

**COMMUNITY PLANNING ASSOCIATION
OF SOUTHWEST IDAHO**

TITLE VI PLAN

Effective May 1, 2014

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This document is available online at:

<http://www.compassidaho.org/people/publicinvolvement.htm>

SECTION 1 - OVERVIEW

INTRODUCTION

The Community Planning Association of Southwest Idaho (COMPASS) is a forum for regional collaboration that helps maintain a healthy and economically vibrant region, offering people choices in how and where they live, work, play, and travel. COMPASS serves as the metropolitan planning organization (MPO) for Ada and Canyon Counties, Idaho.

As a recipient of Federal financial assistance, COMPASS is required to comply with various non-discrimination laws and regulations, including Title VI of the Civil Rights Act of 1964, which provides 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 subjected to discrimination under any program or activity receiving Federal assistance under this title or carried out under this title.”

The Federal-aid Highway Transportation Act of 1973 added sex to the list of prohibitive factors. *Disability* was added through Section 504 of the Rehabilitation Act of 1973. Age was subsequently added in 1975 under the Age Discrimination Act.

The Civil Rights Restoration Act of 1987 broadened the scope of Title VI coverage by expanding the definition of the term “programs or activities” ***to include all programs or activities of Federal-aid recipients, subrecipients, and contractors, whether or not such programs and activities are federally assisted.***

Title VI was further defined in 1994. Executive Order 12898 - Environmental Justice (EJ), directed Federal agencies ***to identify and address the effects of all programs, policies, and activities on “minority populations and low-income populations.”***

In 2000, Executive Order 13166 - Limited English Proficiency (LEP), was also signed into effect requiring Federal agencies to ***assess and address the needs of otherwise eligible limited English proficient persons seeking access to the programs and activities of recipients of Federal financial assistance.***

In addition, the Americans with Disabilities Act (ADA) is part of COMPASS’s Title VI Program. The ADA and Section 504 of the Rehabilitation Act protect the civil rights of persons with disabilities; therefore, COMPASS’s provision of services and benefits to the public must include provisions for persons with disabilities relative to fair and equitable treatment in their transportation needs.

COMPASS’ Director of Operations develops and oversees COMPASS’s Title VI plan and program compliance. COMPASS’ Communications Coordinator submits required reports to the federal agencies.

PLAN OBJECTIVES

The primary objectives of COMPASS's Title VI plan are:

- To assign and clarify roles, responsibilities, and procedures for assuring compliance with Title VI of the Civil Rights Act of 1964 and all related regulations and directives.
- To assure that all people affected by COMPASS's Federal-aid programs and projects receive the services, benefits, and opportunities to which they are entitled without regard to race, color, national origin, age, gender, disability, economic status or Limited English Proficiency.
- To proactively prevent discrimination and ensure nondiscrimination in all COMPASS programs and activities, whether those programs and activities are Federally funded or not.
- To establish procedures for identifying and eliminating discrimination when found to exist.
- To establish procedures to review specific program areas annually within COMPASS to determine the effectiveness of the area's activities at all levels.
- To set forth procedures for the filing and processing of complaints by persons who believe they have been subjected to discrimination under Title VI in any COMPASS service, program, or activity.

PLAN DISSEMINATION

The COMPASS Title VI plan is available to all internal users and members of the public, interest groups and organizations via the COMPASS website:

<http://www.compassidaho.org/people/publicinvolvement.htm>

Hard copies or alternative formats of the COMPASS Title VI plan are available to all internal users and members of the public, interest groups and organizations upon request to the Director of Operations.

AUTHORITIES

COMPASS's Title VI plan was developed pursuant to the following authorities:

- Title VI of the Civil Rights Act of 1964
- 42 USC 2000d
- FTA Circular 4702.1A
- Federal Transit Laws as amended (49 USC Chapter 53 et seq.)
- 49 CFR 21

- DOT Order 1050.2
- 42 USC 4601 to 4655
- Title VIII of the Civil Rights Act of 1968, amended 1974
- 23 USC 109(h)
- 23 USC 324
- Federal-aid Highway Transportation Act
- 23 CFR 200
- E.O. 12250 – Leadership and Coordination of Non-Discrimination Laws
- E.O. 12898 – Environmental Justice
- E.O. 13166 – Limited English Proficiency

TITLE VI POLICY STATEMENT

COMPASS is committed to compliance with Title VI of the Civil Rights Act of 1964 and all related regulations and directives. COMPASS assures that no person shall on the grounds of race, color, national origin, gender, age, or disability be excluded from participation in, be denied the benefits of, or be otherwise subjected to discrimination under any COMPASS service, program, or activity.

COMPASS also assures that every effort will be made to prevent discrimination through the impacts of its programs, policies, and activities on minority and low-income populations. In addition, COMPASS will take reasonable steps to provide meaningful access to services for persons with Limited English Proficiency.

Federal financial assistance is defined as Federal dollars that are passed directly to COMPASS to support the operation of transportation-related programs.

COMPASS' Title VI Plan in its entirety applies to all of COMPASS's programs and services, regardless of funding source.

DISCRIMINATION UNDER TITLE VI

Title VI and its related statutes prohibit two types of discrimination: **intentional discrimination** or **disparate treatment** and **disparate impact** or **disparate effects**.

The first, **intentional discrimination**, is the result of inconsistent application of rules and/or policies to one group of people over another. This form of discrimination may result when rules and policies are applied to intentionally treat a person(s) differently because of race, color, national origin, gender, disability, or age.

The second type of discrimination is **disparate impact** or **disparate effects**. A disparate impact results when rules and laws have a different and more inhibiting effect on women and minority groups than on the majority because of race, color, national origin, gender, disability or age. This type of discrimination occurs when a neutral procedure or practice results in fewer services or benefits, or inferior services or benefits, to members of a protected group such as minorities or low-income populations. With disparate impact, the focus is on the consequences of a decision, policy, or practice rather than on the intent.

Under Title VI, COMPASS's efforts to prevent such discrimination must address, but are not limited to:

- access to services, financial aid, or other benefits provided under its programs;
- distinctions in the quality, quantity, or manner in which the benefit is provided; segregation or separate treatment;
- restriction in the enjoyment of any advantages, privileges, or other benefits provided to others;
- different standards or requirements for participation;
- methods of administration which directly or through contractual relationships would defeat or substantially impair the accomplishment of effective nondiscrimination;
- discrimination in any activities related to highway and infrastructure or facility built or repaired in whole or in part with Federal funds;
- discrimination in any employment resulting from a program, the primary purpose of which is to provide employment.

COMPASS has developed this Title VI plan to help assure that all services, programs, and activities of COMPASS, whether Federally assisted or not, are offered, conducted, and administered fairly, without regard to race, color, national origin, gender, disability, age, economic status or ability to communicate in English of the participants or beneficiaries.



Matthew J. Stoll
Executive Director

May 1, 2014

SECTION 2 - ORGANIZATION AND COMPLIANCE RESPONSIBILITIES

Executive Director – The Executive Director is the head of COMPASS and is responsible to the COMPASS Board of Directors. The Executive Director provides leadership, guidance, direction, and support for COMPASS's Title VI programs.

Director of Operations – The Director of Operations is responsible for supervising, reviewing, monitoring, and evaluating the effectiveness of equal employment opportunity programs. The Director of Operations is responsible for managing the Title VI, ADA/Section 504, Limited English Proficiency (LEP), and Disadvantaged Business Enterprises programs. The Director of Operations acts as a liaison between COMPASS and Federal and state officials regarding EEO issues.

Supervisors – COMPASS supervisors are responsible for familiarizing themselves with the requirements of Title VI, E.O. 12898, and E.O. 13166, and for complying with COMPASS's Title VI Program. They are responsible to promptly report issues or complaints concerning Title VI and related statutes to the Director of Operations.

SECTION 3 - PROGRAM AREA MONITORING AND REVIEW

PROGRAM AREA MONITORING - METROPOLITAN PLANNING ORGANIZATIONS

The Metropolitan Planning Organizations (MPOs) are responsible for the transportation planning process within their urbanized areas. Each MPO develops a 3-year Transportation Improvement Program (TIP), a long-range transportation plan, and develops and implements an annual Unified Planning Work Program (UPWP).

COMPASS principal planners, the Director of Operations and the Communications Coordinator are responsible for that all transportation planning processes are executed in accordance with Title VI requirements. This process entails deliberation of all possible social, economic, and environmental effects of a proposed plan or program on identified groups in order to avoid the unintended creation of inappropriate and biased programs.

Compliance Monitoring

- Monitor overall strategies and goals of the transportation planning process to ensure Title VI compliance;
- Monitor the utilization of demographic information to identify minority and low-income populations and examine the distributions of the benefits/burdens of the transportation plans and activities on these groups;
- Monitor the service equities of the planning data collection and analyses for impacts on different socio-economic groups;
- Monitor the public involvement processes to improve effectiveness and reduce participation barriers for minority and low-income populations;
- Monitor Environmental Justice (E.O. 12898) issues to identify and locate minority and low-income populations that may be impacted by transportation planning programs;
- Monitor compliance with E.O. 13166, Limited English Proficiency, to improve access and understanding of transportation planning processes for those in the population confronted with language barriers;
- Ensure that female and minority-owned firms have an equal opportunity to participate in the consultant selection phase of the transportation planning process;
- Monitor MPO accomplishments and problem areas.

Annual Review

The Director of Operations and the Communications Coordinator review the information listed below for compliance with Title VI and report it annually.

- Strategies used to ensure that all components of the transportation planning process comply with Title VI;
- Whether COMPASS has developed a demographic profile of its planning area that includes identification of minority and low-income populations;
- Whether COMPASS has developed a process to seek to identify the needs of minority and low-income populations and to use demographic information to assess the distribution of benefits across these groups;
- What process is in place to assess the benefits/burdens of transportation system investments on minority and low-income populations on an analytic basis and whether an appropriate data source and tools are used to support the analysis;
- Whether a public involvement strategy for engaging minority and low-income populations in transportation decision-making is in place and what steps are being taken to reduce any participation barriers that have been identified;
- Determine if the public involvement process is routinely evaluated and whether there have been efforts made to improve effectiveness, especially with regard to minority and low-income populations and any other affected groups;
- What efforts have been made to engage minority and low-income populations in the public outreach effort and whether the public outreach effort utilizes media targeted to minority and low-income groups;
- What procedure COMPASS has established for using issues/concerns raised by minority and low-income populations as well as other affected individuals and groups in the decision-making process;
- Composition of COMPASS's workforce by position title, race and gender;
- The names, race and gender of the individuals on COMPASS's Board of Directors and what criteria has been established for their selection and retention;
- Number of consultant agreements awarded and the dollar amount; Number of female and minority firms and the dollar amount;
- Efforts made to ensure an equal opportunity for female and minority consulting firms to participate in the consultant selection process;

- Number of hearings, the location, and the times of day the hearings were held; The percentage of female and minority participation at the hearings;
- Number of public information meetings/open houses held; Percentage of female and minority participation;
- Efforts made to take Environmental Justice concerns into consideration in the transportation planning process;
- Whether there was any training received regarding Title VI or Environmental Justice;
- Review of COMPASS internal complaint procedures and policies;
- Status of any Title VI complaints received regarding any of the transportation planning and public involvement processes;
- Any significant Title VI activities or accomplishments made during the review period.
- Any significant Title VI activities or actions planned for the ensuing year.

SECTION 4 - COMPLAINT PROCEDURES

Any person who believes that he or she, individually, as a member of any specific class, or in connection with any disadvantaged business enterprise, has been subjected to discrimination prohibited by Title VI of the Civil Rights Act of 1964, the American with Disabilities Act of 1990, Section 504 of the Vocational Rehabilitation Act of 1973 and the Civil Rights Restoration Act of 1987, as amended, may file a complaint with COMPASS. A complaint may also be filed by a representative on behalf of such a person. All complaints will be referred to the COMPASS' Director of Operations for review and action.

In order to have the complaint considered under this procedure, the complainant must file the complaint no later than 180 days after:

- a) The date of alleged act of discrimination; or
- b) Where there has been a continuing course of conduct, the date on which that conduct was discontinued.

In either case, the Director of Operations or his/her designee may extend the time for filing or waive the time limit in the interest of justice, specifying in writing the reason for so doing.

Complaints shall be in writing and shall be signed by the complainant and/or the complainant's representative. Complaints shall set forth as fully as possible the facts and circumstances surrounding the claimed discrimination. If necessary, the Director of Operations will assist the person in reducing the complaint to writing and submit the written version of the complaint to the person for signature. The complaint shall then be handled according to the investigative procedures as outlined below.

Please Note This Exception to the Procedures Below:

All complaints regarding accessibility for the disabled must be forwarded directly to the Idaho Transportation Department (ITD) for investigation.

Within 10 days, the Director of Operations will acknowledge receipt of the allegation, inform the complainant of action taken or proposed action to process the allegation, and advise the complainant of other avenues of redress available, such as to ITD and/or the US Department of Transportation (USDOT).

COMPASS will advise ITD within 10 days of receipt of the allegations. Generally, the following information will be included in every notification to ITD:

- a) Name, address, and phone number of the complainant.
- b) Name(s) and address(es) of alleged discriminating official(s).
- c) Basis of complaint (i.e., race, color, national origin or sex)

- d) Date of alleged discriminatory act(s).
- e) Date of complaint received by the COMPASS.
- f) A statement of the complaint.
- g) Other agencies (state, local or Federal) where the complaint has been filed.
- h) An explanation of the actions COMPASS has taken or proposed to resolve the issue raised in the complaint.

Within 60 days, the Director of Operations will conduct an investigation of the allegation and based on the information obtained, will render a recommendation for action in a report of findings to COMPASS' authorized representative. The complaint should be resolved by informal means whenever possible. Such informal attempts and their results will be summarized in the report of findings.

Within 90 days of receipt of the complaint COMPASS' authorized representative will notify the complainant in writing of the final decision reached, including the proposed disposition of the matter. The notification will advise the complainant of his/her appeal rights with ITD, or USDOT, if they are dissatisfied with the final decision rendered by COMPASS. The Director of Operations will also provide ITD with a copy of this decision and summary of findings upon completion of the investigation.

Contacts for the different Title VI administrative jurisdictions are as follows:

Megan Larsen
Director of Operations
COMPASS
700 NE 2nd Street, Suite 200
Meridian, ID 83642
208-475-2228
mlarsen@compassidaho.org

Idaho Transportation Department
Equal Employment Opportunity Office – External Programs
Diane Steiger, EEO/DBE Program Manager, Title VI & ADA Coordinator
PO Box 7149
Boise, ID 83707-1129
208-334-8266
diane.steiger@itd.idaho.gov

Federal Highway Administration
Idaho Division Office
Peter Hartman, Division Administrator
3050 Lakeharbor Lane, Suite 126
Boise, ID 83703
208-334-9180

SECTION 5 - STATE PROCEDURES, MANUALS, AND DIRECTIVES APPLICABLE TO FEDERAL-AID HIGHWAY PROGRAMS AND TITLE VI

Manuals, plans, policies, programs, laws, regulations, executive orders and procedures establishing rules and guidelines for implementing Title VI are as follows:

- Employment Policies and Procedures
- Financial Policy and Procedure Manual
- Public Involvement Policy
- Public Involvement Plans
- FHWA Title VI Program Guidelines for Federal-aid Recipients
- Statewide Transportation Improvement Program (STIP)
- Standard Specifications for Highway Construction
- Required Contract Provisions/Federal-aid Contracts (FHWA-1273)
- LEP Plan
- 49 CFR 21 (DOT Title VI Regulations)
- DOT Order 1050.2 (Standard Title VI Assurances)
- 23 CFR 200 (FHWA Implementation Regulations of Title VI)
- DFR 200 Part 420.121(h) (Funding Planning and Research Activities)
- 23 CFR 450 (FHWA & FTA MPO Planning Regulations)
- 23 USC 109(h)28 CFR Part 50.3 (DOJ's Guidelines for enforcement for Title VI)
- 49 CFR Part 21 (DOT's Implementation regulations of Title VI)
- Executive Order 12250 (DOJ Leadership and Coordination of Nondiscrimination Laws)
- Executive Order 12898 (Environmental Justice)
- Executive Order 13166 (Limited English Proficiency)
- Title VI of the Civil Rights Act of 1964 (42 USC 2000)
- Title VIII of the Civil Rights Act of 1968
- The Federal-aid Highway Act of 1973 (23 USC 324)
- The Federal-aid Highway Act (23 USC 306)
- The Americans with Disabilities Act
- Section 504 of the Rehabilitation Act of 1973 (29 USC 790)
- The Age Discrimination Act of 1975
- The Civil Rights Restoration Act of 1987
- The Uniform Relocation Assistance and Real Property Acquisition Policies Act of 1970 (42 USC 4601)
- The Relocation Act Amendments of 1987

- The Civil Rights Act of 1991

SECTION 6 - DEFINITION OF TERMS

Affirmative Action: A good faith effort to eliminate past and present discrimination which ensures that future discriminatory practices do not occur. Actions aimed at addressing the under-representation of minorities and females.

Beneficiary: An individual and or/entity that directly or indirectly receives an advantage through the operation of a Federal program; however, they do not enter into any formal contract or agreement with the Federal government where compliance with Title VI is a condition of receiving such assistance.

Categorical Exclusion: A technical exclusion for projects that do not result in significant environmental impacts.

Disparate Impact: Discrimination which occurs because of a neutral procedure or practice, and such practice lacks a "substantial legitimate justification." The focus is on the consequences of a recipient's practices rather than the recipient's intent.

Discrimination/Disparate Treatment: Discrimination which occurs when similarly situated persons are treated differently because of their race, color, national origin, gender, disability, or age, and the decision maker was aware of the complainant's race, color, national origin, gender, disability, or age, and decisions were made (at least in part) because of one or more of those factors.

MPO: Metropolitan Planning Organization (considered a subrecipient).

Minority: A person who is a citizen or lawful permanent resident of the United States and who is:

- Black - a person having origins in any of the black racial groups of Africa
- Hispanic - a person of Mexican, Puerto Rican, Cuban, Central or South American, or other Spanish culture or origin, regardless of race
- Asian or Pacific Islander - a person having origins in any of the original peoples of the Far East, Southeast Asia, Indian Subcontinent, or the Pacific Islands
- American Indian or Alaskan Native - a person having origins in any of the original peoples of North America, and who maintain cultural identification through tribal affiliation or community recognition
- White - a female having origins in any of the original peoples of Europe, North Africa, or the Middle East
- Additional subcategories based on national origin or primary language spoken may be used, where appropriate on either a national or regional basis

Recipient: An individual and/or entity that receives Federal financial assistance and operates a program and/or activity.

SEE: Social, Economic, and Environmental – A process to analyze the SEE impacts and effects must be considered during the planning process. The goal of the SEE process is to develop a complete understanding of the existing and future environmental conditions and the possible effects of a proposed project in order to make the best project decision in terms of meeting the intended transportation needs and the goals of an area or community, and for protection and enhancement of the environment.

STIP: A three year, Statewide Transportation Improvement Program that includes the Idaho Transportation Department's program as well as the Transportation Improvement Programs prepared by the Metropolitan Planning Organizations in Idaho.

Subrecipient: A non-Federal entity that expends Federal awards received from a pass-through entity to carry out a Federal program, but does not include an individual that is a beneficiary of such a program. A subrecipient may also be a recipient of other Federal awards directly from a Federal awarding agency.

TIP: A three-year, Transportation Improvement Program prepared by a Metropolitan Planning Organization.

SECTION 7 - EXHIBITS

- I. Standard DOT Title VI Assurances
 - Appendix A
 - 49 CFR 21.7(a) (1) and (2)

EXHIBIT I STANDARD DOT TITLE VI ASSURANCES

COMPASS (hereinafter referred to as the "Recipient") HEREBY AGREES THAT as a condition to receiving any Federal financial assistance from the Department of Transportation, it will comply with Title VI of the Civil Rights Act of 1964, 78 Stat. 252, 42 USC 2000d - 42USC 2000d-7 (hereinafter referred to as the "Act"), and all requirements imposed by or pursuant to Title 49, Code of Federal Regulations, Department of Transportation, Subtitle A, Office of the Secretary, Part 21, Nondiscrimination in Federally Assisted Programs of the Department of Transportation - Effectuation of Title VI of the Civil Rights Act of 1964 (hereinafter referred to as the "Regulations"), Executive Order 12898 - Environmental Justice (hereinafter referred to as "EJ"), Executive Order 13166 - Limited English Proficiency (hereinafter referred to as "LEP") and other pertinent directives, to the end that in accordance with the Act, Regulations, Executive Orders and other pertinent directives, no person in the United States shall, on the grounds of race, color, national origin, gender, age or disability be excluded from participation in, be denied the benefits of, or be otherwise subjected to discrimination under any program or activity for which the Recipient receives Federal financial assistance from COMPASS of Transportation, including the Federal Highway Administration, and HEREBY GIVES ASSURANCE THAT it will promptly take any measures necessary to effectuate this agreement. This assurance is required by subsection 21.7(a) (1) of the Regulations, a copy of which is attached.

More specifically and without limiting the above general assurance, the Recipient hereby gives the following specific assurances with respect to its Federal-aid Highway Program:

1. That the Recipient agrees that each "program" and each "facility" as defined in subsections 21.23(e) and 21.23(b) of the Regulations, will be (with regard to a "program") conducted, or will be (with regard to a "facility") operated in compliance with all requirements imposed by, or pursuant to, the Regulations.
2. That the Recipient shall insert the following notification in all solicitations for bids for work or material subject to the Regulations made in connection with the Federal-aid Highway Program and, in adapted form in all proposals for negotiated agreements:

COMPASS in accordance with Title VI of the Civil Rights Act of 1964, 78 Stat. 252, 42 USC 2000d to 2000d-7 and Title 49, Code of Federal Regulations, Department of Transportation, Subtitle A, Office of the Secretary, Part 21, Nondiscrimination in Federally Assisted Programs of the Department of Transportation issued pursuant to such Act, hereby notifies all bidders that it will affirmatively insure that in any contract entered into pursuant to the advertisement, disadvantaged business enterprises will be afforded full opportunity to submit bids in response to this invitation and will not be discriminated against on the grounds of race, color, national origin, gender, age or disability in consideration for an award.
3. That the Recipient shall insert the clauses of Appendix A of this assurance in every contract subject to the Act and the Regulations.
4. That where the Recipient receives Federal financial assistance to construct a facility, or part of a facility, the assurance shall extend to the entire facility and facilities operated in connection therewith.
5. That where the Recipient receives Federal financial assistance in the form, or for the acquisition of real property or an interest in real property, the assurance shall extend to rights to space on, over, or under such property.
6. That this assurance obligates the Recipient for the period during which Federal financial assistance is extended to the program, except where the Federal financial assistance is to provide, or is in the form of, personal property, or real property or interest therein or

structures or improvements thereon, in which case the assurance obligates the Recipient or any transferee for the longer of the following periods: (a) the period during which the property is used for a purpose for which the Federal financial assistance is extended, or for another purpose involving the provision of similar services or benefits; or (b) the period during which the Recipient retains ownership or possession of the property.

7. The Recipient shall provide for such methods of administration for the program as are found by the Secretary of Transportation, or the official to whom he delegates specific authority, to give reasonable guarantee that it, other recipients, subgrantees, contractors, subcontractors, transferees, successors in interest, and other participants of Federal financial assistance under such program will comply with all requirements imposed by, or pursuant to, the Act, the Regulations, and this Assurance.
8. The Recipient agrees that the United States has a right to seek judicial enforcement with regard to any matter arising under the Act, the Regulations, and this Assurance.

THIS ASSURANCE is given in consideration of and for the purpose of obtaining any and all Federal grants, loans, contracts, property, discounts or other Federal financial assistance extended after the date hereof to the Recipient by COMPASS of Transportation under the Federal-aid Highway Program and is binding on it, other recipients, subgrantees, contractors, subcontractors, transferees, successors in interest and other participants in the Federal-aid Highway Program. The person or persons whose signatures appear herein are authorized to sign this Assurance on behalf of the Recipient.



Matthew J. Stoll
Executive Director

May 1, 2014

Attachments: Appendix A
DOT Title VI Regulations

APPENDIX A

During performance of work covered by this agreement, CONTRACTOR for itself, its assignees, agents, employees, subcontractors and successors agrees that it will comply with all regulations and requirements of the U.S. Department of Transportation relative to Title VI of the Civil Rights Act of 1964, as amended. CONTRACTOR shall not in any way discriminate against any employee or applicant for employment; subcontractor or solicitations for subcontract; or any other individual or firm providing or proposing to provide services based on race, color, sex, national origin, age or handicap/disability. In all solicitations for subcontracts, CONTRACTOR shall provide notice of the civil rights requirements of this agreement. CONTRACTOR shall provide all necessary or required information and reports as determined to be necessary by COMPASS and the appropriate federal agency.

Title VI Assurances
49 CFR 21.7(a) (1)

(a) General. (1) Every application for Federal financial assistance to which this part applies, except an application to which paragraph (b) of this section applies, and every application for Federal financial assistance to provide a facility shall, as a condition to its approval and the extension of any Federal financial assistance pursuant to the application, contain or be accompanied by, an assurance that the program will be conducted or the facility operated in compliance with all requirements imposed by or pursuant to this part. Every award of Federal

financial assistance shall require the submission of such an assurance. In the case where the Federal financial assistance is to provide or is in the form of personal property, or real property or interest therein or structures thereon, the assurance shall obligate the recipient, or, in the case of a subsequent transfer, the transferee, for the period during which the property is used for a purpose for which the Federal financial assistance is extended or for another purpose involving the provision of similar services or benefits, or for as long as the recipient retains ownership or possession of the property, whichever is longer. In all other cases the assurance shall obligate the recipient for the period during which Federal financial assistance is extended to the program. The Secretary shall specify the form of the foregoing assurances, and the extent to which like assurances will be required of subgrantees, contractors and subcontractors, transferees, successors in interest, and other participants. Any such assurance shall include provisions which give the United States a right to seek its judicial enforcement.

(2) In the case where Federal financial assistance is provided in the form of a transfer of real property, structures, or improvements thereon, or interest therein, from the Federal Government, the instrument effecting or recording the transfer shall contain a covenant running with the land assuring nondiscrimination for the period during which the real property is used for a purpose for which the Federal financial assistance is extended or for another purpose involving the provision of similar services or benefits. Where no transfer of property or interest therein from the Federal Government is involved, but property is acquired or improved with Federal financial assistance, the recipient shall agree to include such covenant in any subsequent transfer of such property. When the property is obtained from the Federal Government, such covenant may also include a condition coupled with a right to be reserved by COMPASS to revert title to the property in the event of a breach of the covenant where, in the discretion of the Secretary, such a condition and right of Reverter is appropriate to the statute under which the real property is obtained and to the nature of the grant and the grantee. In such event if a transferee of real property proposes to mortgage or otherwise encumber the real property as security for financing construction of new, or improvement of existing, facilities on such property for the purposes for which the property was transferred, the Secretary may agree, upon request of the transferee and if necessary to accomplish such financing, and upon such conditions as he deems appropriate, to subordinate such right of reversion to the lien of such mortgage or other encumbrance.

(b) Continuing Federal financial assistance. Every application by a State or a State agency for continuing Federal financial assistance to which this part applies (including the types of Federal financial assistance listed in appendix A to this part) shall as a condition to its approval and the extension of any Federal financial assistance pursuant to the application: (1) Contain or be accompanied by a statement that the program is (or, in the case of a new program, will be) conducted in compliance with all requirements imposed by or pursuant to this part, and (2) provide or be accompanied by provision for such methods of administration for the program as are found by the Secretary to give reasonable guarantee that the applicant and all recipients of

Federal financial assistance under such program will comply with all requirements imposed by or pursuant to this part. [35 FR 10080, June 18, 1970, as amended at 68 FR 51389, Aug. 26, 2003]

COMPASS
Title VI Complaint Log

Number	Complainant Name	Complainant Address	Date Filed	Basis	Status	Disposition

Community Planning Association of Southwest Idaho
Title VI Discrimination Complaint Form
 Director of Operations, 700 NE 2nd Street, Suite 200, Meridian, ID 83642

Complainant Name	Complainant Address—Street (P.O. Box), City, State, Zip
Complainant Phone Number	
Name of Discriminating Person(s) or Agency	Address of Person(s) or Agency (if known)
Position of Person(s) (if known)	

Date of Discrimination	Discrimination Due To <input type="checkbox"/> Age <input type="checkbox"/> English Proficiency <input type="checkbox"/> Race <input type="checkbox"/> Sex <input type="checkbox"/> Color <input type="checkbox"/> Income Status <input type="checkbox"/> Religion <input type="checkbox"/> Disability <input type="checkbox"/> National Origin <input type="checkbox"/> Retaliation
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Explain as briefly and clearly as possible what happened and how you were discriminated against. Indicate who was involved and the names of any witnesses. Describe the corrective action you are seeking. Also attach any written material pertaining to your case.

I certify to the best of my knowledge that the statements and information contained herein are true, accurate, and complete.

Signature	Date
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Upon completion, mail your Discrimination Complaint Form to: COMPASS Director of Operations 700 NE 2 nd Street, Suite 200 Meridian, ID 83642	
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