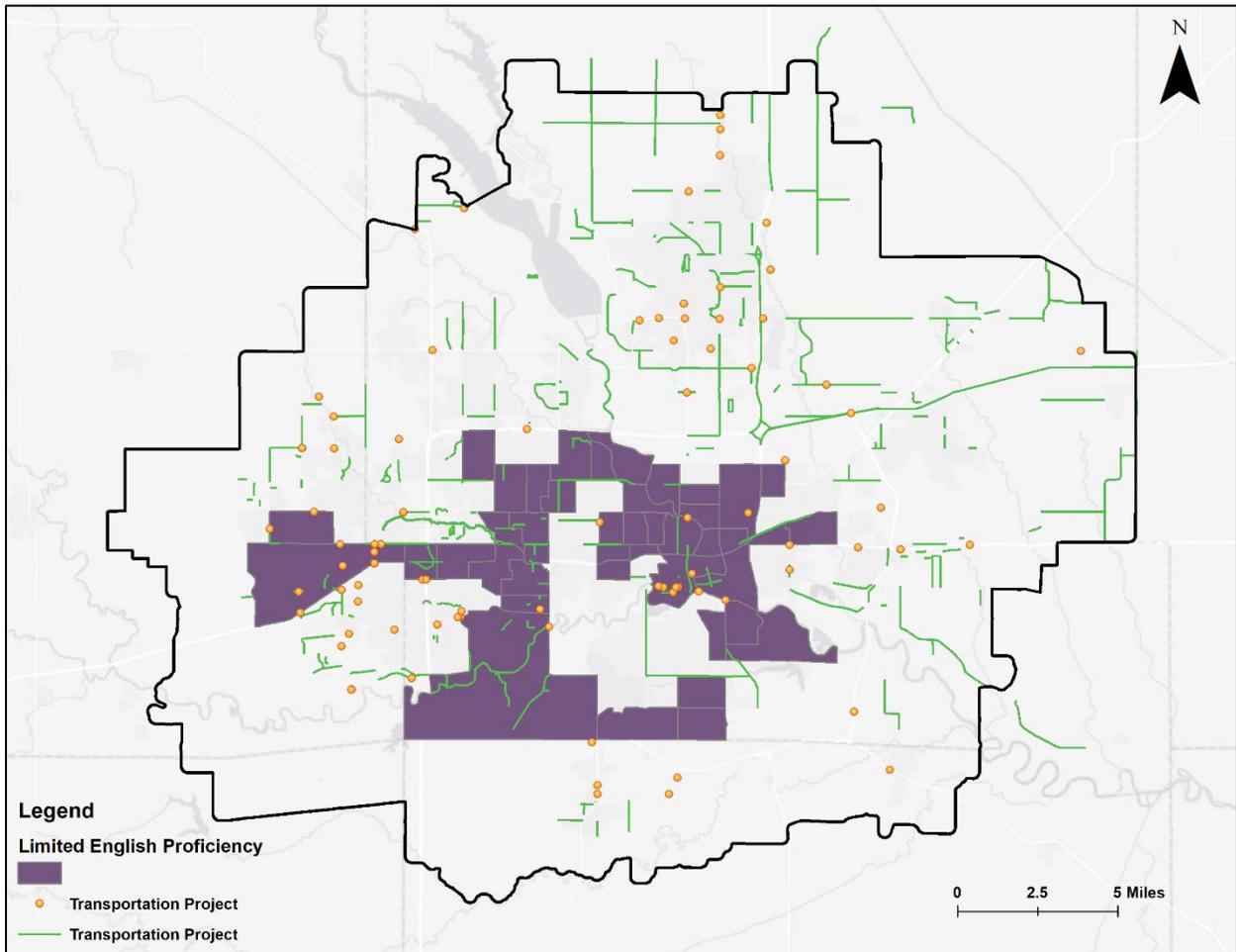
Figure 2: MPO Environmental Justice Areas



Of the 113 census tracts only 8 (7%) are under the regional average for all seven degrees. The remaining 105 tracts are home to at least one group of disadvantaged populations. While concentration is highest in the central urban areas, outlying communities also have disadvantage populations, especially so near clusters of multi-family housing units

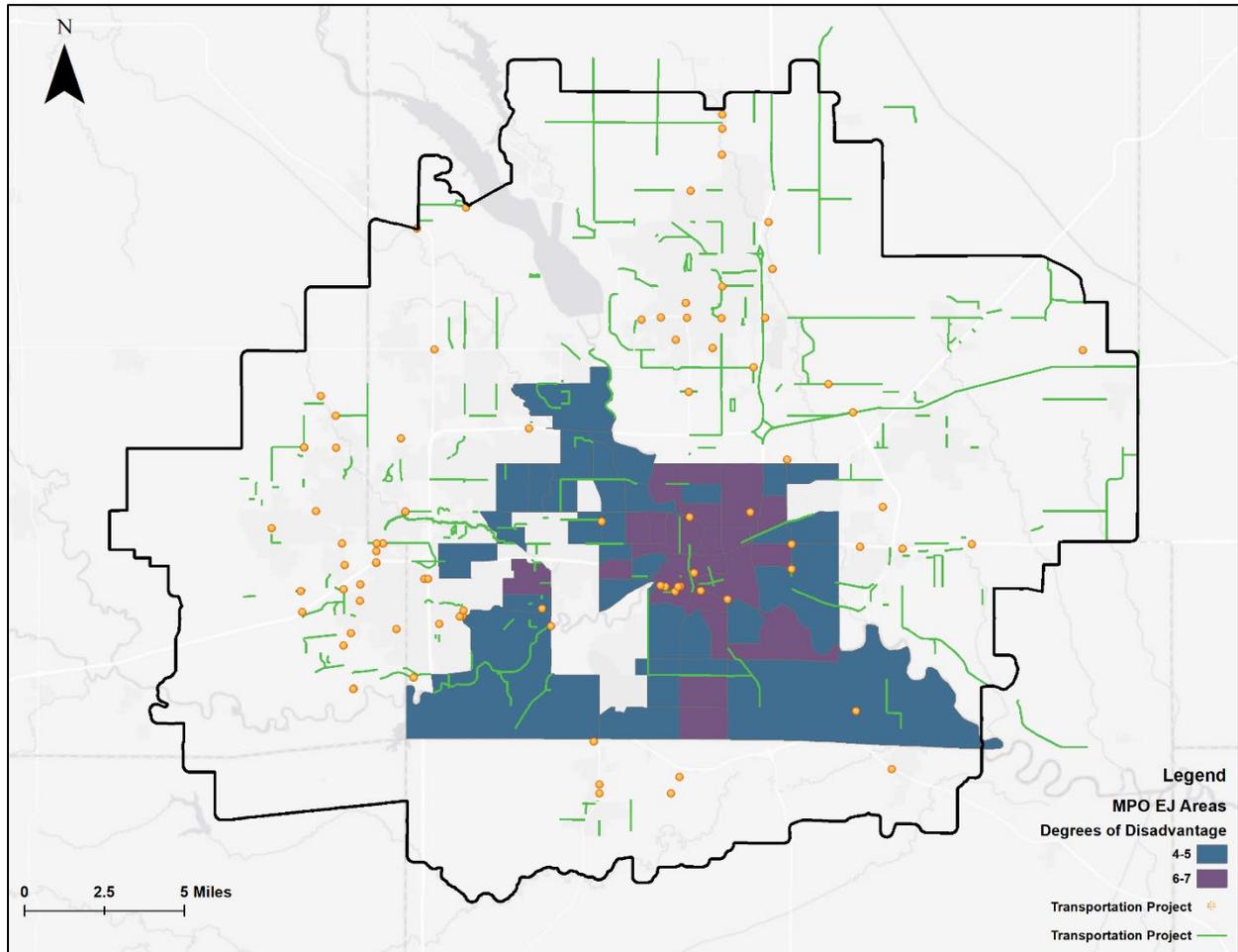
In terms of the limited English proficiency population, it was determined that the MPO planning area regional threshold is 2.5 percent. Approximately 39 percent of FY 2021-2024 transportation capital improvement funding are estimated for projects in or near census tracts with a limited English proficiency population greater than the regional average. (see Figure 3).

Figure 3: Transportation Projects and LIMITED ENGLISH PROFICIENCY Population by Census Tract



The MPO analyzes Environmental Justice base on regional performance measures set in the long-range planning process and compares performance between Environmental Justice and non-Environmental Justice areas. The most recent analysis showed that 18 percent of the total land area in the MPO is consider an Environmental Justice area, and 39 percent of MPO residents live in Environmental Justice areas. Approximately 34 percent of FY 2021-2024 transportation capital improvements funding are estimated for projects in or near Environmental Justice areas with four or more degrees of disadvantage. (See Figure 4).

Figure 4: Transportation Projects and Identified Environmental Justice Areas



Factor 2: The frequency with which LIMITED ENGLISH PROFICIENCY persons come into contact with the MPO services and programs.

The first factor identified Spanish as the most significant language spoken by the limited English proficiency population in the four-county region. The size of the limited English proficiency population in this region will likely continue to increase and, as a result, so will the probability of future contact with this population as part of the planning process. However, to date, no requests for language assistance services have been made by individuals or groups with limited English proficiency. As the limited English proficiency program is expanded in the region, any requests for language assistance will be monitored and used to gauge the effectiveness of the MPO's outreach to these populations.

The MPO conducts regular board meetings, advisory committee meetings and public hearings throughout the year. Community outreach and the MPO's website is the main source of potential contact between the MPO and persons with limited English proficiency. As a result, the frequency of contact is difficult to anticipate.

The MPO's Public Participation Plan highlights the need for outreach opportunities that engage populations that have traditionally been underserved and lacked involvement in the transportation planning process.

Factor 3: The nature and importance of MPO services and programs in people's lives.

The MPO programs use federal funds to plan for future transportation improvements and projects, and therefore do not include any direct services or programs that require vital, immediate, or emergency assistance, such as medical treatment or services for basic needs such as food or shelter. Further, the MPO does not conduct activities such as applications or interviews prior to participation in its programs or events. The participation of any citizen with the MPO or its committees is voluntary.

However, the MPO must ensure that all segments of the population, including persons with limited English proficiency, have been involved or have had the opportunity to be involved in the transportation planning process to be consistent with the goal of the Federal Environmental Justice program and the policy of the MPO.

The impact of proposed transportation investments on underserved and underrepresented population groups is part of the evaluation process in use of federal funds in three major areas for the MPO. These three areas are deemed to have the most widespread impact on the lives of people in the region:

- The **Public Participation Plan (PPP)**, public engagement plan for planning activities;
- The **Transportation Improvement Program (TIP)**, a 4-year staged program of federally funded projects for all modes of travel;

- The **Long-Range Transportation Plan (LRTP)**, a 35-year forecast of multi-modal transportation needs; and,
- The **Passenger Transportation Plan (PTP)**, a plan for the coordination of public transportation systems.

Inclusive public participation is a priority consideration in other MPO plans, studies, and programs, as well. The impacts of transportation improvements resulting from these planning activities influence all residents. The MPO will place greatest emphasis on language assistance for educational materials and public input related to the three major programs and plans identified above. Related materials are often helpful with outreach for other MPO projects and studies.

Factor 4: The resources available to the MPO for limited English proficiency outreach, as well as the costs associated with the outreach.

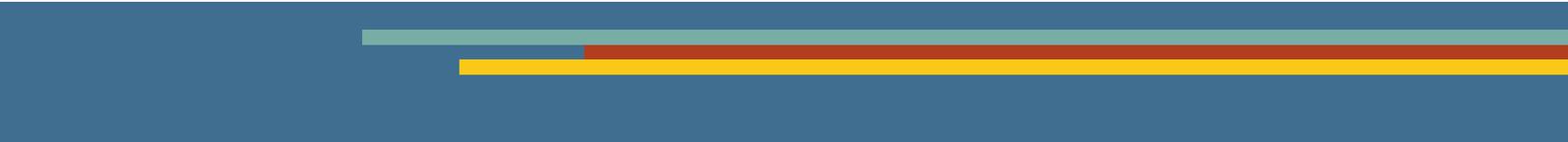
The MPO seeks input from all stakeholders, and every effort is made to ensure that the planning process is as inclusive as possible. Continued public involvement and participation is encouraged throughout the process.

Given the size of the limited English proficiency population in the MPO area and current financial constraints, full language translations of complete transportation plan documents and maps is not considered warranted or cost-feasible at this time.

The MPO will seek to identify any existing Spanish outreach materials from organizations such as federal, state, and local transportation agencies that can be effectively used as outreach tools to these communities. The MPO will also expand efforts to collaborate with state and local agencies and educational facilities to provide language translation and interpretation services when practical, in consideration of funding limitations.

Implementation of the Language Assistance Plan

One of the main tasks for the MPO is to monitor the prioritization of transportation projects in Mobilizing Tomorrow, the Long-Range Transportation Plan (LRTP). In particular, the MPO must analyze any major decision made to the overall transportation system, particularly if it negatively affects areas of high concentration of limited English proficiency population. Some of the ongoing Language Assistance Plan implementation strategies include:

- Identifying the limited English proficiency Individuals who need Language Assistance;
 - Language Assistance Measures;
 - Public Involvement; and
 - Monitoring and Updating the Language Assistance Plan.
- 

Identifying the LIMITED ENGLISH PROFICIENCY Individuals who need Language Assistance:

The MPO will continue to monitor the language needs of the limited English proficiency individuals within its services area and will continue to do the following:

- Continue to monitor the languages and the customers' needs encountered by the front-line staff;
- Use the Census Bureau's Language Identification Flashcards to help identify limited English proficiency individuals at public meetings and the front desk;
- Continue to monitor the American Community Survey 1-Year Estimate published each year by the U.S. Census Bureau for changes in the limited English proficiency population; and,
- Closely monitor the Census data and ensure that the Language Assistance Plan is updated in a timely manner when the threshold population is reached for limited English proficiency populations.

Language Assistance Measures:

The MPO will continue to implement the current measures to assist the limited English proficiency population and will continue to enhance its services to strengthen the Language Assistance Plan to include:

- Continue to provide for interpreters as needed in Spanish; Russian, Polish, other Slavic languages, other Indo-European languages, Vietnamese, and other Asian and Pacific Islander languages, Arabic, other African languages, and any other language requested through the Iowa International Center's Interpretation and Translation Services;
- When possible have a dedicated staff person willing to provide assistance to a Spanish-speaking person;
- Provide links on the MPO website in Spanish, Serbo-Croatian, Vietnamese, Arabic, Russian, and Polish with information on how to receive translation assistance;
- Continue to translate important notices regarding major transportation planning studies or changes in policies that may directly or indirectly impact the limited English proficiency population; and,
- Continue to work with local social-services agencies to disseminate information to the limited English proficiency population and to collect information regarding the unmet needs.

Public Involvement:

The MPO will continue to implement an inclusive public outreach process as detailed in the Public Participation Plan:

- Continue to monitor the effectiveness of the current process via feedback received from the public as well as certain targeted surveys;
- Update the Public Participation Plan as needed; and,
- Explore new and innovative techniques and strategies to engage the public in transportation planning.

Monitoring and Updating the Language Assistance Plan:

The MPO will continue to update the Language Assistance Plan as required by the U.S. DOT and as the characteristics of the population change. Updates will be made as necessary and may include, but are not limited to:

- Changes in limited English proficiency population by number or area as new information are made available;
- Updated analysis of the current limited English proficiency service area;
- Requirements for additional language translation services; and,
- Updates to policies and procedures if such guidance is directed by the MPO Board.

Contact Information

The MPO does not intend that its Language Assistance Plan exclude anyone requiring language assistance and will make every reasonable effort to accommodate requests. Anyone who requires special language services should contact the MPO's Title VI Coordinator or the Communications and Strategy Manager:

Tracey Deckard
Office Manager/Title VI Coordinator
420 Watson Powel, Suite 200
Des Moines, IA 50309
515.334.0075
tdeckard@dmampo.org

Gunnar Olson
Communications and Strategy Manager
420 Watson Powel, Suite 200
Des Moines, IA 50309
515.334.0075
golson@dmampo.org

<Resolution regarding Title VI program
to be inserted here if approved>



Demographic Profile

Des Moines Area Metropolitan Planning Organization

July 2021

Introduction

The Des Moines Area Metropolitan Planning Organization (MPO) works to ensure the fair treatment and meaningful involvement of all residents in the region. This means that no group, including a racial, ethnic, or socioeconomic group, should bear a disproportionate share of negative health or environmental consequences of any project. Therefore the MPO has prepared this Demographics Profile to identify traditionally underserved individuals.

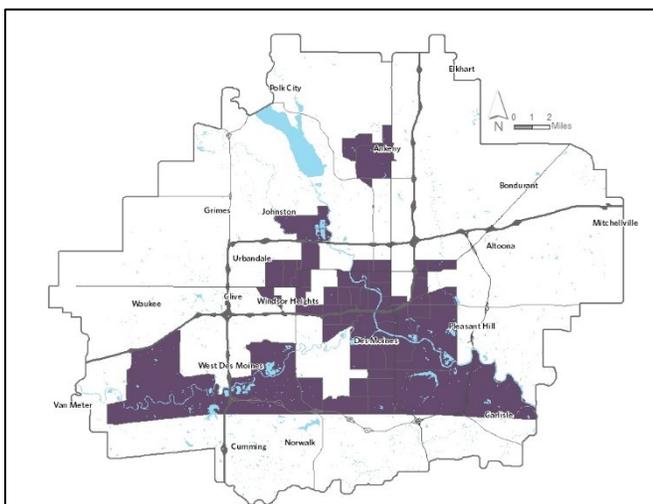
Traditionally Underserved Populations

The MPO identifies traditionally underserved populations with its Environmental Justice analysis, which itself uses a Degrees of Disadvantage methodology. Tract-level data are obtained from the U.S. Census Bureau for seven population groups, including non-white population, carless households, households in poverty, single heads of households with children, households with person(s) over 65, limited English proficiency (LEP), and persons with a disability. The MPO then identifies the 34 census tracts with the highest percentages of each of the seven population groups among the total of 113 census tracts. This way, the MPO can map those areas of the region that meet or exceed the 70th percentile for each of the population groups.

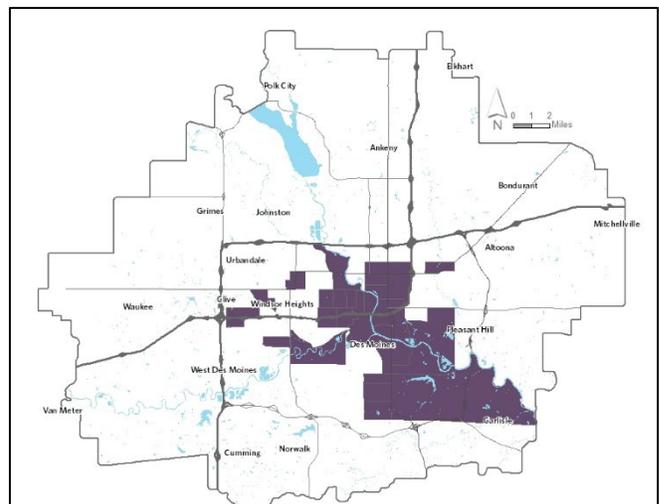
In the 34 census tracts with the highest concentrations of poverty, at least 14.4% of the households are in poverty. The map below shows these census tracts are centrally located in the urban core, areas to the southeast and southwest, and portions of northern suburbs.

In the 34 census tracts with the highest concentrations of nonwhite populations, at least 18.8% of the population is nonwhite. The map below shows these census tracts are concentrated in the urban core, areas to the southeast, and portions of the western suburbs.

Households in Poverty



Nonwhite Populations

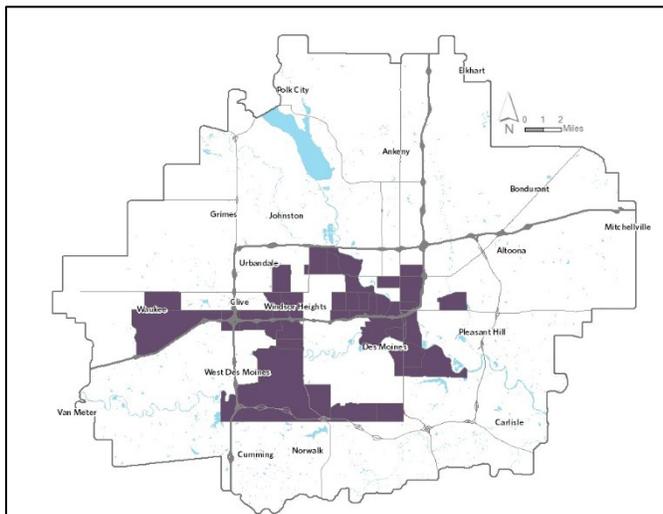


In addition to the mapped areas, additional poverty and income statistics are included below.

Category	Statistic
Total Persons in Poverty	22,041 (14.4 % average)
Area Median Household Income	\$70,517
Area Average Household Income	\$88,037

In the 34 census tracts with the highest concentrations of limited English proficiency populations, at least 3.3% of the population is limited English proficient. The map below shows these census tracts are concentrated in the urban core, areas to the southwest, and portions of the western and eastern suburbs.

Limited English Proficiency



In addition to the mapped areas, additional minority populations statistics are included below.

Category	Statistic
Total Nonwhite Populations	74,963 (18.8% average)
LEP Population	24,361 (3.3%)

MPO	2018	2019	Percent Change
Language Spoken At Home	4-County Total		
Population 5 years and Over	578,885	587,868	1.5%
Language Other Than English	66,590	69,703	4.7%
Speak English Less than "very well"	27,763	29,146	4.9%
Spanish	29,199	30,027	2.8%
Speak Spanish Less than "very well"	12,083	12,148	0.5%
Other Indo-European Languages	13,968	15,067	7.86%
Speak English Less than "very well"	4,430	5,091	14.9%
Other languages	7,908	8,666	9.5%
Speak English Less than "very well"	3,363	3,751	11.5%

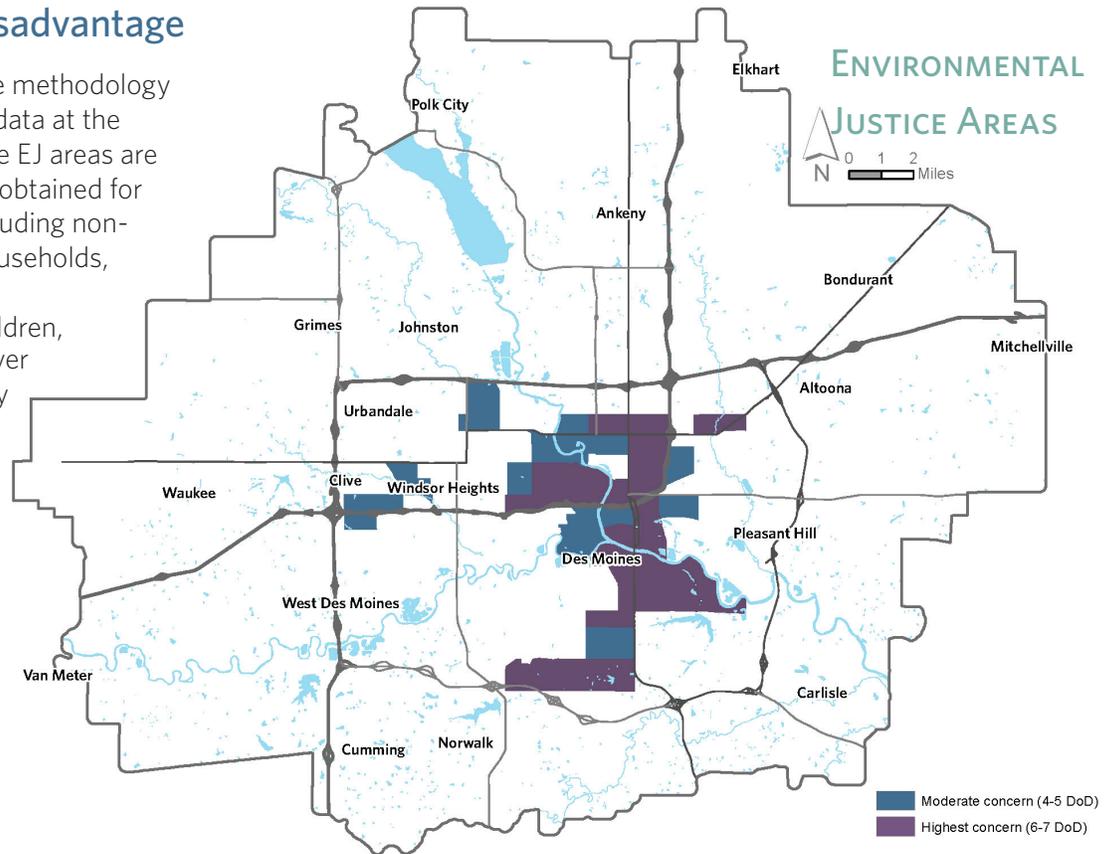
April 2021

Environmental Justice and the MPO

The US Department of Transportation defines environmental justice as the fair treatment and meaningful involvement of all people, regardless of race, ethnicity, income, national origin, or educational level with respect to the development, implementation and enforcement of environmental laws, regulations and policies. To ensure fair treatment, the MPO studies seven Degrees of Disadvantage to identify *environmental justice (EJ)* areas, or those areas with large populations of traditionally under-served individuals. EJ areas in the region can be seen in the map below.

Seven Degrees of Disadvantage

The Degrees of Disadvantage methodology looks at U.S. Census Bureau data at the tract level to determine where EJ areas are located in the region. Data is obtained for seven population groups, including non-white population, car-less households, households in poverty, single heads of households with children, households with person(s) over 65, limited English proficiency (LEP), and persons with a disability. A Degree of Disadvantage is identified for a population group if the census tract exceeds the 70th percentile for each identified demographic group. Census tracts are considered EJ if they exceed this threshold in at least four of the seven population groups - then classified in two categories: moderate and highest concern.



Source: U.S. Census Bureau

CENSUS TRACTS EXCEEDING 70TH PERCENTILE BY POPULATION GROUP

POPULATION GROUP	NO. OF CENSUS TRACTS	% THRESHOLD
Non-White Population	34	18.8%
Carless Households		6.4%
Households in Poverty		14.4%
Single Head of Household with Children		19.9%
Households with Person(s) Over 65		25.9%
Limited English Proficiency		3.3%
Persons with Disabilities		12.4%

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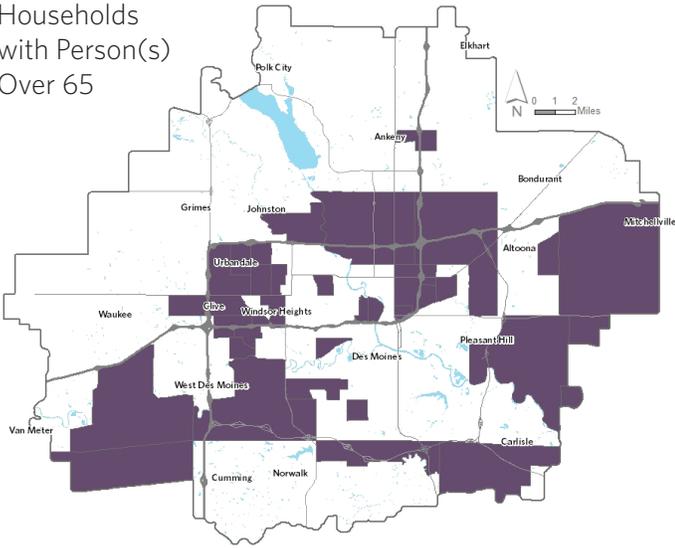
of the 113 census tracts in the planning area are defined as Environmental Justice Areas based on the seven Degrees of Disadvantage

Interactive map of EJ areas and the seven degrees is available at: dmampo.org/maps

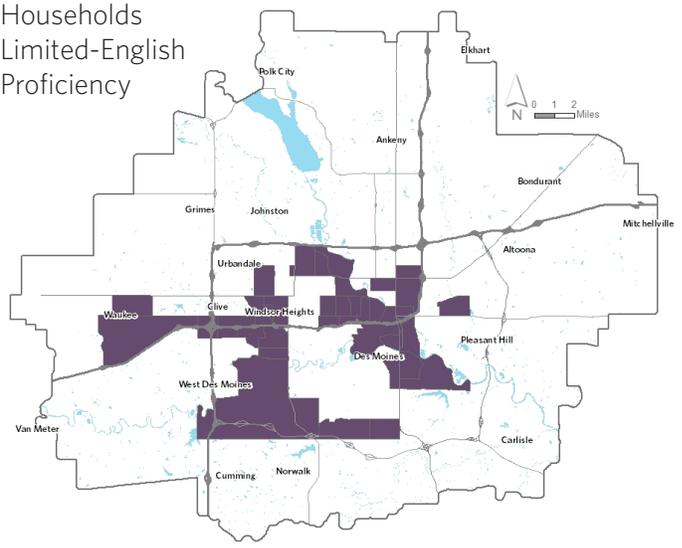
IDENTIFYING EJ AREAS

With this information the MPO aims to enhance data-driven regional transportation and related decisions to increase equity, improve the mobility for all citizens, understand positive and negative consequences of decisions, and further involve identified disadvantaged populations in decision-making region wide.

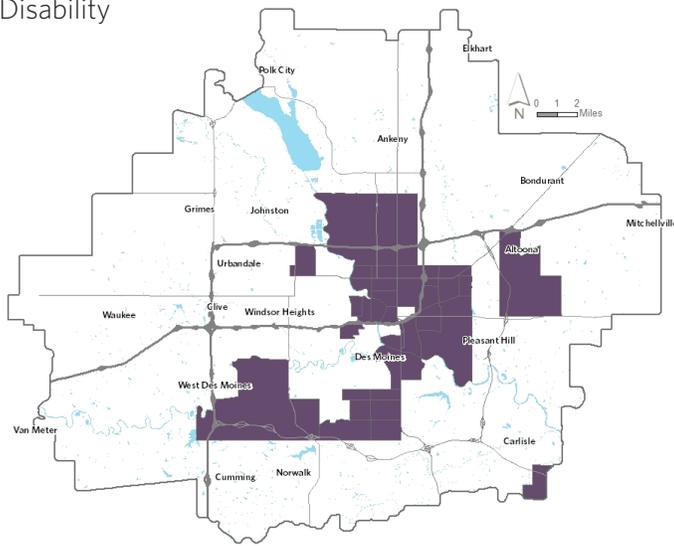
Households with Person(s) Over 65



Households Limited-English Proficiency



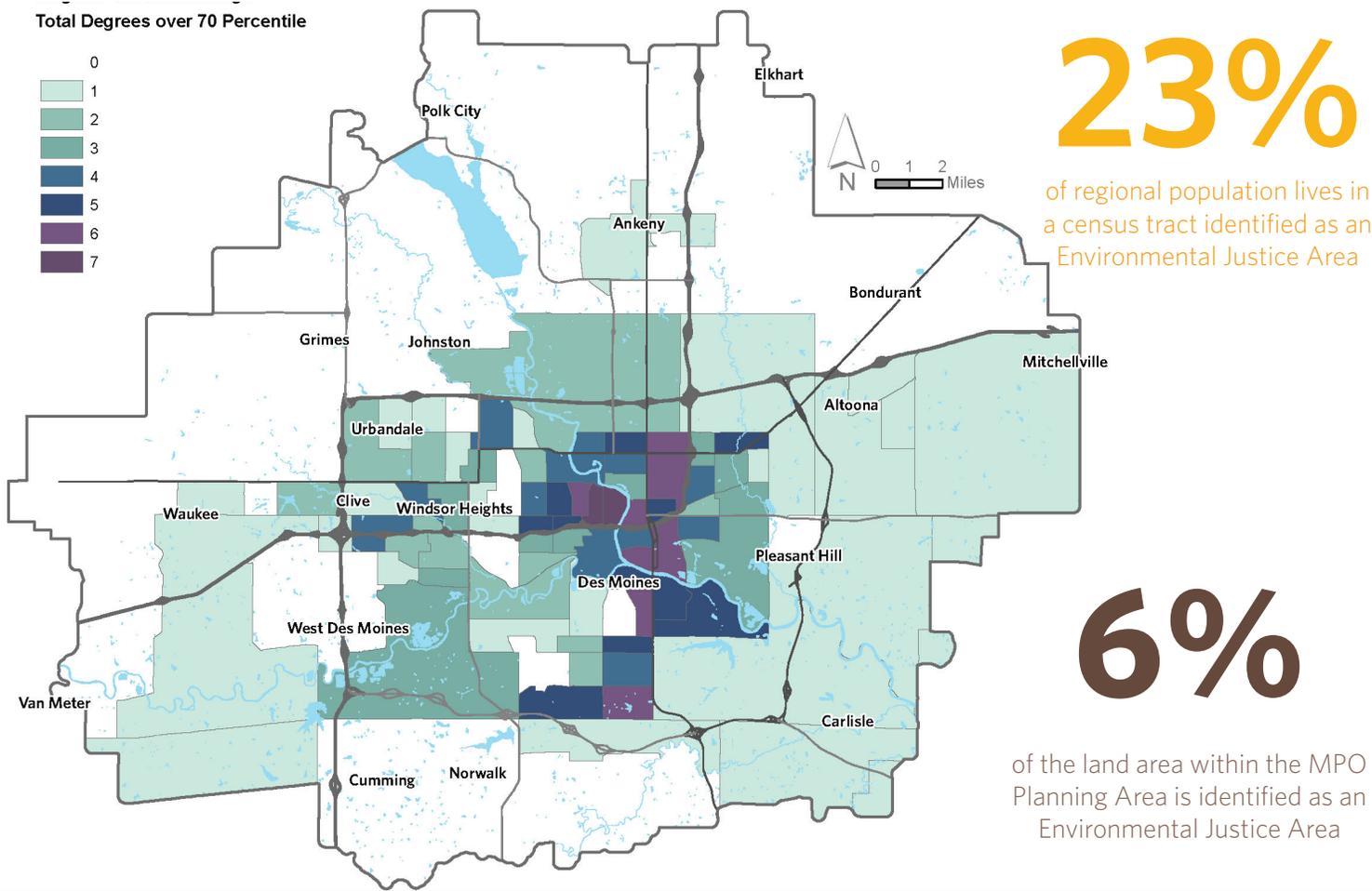
Disability



IDENTIFYING EJ AREAS

Regional Degrees of Disadvantage

The map below shows the overlaying of each degree of disadvantage throughout the MPO planning area at the census tract level. The darker the shade of purple in this map represents a higher degree of disadvantaged populations. While concentration is highest in the central urban areas, outerlying communities also have disadvantage populations, especially so near clusters of multi-family housing units.



FEDERAL MANDATES

"No person in the United States shall, on the ground of race, color, or national origin be excluded from participation in, be denied the benefits of, or be subjected to discrimination under any program or activity receiving Federal financial assistance."

- TITLE VI OF THE CIVIL RIGHTS ACT OF 1964

"Each Federal agency shall make achieving environmental justice part of its mission by identifying and addressing, as appropriate, disproportionately high and adverse human health or environmental effects of its programs, policies, and activities on minority populations and low-income populations."

- EXECUTIVE ORDER 12898, FEDERAL ACTIONS TO ADDRESS ENVIRONMENTAL JUSTICE IN MINORITY POPULATIONS AND LOW-INCOME POPULATIONS, 1994