



**Title VI Plan
for
Carson City
Regional Transportation Commission
(RTC)**

&

**Carson Area
Metropolitan Planning Organization
(CAMPO)**

Approved date: September 12, 2024

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Attachments

1	Signed Assurances for Title VI of the Civil Rights Act of 1964
1.A	Title VI Assurances for Carson City Regional Transportation Commission
1.B	Title VI Assurances for Carson Area Metropolitan Planning Organization
2	Organization Chart
3	Sample Training Log
4	Complaint Procedures and Forms (English and Spanish)
5	Investigations and Complaint Log
6	Sample Right-of-Way Data Collection Log
7	Sample Plan and Policy Review Log

1.0 Title VI Program Overview

The Title VI Plan and associated documentation is submitted to the Nevada Department of Transportation (NDOT) Civil Rights Office to aid in its ability to provide oversight and ensure there is Title VI compliance as a subrecipient. This document is intended to provide guidance to department personnel and other interested entities and is not intended to, does not, and may not be relied upon to create any right or benefit enforceable by law, by a party against the Carson City Regional Transportation Commission (RTC) or the Carson Area Metropolitan Planning Organization (CAMPO).

While this document is referenced by both RTC and CAMPO, both governing boards have independently reviewed and approved this document for the separate and independent use by their respective agencies. This Title VI Plan is made in accordance with the interlocal agreement between Carson City, a consolidated municipality, the RTC, and CAMPO, and it is made as a single reference document to provide simplicity to users and the public in ensuring access to Title VI resources and compliance with Title VI activities across these overlapping agencies.

1.1 Non-Discrimination Policy Statement

It is the policy of the RTC and CAMPO that no person shall on the grounds of race, color, sex or national origin, be excluded from participation in, be denied the benefits of, or be subjected to discrimination in any operation of the RTC or CAMPO as provided by Title VI of the Civil Rights Act of 1964 and related statutes such as The Civil Rights Restoration Act of 1987.

This policy applies to all operations of RTC and/or CAMPO, including its contractors and anyone who acts on their behalf. This policy also applies to the operations of any department or agency to which the RTC or CAMPO extends federal financial assistance.

Prohibited discrimination may be intentional or unintentional. Seemingly neutral acts that have disparate impacts on individuals of a protected group and lack a substantial legitimate justification are a form of prohibited discrimination. Harassment and retaliation are also prohibited forms of discrimination.

Examples of prohibited types of discrimination based on race, color, or national origin include: Denial to an individual of any service, financial aid, or other benefit; Distinctions in the quality, quantity, or manner in which a benefit is provided; Segregation or separate treatment; Restriction in the enjoyment of any advantages, privileges, or other benefits provided; Discrimination in any activities related to highway and infrastructure or facility built or repaired; and Discrimination in employment.

1.2 Title VI/Non-Discrimination Assurances | Título VI/Garantías de No Discriminación

Per federal regulations, the RTC and CAMPO as a recipient of federal funds is required to sign assurances that pledge:

Title VI of the Civil Rights Act of 1964 states:

"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 financial assistance." RTC and CAMPO is committed to complying with the requirements of Title VI in all of its federally funded programs and activities. Additionally, RTC and CAMPO is committed to extending nondiscrimination requirements to include associated nondiscrimination regulations including, but not limited to the Federal Highway Act of 1973 (Sex), the Age Discrimination Act of 1975 (Age), the Americans with Disabilities Act of 1990 (ADA), Section 504 of the Rehabilitation Act of 1973 (Disability), Executive Order 13166, and Executive Order 12898. For additional information about CAMPO and RTC Title VI obligations, please contact (775) 887-2355 or visit our web page at <https://www.carson.org/government/departments-g-z/public-works/transportation/campo-carson-area-metropolitan-planning-organization>.

El Título VI de la Ley de Derechos Civiles de 1964 establece:

"Ninguna persona en los Estados Unidos, por motivos de raza, color u origen nacional, será excluida de la participación, se le negarán los beneficios o estará sujeta a discriminación bajo cualquier programa o actividad que reciba asistencia financiera federal". RTC y CAMPO se compromete a cumplir con los requisitos del Título VI en todos sus programas y actividades financiados con fondos federales. Además, RTC y CAMPO se compromete a extender los requisitos de no discriminación para incluir las regulaciones asociadas de no discriminación, incluidas, entre otras, la Ley Federal de Carreteras de 1973 (Sexo), la Ley de Discriminación por Edad de 1975 (Edad), la Ley de Estadounidenses con Discapacidades de 1990 (ADA), la Sección 504 de la Ley de Rehabilitación de 1973 (Discapacidad), Orden Ejecutiva 13166 y Orden Ejecutiva 12898. Para obtener información adicional sobre las obligaciones de CAMPO y RTC Título VI, comuníquese con (775) 887-2355 o visite nuestro sitio web en <https://www.carson.org/government/departments-g-z/public-works/transportation/campo-carson-area-metropolitan-planning-organization>.

Making a Title VI Complaint / Presentar una queja del Título VI:

Any person who believes that they have been subject to unlawful discriminatory practice under Title VI may file a complaint with the RTC and/or CAMPO. Any such complaint must be in writing and filed within 180 days following the date of the alleged discriminatory occurrence. For information on how to file a complaint, see Attachment 4

Cualquier persona que crea que ha sido objeto de una práctica discriminatoria ilegal bajo el Título VI puede presentar una queja ante el RTC o CAMPO. Cualquier queja de este tipo debe hacerse por escrito y presentarse ante la Agencia/MPO {Departamento de Obras Públicas} dentro de los 180 días siguientes a la fecha del presunto incidente discriminatorio. Para obtener información sobre cómo presentar una queja, comuníquese y leer el archive adjunto 4

Both RTC and CAMPO are recipients of USDOT funding, with NDOT acting as a passthrough agency, and is therefore subject to the Title VI compliance conditions associated with the use of these funds pursuant to the following:

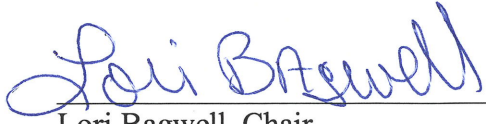
NONDISCRIMINATION STATUTES

- *Title VI of the Civil Rights Act of 1964 (42 USC 2000d et seq);*
- *Section 162 (a) of the Federal-Aid Highway Act of 1973 (23 USC 324);*
- *Age Discrimination Act of 1975;*
- *Section 504 of the Rehabilitation Act of 1973;*
- *Americans With Disabilities Act of 1990;*
- *Civil Rights Restoration Act of 1987;*
- *49 CFR Part 21;*
- *23 CFR Part 200;*
- *USDOT Order 1050.2;*
- *Executive Order #12898 (Environmental Justice);*
- *Executive Order #13166 (Limited-English-Proficiency);*
- *The Americans with Disabilities Act (42 USC 126)*
- *Title II of the Americans with Disabilities Act Implementing Regulation (28 CFR 35)*
- *Section 504 of the Rehabilitation Act of 1973 (29 USC 794, et seq).*
- *Section 504 of the Rehabilitation Act of 1973 Implementing Regulation 49 CFR 27*
- *Americans with Disabilities Act Accessibility Guidelines (ADAAG)*
- *Public Rights-of-Way (PROWAG) Notice of Proposed Rule Making, July 26, 2011*
- *Uniform Federal Accessibility Standards (UFAS)*
- *Title VII of the Civil Rights Act of 1964, as amended.*
(<http://www.eeoc.gov/laws/statutes/titlevii.cfm>)
- *The Age Discrimination in Employment Act of 1967, as amended*
(<http://www.eeoc.gov/laws/statutes/adea.cfm>)
- *The Equal Pay Act of 1963 (<http://www.eeoc.gov/laws/statutes/epa.cfm>)*
- *Sections 501 and 505 of the Rehabilitation Act of 1973, as amended*
(<http://www.eeoc.gov/laws/statutes/rehab.cfm>)
- *The Genetic Information Nondiscrimination Act of 2008 (<http://www.eeoc.gov/laws/statutes/gina.cfm>)*
- *The Civil Rights Act of 1991 (<http://www.eeoc.gov/laws/statutes/cra-1991.cfm>)*
- *Title 29, Code of Federal Regulations, Part 1614 (<http://www.eeoc.gov/federal/directives/1614-final.cfm>)*
- *No Fear Act (<https://www.transportation.gov/civil-rights/civil-rights-awareness-enforcement/no-fear-act>)*
- *23 CFR 230, Subpart C*

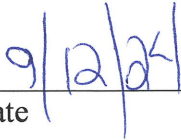
Title VI compliance is a condition of receipt of federal funds and as such this Title VI Plan must be approved by both the RTC and CAMPO governing boards. The Title VI Coordinator is authorized and has signed the Standard USDOT Title VI Assurances included in Attachment 1 in accordance with USDOT 1050.2A. The Title VI Coordination is authorized to ensure compliance

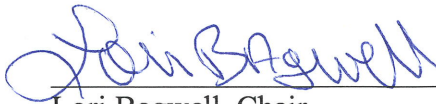
with this policy, the Title VI of the Civil Rights Act of 1964, 42 U.S.C § 2000d and related statutes, and the requirements of 23 Code of Federal Regulation (CFR) pt. 200 and 49 CFR pt. 21.

RTC and CAMPO APPROVALS:

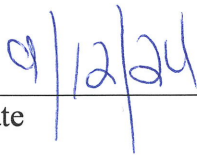


Lori Bagwell, Chair
Carson City Regional Transportation Commission


Date



Lori Bagwell, Chair
Carson Area Metropolitan Planning Organization


Date

2.0 Organization, Staffing, and Structure

CAMPO is the regional metropolitan planning organization designated in 2003 by the Governor of Nevada. CAMPO is responsible for federal regulations regarding regional transportation planning. The boundary of CAMPO includes Carson City, excluding the area near Lake Tahoe, and an area of northern Douglas County and western Lyon County. The CAMPO Board is the official governing body that approves and directs recommendations to staff. The Board is comprised of seven voting members from Carson City, Douglas County and Lyon County, and one Nevada Department of Transportation non-voting ex officio member. Each voting Board member is appointed by their respective county.

The RTC is a special purpose agency formed under NRS 277A. The RTC is comprised of five commissioners who, along with other duties, establish priorities and recommend appropriate funding for transportation improvement projects within Carson City.

The CAMPO Board and RTC Commissioners established the vision, strategic plan, policies, and goals for Carson City and the CAMPO area. CAMPO and RTC receive federal funding from the Federal Highway Administration (FHWA), the Federal Transit Administration (FTA), and from the Nevada Department of Transportation (NDOT).

Per the Nevada Revised Statutes (NRS) and an interlocal agreement between the RTC, CAMPO, and Carson City, the RTC and CAMPO acting as special purpose organizations are independent agencies which are housed within the Public Works Department of the City of Carson City and are both staffed with Carson City Public Works staff reporting the Public Works Director. The duties and responsibilities imposed on RTC and CAMPO for use of federal funds through the requirements of Title VI apply solely to the special purpose organizations of the RTC and CAMPO, who are responsible for implementation.

RTC and CAMPO staff is housed at the following location and can be reached at the following phone number:

Carson City Regional Transportation Commission/
Carson Area Metropolitan Planning Organization
3505 Butti Way, Carson City, NV 89701
Phone: 775-887-2355

The Transportation Manager reports to the CAMPO Board and RTC Commissioners and is primarily responsible for providing leadership and policy guidance to all staff functions and operations and to ensure the vision, strategic plan, and goals of Carson City and the CAMPO area are implemented and achieved. The Transportation Manager performs the professional and administrative processes necessary to achieve the efficient and economic operation of CAMPO and RTC; ensures the financial security of tax dollars by monitoring the overall fiscal activity of CAMPO and RTC; and assists elected officials in establishing policy and long-term goals. The Transportation Manager has been designated as the Title VI Coordination by the RTC and CAMPO.

The Title VI Coordinator is responsible for:

- Maintaining the Title VI Plan and updates,
- Processing and disposition of complaints,
- Collecting and analyzing demographics related to race, color, sex, and national origin,
- Providing information to NDOT for annual Title VI reviews to determine the effectiveness of program activities,
- Conducting updates to the Title VI assessments of pertinent program areas,
- Conduct or facilitate training programs on Title VI and other related statutes for RTC and CAMPO related employees,
- Ensuring Title VI information is readily available for dissemination and included in policies and contracts,
- Reviewing internal plans, policies, procedures, and directives for implications to Title VI requirements,
- Resolving deficiencies or matters of noncompliance regarding subrecipients,
- Identify and strive to eliminate discrimination.

The Title VI Coordinator (Transportation Manager) reports to the Public Works Director, who has the ability to ensure Title VI provisions are incorporated into Public Works policies. Furthermore, the Title VI Coordinator has access to the Title VI liaisons who are responsible for implementing elements of the Title VI Program. An organization chart is provided in Attachment 2 for reference.

Below are key staff positions responsible for implementing elements of the Title VI Program:

- Transportation Manager, Title VI Coordinator for Oversight and Administration
- Document Control Specialist, Title VI Liaison for Construction
- Senior Transportation Planner, Title VI Liaison for Planning, Right-of-Way, Environmental, and Research

3.0 Program Area Descriptions and Review Procedures

The RTC and CAMPO engages in the following Title VI program areas:

3.1 Transportation Planning

CAMPO and RTC staff performs transportation planning activities, which include corridor planning, short and long-range planning, ADA Transition Planning, pavement management, multi-modal planning, research, environmental assessment, and transit planning. Planning activities ensure existing and future expenditures for transportation projects and programs are based on a continuing, cooperative, and comprehensive (3-C) planning process.

Standards – Transportation Planners lead department efforts to prioritize, coordinate, and obtain consensus for the planning and programming of funds. The process of prioritization takes into account multiple factors, including but not limited to equity, environmental assessment, performance, and safety. Staff uses a variety of analytics and factors to help prioritize investments. Analytics and factors commonly used include census data, vehicle volumes, crash data, roadway functional classification, bicycle and pedestrian volumes, land use, network connectivity, pavement condition, and historical distribution of transportation investments. Public participation is also used to ensure no person, because of race, color, or national origin, be excluded from

participating in, or denied benefits of, or be subject to discrimination under any administrative program or capital project.

In effort to ensure and promote non-discrimination, the RTC and CAMPO have adopted and routinely monitor the following metrics and standards to distribute and program investments fairly and avoid disproportionately high or adverse impacts to underserved communities:

- **Pavement Management Plan:** In 2018, the RTC first approved a Pavement Management Plan. It provides a distribution method, a 5-year schedule, and criteria for selecting annual capital projects. The plan created five performance districts based on common geography and miles of roadway. The plan allocates 80% of the annual budget to one district every five years. The plan includes criteria to consistently and equitably prioritize roadway projects. Projects are presented to the RTC annually in late Spring.
- **ADA Transition Plan:** The ADA Transition Plan for public facilities in Carson City’s right-of-way was supported by CAMPO and approved by RTC. This document ensures reasonable access for persons with disabilities, within the public right-of-way, is provided and maintained. Pedestrian facilities within the public right-of-way include sidewalks, curb ramps, pedestrian crossings, transit stops, paved shared use paths, and pedestrian activated signal systems. This plan prioritizes barriers that pose significant safety issues, such as missing curb ramps and narrow access, due to their ability to force pedestrians off of the sidewalk network and into the roadway. Progress on the plan is maintained in the City’s GIS database and reported as part of plan updates.
- **Safety Performance Measures:** The U.S. Department of Transportation Federal Highway Administration Safety Performance Measure Final Rule establishes requirements for the purpose of assessing fatalities and serious injuries on public roads. These statistics are reviewed annually to help channel investments fairly to areas with a high frequency of crashes. Safety Performance Measures are reported annually in the Network Monitoring Report.
- **Functional Classification Map:** The classification of roadways is a joint effort between local, regional, state, and federal agencies. To be eligible for federal funding, federal regulations require a roadway to be classified as a ‘Collector’ or greater. Roads with higher classifications serve the mobility needs of a greater number of people and typically carry more traffic. Roads with lower classifications tend to provide access more to individual properties than serve the mobility needs of a greater number of people. As part of the project selection process, roadways with a higher classification are prioritized.

3.2 Design / Environmental

The RTC utilizes both in-house and external design services. The majority of projects are designed in house from start to finish. In an effort to design projects consistently, fairly, and properly, design standards are utilized. CAMPO staff does not provide design services. Projects are selected for design using the Transportation Planning process outlines above.

The following is a list of design standards used to deliver transportation projects: the Manual on Uniform Traffic Control Devices (MUTCD), the Green Book (A Policy on Geometric Design of Highways and Streets), the Nevada Department of Transportation Access Standards, the 2010 ADA Accessibility Guidelines, the Carson City Municipal Code, the Orange Book (Standards

Specification for Public Works Construction), and Carson City Standard Details for Public Works Construction.

CAMPO and RTC commonly coordinate with NDOT for projects involving NEPA. Procedures for the NEPA process are focused on preparing environmental documentation that considers how Title VI should be incorporated into a project's environmental process and environmental documentation.

When contracting for professional services, contract standard terms and conditions are submitted with all Requests for Proposals, which includes the required Title VI language. Additionally, contracts with consultants are compiled using standard templates which have standard contract language regarding Title VI as part of the general terms. All consultant contracts include the standard contract clauses and also include a provision that says that any subcontracts must include these same provisions.

3.3 Right-of-Way Acquisition

Right-of-way in the form of temporary easements, permanent easements, and through deeds is acquired by the RTC periodically. CAMPO does not acquire right-of-way. The most common type of acquisition is for temporary easements to allow for construction. RTC projects are commonly funded in part by local, state, and federal funds. RTC complies with all applicable federal and state regulations regarding right-of-way acquisitions, including but not limited to compliance with the Uniform Act.

The RTC employs a Real Property Manager to facilitate right-of-way acquisitions. Furthermore, NDOT staff is consulted to ensure compliance with the Uniform Act. The acquisition of property is based on need and related to transportation projects. All transportation projects are prioritized and selected based on a variety of analytics and factors, which were discussed in Section 3.1 of this program document. Additionally, Section 3.2 provides design standards which are used to establish right-of-way needs. The Title VI Coordinator consults with the Real Property Manager on the requirements related to any right-of-way acquisitions which may include ensuring that any interpreters or translators are available, any special accommodations for persons with disabilities are provided, and procedures for data collection are consistent with the provisions of this Title VI Plan.

3.4 Construction of Transportation Projects

Transportation projects are undertaken by the RTC based on an assessment of needs and availability of resources. CAMPO does not construct projects.

RTC makes every effort to provide quality, responsive, and customer service-oriented purchasing, contracting, and related services in accordance with the Nevada Revised Statutes; and to ensure that all bid processes are fair and equitable affording vendors an equal opportunity of doing business with the RTC. In effort to ensure and promote non-discrimination, the RTC and CAMPO have adopted and routinely monitor the following metrics and standards to construction projects to fairly communicate and avoid disproportionately high or adverse impacts to underserved

communities:

- All construction contracts are required to comply with Executive Order 11246, which requires affirmative action and prohibits federal contractors from discriminating on the basis of race, color, religion, sex, sexual orientation, gender identity, or national origin. Contractors are prohibited from discriminating against applicants or employees because they inquire about, discuss, or disclose their compensation or that of others, subject to certain limitations. All construction contracts include the appropriate non-discrimination clauses, contained in Attachment 1 (Title VI Assurances) and federal contracts include FHWA Form 1273.
- All construction projects over \$100,000 are subject to competitive bidding processes. The RTC currently uses the [Nevada Government Electronic Marketplace \(NGEM\)](#) to facilitate bidder registration, solicitation publishing, and to transact solicitations electronically.
- Periodically check construction contracts to ensure appropriate nondiscrimination language and required contract inclusions have been attached.
- Provide public outreach and project communications that follow the LEP process.

4.0 Training

The Title VI Coordinator is responsible for implementing a Title VI/Nondiscrimination Training Program for RTC and CAMPO staff. The training will be conducted annually for general employees, managers, Title VI Liaisons. Training will consist of 1) an in-person training, and 2) acknowledgement and acceptance of policy reviews through Carson City's policy management software during annual performance reviews. Training will be provided to newly hired or promoted employees within six months or appointment.

Staff will be provided with NDOT approved content training annually to include:

- Polices
- Procedures
- Appropriate NRS and federal regulations

Staff may also be trained on CAMPO's Public Participation Plan elements, as required, that encompasses the required content and awareness of incorporating Title VI into their day-to-day activities. If a consultant is used for this training, the consultant will provide access to their training platform for employees to view Title VI training.

In addition, all staff will be given training on Limited English Proficiency, as described by this document, that outlines RTC's and CAMPO's policies and commitment to Limited English Proficiency persons (LEP).

- The Title VI Coordinator will track and maintain staff awareness training in Title VI and submit staff sign-in sheets annually to NDOT.

5.0 Environmental Justice Process

In 1994, Executive Order (EO) 12898 Federal Actions to Address Environmental Justice in Minority Populations and Low-Income Populations was issued. EO 12898 emphasized a federal agency's responsibility to make environmental justice a goal by identifying and addressing the effects of programs, policies and activities on minority and low-income populations. This is accomplished by involving the public in developing transportation projects that fit within their communities without sacrificing equity, environmental justice, and safety.

Planning staff for RTC and CAMPO fulfills this requirement by adopting standards that distribute transportation investment dollars transparently and equitably. RTC and CAMPO promotes public participation through monthly public meetings and with public outreach strategies discussed in Section 8.0 of this plan.

Environmental Justice (EJ) is 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. Fair treatment means (1) that all persons share in the benefits of our investments; and (2) that no person (including racial, ethnic, or low-income groups) should bear a disproportionate share of the negative consequences resulting from the execution of federal, state, and local programs and policies.

Based on the guidance of the USDOT Order on Environmental Justice as cited in “An Overview of Transportation and Environmental Justice” there are three fundamental principles of environmental justice, and they are:

- To avoid, minimize, or mitigate disproportionately high and adverse human health and environmental effects on minority populations and low-income populations;
- To ensure the full and fair participation by all potentially affected communities in the transportation decision-making process;
- To prevent the denial of, reduction in, or significant delay in the receipt of benefits by minority and low-income populations.

In accordance with Executive Order 12898 on EJ and the related US DOT and FHWA Orders, the RTC and CAMPO advances the principles of EJ in all programs, services and activities through the adoption of standards and by screening programs and projects at public meetings which aim to distribute investments fairly and to identify, avoid, minimize or mitigate disproportionately high and adverse impacts. CAMPO and RTC staff assist with respect to public involvement activities around the city and CAMPO area. The transportation planning process requires CAMPO and RTC to identify planning assumptions under federal law – one of which is to use the most recently published U.S. Census Bureau data in the development of plans and programs.

6.0 Data Collection

The RTC and CAMPO is required by federal regulation to collect statistical data on the race, color, and national origin of participants in and beneficiaries of its programs (*49 CFR 21.9 and 23 CFR 200.9*). The following is a brief description of data collection efforts conducted by RTC and CAMPO:

- Right-of-Way: Race and ethnicity of appraisers used for right of way acquisition and of residents / business owners who have been relocated through the Right of Way acquisition process for capital projects. This information will be reported as part of Title VI Plan using a form similar to that provided in Attachment 6.
- Planning and Environmental: As part of the Planning Process and this Title VI Plan, staff analyzed population demographic maps which include:
 - Demographics on race, color, and national origin by Census Tract
 - Demographics on sex and age
 - Demographics on Household Income
 - Distribution of Capital Projects as it relates to national origin, race, color, and income
- RTC and CAMPO Public Meetings: Sign-in sheets will include space for participants to note race, color, sex, and national origin. This information will be retained for a minimum of three years.

CAMPO and RTC collects and analyzes U.S. Census data on race, color, income, and national origin to ensure low-income or minority persons are not disproportionately adversely impacted or denied benefits of federal, state, or local funding. Based on an analysis of the census data and distribution of corridor plans and capital transportation projects, staff has not identified any disproportionate adverse impact or denial of benefits to census tracts with higher rates of minorities, of lower income, or are disproportionate to any one race or population of color.

Figures 1 through 6 provide data on demographics for both the CAMPO planning area and the Carson City RTC service area. Additional information related to current RTC and CAMPO demographics, such as sex, age, race, color, and national origin, can be found in CAMPO's annual "Transportation Network Monitoring Report" and "Public Participation Plan".

- Figure 1: Map of CAMPO and Carson City Census Tracts
- Figure 2: Table of Demographics on Ethnicity by Census Tract
- Figure 3: Table of Demographics on Race and Color by Census Tract
- Figure 4: Table of Demographics on Minorities by Census Tract
- Figure 5: Table of Demographics on Household Income by Census Tract
- Figure 6: Map of Census Tracts with Below Average Median Household Income

Figure 1 – Map of CAMPO and Carson City Census Tracts

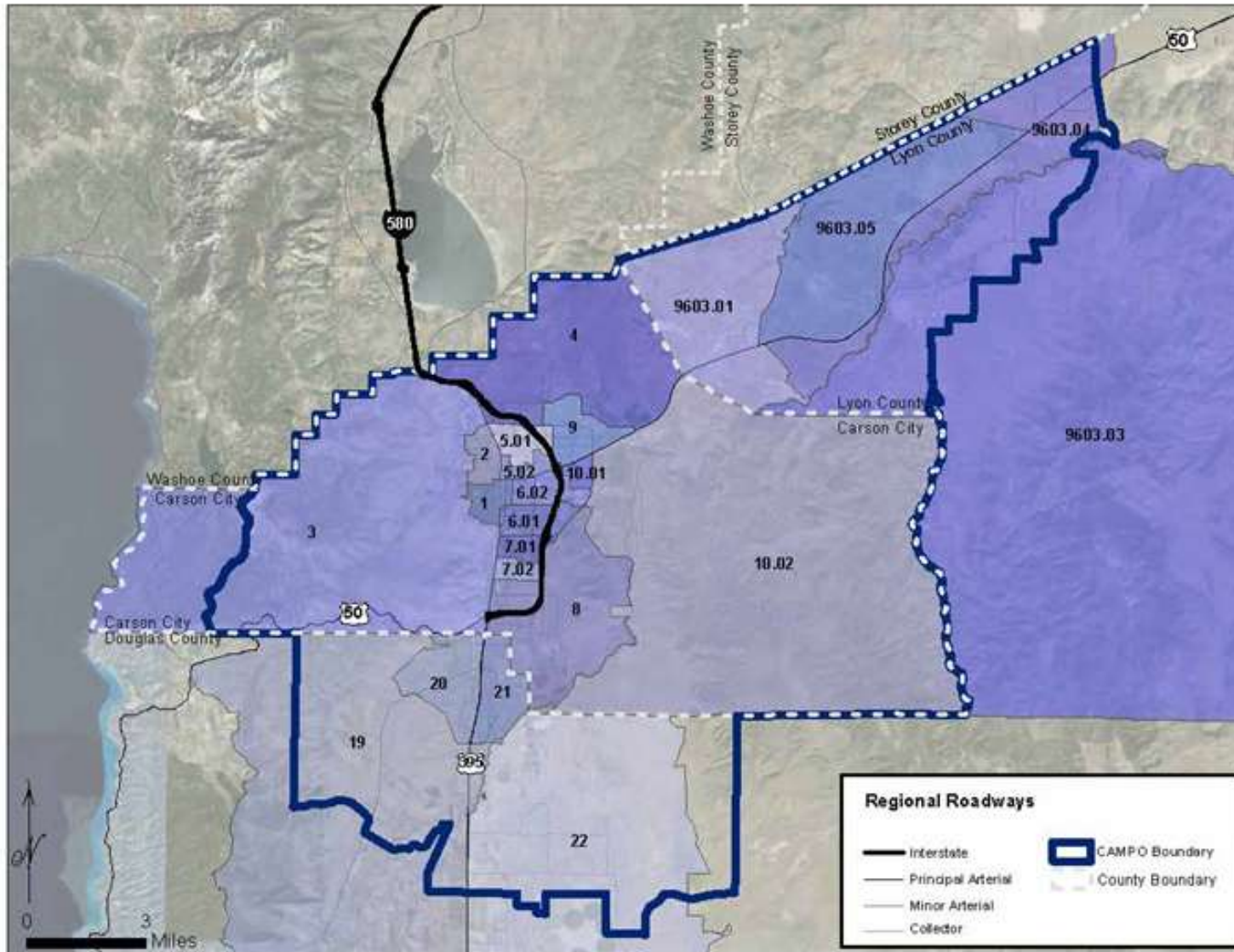


Figure 2 - 2022 Demographics on Ethnicity by Census Tract for CAMPO and RTC

Geographic Area Census Tract (CT)	Total Population	Hispanic or Latino	Percentage	Not Hispanic or Latino All Races
Nevada	3,177,772	961,357	30.3%	2,216,415
Carson Area MPA	84,258	19,150	22.7%	65,108
CT 19, Douglas Cty	409	15	3.7%	394
CT 20, Douglas Cty	3,448	532	15.4%	2,916
CT 21, Douglas Cty	2,229	139	6.2%	2,090
CT 22, Douglas Cty	6,642	461	6.9%	6,181
CT 9603.01, Lyon Cty	1,878	614	32.7%	1,264
CT 9603.04, Lyon Cty	5,586	1143	20.5%	4,443
CT 9603.05, Lyon Cty	5,817	1670	28.7%	4,147
Carson City	58,249	14,576	25.0%	43,673
CT 1, Carson City	3,008	273	9.1%	2,735
CT 2, Carson City	4,112	772	18.8%	3,340
CT 3, Carson City	4,078	144	3.5%	3,934
CT 4, Carson City	3,932	900	22.9%	3,032
CT 5.01 Carson City	5,960	2445	41.0%	3,515
CT 5.02, Carson City	2,821	630	22.3%	2,191
CT 6.01, Carson City	2,799	573	20.5%	2,226
CT 6.02, Carson City	3,053	1128	36.9%	1,925
CT 7.01, Carson City	4,338	895	20.6%	3,443
CT 7.02, Carson City	3,967	982	24.8%	2,985
CT 8, Carson City	5,572	753	13.5%	4,819
CT 9, Carson City	5,854	2011	34.4%	3,843
CT 10.01, Carson City	4,488	2550	56.8%	1,938
CT 10.02, Carson City	4,267	520	12.2%	3,747

*ACS Demographic and Housing Estimates, 2022 5-Year Estimates, Table DP05

Figure 3 - 2022 Demographics on Race and Color by Census Tract for CAMPO and RTC

Geographic Area Census Tract (CT)	Total Population	Not Hispanic or Latino By Race											
		White	%	Black or African American	%	American Indian and Alaska Native	%	Asian	%	Native Hawaiian & Pacific Islander	%	Other races and Two or more races	%
Nevada	3,177,772	1,561,784	49.1%	297,866	9.4%	46,997	1.5%	290,678	9.1%	21,966	0.7%	168,975	5.3%
Carson Area MPA	84,258	57,249	67.9%	1,253	1.5%	1,177	1.4%	2068	2.5%	32	0.0%	3,329	4.0%
CT 19, Douglas Cty	409	358	87.5%	0	0.0%	0	0.0%	0	0.0%	0	0.0%	36	8.8%
CT 20, Douglas Cty	3,448	2,689	78.0%	0	0.0%	57	1.7%	65	1.9%	0	0.0%	105	3.0%
CT 21, Douglas Cty	2,229	1,657	74.3%	1	0.0%	0	0.0%	245	11.0%	7	0.3%	180	8.1%
CT 22, Douglas Cty	6,642	5,968	89.9%	0	0.0%	9	0.1%	49	0.7%	11	0.2%	144	2.2%
CT 9603.01, Lyon Cty	1,878	1,192	63.5%	0	0.0%	13	0.7%	16	0.9%	0	0.0%	43	2.3%
CT 9603.04, Lyon Cty	5,586	4,197	75.1%	17	0.3%	0	0.0%	60	1.1%	0	0.0%	169	3.0%
CT 9603.05, Lyon Cty	5,817	3,749	64.4%	0	0.0%	192	3.3%	115	2.0%	0	0.0%	91	1.6%
Carson City	58,249	37,439	64.3%	1,235	2.1%	906	1.6%	1,518	2.6%	14	0.0%	2,561	4.4%
CT 1, Carson City	3,008	2,613	86.9%	2	0.1%	16	0.5%	35	1.2%	0	0.0%	69	2.3%
CT 2, Carson City	4,112	3,128	76.1%	17	0.4%	0	0.0%	141	3.4%	0	0.0%	54	1.3%
CT 3, Carson City	4,078	3,552	87.1%	1	0.0%	212	5.2%	90	2.2%	1	0.0%	78	1.9%
CT 4, Carson City	3,932	2,701	68.7%	81	2.1%	66	1.7%	51	1.3%	0	0.0%	133	3.4%
CT 5.01 Carson City	5,960	2,875	48.2%	0	0.0%	6	0.1%	288	4.8%	0	0.0%	346	5.8%
CT 5.02, Carson City	2,821	2,035	72.1%	4	0.1%	70	2.5%	9	0.3%	0	0.0%	73	2.6%
CT 6.01, Carson City	2,799	1,966	70.2%	104	3.7%	13	0.5%	40	1.4%	2	0.1%	101	3.6%
CT 6.02, Carson City	3,053	1,538	50.4%	26	0.9%	4	0.1%	60	2.0%	0	0.0%	297	9.7%
CT 7.01, Carson City	4,338	2,493	57.5%	499	11.5%	37	0.9%	276	6.4%	0	0.0%	138	3.2%
CT 7.02, Carson City	3,967	2,863	72.2%	0	0.0%	0	0.0%	49	1.2%	0	0.0%	73	1.8%
CT 8, Carson City	5,572	3,492	62.7%	363	6.5%	305	5.5%	400	7.2%	11	0.2%	248	4.5%
CT 9, Carson City	5,854	3,602	61.5%	103	1.8%	23	0.4%	25	0.4%	0	0.0%	90	1.5%
CT 10.01, Carson City	4,488	1,188	26.5%	0	0.0%	74	1.6%	0	0.0%	0	0.0%	676	15.1%
CT 10.02, Carson City	4,267	3,393	79.5%	35	0.8%	80	1.9%	54	1.3%	0	0.0%	185	4.3%

*ACS Demographic and Housing Estimates, 2022 5-Year Estimates, Table DP05

Figure 4 - 2022 Demographics on Minorities by Census Tract for CAMPO and RTC

Geographic Area Census Tract = CT	Total Population	Majority Race (White)		Aggregate of Minorities	
		#	%	#	%
State of Nevada	3,177,772	1,561,784	49.1%	1,615,988	50.9%
Carson Area MPA	84,258	57,249	67.9%	27,009	32.1%
CT 19, Douglas Cty	409	358	87.5%	51	12.5%
CT 20, Douglas Cty	3,448	2,689	78.0%	759	22.0%
CT 21, Douglas Cty	2,229	1,657	74.3%	572	25.7%
CT 22, Douglas Cty	6,642	5,968	89.9%	674	10.1%
CT 9603.01, Lyon Cty	1,878	1,192	63.5%	686	36.5%
CT 9603.04, Lyon Cty	5,586	4,197	75.1%	1,389	24.9%
CT 9603.05, Lyon Cty	5,817	3,749	64.4%	2,068	35.6%
Carson City	58,249	37,439	64.3%	20,810	35.7%
CT 1, Carson City	3,008	2,613	86.9%	395	13.1%
CT 2, Carson City	4,112	3,128	76.1%	984	23.9%
CT 3, Carson City	4,078	3,552	87.1%	526	12.9%
CT 4, Carson City	3,932	2,701	68.7%	1,231	31.3%
CT 5.01 Carson City	5,960	2,875	48.2%	3,085	51.8%
CT 5.02, Carson City	2,821	2,035	72.1%	786	27.9%
CT 6.01, Carson City	2,799	1,966	70.2%	833	29.8%
CT 6.02, Carson City	3,053	1,538	50.4%	1,515	49.6%
CT 7.01, Carson City	4,338	2,493	57.5%	1,845	42.5%
CT 7.02, Carson City	3,967	2,863	72.2%	1,104	27.8%
CT 8, Carson City	5,572	3,492	62.7%	2,080	37.3%
CT 9, Carson City	5,854	3,602	61.5%	2,252	38.5%
CT 10.01, Carson City	4,488	1,188	26.5%	3,300	73.5%
CT 10.02, Carson City	4,267	3,393	79.5%	874	20.5%

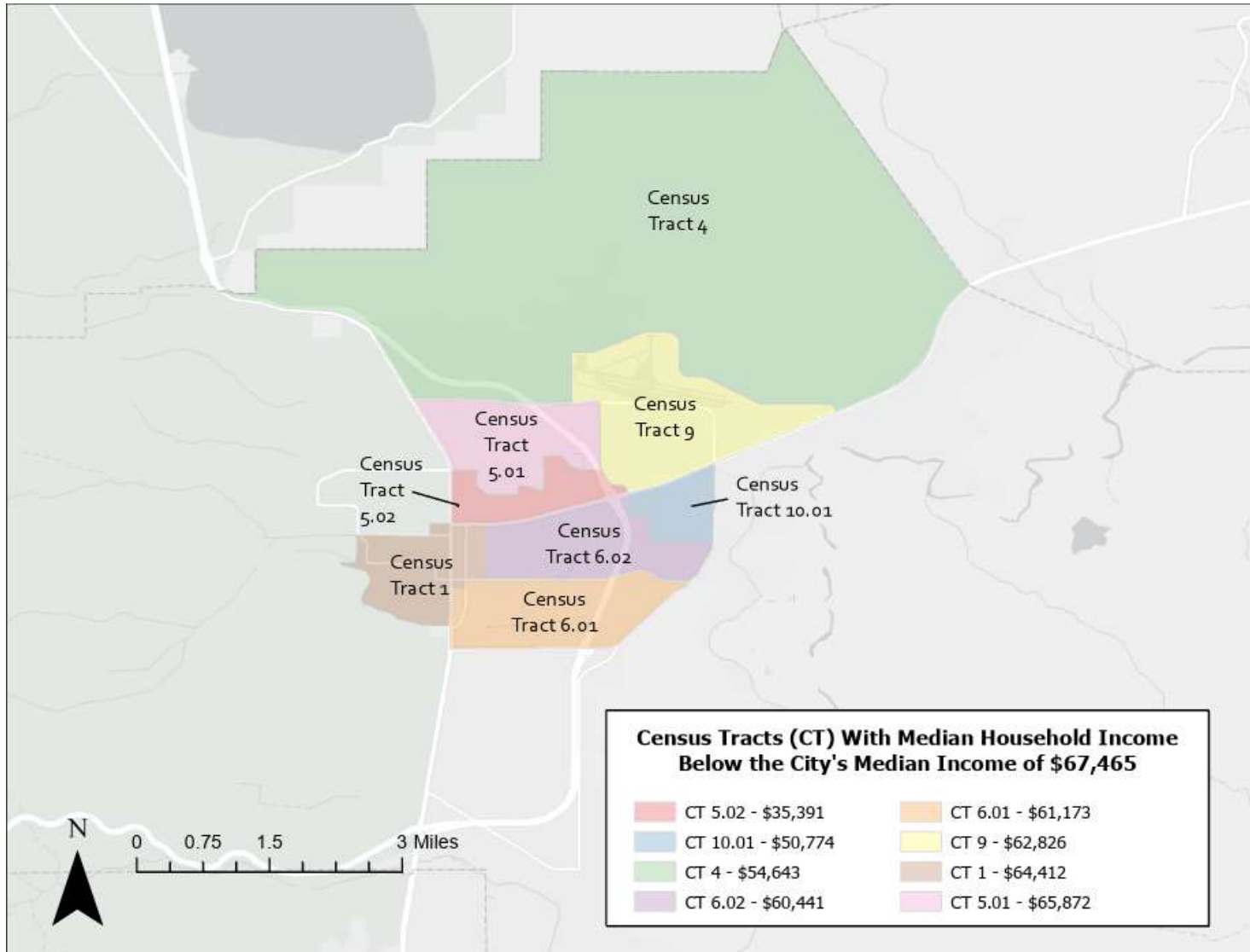
*Source: ACS Demographic and Housing, 2022 5-Year Estimates, Table DP05

**Aggregate defined as all other races

Figure 5 - 2022 Demographics on Household Income by Census Tract for CAMPO and RTC

Geographic Area Census Tract (CT)	Total households	Less than \$24,999		\$25,00 to \$49,999		\$50,000 to \$99,999		\$100,000 or more		Median Household Income
	# of Households	# of Households	%	# of Households	%	# of Households	%	# of Households	%	
Nevada	1,163,671	178,468	15%	223,910	19%	361,255	31%	400,038	34%	\$71,646
Carson Area MPA	33,425	2,388	7%	6,083	18%	11,283	34%	11,350	34%	\$74,987
CT 19, Douglas Cty	206	25	12%	47	23%	42	20%	92	45%	\$114,514
CT 20, Douglas Cty	1439	189	13%	216	15%	405	28%	543	38%	\$78,631
CT 21, Douglas Cty	952	68	7%	153	16%	221	23%	380	40%	\$76,667
CT 22, Douglas Cty	2706	220	8%	425	16%	645	24%	1,487	55%	\$104,085
CT 9603.01, Lyon Cty	743	75	10%	213	29%	288	39%	129	17%	\$55,446
CT 9603.04, Lyon Cty	2078	242	12%	354	17%	596	29%	852	41%	\$77,619
CT 9603.05, Lyon Cty	1946	153	8%	324	17%	477	25%	771	40%	\$93,397
Carson City	22,886	3,682	16%	4,335	19%	8,097	35%	6,772	30%	\$67,465
CT 1, Carson City	1652	354	21%	291	18%	522	32%	485	29%	\$64,412
CT 2, Carson City	1637	284	17%	122	7%	503	31%	728	44%	\$85,820
CT 3, Carson City	1890	268	14%	308	16%	402	21%	912	48%	\$95,431
CT 4, Carson City	1812	284	16%	490	27%	619	34%	419	23%	\$54,643
CT 5.01 Carson City	2400	211	9%	541	23%	1,092	46%	556	23%	\$65,872
CT 5.02, Carson City	1407	446	32%	387	28%	457	32%	117	8%	\$35,391
CT 6.01, Carson City	1193	247	21%	150	13%	541	45%	255	21%	\$61,173
CT 6.02, Carson City	1112	46	4%	270	24%	571	51%	225	20%	\$60,441
CT 7.01, Carson City	1619	325	20%	283	17%	493	30%	518	32%	\$75,850
CT 7.02, Carson City	1560	233	15%	167	11%	552	35%	608	39%	\$77,016
CT 8, Carson City	1475	132	9%	202	14%	482	33%	659	45%	\$92,621
CT 9, Carson City	2150	358	17%	518	24%	622	29%	652	30%	\$62,826
CT 10.01, Carson City	1728	416	24%	435	25%	730	42%	147	9%	\$50,774
CT 10.02, Carson City	1720	133	8%	187	11%	585	34%	815	47%	\$92,105
*Income Estimates in 2022 Inflation-Adjusted Dollars										
**Source: ACS Economic Characteristics, 2022 5-Year Estimates, Table DP03										
***Shaded boxes denote census tracts below the median income										

Figure 6 - Map of Census Tracts with Below Average Median Household Income in Carson City



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7.0 Limited English Proficiency (LEP) and Language Access Plan (LAP)

CAMPO and the RTC are committed to assisting people who do not speak English or do not speak English well. Individuals who do not speak English as their primary language and who have a limited ability to read, speak, write, or understand English are limited English proficient, or LEP. These individuals may be entitled to language assistance with respect to a particular type of program, service or activity. This section outlines the LEP protections and plans for compliance. Title VI and Executive Order 13166 prohibit recipients of federal financial assistance from discrimination based on national origin.

- It is the policy of the RTC and CAMPO to take reasonable steps to provide Limited English Proficient individuals with meaningful access to all programs, services or activities.
- The RTC and CAMPO shall take reasonable steps to effectively inform the public of the availability of language accessible programs, services, and activities.

In line with federal guidance, a “four factor analysis” has been completed to understand language assistant needs and allocate resources appropriately. However, the agency understands the nature and importance of the program, activity, and services to people’s lives and will take reasonable steps to promote participation and inclusion in our programs. The agency’s Title VI Coordinator may evaluate and monitor its language assistance programs annually in coordination with activities conducted by Carson City of other partner agencies of CAMPO.

Factor 1 - Number and Proportion of LEP Population: An analysis on limited English-speaking households has been conducted to meet the requirements under Title VI of the Civil Rights Act of 1964, which seeks to improve access to services for persons identified as LEP. The purpose is to ensure that no person shall, based on 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.

CAMPO and the RTC serve a largely English-speaking community; however, the region has experienced growth in the Spanish-speaking population over recent years. As part of the research for this Title VI Plan, the *2022 American Community Survey (ACS) Block Group 5-Year Estimates* were used to obtain household language data for the Metropolitan Area and Carson City.

Figure 7 below summarize the findings. Limited English-speaking households by origin range between 2.4% and 0.01% of the total number of households for both the CAMPO and Carson City areas. In general, the limited English-speaking households are similar between the CAMPO and Carson City areas. This program will continue to track this statistic with future updates to understand translation needs. Currently, Spanish is the second most common language in the CAMPO and Carson City areas.

A map based on Figure 7 displays the physical distribution of Limited English-Speaking Households in the Carson City and CAMPO area can be found in the CAMPO Public Participation Plan. A concentration of LEP households is prevalent in the northeastern area of Carson City.

Figure 7- Number of Households and Percent of Limited English Speaking Households				
	CAMPO		Carson City	
Total Service Area Households	33,425	100.0%	23,355	100.0%
English Only	26,557	79.5%	18,294	78.3%
Language other than English	6,868	20.5%	5,061	21.7%
Limited English Speaking	605	1.8%	563	2.4%
Spanish	5,467	16.4%	4,001	17.1%
-Limited English Speaking	462	1.4%	420	1.8%
Other Indo-European languages	654	2.0%	439	1.9%
-Limited English Speaking	55	0.2%	55	0.2%
Asian and Pacific Islander languages	574	1.7%	479	2.1%
-Limited English Speaking	88	0.3%	88	0.4%
Other languages	173	0.5%	142	0.6%
-Limited English Speaking	0	0.0%	0	0.0%
<i>*Source: 2022 American Community Survey Block Group 5-Year Estimates, Table C16002</i>				

Spanish speaking individuals represent between 16% and 17% of the total population for CAMPO and the Carson City Area, respectively. Spanish speaking LEP individuals represent fewer than two percent of the total population, with other language LEP individuals representing between 0.1-0.6 percent of the population. As a result, public outreach efforts in languages other than English only include Spanish.

Factor 2 - Frequency of Contact: Contact with LEP individuals occurs with periodic occurrence with different government agencies in the CAMPO region reporting that Spanish is often used to communicate with customers.. Both RTC and CAMPO make continued efforts to engage with all portions of the population.

The most frequent point of contact with LEP individuals for RTC and CAMPO is at construction sites when prevailing wage interviews are conducted as part of a RTC funded construction project. Typically, the construction site foreman has other workers available to translate if needed. If not, translation services are procured.

The second most frequent point of contact with LEP individuals would include public outreach efforts for plans or projects. The frequency of contact differs depending on the subject. Public outreach related to transit route planning, non-motorized transportation planning, and upcoming construction projects would typically have a higher frequency of contact with LEP individuals.

Factor 3 - Nature and Importance of Programs, Services, and Activities: Transportation significantly impacts an individual's quality of life, as such, programs, services, and activities that influence one's transportation habits are important. If limited English is a barrier to one's transportation habits, then the consequences for the individual can be significant, including the potential for limited access to health care, education, and employment.

Factor 4 - Resources Available: Title VI Notice to the Public is posted at the Carson City Public Works office, which is open to the public; the notice is printed in English and Spanish, and available in other languages as requested. Other resources are available at public counters and employee desks or at job sites. All vital documents will be translated into Spanish and other languages can be translated upon request by contacting the Title VI Coordinator.

As additional resources become available, the translation of public outreach efforts into Spanish are prioritized for transit route planning, non-motorized transportation planning, and upcoming construction projects. Carson City's and CAMPO's website can be translated into Spanish and staff is available within Carson City Public Works to assist with any in-person Spanish translation needs for those who call or visit the office in person.

All staff will be provided with the LEP plan and will be educated on policies, procedures, and services available. This training will be included in our annual Title VI training. CAMPO and RTC use translation applications to help LEP individuals to access our programs, services, and activities. These resources are available to staff working at Carson City Public Works.

8.0 Public Participation and Distribution of Information

The RTC and CAMPO are committed to compliance with all federal laws and regulation throughout the public participation process including adherence to Title VI of the Civil Rights Act of 1964 and the Americans with Disabilities Act of 1990. Outreach and the distribution of information occurs through CAMPO's Public Participation Plan (PPP). The PPP is available online: <https://www.carson.org/home/showpublisheddocument/86399/638248596043770000>.

The following is a list of objectives that RTC and CAMPO has committed to achieve through the PPP:

- a. Ensure that outreach methods are accessible and relevant for all residents, including underserved and underrepresented populations (e.g., low-income, minority, and Limited English Proficiency (LEP)).
- b. Hold public meetings and events in physically accessible spaces.
- c. Provide meeting materials in accessible formats (e.g., screen reader accessible and/or multiple languages upon request).
- d. Make use of a variety of both virtual and in-person outreach strategies to ensure convenience relevance, and accessibility for all residents.
- e. Monitor and document the relative success of various outreach methods throughout the year and adjust subsequent efforts accordingly.

Both RTC and CAMPO Boards meet the second Wednesday of every month in the Robert Crowell Board Room of the Carson City Community Center. All individuals from the public are welcome to attend these meetings, except during emergencies. Meetings are also broadcast on Carson City's Website, www.carson.org.

The following is a list of efforts for public meetings, employed by RTC and CAMPO to engage all individuals of the public.

- Written notice of all meetings will be given at least three (3) working days before the meeting.
- Agendas shall include the time and location of meetings, will be posted in multiple locations, and will be made available upon request. This policy is in accordance with the Nevada open meetings laws (NRS: Chapter 241 – Meetings of State and Local Agencies).

- All agendas/meeting notices and, to the extent possible, all other technical information will be made electronically available on the website at:
<https://www.carson.org/government/departments-g-z/public-works/transportation/rtc-agendas> .
- All agenda materials will be written in a concise manner that can be easily understood by the general public.
- A diverse mailing list of interested parties including various federal, state and local agencies, organizations, private providers, and local media is maintained. Meeting agendas are electronically mailed to every individual on the distribution list.
- All meetings will be open and public, all persons shall be permitted to attend, except in an emergency.
- Reasonable efforts will be made to assist and accommodate persons with physical disabilities desiring to attend.
- Meetings will be held at convenient and accessible locations in close proximity to public transportation with consideration and accommodation made for individuals covered under the Americans with Disabilities Act (ADA).
- Except in an emergency, all agendas are posted a minimum of three (3) working days prior to the meeting (as per NRS 241) at the following locations:
 - City Hall, 201 North Carson Street
 - Community Center, Robert Crowell Board Room 851 East William Street
 - Carson City Library, Carson City Library, 900 North Roop Street
 - Carson City Public Works, 3505 Butti Way
 - Carson City Planning Division, 108 E. Proctor Street
 - Douglas County Executive Offices, 1594 Esmeralda Ave., Minden (CAMPO only)
 - Lyon County Manager's Office, 27 South Main Street, Yerington (CAMPO only)
 - Nevada Department of Transportation, 1263 S. Stewart Street, Carson City
 - Carson City Website: www.carson.org/agendas
 - Official State Website: <https://notice.nv.gov>
- An effort will be made to meet translation or enlargement requests for documents made by LEP individuals and persons with visual impairments. Services for an interpreter/translator will be acquired, as needed.

Staff may produce and distribute information periodically across the following outlets:

- The *Nevada Appeal* Newspaper
- Online news platforms, such as Carsonnow.org and the Nevadaappeal.com
- Electronic newsletters or email notifications
- Websites, such as Carson.org and CarsonProud.com, CarsonAreaMPO.com
- Social Media, including Carson City and Public Works Facebook pages
- Others as described in the PPP

9.0 Subrecipients

CAMPO and RTC may perform the required annual subrecipient reviews for those currently receiving funding from CAMPO. In addition to completing Title VI training, subrecipient directors, managers, and supervisors are responsible for familiarizing themselves with the requirements of Title VI, E.O. 12898, and E.O. 13166, and for ensuring that their departmental contractors, consultants, and vendors are complying with the requirements of this Title VI Plan. They are responsible to promptly report issues or complaints concerning Title VI and related statutes to the Title VI Coordinator and for assisting the Title VI Coordinator in their efforts to implement all requirements, internally and externally. They are also responsible for coordinating with the Title VI Coordinator on any proposed changes to operating procedures, instructional memoranda, policies, and manuals, etc. that relate to Title VI.

10.0 Plan, Policy, and Directive Review

The Title VI Coordinator will annually review portions the Title VI Plan and associated policy attachments to determine if updates or revisions are needed. A sample review log is included in Attachment 7. The Title VI Coordination may also review internal plans, policies and procedures, and agency directives for implications to Title VI requirements and to ensure that the content is nondiscriminatory. The Title VI Coordinator shall ensure the annual Standard Title VI Assurances are signed and submitted to NDOT annually.

11.0 Compliance and Enforcement Procedures

The RTC and CAMPO is a subrecipient of federal financial assistance and is committed to comply with various nondiscrimination laws and regulations, including Title VI of the Civil Rights Act of 1964. RTC, CAMPO, and its subrecipients of federal-aid funds are committed to ensuring all of its programs and activities are operated in a nondiscriminatory manner. Activities to ensure nondiscrimination compliance:

- Ensure project information is adequately distributed to stakeholders and the public,
- Review project activities to avoid disproportionately high or adverse impacts to underserved communities during the construction phases,
- Review the distribution of transportation investment dollars to ensure equitable distribution,
- Regularly check all contracts and random subcontracts to ensure appropriate nondiscrimination language and required contract inclusions,
- Review contract forms and products of sub-recipients, contractors, and consultants
- Manage all ADA complaints,
- Monitor current policies and practices for implementing ADA requirements,

Should noncompliance be found, RTC and CAMPO staff shall work with the sub-recipient, contractor, or consultant, to come into voluntary compliance. If that is unsuccessful, RTC or CAMPO shall take additional action to ensure compliance, which may include:

1. Withholding payments to the sub-recipient / contractor under the agreement/contract until the contractor complies; and/or
2. Cancelling, terminating, or suspending an agreement/contract, in whole or in part.

12.0 Title VI Notice of Rights and Complaint Procedures

The RTC and CAMPO operate programs and services without regard to race, color, sex, and national origin. Anyone who believes they have been excluded from participation in, denied the benefits of, or otherwise subjected to discrimination under any RTC or CAMPO program or activity because of their race, color, or national origin may file a discrimination complaint.

Federal law prohibits discrimination on the basis of race, color, or national origin in any RTC or CAMPO programs or activities. This prohibition applies to all branches of RTC and CAMPO, its contractors, consultants, and anyone else who acts on their behalf. Discrimination includes lack of access, harassment, retaliation and disparate impacts from a program or activity. Harassment includes a wide range of abusive and humiliating verbal or physical behaviors. Retaliation includes intimidating, threatening, coercing, or engaging in other discriminatory conduct against anyone because they filed a complaint or otherwise participated a discrimination investigation.

Any person who believes she or he has been discriminated against on the basis of race, color, or national origin by CAMPO or the RTC, or believes they were discriminated against because sex, age, or disability, may file a Title VI complaint by completing and submitting this Title VI Complaint Form. CAMPO and RTC have established complaint procedures and a form to facilitate the complaint process. Complaints are encouraged to be filed with CAMPO and RTC initially to allow for the quickest resolution.

Complaint procedures and forms are available online or can be picked up at the Carson City Public Works Department. Attachment 4 of this document contains both the English and Spanish versions of the complaint procedures and forms. Complaints maybe submitted via mail, email, fax or in person.

- [English Complaint Procedures](#)
- [English Complaint Form](#)
- [Spanish Complaint Procedures | Espanol Procedimientos de Reclamación](#)
- [Spanish Complaint Form | Espanol Formulario de Reclamación](#)

Complaints will be forwarded to the Nevada Department of Transportation within twenty-one (21) business days. All formal complaints are investigated by NDOT or FHWA, not the RTC or CAMPO. All complaints submitted to NDOT will follow their Title VI Implementation Plan, available online here:

<https://www.nevadadot.com/home/showdocument?id=13978#:~:text=The%20Title%20VI%20Implementation%20Plan,regulations%2C%20and%20For%20policy.>

If assistance is needed to file a complaint or if interpretation services are needed, please contact:

Transportation Manager
FHWA Title VI Coordinator
3505 Butti Way
Carson City, NV 89701
Phone: 775-887-2355

E-mail: cmartinovich@carson.org or comments@carsonareampo.com

Complaints can also be filed with the NDOT or FHWA. For questions or to file a complaint, please contact either:

Sonnie Braih, Civil Rights Officer,
Nevada Department of Transportation (NDOT)
3014 W. Charleston Blvd., Ste. 150, Las Vegas NV 89102
Main: (702) 730-3301 Fax: (702) 486-0487

Rhonda Motley, Civil Rights Program Manager
U.S. Department of Transportation, Federal Highway Administration, Nevada Division
705 N. Plaza Street #220, Ste. 220, Carson City, NV 89701
Main: (775) 687-1204 Fax: (775) 687-3803
Office email: nevada.fhwa@fhwa.dot.gov

Federal law dictates that neither CAMPO nor RTC can investigate complaints. However, are required to track and report discrimination complaints. At this time, neither CAMPO or RTC have active or closed Title VI investigations, complaints, or lawsuits. CAMPO and RTC acknowledges, all recipients are required to prepare and maintain a list of any of active investigations, lawsuits, and complaints naming the recipient that allege discrimination on the basis of race, color, or national origin.

A log for tracking investigations, complaints, and lawsuits in the event such action is brought to CAMPO or RTC is included in Attachment 5.

Attachment 1

1.A – Carson City RTC Title VI Assurances

1.B – CAMPO Title VI Assurances

The United States Department of Transportation (USDOT)

Standard Title VI/Non-Discrimination Assurances

DOT Order No. 1050.2A

The Carson City Regional Transportation Commission (herein referred to as the "Recipient"), **HEREBY AGREES THAT**, as a condition to receiving any Federal financial assistance from the U.S. Department of Transportation (DOT), through the Federal Highway Administration, is subject to and will comply with the following:

Statutory/Regulatory Authorities

- Title VI of the Civil Rights Act of 1964 (42 U.S.C. § 2000d et seq., 78 stat. 252), (prohibits discrimination on the basis of race, color, national origin);
- 49 C.F.R. Part 21 (entitled Non-discrimination In Federally Assisted Programs Of The Department Of Transportation-Effectuation Of Title VI Of The Civil Rights Act Of 1964);
- 28 C.F.R. section 50.3 (U.S. Department of Justice Guidelines for Enforcement of Title VI of the Civil Rights Act of 1964);

The preceding statutory and regulatory cites hereinafter are referred to as the "Acts" and "Regulations," respectively.

General Assurances

In accordance with the Acts, the Regulations, and other pertinent directives, circulars, policy, memoranda, and/or guidance, the Recipient hereby gives assurance that it will promptly take any measures necessary to ensure 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, "for which the Recipient receives Federal financial assistance from DOT, including the Federal Highway Administration.

The Civil Rights Restoration Act of 1987 clarified the original intent of Congress, with respect to Title VI and other Non-discrimination requirements (The Age Discrimination Act of 1975, and Section 504 of the Rehabilitation Act of 1973), by restoring the broad, institutional-wide scope and coverage of these non-discrimination statutes and requirements to include all programs and activities of the Recipient, so long as any portion of the program is Federally assisted.

Specific Assurances

More specifically, and without limiting the above general Assurance, the Recipient agrees with and gives the following Assurances with respect to its Federally assisted Title VI Program:

1. The Recipient agrees that each "activity," "facility," or "program," as defined in §§ 21.23(b) and 21.23(e) of 49 C.F.R. § 21 will be (with regard to an "activity") facilitated, or will be (with regard to a "facility") operated, or will be (with regard to a "program") conducted in compliance with all requirements imposed by, or pursuant to the Acts and the Regulations.
2. The Recipient will insert the following notification in all solicitations for bids, Requests For Proposals for work, or material subject to the Acts and the Regulations made in connection with all Title VI and, in adapted form, in all proposals for negotiated agreements regardless of funding source:

" The Carson City Regional Transportation Commission, in accordance with the provisions of Title VI of the Civil Rights Act of 1964 (78 Stat. 252, 42 U.S.C. §§ 2000d to 2000d-4) and the Regulations, hereby notifies all bidders that it will affirmatively ensure that any contract entered into pursuant to this advertisement, disadvantaged business enterprises will be afforded full and fair opportunity to submit bids in response to this invitation and will not be discriminated against on the grounds of race, color, or national origin in consideration for an award."
3. The Recipient will insert the clauses of Appendix A and E of this Assurance in every contract or agreement subject to the Acts and the Regulations.
4. The Recipient will insert the clauses of Appendix B of this Assurance, as a covenant running with the land, in any deed from the United States effecting or recording a transfer of real property, structures, use, or improvements thereon or interest therein to a Recipient.
5. That where the Recipient receives Federal financial assistance to construct a facility, or part of a facility, the Assurance will extend to the entire facility and facilities operated in connection therewith.
6. 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 will extend to rights to space on, over, or under such property.
7. That the Recipient will include the clauses set forth in Appendix C and Appendix D of this Assurance, as a covenant running with the land, in any future deeds, leases, licenses, permits, or similar instruments entered into by the Recipient with other parties:
 - a. for the subsequent transfer of real property acquired or improved under the applicable activity, project, or program; and
 - b. for the construction or use of, or access to, space on, over, or under real property acquired or improved under the applicable activity, project, or program.
8. 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.
9. The Recipient will provide for such methods of administration for the program as are found by the Secretary of Transportation or the official to whom he/she delegates specific authority to give reasonable guarantee that it, other recipients, sub-recipients, sub-grantees, contractors, subcontractors, consultants, transferees, successors in interest, and other participants of Federal financial assistance under such program will comply with all requirements imposed or pursuant to the Acts, the Regulations, and this Assurance.
10. The Recipient agrees that the United States has a right to seek judicial enforcement with regard to any matter arising under the Acts, the Regulations, and this Assurance.

By signing this ASSURANCE, the Carson City Regional Transportation Commission also agrees to comply (and require any sub-recipients, sub-grantees, contractors, successors, transferees, and/or assignees to comply) with all applicable provisions governing the Federal Highway Administration access to records, accounts, documents, information, facilities, and staff. You also recognize that you must comply with any program or compliance reviews, and/or complaint investigations conducted by the Federal Highway Administration. You must keep records, reports, and submit the material for review upon request to Federal Highway Administration, or its designee in a timely, complete, and accurate way. Additionally, you must comply with all other reporting, data collection, and evaluation requirements, as prescribed by law or detailed in program guidance.

The Carson City Regional Transportation Commission gives this ASSURANCE in consideration of and for obtaining any Federal grants, loans, contracts, agreements, property, and/or discounts, or other Federal-aid and Federal financial assistance extended after the date hereof to the recipients by the U.S. Department of Transportation under the Title VI Program. This ASSURANCE is binding on Nevada, other recipients, sub-recipients, sub-grantees, contractors, subcontractors and their subcontractors', transferees, successors in interest, and any other participants in the Title VI Program. The person(s) signing below is authorized to sign this ASSURANCE on behalf of the Recipient.

Carson City Regional Transportation Commission

by Christopher Martinovich
Signed: Transportation Manager

by Christopher Martinovich
Printed:

DATED 9/12/2024

APPENDIX A

During the performance of this contract, the contractor, for itself, its assignees, and successors in interest (hereinafter referred to as the "contractor") agrees as follows:

1. **Compliance with Regulations:** The contractor (hereinafter includes consultants) will comply with the Acts and the Regulations relative to Non-discrimination in Federally-assisted programs of the U.S. Department of Transportation, Federal Highway Administration, as they may be amended from time to time, which are herein incorporated by reference and made a part of this contract.
2. **Non-discrimination:** The contractor, with regard to the work performed by it during the contract, will not discriminate on the grounds of race, color, or national origin in the selection and retention of subcontractors, including procurements of materials and leases of equipment. The contractor will not participate directly or indirectly in the discrimination prohibited by the Acts and the Regulations, including employment practices when the contract covers any activity, project, or program set forth in Appendix B of 49 CFR Part 21.
3. **Solicitations for Subcontracts, Including Procurements of Materials and Equipment:** In all solicitations, either by competitive bidding, or negotiation made by the contractor for work to be performed under a subcontract, including procurements of materials, or leases of equipment, each potential subcontractor or supplier will be notified by the contractor of the contractor's obligations under this contract and the Acts and the Regulations relative to Non-discrimination on the grounds of race, color, or national origin.
4. **Information and Reports:** The contractor will provide all information and reports required by the Acts, the Regulations, and directives issued pursuant thereto and will permit access to its books, records, accounts, other sources of information, and its facilities as may be determined by the Recipient or the Federal Highway Administration to be pertinent to ascertain compliance with such Acts, Regulations, and instructions. Where any information required of a contractor is in the exclusive possession of another who fails or refuses to furnish the information, the contractor will so certify to the Recipient or the Federal Highway Administration, as appropriate, and will set forth what efforts it has made to obtain the information.
5. **Sanctions for Noncompliance:** In the event of a contractor's noncompliance with the Non-discrimination provisions of this contract, the Recipient will impose such contract sanctions as it or the Federal Highway Administration may determine to be appropriate, including, but not limited to:
 - a. withholding payments to the contractor under the contract until the contractor complies; and/or
 - b. cancelling, terminating, or suspending a contract, in whole or in part.
6. **Incorporation of Provisions:** The contractor will include the provisions of paragraphs one through six in every subcontract, including procurements of materials and leases of equipment, unless exempt by the Acts, the Regulations and directives issued pursuant thereto. The contractor will take action with respect to any subcontract or procurement as the Recipient or

the Federal Highway Administration may direct as a means of enforcing such provisions including sanctions for noncompliance. Provided, that if the contractor becomes involved in, or is threatened with litigation by a subcontractor, or supplier because of such direction, the contractor may request the Recipient to enter into any litigation to protect the interests of the Recipient. In addition, the contractor may request the United States to enter into the litigation to protect the interests of the United States.

APPENDIX B

CLAUSES FOR DEEDS TRANSFERRING UNITED STATES PROPERTY

The following clauses will be included in deeds effecting or recording the transfer of real property, structures, or improvements thereon, or granting interest therein from the United States pursuant to the provisions of Assurance 4:

NOW, THEREFORE, the U.S. Department of Transportation as authorized by law and upon the condition that the Carson City Regional Transportation Commission will accept title to the lands and maintain the project constructed thereon in accordance with Title 23, U.S.C, the Regulations for the Administration of Title VI Program, and the policies and procedures prescribed by the Federal Highway Administration of the U.S. Department of Transportation in accordance and in compliance with all requirements imposed by Title 49, Code of Federal Regulations, U.S. Department of Transportation, Subtitle A, Office of the Secretary, Part 21, Non-discrimination in Federally-assisted programs of the U.S Department of Transportation pertaining to and effectuating the provisions of Title VI of the Civil Rights Act of 1964 (78 Stat. 252; 42 U.S.C. § 2000d to 2000d-4), does hereby remise, release, quitclaim and convey unto the Carson City Regional Transportation Commission all the right, title and interest of the U.S. Department of Transportation in and to said lands described in Exhibit A attached hereto and made a part hereof.

(HABENDUM CLAUSE)

TO HAVE AND TO HOLD said lands and interests therein unto the Carson City Regional Transportation Commission and its successors forever, subject, however, to the covenants, conditions, restrictions and reservations herein contained as follows, which will remain in effect for the period during which the real property or structures are used for a purpose for which Federal financial assistance is extended or for another purpose involving the provision of similar services or benefits and will be binding on the Carson City Regional Transportation Commission, its successors and assigns.

The Carson City Regional Transportation Commission, in consideration of the conveyance of said lands and interests in lands, does hereby covenant and agree as a covenant running with the land for itself, its successors and assigns, that (1) no person will 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 with regard to any facility located wholly or in part on, over, or under such lands hereby conveyed [,] and]* (2) that the Carson City Regional Transportation Commission will use the lands and interests in lands and interests in lands so conveyed, in compliance with all requirements imposed by or pursuant to Title 49, Code of Federal Regulations, U.S. Department of Transportation, Subtitle A, Office of the Secretary, Part 21, Non-discrimination in Federally-assisted programs of the U.S. Department of Transportation, Effectuation of Title VI of the Civil Rights Act of 1964, and as said Regulations and Acts may be amended [, and (3) that in the event of breach of any of the above-mentioned non-discrimination conditions, the Agency Name Here will have a right to enter or re-enter said lands and facilities on said land, and that above described land and facilities will thereon revert to and vest in and become the absolute property of the U.S. Department of Transportation and its assigns as such interest existed prior to this instruction].*

Reverter clause and related language to be used only when it is determined that such a clause is necessary in order to make clear the purpose of Title VI.)

APPENDIX C

CLAUSES FOR TRANSFER OF REAL PROPERTY ACQUIRED OR IMPROVED UNDER THE ACTIVITY, FACILITY, OR PROGRAM

The following clauses will be included in deeds, licenses, leases, permits, or similar instruments entered into by the Carson City Regional Transportation Commission pursuant to the provisions of Assurance 7(a):

- A. The (grantee, lessee, permittee, etc. as appropriate) for himself/herself, his/her heirs, personal representatives, successors in interest, and assigns, as a part of the consideration hereof, does hereby covenant and agree [in the case of deeds and leases add "as a covenant running with the land"] that:
 - 1. In the event facilities are constructed, maintained, or otherwise operated on the property described in this (deed, license, lease, permit, etc.) for a purpose for which a U.S. Department of Transportation activity, facility, or program is extended or for another purpose involving the provision of similar services or benefits, the (grantee, licensee, lessee, permittee, etc.) will maintain and operate such facilities and services in compliance with all requirements imposed by the Acts and Regulations (as may be amended) such that no person on the grounds of race, color, or national origin, will be excluded from participation in, denied the benefits of, or be otherwise subjected to discrimination in the use of said facilities.
- B. With respect to licenses, leases, permits, etc., in the event of breach of any of the above Non-discrimination covenants, Agency Name Here will have the right to terminate the (lease, license, permit, etc.) and to enter, re-enter, and repossess said lands and facilities thereon, and hold the same as if the (lease, license, permit, etc.) had never been made or issued.*
- C. With respect to a deed, in the event of breach of any of the above Non-discrimination covenants, the Agency Name Here will have the right to enter or re-enter the lands and facilities thereon, and the above described lands and facilities will there upon revert to and vest in and become the absolute property of the Agency Name Here and its assigns.*

(*Reverter clause and related language to be used only when it is determined that such a clause is necessary to make clear the purpose of Title VI.)

APPENDIX D

CLAUSES FOR CONSTRUCTION/USE/ACCESS TO REAL PROPERTY ACQUIRED UNDER THE ACTIVITY, FACILITY OR PROGRAM

The following clauses will be included in deeds, licenses, permits, or similar instruments/agreements entered into by Agency Name Here pursuant to the provisions of Assurance 7(b):

- A. The (grantee, licensee, permittee, etc., as appropriate) for himself/herself, his/her heirs, personal representatives, successors in interest, and assigns, as a part of the consideration hereof, does hereby covenant and agree (in the case of deeds and leases add, "as a covenant running with the land") that (1) no person on the ground of race, color, or national origin, will be excluded from participation in, denied the benefits of, or be otherwise subjected to discrimination in the use of said facilities, (2) that in the construction of any improvements on, over, or under such land, and the furnishing of services thereon, no person on the ground of race, color, or national origin, will be excluded from participation in, denied the benefits of, or otherwise be subjected to discrimination, (3) that the (grantee, licensee, lessee, permittee, etc.) will use the premises in compliance with all other requirements imposed by or pursuant to the Acts and Regulations, as amended, set forth in this Assurance.
- B. With respect to (licenses, leases, permits, etc.), in the event of breach of any of the above Non-discrimination covenants, Agency Name Here will have the right to terminate the (license, permit, etc., as appropriate) and to enter or re-enter and repossess said land and the facilities thereon, and hold the same as if said (license, permit, etc., as appropriate) had never been made or issued.*
- C. With respect to deeds, in the event of breach of any of the above Non-discrimination covenants, Agency Name Here will there upon revert to and vest in and become the absolute property of Agency Name Here and its assigns. *

(*Reverter clause and related language to be used only when it is determined that such a clause is necessary to make clear the purpose of Title VI.)

APPENDIX E

During the performance of this contract, the contractor, for itself, its assignees, and successors in interest (hereinafter referred to as the "contractor") agrees to comply with the following non-discrimination statutes and authorities; including but not limited to:

Pertinent Non-Discrimination Authorities:

- Title VI of the Civil Rights Act of 1964 (42 U.S.C. § 2000d et seq., 78 stat. 252), (prohibits discrimination on the basis of race, color, national origin); and 49 CFR Part 21.
- The Uniform Relocation Assistance and Real Property Acquisition Policies Act of 1970, (42 U.S.C. § 4601), (prohibits unfair treatment of persons displaced or whose property has been acquired because of Federal or Federal-aid programs and projects);
- Federal-Aid Highway Act of 1973, (23 U.S.C. § 324 et seq.), (prohibits discrimination on the basis of sex);
- Section 504 of the Rehabilitation Act of 1973, (29 U.S.C. § 794 et seq.), as amended, (prohibits discrimination on the basis of disability); and 49 CFR Part 27;
- The Age Discrimination Act of 1975, as amended, (42 U.S.C. § 6101 et seq.), (prohibits discrimination on the basis of age);
- Airport and Airway Improvement Act of 1982, (49 USC § 471, Section 47123), as amended, (prohibits discrimination based on race, creed, color, national origin, or sex);
- The Civil Rights Restoration Act of 1987, (PL 100-209), (Broadened the scope, coverage and applicability of Title VI of the Civil Rights Act of 1964, The Age Discrimination Act of 1975 and Section 504 of the Rehabilitation Act of 1973, by expanding the definition of the terms "programs or activities" to include all of the programs or activities of the Federal-aid recipients, sub-recipients and contractors, whether such programs or activities are Federally funded or not);
- Titles II and III of the Americans with Disabilities Act, which prohibit discrimination on the basis of disability in the operation of public entities, public and private transportation systems, places of public accommodation, and certain testing entities (42 U.S.C. §§ 12131-12189) as implemented by Department of Transportation regulations at 49 C.F.R. parts 37 and 38;
- The Federal Aviation Administration's Non-discrimination statute (49 U.S.C. § 47123) (prohibits discrimination on the basis of race, color, national origin, and sex);
- Executive Order 12898, Federal Actions to Address Environmental Justice in Minority Populations and Low-Income Populations, which ensures Non-discrimination against minority populations by discouraging programs, policies, and activities with disproportionately high and adverse human health or environmental effects on minority and low-income populations;
- Executive Order 13166, Improving Access to Services for Persons with Limited English Proficiency, and resulting agency guidance, national origin discrimination includes discrimination because of Limited English proficiency (LEP). To ensure compliance with Title VI, you must take reasonable steps to ensure that LEP persons have meaningful access to your programs (70 Fed. Reg. at 74087 to 74100);
- Title IX of the Education Amendments of 1972, as amended, which prohibits you from discriminating because of sex in education programs or activities (20 U.S.C. 1681 et seq).

The United States Department of Transportation (USDOT)

Standard Title VI/Non-Discrimination Assurances

DOT Order No. 1050.2A

The Carson Area Metropolitan Planning Organization (herein referred to as the "Recipient"), **HEREBY AGREES THAT**, as a condition to receiving any Federal financial assistance from the U.S. Department of Transportation (DOT), through the Federal Highway Administration, is subject to and will comply with the following:

Statutory/Regulatory Authorities

- Title VI of the Civil Rights Act of 1964 (42 U.S.C. § 2000d et seq., 78 stat. 252), (prohibits discrimination on the basis of race, color, national origin);
- 49 C.F.R. Part 21 (entitled Non-discrimination In Federally Assisted Programs Of The Department Of Transportation-Effectuation Of Title VI Of The Civil Rights Act Of 1964);
- 28 C.F.R. section 50.3 (U.S. Department of Justice Guidelines for Enforcement of Title VI of the Civil Rights Act of 1964);

The preceding statutory and regulatory cites hereinafter are referred to as the "Acts" and "Regulations," respectively.

General Assurances

In accordance with the Acts, the Regulations, and other pertinent directives, circulars, policy, memoranda, and/or guidance, the Recipient hereby gives assurance that it will promptly take any measures necessary to ensure 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, "for which the Recipient receives Federal financial assistance from DOT, including the Federal Highway Administration.

The Civil Rights Restoration Act of 1987 clarified the original intent of Congress, with respect to Title VI and other Non-discrimination requirements (The Age Discrimination Act of 1975, and Section 504 of the Rehabilitation Act of 1973), by restoring the broad, institutional-wide scope and coverage of these non-discrimination statutes and requirements to include all programs and activities of the Recipient, so long as any portion of the program is Federally assisted.

Specific Assurances

More specifically, and without limiting the above general Assurance, the Recipient agrees with and gives the following Assurances with respect to its Federally assisted Title VI Program:

1. The Recipient agrees that each "activity," "facility," or "program," as defined in §§ 21.23(b) and 21.23(e) of 49 C.F.R. § 21 will be (with regard to an "activity") facilitated, or will be (with regard to a "facility") operated, or will be (with regard to a "program") conducted in compliance with all requirements imposed by, or pursuant to the Acts and the Regulations.
2. The Recipient will insert the following notification in all solicitations for bids, Requests For Proposals for work, or material subject to the Acts and the Regulations made in connection with all Title VI and, in adapted form, in all proposals for negotiated agreements regardless of funding source:

" The Carson Area Metropolitan Planning Organization, in accordance with the provisions of Title VI of the Civil Rights Act of 1964 (78 Stat. 252, 42 U.S.C. §§ 2000d to 2000d-4) and the Regulations, hereby notifies all bidders that it will affirmatively ensure that any contract entered into pursuant to this advertisement, disadvantaged business enterprises will be afforded full and fair opportunity to submit bids in response to this invitation and will not be discriminated against on the grounds of race, color, or national origin in consideration for an award."

3. The Recipient will insert the clauses of Appendix A and E of this Assurance in every contract or agreement subject to the Acts and the Regulations.
4. The Recipient will insert the clauses of Appendix B of this Assurance, as a covenant running with the land, in any deed from the United States effecting or recording a transfer of real property, structures, use, or improvements thereon or interest therein to a Recipient.
5. That where the Recipient receives Federal financial assistance to construct a facility, or part of a facility, the Assurance will extend to the entire facility and facilities operated in connection therewith.
6. 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 will extend to rights to space on, over, or under such property.
7. That the Recipient will include the clauses set forth in Appendix C and Appendix D of this Assurance, as a covenant running with the land, in any future deeds, leases, licenses, permits, or similar instruments entered into by the Recipient with other parties:
 - a. for the subsequent transfer of real property acquired or improved under the applicable activity, project, or program; and
 - b. for the construction or use of, or access to, space on, over, or under real property acquired or improved under the applicable activity, project, or program.
8. 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.
9. The Recipient will provide for such methods of administration for the program as are found by the Secretary of Transportation or the official to whom he/she delegates specific authority to give reasonable guarantee that it, other recipients, sub-recipients, sub-grantees, contractors, subcontractors, consultants, transferees, successors in interest, and other participants of Federal financial assistance under such program will comply with all requirements imposed or pursuant to the Acts, the Regulations, and this Assurance.
10. The Recipient agrees that the United States has a right to seek judicial enforcement with regard to any matter arising under the Acts, the Regulations, and this Assurance.

By signing this ASSURANCE, the Carson Area Metropolitan Planning Organization also agrees to comply (and require any sub-recipients, sub-grantees, contractors, successors, transferees, and/or assignees to comply) with all applicable provisions governing the Federal Highway Administration access to records, accounts, documents, information, facilities, and staff. You also recognize that you must comply with any program or compliance reviews, and/or complaint investigations conducted by the Federal Highway Administration. You must keep records, reports, and submit the material for review upon request to Federal Highway Administration, or its designee in a timely, complete, and accurate way. Additionally, you must comply with all other reporting, data collection, and evaluation requirements, as prescribed by law or detailed in program guidance.

The Carson Area Metropolitan Planning Organization gives this ASSURANCE in consideration of and for obtaining any Federal grants, loans, contracts, agreements, property, and/or discounts, or other Federal-aid and Federal financial assistance extended after the date hereof to the recipients by the U.S. Department of Transportation under the Title VI Program. This ASSURANCE is binding on Nevada, other recipients, sub-recipients, sub-grantees, contractors, subcontractors and their subcontractors', transferees, successors in interest, and any other participants in the Title VI Program. The person(s) signing below is authorized to sign this ASSURANCE on behalf of the Recipient.

Carson Area Metropolitan Planning Organization

by 
Signed: Transportation Manager

by 
Printed:

DATED 9/12/2024

APPENDIX A

During the performance of this contract, the contractor, for itself, its assignees, and successors in interest (hereinafter referred to as the "contractor") agrees as follows:

1. **Compliance with Regulations:** The contractor (hereinafter includes consultants) will comply with the Acts and the Regulations relative to Non-discrimination in Federally-assisted programs of the U.S. Department of Transportation, Federal Highway Administration, as they may be amended from time to time, which are herein incorporated by reference and made a part of this contract.
2. **Non-discrimination:** The contractor, with regard to the work performed by it during the contract, will not discriminate on the grounds of race, color, or national origin in the selection and retention of subcontractors, including procurements of materials and leases of equipment. The contractor will not participate directly or indirectly in the discrimination prohibited by the Acts and the Regulations, including employment practices when the contract covers any activity, project, or program set forth in Appendix B of 49 CFR Part 21.
3. **Solicitations for Subcontracts, Including Procurements of Materials and Equipment:** In all solicitations, either by competitive bidding, or negotiation made by the contractor for work to be performed under a subcontract, including procurements of materials, or leases of equipment, each potential subcontractor or supplier will be notified by the contractor of the contractor's obligations under this contract and the Acts and the Regulations relative to Non-discrimination on the grounds of race, color, or national origin.
4. **Information and Reports:** The contractor will provide all information and reports required by the Acts, the Regulations, and directives issued pursuant thereto and will permit access to its books, records, accounts, other sources of information, and its facilities as may be determined by the Recipient or the Federal Highway Administration to be pertinent to ascertain compliance with such Acts, Regulations, and instructions. Where any information required of a contractor is in the exclusive possession of another who fails or refuses to furnish the information, the contractor will so certify to the Recipient or the Federal Highway Administration, as appropriate, and will set forth what efforts it has made to obtain the information.
5. **Sanctions for Noncompliance:** In the event of a contractor's noncompliance with the Non-discrimination provisions of this contract, the Recipient will impose such contract sanctions as it or the Federal Highway Administration may determine to be appropriate, including, but not limited to:
 - a. withholding payments to the contractor under the contract until the contractor complies; and/or
 - b. cancelling, terminating, or suspending a contract, in whole or in part.
6. **Incorporation of Provisions:** The contractor will include the provisions of paragraphs one through six in every subcontract, including procurements of materials and leases of equipment, unless exempt by the Acts, the Regulations and directives issued pursuant thereto. The contractor will take action with respect to any subcontract or procurement as the Recipient or

the Federal Highway Administration may direct as a means of enforcing such provisions including sanctions for noncompliance. Provided, that if the contractor becomes involved in, or is threatened with litigation by a subcontractor, or supplier because of such direction, the contractor may request the Recipient to enter into any litigation to protect the interests of the Recipient. In addition, the contractor may request the United States to enter into the litigation to protect the interests of the United States.

APPENDIX B

CLAUSES FOR DEEDS TRANSFERRING UNITED STATES PROPERTY

The following clauses will be included in deeds effecting or recording the transfer of real property, structures, or improvements thereon, or granting interest therein from the United States pursuant to the provisions of Assurance 4:

NOW, THEREFORE, the U.S. Department of Transportation as authorized by law and upon the condition that the Carson Area Metropolitan Planning Organization will accept title to the lands and maintain the project constructed thereon in accordance with Title 23, U.S.C, the Regulations for the Administration of Title VI Program, and the policies and procedures prescribed by the Federal Highway Administration of the U.S. Department of Transportation in accordance and in compliance with all requirements imposed by Title 49, Code of Federal Regulations, U.S. Department of Transportation, Subtitle A, Office of the Secretary, Part 21, Non-discrimination in Federally-assisted programs of the U.S Department of Transportation pertaining to and effectuating the provisions of Title VI of the Civil Rights Act of 1964 (78 Stat. 252; 42 U.S.C. § 2000d to 2000d-4), does hereby remise, release, quitclaim and convey unto the Carson Area Metropolitan Planning Organization all the right, title and interest of the U.S. Department of Transportation in and to said lands described in Exhibit A attached hereto and made a part hereof.

(HABENDUM CLAUSE)

TO HAVE AND TO HOLD said lands and interests therein unto the Carson Area Metropolitan Planning Organization and its successors forever, subject, however, to the covenants, conditions, restrictions and reservations herein contained as follows, which will remain in effect for the period during which the real property or structures are used for a purpose for which Federal financial assistance is extended or for another purpose involving the provision of similar services or benefits and will be binding on the Carson Area Metropolitan Planning Organization, its successors and assigns.

The Carson Area Metropolitan Planning Organization, in consideration of the conveyance of said lands and interests in lands, does hereby covenant and agree as a covenant running with the land for itself, its successors and assigns, that (1) no person will 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 with regard to any facility located wholly or in part on, over, or under such lands hereby conveyed [,] [and]* (2) that the Carson Area Metropolitan Planning Organization will use the lands and interests in lands and interests in lands so conveyed, in compliance with all requirements imposed by or pursuant to Title 49, Code of Federal Regulations, U.S. Department of Transportation, Subtitle A, Office of the Secretary, Part 21, Non-discrimination in Federally-assisted programs of the U.S. Department of Transportation, Effectuation of Title VI of the Civil Rights Act of 1964, and as said Regulations and Acts may be amended [, and (3) that in the event of breach of any of the above-mentioned non-discrimination conditions, the Agency Name Here will have a right to enter or re-enter said lands and facilities on said land, and that above described land and facilities will thereon revert to and vest in and become the absolute property of the U.S. Department of Transportation and its assigns as such interest existed prior to this instruction].*

(*Reverter clause and related language to be used only when it is determined that such a clause is necessary in order to make clear the purpose of Title VI.)

APPENDIX C

CLAUSES FOR TRANSFER OF REAL PROPERTY ACQUIRED OR IMPROVED UNDER THE ACTIVITY, FACILITY, OR PROGRAM

The following clauses will be included in deeds, licenses, leases, permits, or similar instruments entered into by the Carson Area Metropolitan Planning Organization pursuant to the provisions of Assurance 7(a):

- A. The (grantee, lessee, permittee, etc. as appropriate) for himself/herself, his/her heirs, personal representatives, successors in interest, and assigns, as a part of the consideration hereof, does hereby covenant and agree [in the case of deeds and leases add "as a covenant running with the land"] that:
 - 1. In the event facilities are constructed, maintained, or otherwise operated on the property described in this (deed, license, lease, permit, etc.) for a purpose for which a U.S. Department of Transportation activity, facility, or program is extended or for another purpose involving the provision of similar services or benefits, the (grantee, licensee, lessee, permittee, etc.) will maintain and operate such facilities and services in compliance with all requirements imposed by the Acts and Regulations (as may be amended) such that no person on the grounds of race, color, or national origin, will be excluded from participation in, denied the benefits of, or be otherwise subjected to discrimination in the use of said facilities.
- B. With respect to licenses, leases, permits, etc., in the event of breach of any of the above Non-discrimination covenants, Agency Name Here will have the right to terminate the (lease, license, permit, etc.) and to enter, re-enter, and repossess said lands and facilities thereon, and hold the same as if the (lease, license, permit, etc.) had never been made or issued.*
- C. With respect to a deed, in the event of breach of any of the above Non-discrimination covenants, the Agency Name Here will have the right to enter or re-enter the lands and facilities thereon, and the above described lands and facilities will there upon revert to and vest in and become the absolute property of the Agency Name Here and its assigns.*

(*Reverter clause and related language to be used only when it is determined that such a clause is necessary to make clear the purpose of Title VI.)

APPENDIX D

CLAUSES FOR CONSTRUCTION/USE/ACCESS TO REAL PROPERTY ACQUIRED UNDER THE ACTIVITY, FACILITY OR PROGRAM

The following clauses will be included in deeds, licenses, permits, or similar instruments/agreements entered into by Agency Name Here pursuant to the provisions of Assurance 7(b):

- A. The (grantee, licensee, permittee, etc., as appropriate) for himself/herself, his/her heirs, personal representatives, successors in interest, and assigns, as a part of the consideration hereof, does hereby covenant and agree (in the case of deeds and leases add, "as a covenant running with the land") that (1) no person on the ground of race, color, or national origin, will be excluded from participation in, denied the benefits of, or be otherwise subjected to discrimination in the use of said facilities, (2) that in the construction of any improvements on, over, or under such land, and the furnishing of services thereon, no person on the ground of race, color, or national origin, will be excluded from participation in, denied the benefits of, or otherwise be subjected to discrimination, (3) that the (grantee, licensee, lessee, permittee, etc.) will use the premises in compliance with all other requirements imposed by or pursuant to the Acts and Regulations, as amended, set forth in this Assurance.
- B. With respect to (licenses, leases, permits, etc.), in the event of breach of any of the above Non-discrimination covenants, Agency Name Here will have the right to terminate the (license, permit, etc., as appropriate) and to enter or re-enter and repossess said land and the facilities thereon, and hold the same as if said (license, permit, etc., as appropriate) had never been made or issued.*
- C. With respect to deeds, in the event of breach of any of the above Non-discrimination covenants, Agency Name Here will there upon revert to and vest in and become the absolute property of Agency Name Here and its assigns. *

(*Reverter clause and related language to be used only when it is determined that such a clause is necessary to make clear the purpose of Title VI.)

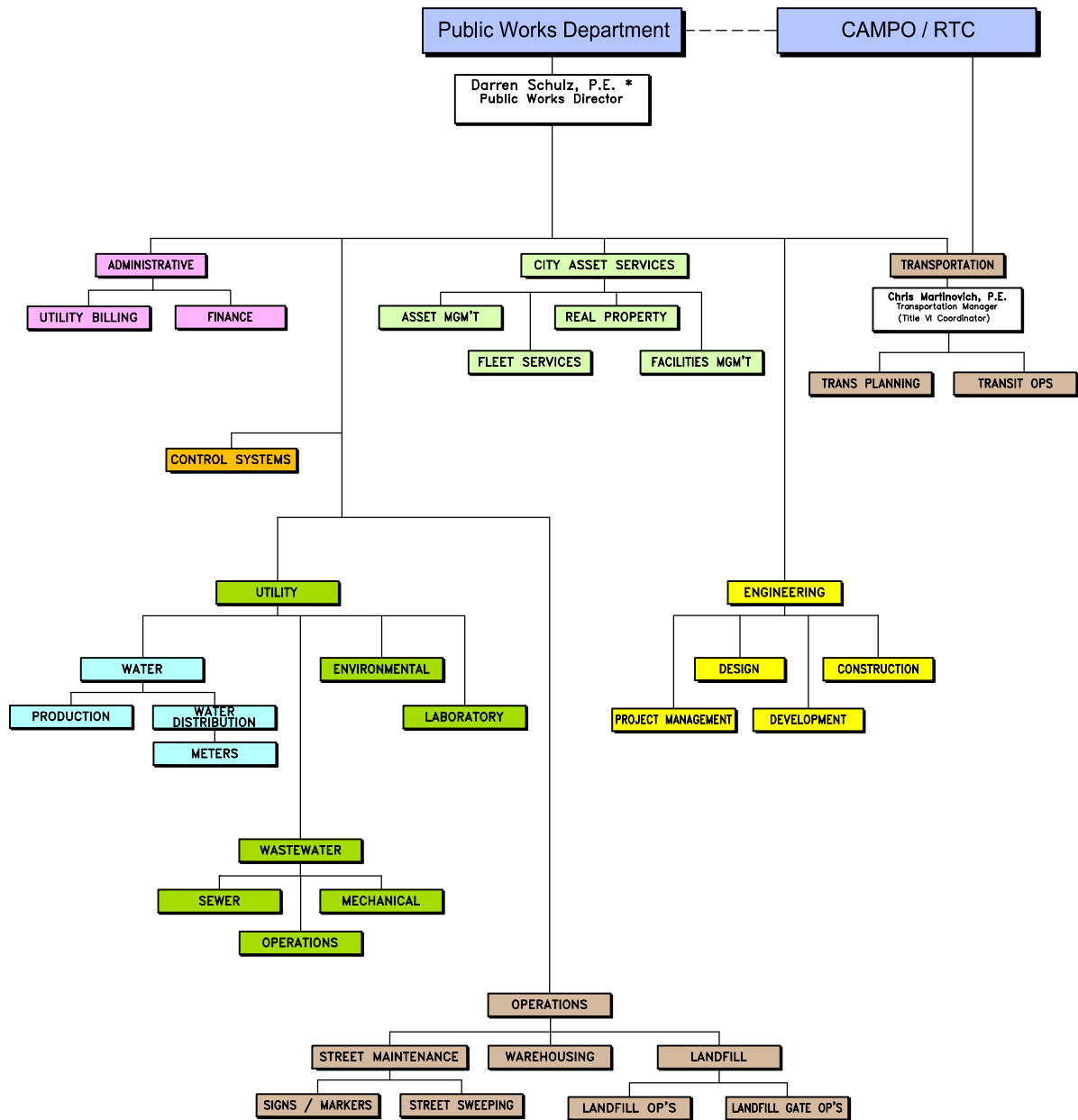
APPENDIX E

During the performance of this contract, the contractor, for itself, its assignees, and successors in interest (hereinafter referred to as the "contractor") agrees to comply with the following non-discrimination statutes and authorities; including but not limited to:

Pertinent Non-Discrimination Authorities:

- Title VI of the Civil Rights Act of 1964 (42 U.S.C. § 2000d et seq., 78 stat. 252), (prohibits discrimination on the basis of race, color, national origin); and 49 CFR Part 21.
- The Uniform Relocation Assistance and Real Property Acquisition Policies Act of 1970, (42 U.S.C. § 4601), (prohibits unfair treatment of persons displaced or whose property has been acquired because of Federal or Federal-aid programs and projects);
- Federal-Aid Highway Act of 1973, (23 U.S.C. § 324 et seq.), (prohibits discrimination on the basis of sex);
- Section 504 of the Rehabilitation Act of 1973, (29 U.S.C. § 794 et seq.), as amended, (prohibits discrimination on the basis of disability); and 49 CFR Part 27;
- The Age Discrimination Act of 1975, as amended, (42 U.S.C. § 6101 et seq.), (prohibits discrimination on the basis of age);
- Airport and Airway Improvement Act of 1982, (49 USC § 471, Section 47123), as amended, (prohibits discrimination based on race, creed, color, national origin, or sex);
- The Civil Rights Restoration Act of 1987, (PL 100-209), (Broadened the scope, coverage and applicability of Title VI of the Civil Rights Act of 1964, The Age Discrimination Act of 1975 and Section 504 of the Rehabilitation Act of 1973, by expanding the definition of the terms "programs or activities" to include all of the programs or activities of the Federal-aid recipients, sub-recipients and contractors, whether such programs or activities are Federally funded or not);
- Titles II and III of the Americans with Disabilities Act, which prohibit discrimination on the basis of disability in the operation of public entities, public and private transportation systems, places of public accommodation, and certain testing entities (42 U.S.C. §§ 12131-12189) as implemented by Department of Transportation regulations at 49 C.F.R. parts 37 and 38;
- The Federal Aviation Administration's Non-discrimination statute (49 U.S.C. § 47123) (prohibits discrimination on the basis of race, color, national origin, and sex);
- Executive Order 12898, Federal Actions to Address Environmental Justice in Minority Populations and Low-Income Populations, which ensures Non-discrimination against minority populations by discouraging programs, policies, and activities with disproportionately high and adverse human health or environmental effects on minority and low-income populations;
- Executive Order 13166, Improving Access to Services for Persons with Limited English Proficiency, and resulting agency guidance, national origin discrimination includes discrimination because of Limited English proficiency (LEP). To ensure compliance with Title VI, you must take reasonable steps to ensure that LEP persons have meaningful access to your programs (70 Fed. Reg. at 74087 to 74100);
- Title IX of the Education Amendments of 1972, as amended, which prohibits you from discriminating because of sex in education programs or activities (20 U.S.C. 1681 et seq).

Attachment 2
Organization Chart



**CARSON CITY
PUBLIC WORKS DEPARTMENT**

3505 BUTTI WAY CARSON CITY, NEVADA 89701
PH: 887-2355 FAX: 887-2112

ORGANIZATIONAL CHART

**FIGURE
ORG**

Attachment 3
Sample Training Log

Attachment 4
Complaint Procedures and Forms



TITLE VI COMPLAINT PROCEDURES

Federal law prohibits discrimination on the basis of race, color, or national origin in any Carson City Regional Transportation Commission (RTC) or Carson Area Metropolitan Planning Organization (CAMPO) programs or activities. This prohibition applies to all branches of the RTC and CAMPO, its contractors, consultants, and anyone else who acts on behalf of RTC and CAMPO.

Any person who believes they have been discriminated against on the basis of race, color, or national origin by the RTC, CAMPO, or its affiliates may file a Title VI complaint by completing and submitting a Title VI Complaint Form. Additionally, a person who believes they were subject to nondiscrimination regulations including on the basis on sex, age, or disability may submit at Title VI Complaint Form.

Any such complaint maybe submitted via mail, email, fax or in person within 180 days following the date of the alleged discriminatory occurrence.

English and Spanish complaint forms may be downloaded at the links below, or by contacting the Title VI Coordinator below:

- <https://www.carson.org/government/departments-g-z/public-works/transportation/documents>

Complaints should be submitted to:

Attn: Transportation Manager
FHWA Title VI Coordinator
3505 Butti Way, Carson City, NV 89701
Phone: 775-887-2355 Fax: 775-887-2122
E-mail: cmartinovich@carson.org or comments@campoareampo.com

Title VI complaints shall be documented by the representative receiving the complaint on a form provided for this purpose. Documentation shall include the name of the person filing the complaint, the time, date and place the alleged incident occurred, as well as any other information necessary to fully explain the situation. The complaint shall be dated and assigned a control number for tracking purposes.

Complaints will be forwarded to the Nevada Department of Transportation within seven business days. All formal complaints are investigated by NDOT or FHWA, not the RTC or CAMPO. All complaints submitted to NDOT will follow their Title VI Implementation Plan, available online here:

<https://www.nevadadot.com/home/showdocument?id=13978#:~:text=The%20Title%20VI%20Implementation%20Plan,regulations%2C%20and%2For%20policy.>

Complaints can also be filed with the NDOT or FHWA. For questions or to file a complaint, please contact:

Sonnie Braih, Civil Rights Officer,
Nevada Department of Transportation (NDOT)
3014 W. Charleston Blvd., Ste. 150, Las Vegas NV 89102
Main: (702) 730-3301 Fax: (702) 486-0487

Rhonda Motley, Civil Rights Program Manager
U.S. Department of Transportation, Federal Highway Administration, Nevada Division
705 N. Plaza Street #220, Ste. 220, Carson City, NV 89701
Main: (775) 687-1204 Fax: (775) 687-3803
Office email: nevada.fhwa@fhwa.dot.gov



TITLE VI COMPLAINT FORM



Staff Use Only

Date of Complaint Received: _____ Tracking No. _____

All Title VI complaints shall be forwarded to the Nevada Department of Transportation (NDOT) within seven business days.

---Additional Information available in Title VI Complaint Procedures---

Any person who believes she or he has been discriminated against on the basis of race, color, or national origin by CAMPO or the RTC, or believes they were discriminated against because sex, age, or disability, may file a Title VI complaint by completing and submitting this Title VI Complaint Form. The RTC nor CAMPO investigates complaints. All formal complaints are investigated by NDOT or FHWA.

1. Name of Complainant _____

2. Address _____

3. City: _____ State: _____

4. Phone No. _____ E-mail: _____

5. Person Discriminated Against (if other than Complainant): _____

a. Address _____

b. Phone No. _____

c. Email Address _____

d. Please confirm that you have obtained the permission of the aggrieved party if you are filing on behalf of a third party: Yes No

6. Nature of Complaint:

- Race Color National Origin Sex Age Disability LEP

Other: _____

7. Details of Complaint: In your words, please describe the alleged discrimination and all persons who were involved. Include the name and contact information of the person(s) who discriminated against you (if known).

8. Date & Time Discrimination Occurred: _____
9. Place Incident Discrimination Occurred: _____
10. Were there any other witnesses to the discrimination?

Name	Organization/Title	Telephone

11. How would you like to see this situation resolved?

12. Have you filed your complaint, grievance, or lawsuit with any other agency or court?
- a. Who _____
 - b. When _____
 - c. Status (pending, resolved, etc.) _____
 - d. Result, if known _____
 - e. Complaint number, if known _____

13. Have you filed a lawsuit regarding this complaint? Yes _____ No _____

You may attach any written materials or other information that you think is relevant to your complaint.

Signature

Date

Please submit this form in person, or mail to:

Transportation Manager
 FHWA Title VI Coordinator
 3505 Butti Way
 Carson City, NV 89701
 Phone: 775-887-2355



TÍTULO VI PROCEDIMIENTOS DE RECLAMACIÓN

La ley federal prohíbe la discriminación por motivos de raza, color, o origen nacional en cualquier programa o actividad de la Comisión de Transporte Regional de Carson City (RTC) o de la Organización de Planificación Metropolitana del Área de Carson (CAMPO). Esta prohibición se aplica a todas las sucursales de RTC y CAMPO, sus contratistas, consultores y cualquier otra persona que actúe en nombre de RTC y CAMPO.

Cualquier persona que crea que él o ella ha sido discriminada por motivos de raza, color, o origen nacional por el RTC, CAMPO o sus afiliados puede presentar una queja del Título VI completando y presentando un Formulario de Queja del Título VI. Además, una persona que crea que estaba sujeta a regulaciones de no discriminación, incluso por motivos de sexo, edad o discapacidad, puede presentar un Formulario de queja del Título VI.

Cualquier queja de este tipo puede ser presentada por correo, correo electrónico, fax o en persona dentro de los 180 días posteriores a la fecha del supuesto hecho discriminatorio.

Las formas de quejas en inglés y en español se pueden descargar en los enlaces a continuación, o comunicándose con el Coordinador del Título VI a continuación:

- <https://www.carson.org/government/departments-g-z/public-works/transportation/documents>

Las quejas deben enviarse a:

Attn: gerente de transporte
FHWA Coordinador del Título VI
3505 Butti Way, Carson City, NV 89701
Teléfono: 775-887-2355 Fax: 775-887-2122
Correo electrónico: cmartinovich@carson.org or Comments@carsonareampo.com

Las quejas del Título VI deben ser documentadas por el representante que recibe la queja en un formulario provisto para este propósito. La documentación debe incluir el nombre de la persona que presenta la queja, la hora, la fecha y el lugar donde ocurrió el supuesto incidente, así como cualquier otra información necesaria para explicar completamente la situación. La queja deberá tener fecha y se le asignará un número de control para fines de seguimiento.

Las quejas serán enviadas al Departamento de Transporte de Nevada dentro de los siete días hábiles. Todas las quejas formales son investigadas por NDOT o FHWA, no por RTC o CAMPO. Todas las quejas enviadas a NDOT seguirán su Plan de Implementación del Título VI, disponible en línea aquí:

<https://www.nevadadot.com/home/showdocument?id=13978#:~:text=The%20Title%20VI%20Implementation%20Plan,regulations%2C%20and%2For%20policy.>

Las quejas también se pueden presentar ante el NDOT o FHWA. Para preguntas o presentar una queja, comuníquese con:

Sonnie Braih, Oficial de Derechos Civiles,
Departamento de Transporte de Nevada (NDOT)
3014 W. Charleston Blvd., Ste. 150, Las Vegas NV 89102
Principal: (702) 730-3301 Fax: (702) 486-0487

Rhonda Motley, Gerente del Programa de Derechos Civiles
Departamento de Transporte de EE. UU., Administración Federal de Carreteras, División de Nevada
705 N. Plaza Street #220, Ste. 220, Carson City, NV 89701
Principal: (775) 687-1204 Fax: (775) 687-3803
Correo electrónico: nevada.fhwa@fhwa.dot.gov



TITLE VI FORMULARIO DE RECLAMACIÓN



Staff Use Only

Date of Complaint Received: _____ Tracking No. _____

All Title VI complaints shall be forwarded to the Nevada Department of Transportation (NDOT) within seven business days.

---Additional Information available in Title VI Complaint Procedures---

Cualquier persona que crea que ella o él ha sido discriminado por motivos de raza, color, o origen nacional por CAMPO o el RTC, o que crea que fue discriminada por motivos de sexo, edad o discapacidad, puede presentar una queja de Título VI completando y presentando este Formulario de queja de Título VI. El RTC ni CAMPO investiga las quejas. Todas las quejas formales son investigadas por NDOT o FHWA.

1. Nombre del Delmndante _____

2. Dirección _____

3. Ciudad: _____ Estado: _____

4. Numero de Teléfono _____ Correo Electronico: _____

5. Persona Discriminada (si no es el demandante): _____

a. Direccion _____

b. Numero de Teléfono. _____

c. Correo Electronico _____

d. Confirme que ha obtenido el permiso de la parte perjudicada si está presentando una solicitud en nombre de un tercero: Si No

6. Naturaleza de la Queja:

- Raza Color Origen Nacional Sexo Edad Discapacidad
- Inglés Limitado

7. Detalles de la Queja: describa a todas las personas involucradas. Incluya el nombre y la información de contacto de la(s) persona(s) que lo discriminaron (si se sabe).

8. Donde ocurrió la discriminación? _____

9. Fechas y Horas en que ocurrió la discriminación? _____

10. Hubo otros testigos de la discriminación?

Nombre	Organización/Título	Teléfono

11. Como le gustaría ver resuelta esta situación?

12. Ha presentado su queja, reclamo, o demanda ante cualquier otra agencia o tribunal?

- a. Quien _____
- b. Cuando _____
- c. Estado (pendiente, resuelto, etc.) _____
- d. Resultado, si se sabe _____
- e. Numero de Queja, si se sabe _____

13. ¿Ha presentado una demanda sobre la queja? Si _____ No _____

Puede adjuntar cualquier material escrito o otra información que considere relevante para su queja.

Firma

Fecha

Envíe este formulario en persona o envíelo por correo a:

gerente de transporte
FHWA Coordinadora del Título VI
3505 Butti Way
Carson City, NV 89701
Teléfono: 775-887-2355

Attachment 5
Grievance and Complaint Tracking

Attachment 6
Right-of-Way Data Collection Log

Attachment 7
Plan and Policy Log

