



Toledo Metropolitan Area Council of Governments  
Title VI Program

October 2015



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## **Resolution to the Board of Trustees**

### **A RESOLUTION OF THE TOLEDO METROPOLITAN AREA COUNCIL OF GOVERNMENTS ADOPTING A REVISED TITLE VI PROGRAM**

WHEREAS, the Toledo Metropolitan Area Council of Governments (TMACOG) is a voluntary association of local governments and non-governmental partners in northwest Ohio and southeast Michigan, organized on May 31, 1968, and established under Chapter 167 of the Ohio Revised Code and the Michigan Public Act No. 7 (EX-SESS), and has carried out comprehensive metropolitan and regional planning since that date; and

WHEREAS, the MPO has been designated by the United States Department of Transportation (USDOT) and the Ohio Department of Transportation (ODOT) to direct, coordinate, and administer the Process in the Toledo Metropolitan Planning Area as mandated by the Congress in Titles 23 and 49 U.S.C.; and

WHEREAS, the USDOT allocates to the Toledo Metropolitan Planning Organization through ODOT certain Federal-Aid funds for transportation-related projects and activities; and

WHEREAS, the Moving Ahead for Progress in the 21st Century Act (MAP- 21) (P.L. 112-141), effective October 1, 2012, and associated regulations published in 2014 (23 U.S.C. 134 and 135; 42 U.S.C. 7410 et seq.; 49U.S.C. 5303 and 5304; 49 CFR 1.85 and 1.90) contain certain requirements assuring non-discrimination in transportation planning; and

WHEREAS, based on MAP-21, it is necessary to update the TMACOG Title VI Program; and

WHEREAS, the MPO has been designated by the United States Department of Transportation (USDOT) and the Ohio Department of Transportation (ODOT) to direct, coordinate, and administer the Process in the Toledo Metropolitan Planning Area as mandated by the Congress in Titles 23 and 49 U.S.C.; and

WHEREAS, the USDOT allocates to the Toledo Metropolitan Planning Organization through ODOT certain Federal-Aid funds for transportation-related projects and activities; and

WHEREAS, the Ohio Department of Transportation (ODOT) has instructed TMACOG to develop a new Title VI Compliance Program; and

WHEREAS, the proposed TMACOG Title VI Program has undergone the required forty-five (45) day public review period prior to its adoption; and

WHEREAS, the policy in this resolution was recommended for approval by the Board of Trustees by the Transportation Council on September 2, 2015, the Finance, Audit, & Administration Committee on September 9, 2015 and by the Executive Committee on September 23, 2015.


NOW, THEREFORE, BE IT RESOLVED BY THE TOLEDO METROPOLITAN AREA COUNCIL OF GOVERNMENTS:

THAT, the document attached to this resolution entitled "Toledo Metropolitan Area Council of Governments Title VI Program" dated October, 2015 is hereby adopted as the Title VI Program for TMACOG.

Adopted by the Board of Trustees, October 21, 2015.

Yea -26-, Nay -0-, Abstain -0-

  
James M. Sass, Chair  
Toledo Metropolitan Area  
Council of Governments (TMACOG)

  
Anthony L. Reams, President  
Toledo Metropolitan Area  
Council of Governments (TMACOG)

## Introduction

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

- Title VI of the Civil Rights Act of 1964

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The Toledo Metropolitan Area Council of Governments (TMACOG) is fully committed to and has a strong tradition of supporting the principles expressed in Title VI of the Civil Rights Act of 1964.

TMACOG does not discriminate on the basis of race, color, religion, sex, national origin, age, disability, military/veteran status, sexual orientation, gender identity, genetic information, or any other characteristic protected by law. We are committed to consideration of the needs of our diverse community in all agency planning activities.

The agency incorporates policies and procedures to ensure that no person is excluded from participation in TMACOG’s transportation and environmental planning programs and operations, and takes positive steps to include all members of the community – specifically including representatives of low-income neighborhoods, people with disabilities, minority populations, and people with low English proficiency. On-going data collection and analysis is used to monitor the effects of transportation and environmental planning and projects on these populations. Within its own administration, TMACOG fully complies with Title VI regulations. TMACOG maintains procedures to ensure that consultants and contractors also reject discrimination and seek inclusiveness.

TMACOG procedures supporting these policies are well-documented and regularly reviewed. This document - *Title VI Program* - will be updated as needed to document TMACOG’s compliance with Title VI and related non-discrimination regulations and to describe how TMACOG incorporates Title VI requirements into the region’s planning programs.

TMACOG is a regional planning partnership made up of members in northwest Ohio and southeast Michigan. Members include governments and non-governmental organizations: cities, counties, villages and townships, as well as schools and colleges, park districts, and other groups concerned with quality of life in the region. Members join TMACOG to plan for a common future for the region, planning to build and maintain transportation systems, working together for clean water and air.

TMACOG is the Metropolitan Planning Organization (MPO) for Lucas and Wood counties in Ohio, and Bedford, Whiteford, and Erie townships of southern Monroe County in Michigan. TMACOG also manages the region’s Areawide Water Quality Management Plan (the 208 Plan from that section of the Clean Water Act). The 208 Plan region is the same area as the MPO with the addition of Ottawa and Sandusky counties in Ohio.

## Title VI Notice to the Public

TMACOG posts the Title VI Notice to the Public on [www.tmacog.org](http://www.tmacog.org) and in public areas in the TMACOG offices. The notice is posted in English and in Spanish. The webpage where it is posted can be translated into other languages.

See the Notice to the Public in Appendix page A-1

## **Complaint Procedure**

The TMACOG Title VI complaint procedure is described on the TMACOG website in English and Spanish and is posted in public areas of the TMACOG office: the Boardroom, the break room, and the notice board in the lobby of the TMACOG offices.

See the Complaint Procedure in the Appendix page A-3

## **Title VI Complaint Form**

See Complaint Form in Appendix page A-5

## **Contractor Compliance**

TMACOG occasionally hires consultants to perform studies or data analysis. Contract language with these consultants incorporates ODOT-prescribed language requirements in reference to Title VI responsibilities of the contractor.

See sample contract language in Appendix page A-9

## **Record of Investigations, complaints, and lawsuits**

No person or group has filed a civil rights discrimination complaint against TMACOG since at least 1990. TMACOG records show no evidence that a complaint has ever been filed.

## **Limited English Proficiency Plan**

[Executive Order 13166](#) directs federal agencies to “implement a system by which (limited English-proficient or ‘LEP’) persons can meaningfully access... services consistent with, and without unduly burdening, the fundamental mission of the agency.” When read in its entirety, and interpreted consistently with Title VI of the Civil Rights Act of 1964 and Section 504 of the Rehabilitation Act of 1972, the Executive Order applies to all programs and activities of a federal agency.

Federal guidance outlines a four-factor analysis to determine appropriate services for persons with limited English proficiency.

### **Analysis for Determining Appropriate Services**

It is relevant to note that TMACOG provides no direct services to individuals. TMACOG works with local governments, agencies, county engineers, and state and federal authorities to provide transportation and environmental planning services for governments in the region. TMACOG does not provide transit services or water treatment services. The vast majority of people in the region come into contact with TMACOG only due to TMACOG outreach efforts related to planning activities.

In the history of records of TMACOG activities, there have been no requests for translations of documents or for special accommodations at public meetings. When surveys have been provided in Spanish very few comments have ever been submitted in Spanish. That said, TMACOG plans serve the entire community and outreach activities have been and will continue to be proactive in reaching traditionally underserved populations including people with Low English Proficiency and people with disabilities. TMACOG will regularly review the need for further outreach to ensure full participation in planning activities by all interested people.



In creating the outreach plan for TMACOG's transportation and environmental planning programs and projects, TMACOG performs a four-factor analysis. Specific strategies are based on the results. This analysis is based on Census data and/or American Community Survey Data.

In addition to considering Low English Proficiency citizens, TMACOG also considers Environmental Justice neighborhoods, people with disabilities, and neighborhoods where many households have no private vehicle. Strategies for engaging these audiences are similar. For LEP analysis TMACOG considers:

- 1) **The Number or Proportion of LEP Persons Served or Encountered in the Eligible Service Population.** The TMACOG planning areas vary depending on projects. For example, the Metropolitan Planning Organization (MPO) area for the Long Range Transportation Plan is Lucas and Wood counties and the three townships of southern Monroe County, Michigan. The planning area for the Areawide Water Quality Management Plan (the 208 Plan) is Lucas, Ottawa, Sandusky, and Wood counties in Ohio and the three southern townships of Monroe County, Michigan.
- 2) **The Frequency with which LEP Individuals Come in Contact with the Recipient's Program, Activity or Service.** TMACOG planning activities have the potential to affect all members of the community when plans come to completion through government activities. Most members of the public only come into contact with TMACOG through public outreach activities. All TMACOG outreach and public involvement activities will invite and welcome any interested members of the community, particularly seeking inclusion of under-served groups including LEP persons.
- 3) **The Nature and Importance of the Recipient's Program, Activity, or Service.** TMACOG planning activities are not usually urgent, and public participation is not obligated. However, planning activities do have long-term consequences for the region and the input of the representative population is essential to plans that successfully serve the entire population.
- 4) **The Resources Available to the Recipient and Costs.** Technology makes some translations possible on TMACOG webpages and electronic documents. As a small agency with limited resources, TMACOG will work closely with agencies serving the LEP community to seek strategies for sharing costs and expertise for in-person interpretive or translation services.

See the Appendix for maps showing LEP and Environmental Justice neighborhoods. These maps are reviewed and updated regularly as part of long range planning and modeling activities.

#### Limited English Proficient (LEP) Persons in the TMACOG Region

County	Speaks English Only	Percent Speaks English Only	Speaks English "very well"	Percent Speaks English "very well"	Total LEP Speaks English "less than very well"	Percent LEP Speaks English "less than very well"
Lucas, OH	386,719	93.86%	17,423	4.23%	7,887	1.91%
Ottawa, OH	37,920	96.25%	1,039	2.64%	440	1.12%
Sandusky, OH	53,882	94.45%	2,241	3.93%	927	1.62%
Wood, OH	113,736	95.23%	3,923	3.29%	1,769	1.48%
Monroe, MI	37,853	96.40%	1,120	2.85%	294	.75%
<b>TOTAL</b>	<b>630,110</b>	<b>94.44%</b>	<b>25,755</b>	<b>3.86%</b>	<b>11,317</b>	<b>1.70%</b>

Source: 2008-2012 American Community Survey 5-Year Estimates

\* Monroe County count includes only jurisdictions in TMACOG planning area (Bedford Twp., Erie Twp., Whiteford Twp., and City of Luna Pier)

Data from the *2008-2012 American Community Survey 5-Year Estimates* shows that the most common languages among those who speak English “less than very well” are Spanish, Arabic, and Chinese. For the primary TMACOG planning area, the percentages are well below five percent:

Spanish: .76%

Arabic: .19%

Chinese: .16%

Analysis shows that of the population that speaks English “less than very well,” in Lucas County, there are likely 3,000 speakers of Spanish, and possibly more than 1,000 speakers of Arabic and Chinese, considering the margin of error. There are no other language groups that exceed 1000 speakers in any of the TMACOG planning counties.

With this data and considering the four-factor analysis, TMACOG has defined strategies to reach the Spanish-speaking population and respond to any requests from Arabic or Chinese speakers.

### **Involve Target Populations**

TMACOG works with regional partners to involve LEP populations. TMACOG has identified organization and neighborhood leaders who can assist with outreach efforts to their communities. The agency has ongoing alliances with existing organizations and seeks out the involvement of local officials and community leaders in planning activities.

### **Adapt advertising**

TMACOG maintains and uses a list of non-English speaking or bi-lingual media outlets. The agency explores websites and local newspapers for advertising and meeting opportunities. The staff uses word of mouth, radio, television, social media, and newspaper to reach out to communities and let them know of public input opportunities.

### **Choose Appropriate Meeting Times and Locations**

TMACOG uses appropriate meeting times and locations for public meetings. Some meetings are held during the day and some in the evening to accommodate shift workers. Locations are selected with consideration of underserved populations and those who would be affected by plans. TMACOG ensures that at least some if not all public meetings are held near LEP and EJ neighborhoods and on transit lines.

TMACOG staff members attend neighborhood meetings and special events as appropriate to encourage participation in TMACOG processes. TMACOG presents information at meetings of underserved populations including to Spanish speaking organizations and to non-driving groups including the elderly and people with disabilities.

### **Structure Meetings to Encourage Participation**

Meetings are usually brief or open-house format, where a welcoming atmosphere is established and light refreshments may be served. TMACOG will seek input by:

- Offering interpreters and translated materials as appropriate.
- Incorporating graphics and symbols.
- Using photographs, maps, or videos.
- Taking notes or recording comments so that written public comments are not the only way a citizen can communicate.

## **Availability of Public Documents**

TMACOG makes documents accessible to those with LEP needs:

- As part of a major outreach effort, TMACOG may place documents such as translated surveys at community centers or public libraries located in LEP areas.
- TMACOG places many documents on the website and will translate major policy documents as needed. For major documents containing a large amount of supporting data and analysis, a summary document will be available for translation or large print.
- Language translation tools on the TMACOG website improve accessibility.
- Information about the availability of translations or interpretation is posted on the website and a contact person on staff is appointed to respond to requests.

## **Composition of Committees and Councils**

No council or committee member is selected or appointed by TMACOG. Some committees are elected by the general assembly of TMACOG members and the majority of committee members are appointed by their representative jurisdictions or organizations. This system is established in the TMACOG bylaws to ensure geographic and community representation. Although TMACOG does not select council or committee membership, the Leadership Committee and agency staff invite a diverse cross-section of the community to attend and participate in planning activities.

See TMACOG Committee Structure chart in Appendix page A-21

## **Public Involvement Policy**

TMACOG updated the Public Involvement Policy in December 2014 and approved the update June 2015. This policy was created with public input and with advice and recommendations from residents typically underserved by public policy including representatives of the Ability Center of Greater Toledo, and Adelante (Hispanic cultural organization), both represented by Advocates for Basic Legal Equality (ABLE).

The Public Involvement Policy is posted on the TMACOG website at [LINK](#) in English and in Spanish. An electronic translator allows for other language translations. A large-print version is available on request.

Based on suggestions from ABLE representatives in 2015, TMACOG appointed a staff person to respond to and track requests from the public for assistance in participating in planning activities. That staff person has been charged with providing services including language, mobility, and communications technology assistance that will make it possible for a wide range of citizens to participate in TMACOG planning processes. This staff person will also track any requests and keep a list of accommodations that were requested. The staff name and contact information is posted on all announcements of public meetings and in all press materials relating to public meetings.

## **Title VI Training**

TMACOG's responsibilities with regard to Title VI and other nondiscrimination requirements begin with staff training and awareness. When it was revised in 2014-2015, the Public Involvement Policy was presented to all major councils and committees. TMACOG's commitment to full inclusion was clearly communicated and shared with staff and with committee members.

In 2013, the Vice President of Finance and Administration attended the webinar "Title VI Program Sub-recipient Monitoring" presented by FHWA. In 2015 the Vice President of Finance and Administration

completed ODOT's Title VI for Local Public Agencies online training. Planning staff and the employee assigned to respond to requests for special accommodations will take the same training in 2015.

## **Appendix**

**Title VI Notice to the Public**

**Complaint Procedure**

**Title VI and Related Statutes Discrimination Complaint Form**

**Contractor Language**

**Maps for LEP and EJ areas**

**Staff organizational chart**



## **Title VI Notice to the Public**

Toledo Metropolitan Area Council of Governments (TMACOG) operates its programs and services without regard to race, color, national origin, sex, age, disability, or low-income status in accordance with Title VI of the civil Right Act of 1964 and its related statutes. Any person who believes she or he has been aggrieved by any unlawful discriminatory practice under Title VI may file a complaint with TMACOG.

For more information on the TMACOG civil rights program and the procedure for filing a complaint, contact the TMACOG Vice President of Finance and Administration, William Best at 419.241.9155 ext. 108; by e-mail at [best@tmacog.org](mailto:best@tmacog.org); or visit our administrative office at 300 Martin Luther King, Jr. Drive, Suite 300, Toledo, OH 43604. For more information see [www.tmacog.org](http://www.tmacog.org). Title VI documents are listed under the About Us tab on the home page.

A complainant may file a complaint directly with the Federal Highway Administration (FHWA) by filing a complaint with the Office of Civil Rights, Attention: Title VI Program Coordinator, 1200 New Jersey Avenue, SE, Washington D.C., 20590; or with the Ohio Department of Transportation (ODOT) Office of Equal Opportunity, Attention: Sarah E. Johnson, Title VI & ADA/504 Specialist, 1980 W. Broad St., 3<sup>rd</sup> floor, Mail Stop: 3270, Columbus, OH 43223.

If information is needed in another language, contact Jennifer Allen at 419.241.9155 ext. 107 or [allen@tmacog.org](mailto:allen@tmacog.org).





## **Title VI Complaint Procedure Description**

### **Persons eligible to File**

Any person who believes she or he or any specific class of persons has been subjected to discrimination or retaliation prohibited by any of the civil rights authorities, based upon race, color, national origin, low English proficiency, sex, age, disability, or low-income status, may file a written complaint. The complaint may be filed by the affected individual or by a representative and must be in writing.

If this complaint procedure is required in another language, please contact Jennifer Allen, 419.241.9155 ext. 107 or [allen@tmacog.org](mailto:allen@tmacog.org).

### **Time Limits for Filing**

The affected person shall within 180 days of the alleged discriminatory action, outline in writing the facts and circumstances surrounding the complaint and contact TMACOG. The complainant has the right to also file a complaint with the state division of Equal Opportunity and with the relevant federal agency.

- TMACOG Title VI Coordinator  
William Best, Vice President of Finance and Administration  
Phone: 419.241.9155 ext. 108  
E-mail: [best@tmacog.org](mailto:best@tmacog.org)  
In person at: 300 Martin Luther King, Jr. Drive, Ste. 300, Toledo, OH 43604

A complaint must outline the following:

- The date of the alleged act of discrimination; or
- The date when the person(s) became aware of the alleged discrimination; or
- Where there has been a continuing course of conduct, the date on which that conduct was discontinued or the latest instance of the conduct.

### **Determination of Jurisdiction and investigative Merit**

Based upon the information in the complaint, TMACOG will determine TMACOG's jurisdiction, validity of the complaint, and need for additional information. TMACOG will acknowledge receipt of the complaint by notifying the complainant. If the complaint is determined to be within TMACOG's jurisdiction, TMACOG will assign a staff person or representative to investigate the merit of the complaint.

### **Investigative Merit**

A complaint will be regarded as meriting an investigation unless:

- a) It clearly appears on its face to be frivolous or trivial;
- b) The party complained against voluntarily concedes that the complaint is valid and agrees to take appropriate remedial action;
- c) The complainant withdraws the complaint; or
- d) Other good cause for not investigating the complaint exists.

**Timeframe**

Within five days of TMACOG's decision concerning the disposition of the complaint, TMACOG will notify by registered letter the complainant, party charged, and primary recipient (if not the respondent) of the disposition.

- a) In the event of a decision not to investigate the complaint, the notification shall specifically state the reason for the decision.
- b) In the event the complaint is to be investigated, the notification shall state the grounds for the investigation, inform the parties that an on-site investigation will take place, and request any additional information needed to assist the investigator in preparing for the investigation.

**Referral to Other Agencies**

Should TMACOG lack jurisdiction to investigate, TMACOG will, if appropriate, refer the complaint to other state or federal agencies.

**Informal Resolution**

These procedures apply to any complaints filed under Title VI and its related statutes relating to any program or activity administered by TMACOG. These procedures do not deny the right of the complainant to file formal complaints with other State or Federal agencies or to seek private counsel for complaints alleging discrimination. These procedures are part of an administrative process that does not provide for remedies that include punitive damages or compensatory remuneration for the complainant. Every effort will be made to obtain early resolution of complaints at the lowest level possible. The option of informal resolution meeting(s) between the affected parties may be used for resolution at any stage of the process.

**Toledo Metropolitan Area Council of Governments (TMACOG) – Title VI and Related  
Statutes Discrimination Complaint Form**

<b>Section I</b>			
<b>Name of Complainant:</b>			
<b>Home telephone:</b>		<b>Work telephone:</b>	
<b>Mailing Address:</b>			
<b>Street</b>	<b>City</b>	<b>State</b>	<b>Zip</b>
<b>E-mail Address:</b>			
<b>Do you require a different format?</b>  <input type="checkbox"/> <b>Large Print</b>	<input type="checkbox"/> <b>Audible</b>	<input type="checkbox"/> <b>Other</b>	
<b>What is the most convenient time/method for us to contact you about this complaint?</b>		<b>A.M.</b>	<b>P.M.</b>
<b>Section II</b>			
<b>Are you filing this complaint on your own behalf?</b>		<input type="checkbox"/> <b>Yes</b>	<input type="checkbox"/> <b>No</b>
<b>If you answered yes, go to Section III.</b>			
<b>If not, please supply the name and relationship of the person for whom you are complaining:</b>			

### Section III

**I believe the discrimination I experienced was based on:**

\_\_\_ Race      \_\_\_ Color      \_\_\_ National Origin  
(Title VI – Civil Rights Act of 1964)

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\_\_\_ Sex      \_\_\_ Age      \_\_\_ Disability

**Date and place alleged discriminatory actions. Please include earliest date of discrimination and most recent date of discrimination:**

**How were you discriminated against? Describe the nature of the action, decision, or conditions of the alleged discrimination. Explain as clearly as possible what happened and why you believe your protected status was a factor in the discrimination. Include how other persons were treated differently from you. (Attach additional pages if necessary).**

**Names of individual(s) responsible for the discriminatory action(s) if known:**

**Names of persons (witnesses, fellow employees, supervisors, or others) whom we may contact for additional information to investigate your complaint:**

Name	Address	Phone Number

<b>What remedy, or action, are you seeking for the alleged discrimination?</b>	
<b>Have you filed, or do you intend to file, a charge or complaint regarding the matters related in this complaint with the following:</b>	
<b>Federal Agency</b>	<b>Federal Court      State Agency      State Court      Local Agency</b>
<b>If you have already filed a charge or complaint, please provide the following information:</b>	
<b>Agency/court:</b>	
<b>Address:</b>	
<b>Date Filed:</b>	<b>Case Number:</b>
<b>Type of Trial/Hearing</b>	
<b>Status of Case</b>	
<b>Please provide any additional information that you believe would assist with this investigation.</b>	
<b><u>We cannot accept an unsigned complaint. Please sign and date this complaint form.</u></b>	
<b>Complainant:</b>	
<b>Date:</b>	



## **Title VI Contractor Language**

*Following is the language provided to TMACOG by the Ohio EPA which TMACOG includes in state contracts concerning environmental consulting.*

### **Nondiscrimination**

Pursuant to R.C. 125.111 and 4112.02, Consultant, its employees, and any person acting on behalf of Consultant shall not discriminate, by reason of race, color, religion, military status, sex, age, ancestry, national origin, or disability against any citizen of this state in the employment of any person qualified and available to perform the work under this Agreement, nor shall in any manner discriminate against, intimidate, or retaliate against any employee hired for the performance of work under this Agreement on account of race, color, religion, military status, sex, age, ancestry, national origin, or disability.

*Following is the language provided to TMACOG by the Ohio Department of Transportation which TMACOG includes in federal- and state-funded transportation subcontracts.*

### **SECTION XIII: NON-DISCRIMINATION**

To effectuate Title VI of the Civil Rights Act of 1964, the following notice to the AGENCY's compliance with Title VI of the Civil Rights Act of 1964 for federal aid recipients applies.

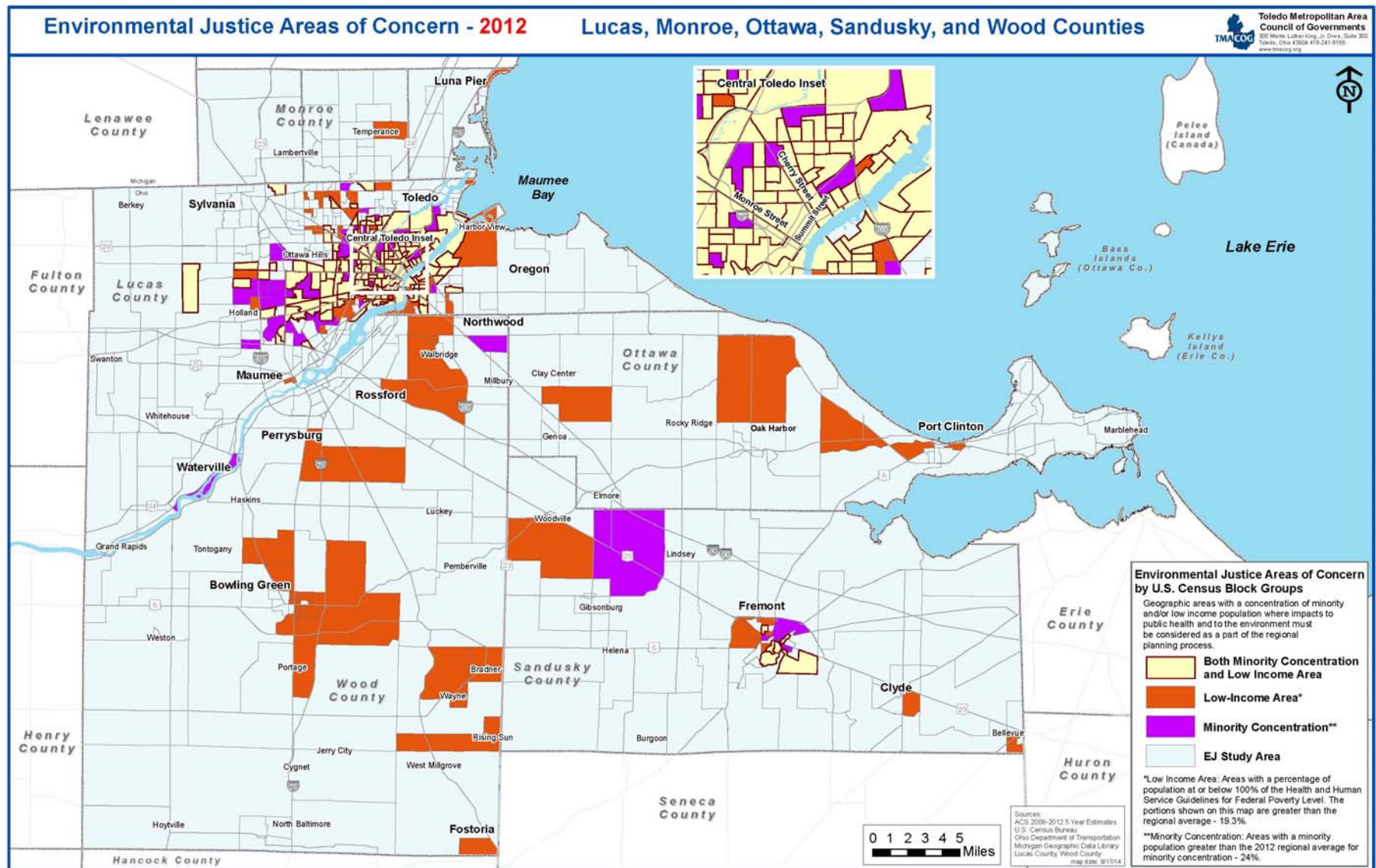
During the performance of this Agreement, the AGENCY for itself, its assignees and successors in interest agrees as follows:

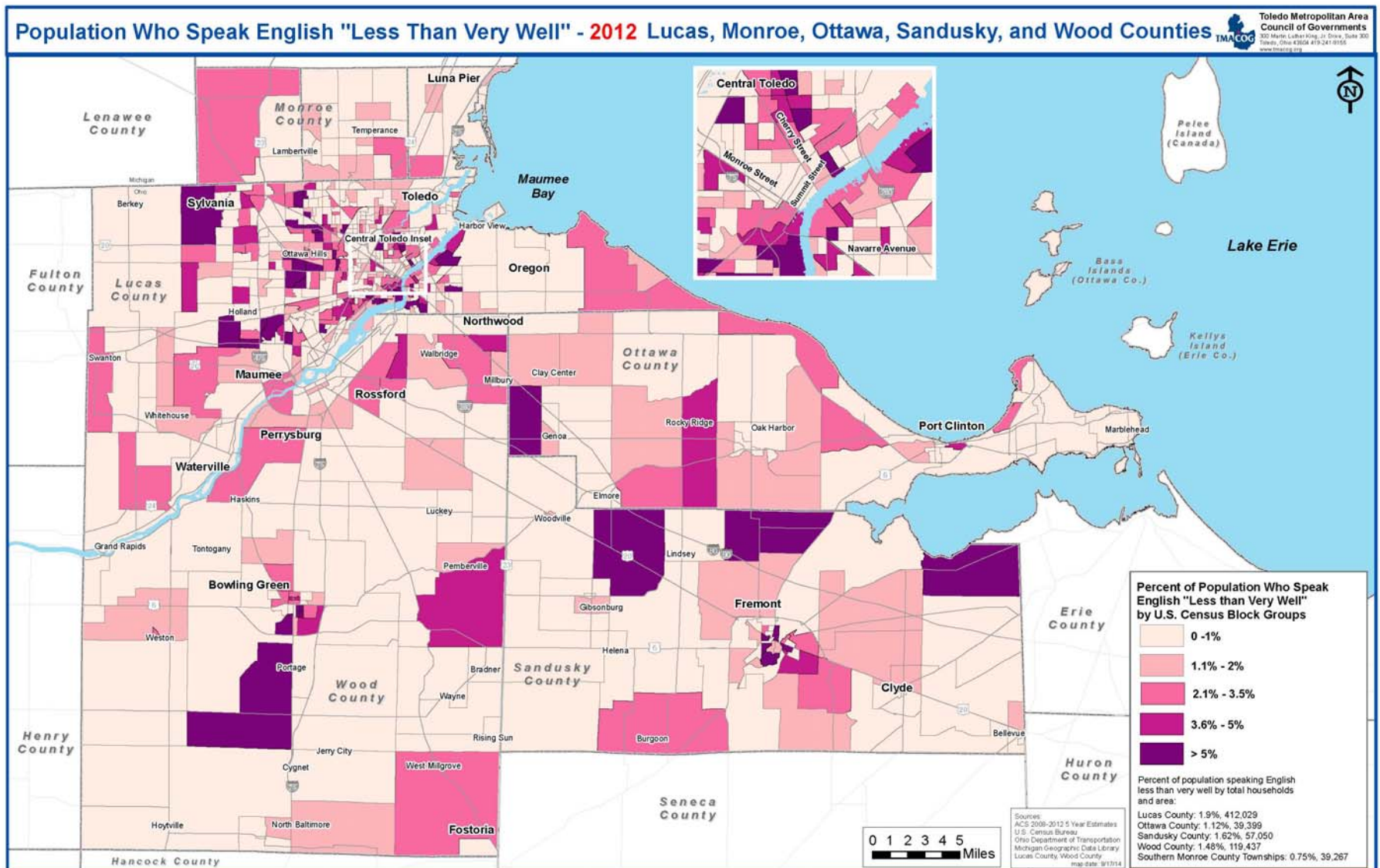
1. **Compliance with Regulations:** The AGENCY will comply with the regulations relative to nondiscrimination in Federally-assisted programs of the U.S. DOT Title 49, Code of Federal Regulations, Part 21, as they may be amended from time to time, (hereinafter referred to as "Regulations"), which are herein incorporated by reference and made a part of this Agreement.
2. **Nondiscrimination:** The AGENCY, with regard to the work performed by it after the execution of this Agreement, will not discriminate on the grounds of race, color, or national origin, in the selection and retention of contractors and consultants, including in the procurement of materials and leases of equipment. The AGENCY will not participate either directly or indirectly in the discrimination prohibited by Section 21.5 of the Regulations, including employment practices when the contract covers a program set forth in Appendix B of the Regulations.
3. **Solicitations for Contracts, including Procurement of Materials and Equipment:** In all solicitations either by competitive bidding or negotiation made by the AGENCY for work to be performed under a contract, including procurement of materials or equipment, each potential contractor or supplier will be notified by the AGENCY of the AGENCY's obligations under this Agreement and the Regulations relative to nondiscrimination on the grounds of race, color, or national origin.
4. **Information and Reports:** The AGENCY will provide all information and reports required by the Regulations or 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 ODOT, FHWA, or FTA to be pertinent to ascertain compliance with such Regulations or directives. Where any information required of the AGENCY is in the exclusive possession of another who fails or refuses to furnish this

information, the AGENCY will so certify to ODOT, FHWA or FTA as appropriate, and will set forth what efforts it has made to obtain the information.

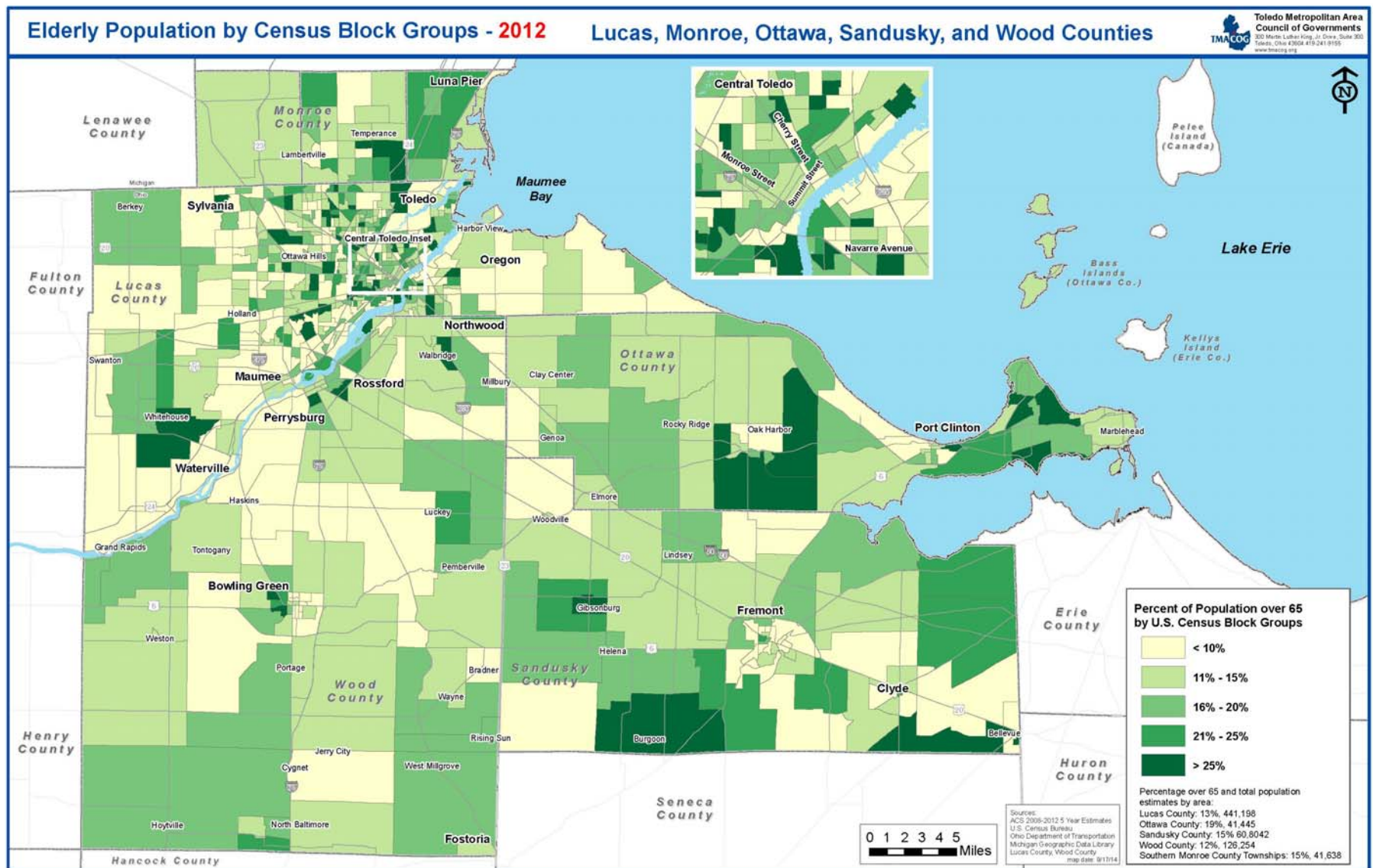
5. Sanctions for Noncompliance: In the event of the AGENCY's noncompliance with the nondiscrimination provisions of this Agreement, ODOT will impose such Agreement sanctions as ODOT, FHWA, or FTA may determine to be appropriate, including, but not limited to:
  - a. withholding of payments to the AGENCY under the Agreement until the AGENCY complies, and/or
  - b. cancellation, termination, or suspension of the Agreement, in whole or in part.
6. Incorporation of Provisions: The AGENCY will include the provisions of the five immediately preceding paragraphs in every contract, including procurement of materials and leases of equipment, unless exempt by the Regulations, or directives issued pursuant thereto. The AGENCY will take such action with respect to any contracts or procurement as ODOT, FHWA, or FTA may direct as a means of enforcing such provisions including sanctions for noncompliance; provided, however, that, in the event the AGENCY becomes involved in, or is threatened with, litigation with a contractor, consultant, or supplier as a result of such direction, the Agency may request ODOT to enter into such litigation to protect the interests of ODOT, and, in addition, the Agency may request the United States to enter into such litigation to protect the interest of the United States.







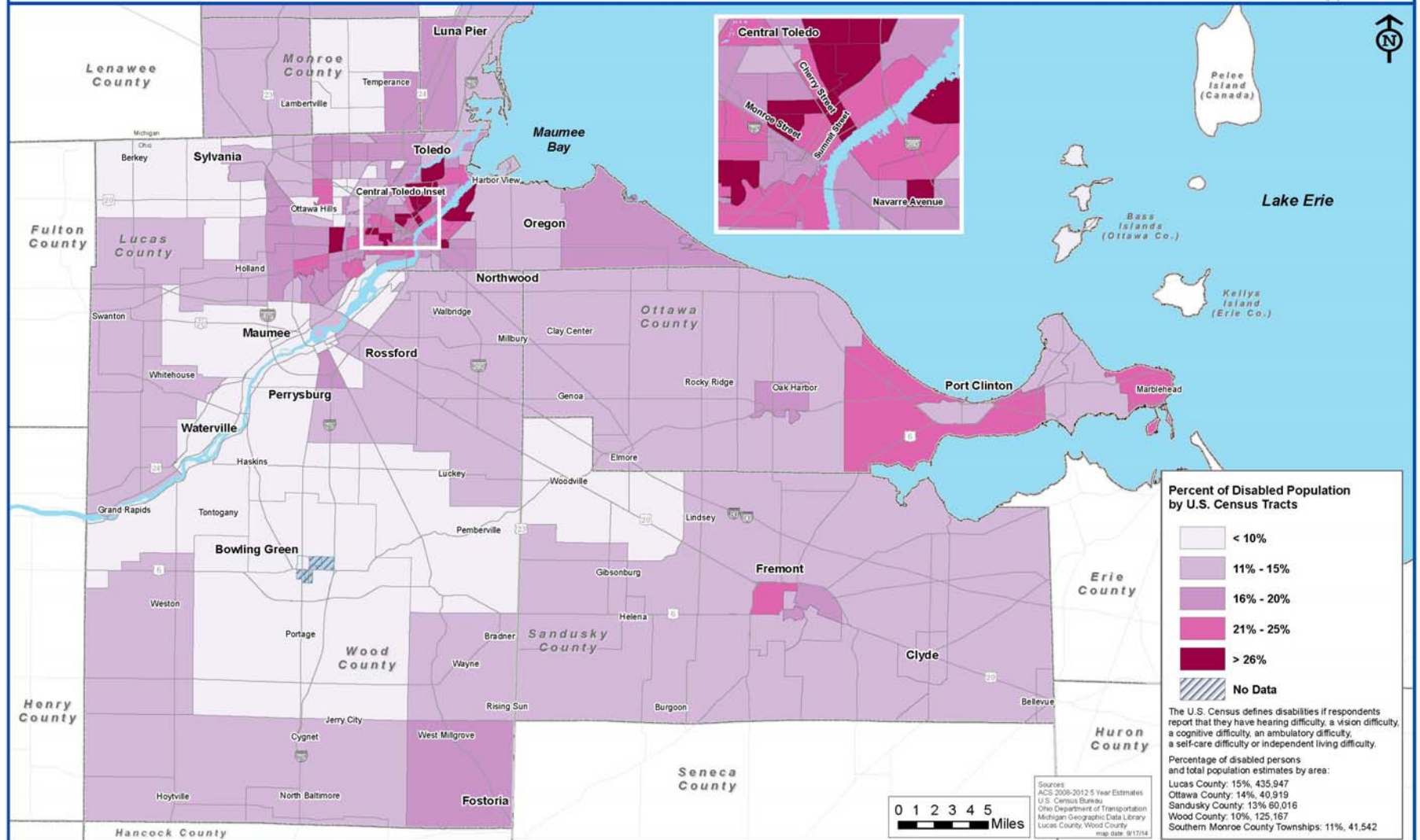




# Disabled Population by Census Tracts - 2012

Lucas, Monroe, Ottawa, Sandusky, and Wood Counties

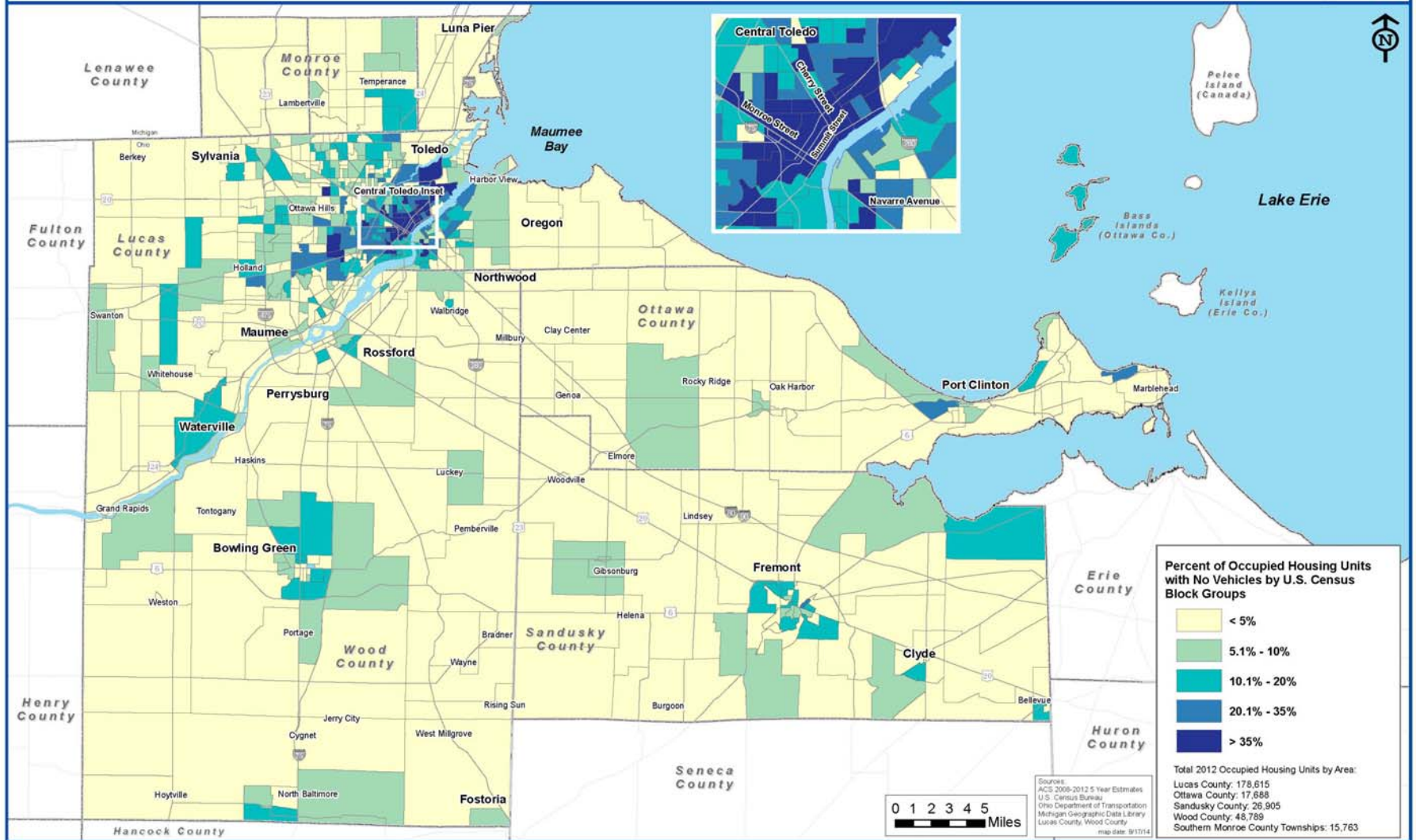
Toledo Metropolitan Area  
Council of Governments  
TMACOG  
300 Martin Luther King, Jr. Drive, Suite 300  
Toledo, Ohio 43624-4175, 419.241.9155  
www.tmacog.org





# No Vehicle Households by Census Block Groups- 2012 Lucas, Monroe, Ottawa, Sandusky, and Wood Counties

**Toledo Metropolitan Area Council of Governments**  
 TMACOG  
 300 Maple Leaf King, Jr. Drive, Suite 300  
 Toledo, Ohio 43604 419-247-8155  
 www.tmacog.org



# TMACOG COMMITTEE STRUCTURE

