

**West Piedmont
Planning District
Commission TITLE VI
IMPLEMENTATION
PLAN**

DRAFT — FOR PUBLIC COMMENT

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Title VI Policy

Utilizing this Title VI Plan the West Piedmont Planning District Commission (WPPDC) will execute the provisions of Title VI of the Civil Rights Act of 1964, 49 Code of Federal Regulations (CFR) Part 21, 23 CFR Part 200, and other relevant provisions. These provisions hold that, as a federal-aid funding recipient, 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 WPPDC receives federal assistance.

The WPPDC will make every effort to ensure nondiscrimination in all of its programs and activities, regardless of whether these programs and activities are federally funded. Additionally, the WPPDC will ensure that each one of its employees, contractors, and sub-recipients receiving federal-aid funds administered through the Danville MPO, or through any of its programs, is made aware of and applies the intent of Title VI of the Civil Rights Act of 1964 and other nondiscrimination authorities in performing assigned duties.

The Executive Director of the West Piedmont Planning District Commission (WPPDC) also serves as the Title VI Coordinator of the organization. In this capacity, the Title VI Coordinator is responsible for ensuring that all matters pertaining to nondiscrimination are administered effectively. Individuals with questions, comments, or complaints regarding this statement, and the implementation of the stated provisions, should contact the Title VI Coordinator:

Michael Armbrister, Executive Director
West Piedmont Planning District Commission
1100 Madison Street
Martinsville, VA 24112
(276) 638-3987
marmbrister@wppdc.org

Michael Armbrister, Executive Director

Date

West Piedmont Planning District Commission / Danville MPO Title VI Coordinator

Title VI Implementation Plan

The Title VI Implementation Plan describes the measures the West Piedmont Planning District Commission (WPPDC) adopts to ensure compliance with Title VI of the Civil Rights Act of 1964, which prohibits discrimination on the basis of race, color, or national origin. Any agency that receives federal financial assistance must comply with Title VI. The Danville MPO and the programs, plans, and projects it administers are subject to this Title VI Implementation Plan.

The WPPDC is one of 21 planning district commissions serving the Commonwealth of Virginia. The WPPDC provides planning services in the areas of housing, transportation, broadband, community development, economic development, and others. The jurisdiction of the WPPDC covers the counties of Franklin, Henry, Patrick, and Pittsylvania, the cities of Danville and Martinsville, and the Town of Rocky Mount. Public transit service within the rural portion of the region serves the Martinsville-Henry County community as Piedmont Area Regional Transit (PART) and is operated by RADAR, of Roanoke. The transit provider is governed by its own Title VI program filed with the Federal Transit Administration and is not included in this implementation plan.

Approval and Adoption of Plan

This plan was developed by the WPPDC in coordination with its Board, in compliance with guidance provided by the Virginia Department of Transportation (VDOT) as well as the relevant federal agencies.

The WPPDC Board of Supervisors, serving as the organization's governing body, is responsible for the final approval and adoption of the WPPDC's Title VI Policy and Implementation Plan.

Policy Board Chair

Date

Danville Metropolitan Planning Organization

Michael Armbrister, MPO Administrator

Date

West Piedmont Planning District Commission

Placeholder for Danville MPO Policy Board Resolution of Adoption

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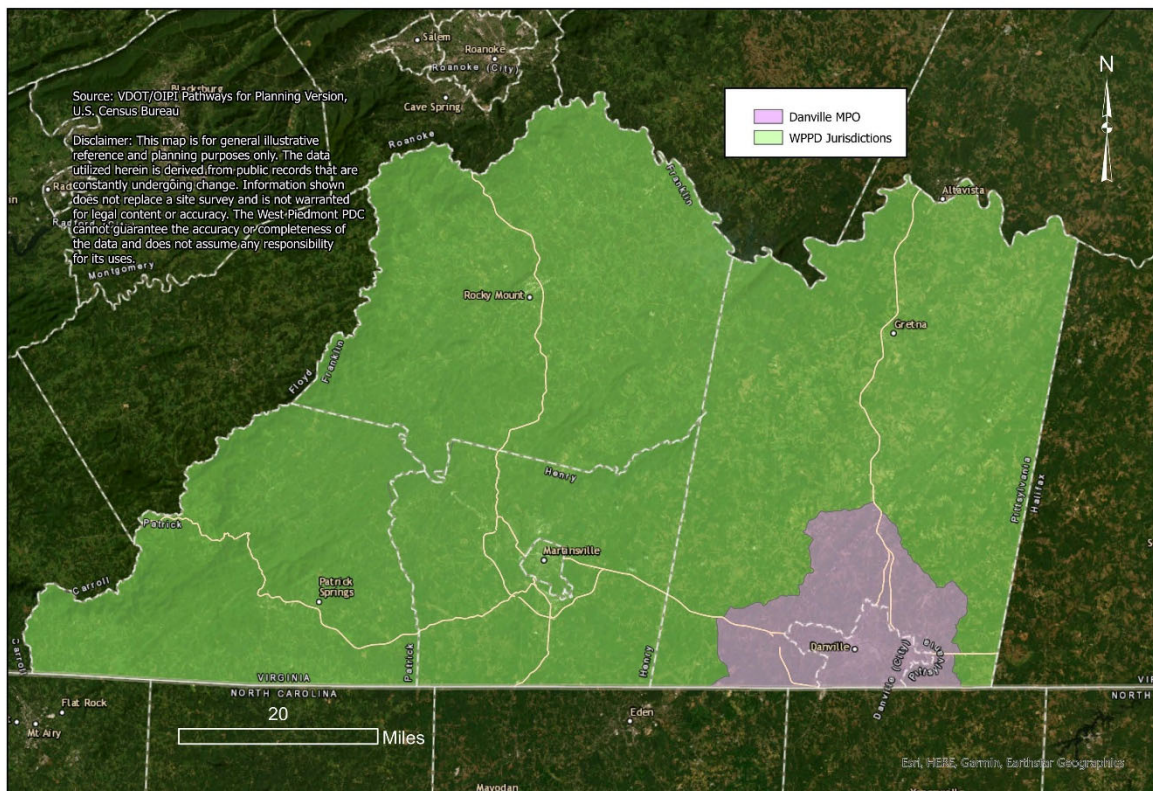
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1. Overview

Title VI of the Civil Rights Act of 1964 prohibits discrimination on the basis of race, color, or national origin by agencies that receive federal financial assistance. As a recipient of federal financial assistance, the West Piedmont Planning District Commission (WPPDC) and its programs, therefore, do not discriminate on the basis of race, color, or national origin.

The WPPDC is responsible for, among many other activities, facilitating transportation planning in the rural area of the Planning District, which excludes the City of Danville as well as adjacent portions of Pittsylvania County, as these areas fall into the Danville Metropolitan Planning Organization (MPO). In addition to facilitating rural transportation planning, the WPPDC also engages in planning activities related to housing, broadband, economic development, community development, and hazard mitigation. The WPPDC serves Franklin, Henry, Patrick, and Pittsylvania Counties, the Cities of Danville and Martinsville, and the Town of Rocky Mount. An organizational chart is provided in Appendix I, and a map of the MPO Planning Area follows.

West Piedmont Planning District Overview



This Title VI Plan serves as the blueprint for how the WPPDC will ensure nondiscrimination with regard to all of its activities and communications, which encompasses planning and programming, public

participation, staff education and training, as well as contracts with its consultants. The required components of the program are covered in four sections — the Title VI program, the staff responsible for oversight of the program, the Danville MPO's approach to ensuring nondiscrimination for individuals with limited English proficiency, and procedures and forms pertaining to discrimination complaints.

This Title VI Implementation Plan describes how all federally funded transportation planning programs and projects administered and staffed on behalf of the WPPDC will comply with Title VI of the Civil Rights Act of 1964.

Michael Armbrister, WPPDC Executive Director, also serves as the Title VI Coordinator, and in his capacity, will work with WPPDC staff to ensure that WPPDC programs and projects are compliant with Title VI vis-à-vis staff training, policy maintenance, and regular program reviews. All staff assigned to the WPPDC will receive Title VI training, and will receive ongoing training as necessary. Staff will be made aware of this Title VI Implementation Plan and its requirements and resources.

2. Title VI Program

WPPDC Staff and members of the organization's boards and committees, as a means to adhere to Title VI requirements, will not discriminate on the basis of race, color and/or national origin. To this end, staff will monitor compliance with regard to communications and public participation, planning and programming, education and training, as well as contracts with consultants and other relevant subrecipients. There are numerous activities the the WPPDC will engage in with regard to adherence to Title VI requirements. In addition to the designation of its Title VI Coordinator, the WPPDC will execute the following activities:

- Maintain current Title VI Assurances
- Promptly correct any deficiency identified
- Conduct ongoing reviews of program areas and contractors
- Review sub-recipients' Title VI procedures on an ongoing basis
- Document and prepare reports of Title VI efforts on a regular basis

2.1 Communications and Public Participation

A major part of the WPPDC's activities includes development of various studies, plans, and programs. A significant part of these processes includes public input and participation. With regards to its plans and studies, the WPPDC seeks public input and participation from all members of the public, particularly low-income, minority, and disabled individuals, given that projects and programs have the greatest potential to impact members of these groups, either negatively or positively. The WPPDC has adopted a public participation plan that details the process the organization employs to engage with affected and interested parties, consistent with CFR 450.316.

To ensure Title VI compliance in communications and public participation, staff will:

- Include contact information for people requesting accommodations in all public notices
- Post the Title VI Policy on the and WPPDC website
- Include the following statement in all public notices:

"The West Piedmont Planning District Commission (WPPDC) ensures nondiscrimination in all programs and activities in accordance with Title VI of the Civil Rights Act of 1964. The WPPDC provides reasonable accommodations for persons who require special assistance to participate in public involvement opportunities. For more information, to request assistance for persons with disabilities or language access barriers, or to obtain a Discrimination Complaint Form, contact (276) 638-3987 or visit www.wppdc.org."

- Provide reasonable accommodations for persons who require special assistance to participate in public involvement opportunities
- Collect and monitor demographic data during public input opportunities, and conduct additional targeted outreach if data shows deficiencies in public input from particular groups

- Recruit individuals including minorities, low-income persons, and persons with disabilities, for public participation opportunities and service on the Citizens Advisory Committee and other committees
- Make meeting materials available in alternative formats, such as other languages, upon request
- Hold public meetings in locations that are accessible under the Americans with Disabilities Act and, where practicable, served by public transit

2.2 Planning and Programming

To ensure compliance with regard to the planning and programming processes, staff will:

- Prepare and update publicly available demographic profiles of the WPPDC region using the most current and appropriate statistical information
- Consider how projects may affect minority, low-income, and disabled populations by geo-referencing demographic information as well as project features affecting relevant communities.
- Review project selection criteria in the Rural Long-Range Transportation Plan and the Rural Transportation Work Program to ensure they do not have discriminatory impacts
- Ensure that transportation planning considers the needs of all residents of the West Piedmont Planning District, including those without personal vehicles
- Review directives to determine Title VI implications across all program areas

2.3 Consultant and Subrecipient Contracts

As part of its process relating to regional planning, the WPPDC often employs the assistance of consultants with resources to perform tasks that staff may not have. As such, the WPPDC

is responsible for selection, negotiation, and administration of consultant and subrecipient contracts. The WPPDC complies with all relevant federal and state laws in contract selection, including the Virginia Public Procurement Act, and evaluates consultant contracts for compliance with nondiscrimination authorities. As part of this process, staff will:

- Ensure inclusion of nondiscrimination language in all contracts and Requests for Proposals
- Require all consultants to verify their compliance with nondiscrimination authorities, procedures, and requirements
- Work with any consultant found to be not in compliance to resolve deficiency status and develop remedial action if necessary
- Review outreach activities to ensure small, disadvantaged, minority, women-owned, and disabled veteran businesses are not excluded from opportunities to compete for consulting contracts

- Document consultant selection processes to demonstrate fair and equitable practices

2.4 Education and Training

To ensure compliance through education and training, the Title VI Coordinator will:

- Provide information to staff, and board and committee members on Title VI training programs and related nondiscrimination authorities
- Train staff in Title VI nondiscrimination and implementation periodically and during new employee orientation
- Track Title VI training of staff, Policy Board members, and committee members
- Seek out and participate in Title VI and civil rights training activities offered by the Virginia Department of Transportation (VDOT) and the Federal Highway Administration (FHWA)

3. Individuals with Language Access Needs

Individuals who have a limited ability to read, speak, write, or understand the English language are classified as those having language access barriers, or language access needs. The WPPDC will take reasonable steps to ensure these individuals have meaningful access to programs, activities, services, and information related to planning processes by providing accommodations whenever possible to remove language barriers.

3.1 Implementation

To ensure meaningful access and participation in planning processes for individuals with language access needs or a hearing disability, staff will

- Provide language interpreter services upon request for in-person meetings, and translation of virtual or physical resources directly related to in-person meetings held by and in association with the WPPDC.
- In the case of a hearing disability, the WPPDC will provide, upon request, the information in a format in which the party can easily decipher, within reason
- Translate documents and materials based upon the needs of the project and impacted populations, or upon request within reason
- Ensure public notices include statements about reasonable accommodations including the right to free language assistance.
- Train staff on:
 - Rights of those with language access barriers to free language assistance
 - How to use language assistance resources
 - How to alert the public of accommodation services when available

3.2 Monitoring and Updating

The Danville MPO monitors language access barrier policies using a four-factor analysis:

1. Demography — Number or proportion of individuals having language access barriers who are likely to be served or encountered within the service area.
2. Frequency — Rate of contact with services or programs
3. Importance — Nature and importance of programs and services to people's lives
4. Resources — Available resources, including language assistance services

The Title VI Coordinator will:

- Review demographic data and conduct a four-factor analysis on a regular basis and update as necessary

- Proactively modify guidelines if language access barriers are present in more than 5% of the population in any portion of the West Piedmont Planning District
- Collect and maintain demographic statistics for individuals with language access barriers affected by projects
- Solicit feedback from social service departments and community organizations on language assistance needed

4. Title VI Coordinator and Organization

Title VI Leadership

The Title VI Coordinator serves the WPPDC and has direct access to the highest level of administration over the organization. The WPPDC Executive Director serves as the Title VI Coordinator for the organization, and reports directly to the WPPDC Board of Commissioners on matters concerning the rural planning process as well as agency administration.

Title VI Coordinator: Michael Armbrister, Executive Director

Email: marmbrister@wppdc.org

Phone: (276) 638-3987

Address: 1100 Madison Street, Martinsville, VA 24112

- Overall responsibility for Title VI compliance
- Coordinates Title VI implementation across all program areas
- Coordinates Title VI reviews and training
- Processes discrimination complaints
- Maintains Title VI documentation

Additional WPPDC staff responsible for implementing the Title VI Program on behalf of the WPPDC are identified below. These positions report to the Executive Director.

Deputy Director: Sean Campbell

Senior Planner, Transportation: Joe Bonanno, AICP

Contact information for all staff is maintained on the WPPDC website and is available upon request from the WPPDC offices.

5. Program Areas Covered

Rural Transportation Planning

The WPPDC serves the West Piedmont Region, with the exceptions being the City of Danville and the urbanized portions of Pittsylvania County, which both fall into the Danville MPO. The WPPDC receives federal financial assistance annually through the Federal Highway Administration (FHWA), administered vis-à-vis the Virginia Department of Transportation (VDOT). Unless otherwise specified by the program, the Title VI compliance requirements outlined in this Title VI Program and Plan comply with the requirements set forth by the Federal Highway Administration under 23 CFR Part 200 (§ 200.9) and 49 CFR Part 21.

Through the development of an Rural Transportation Work program, the WPPDC conducts planning activities such as:

- Development and maintenance of the region's Rural Long-Range Transportation Plan
- Executes and coordinates corridor, safety, and multimodal planning studies
- Coordinates with federal, state, and local agencies regarding bicycle and pedestrian, as well as freight planning
- Provides regional planning support to Piedmont Area Regional Transit (PART)
- Supports member jurisdictions in the development of SMART SCALE and federal discretionary grant applications

Rural transportation planning and programming is administered and staffed by the West Piedmont Planning District Commission. The Commission is comprised of representatives from the City of Danville, Pittsylvania County, Franklin County, Henry County, Patrick County, the City of Martinsville, and the Town of Rocky Mount.

Title VI Requirements for the West Piedmont Planning District Commission:

- Conducting a benefits and burdens analysis as part of the development of the Rural Long-Range Transportation Plan
- The development and maintenance of a Public Participation Plan that outlines the WPPDC's standards for public engagement and inclusion in planning processes
- Assurance of Title VI compliance in all planning studies and projects
- Conducting demographic analyses for project prioritization
- Review of the TIP for equitable distribution of projects
- Maintenance of a current Title VI Assurance executed with VDOT

5.2 Relationship to Other Federally Assisted Programs

The West Piedmont Planning District Commission administers additional federally assisted programs outside the scope of the Rural Transportation Planning Program, including the Danville MPO, , Appalachian Regional Commission (ARC) Local Development District planning and administration, U.S. Economic Development Administration (EDA) Economic Development District planning and administration, hazard mitigation planning, a local housing office, and the Virginia Telecommunication Initiative (VATI). Those programs are governed by the WPPDC's agency-wide nondiscrimination policies and by the requirements of their respective funding agencies.

6. Discrimination Complaint Procedures

Any person who believes the West Piedmont Planning District Commission has unlawfully discriminated against them may file a complaint. The following steps and procedures are written for staff to follow. A person who believes there has been discrimination may use the information below and the forms in Appendix D to file a complaint.

6.1 Eligibility

Any person who believes they — or a specific class of persons — were subjected to discrimination on the basis of race, color, or national origin in WPPDC programs and activities may file a Title VI complaint.

6.2 Filing a Complaint

Forms Available:

- Title VI Discrimination Complaint Form (English)
- Title VI Discrimination Complaint Form (Spanish)
- Additional languages available upon request

How to File:

- Online: Available on the Danville MPO and WPPDC websites
- By mail: 1100 Madison Street, Martinsville, VA 24112
- In person: WPPDC offices during business hours
- By phone: (276) 638-3987 (assistance available)
- By email: marmbrister@wppdc.org

Timeline: Complaints must be filed within 180 days of the alleged discrimination, unless the time for filing is extended by the processing agency.

6.3 Complaint Processing

The WPPDC logs all complaints received on its behalf and forwards complaints through the appropriate federal oversight authority. For Federal Highway Administration (FHWA) funded programs, the WPPDC will forward the complaint to the Virginia Department of Transportation (VDOT), which should forward the complaint to Virginia's FHWA Division Office, which should forward the complaint to the FHWA Office of Civil Rights (OCR).

OCR will decide whether to accept, dismiss, or transfer the complaint and will notify the complainant, the FHWA Division Office, the Virginia Department of Transportation, and the WPPDC. The WPPDC is committed to full cooperation with all oversight authorities in the investigation of any filed complaints

and will maintain records of all complaints received, actions taken, outcomes, and corrective actions implemented.

A complainant may also file a complaint directly with the Federal Highway Administration, the Federal Transit Administration, or the U.S. Department of Transportation Departmental Office of Civil Rights. Filing a complaint with the WPPDC does not extend or preserve any filing deadline that applies to a federal complaint.

7. Appendices

Appendix A: Title VI of the Civil Rights Act of 1964

Appendix B: Non-Discrimination Statement

Appendix C: Certificate of Assurance

Appendix D: Title VI Complaint Form and Log of Complaints

Appendix E: Public Notification

Appendix F: Data Collection, Regional Demographics, and Language Access Barriers Four-Factor Analysis

Appendix G: Review Procedures

Appendix H: Danville MPO Public Participation Plan

Appendix I: Organizational Chart

Appendix J: List of Policy Board and Committee Members

Appendix A: Title VI of the Civil Rights Act of 1964

The eleven titles of the Civil Rights Act of 1964 are:

- I. Voting Rights
- II. Public Accommodation
- III. Desegregation of Public Facilities
- IV. Desegregation of Public Education
- V. Commission on Civil Rights
- VI. Nondiscrimination in Federally Assisted Programs and Activities
- VII. Equal Employment Opportunity
- VIII. Registration and Voting Statistics
- IX. Intervention and Procedure after Removal in Civil Rights Cases
- X. Establishment of Community Relations Service
- XI. Miscellaneous

Title VI of the Civil Rights Act of 1964 addresses nondiscrimination in federally assisted programs and activities. Title VI declares it to be the policy of the United States that discrimination on the grounds of race, color, or national origin shall not occur in connection with programs and activities receiving federal financial assistance and authorizes and directs the appropriate federal departments and agencies to take action to carry out this policy. Subsequent nondiscrimination laws expanded the range and scope of Title VI coverage and applicability. Executive orders and federal agency orders and memoranda clarify implementation of nondiscrimination policy.

Appendix B: Non-Discrimination Statement

The West Piedmont Planning District Commission (WPPDC) gives public notice of its policy to assure full compliance with Title VI of the Civil Rights Act of 1964, the Civil Rights Restoration Act of 1987 (P.L. 100-259), and all related statutes. The WPPDC is committed to ensuring that no person in the United States of America shall, on the grounds of race, color, or national origin, be excluded from the participation in, be denied the benefits of, or be otherwise subjected to discrimination under any program or activity for which the WPPDC receives federal financial assistance as required by Title VI.

In addition to Title VI, the following federal statutes and regulations also prohibit discrimination:

Section 162(a) of the Federal-Aid Highway Act of 1973 (23 U.S.C. § 324) — Prohibits discrimination based on sex

Section 504 of the Rehabilitation Act of 1973 (29 U.S.C. § 794) — Prohibits discrimination based on disability

The Age Discrimination Act of 1975 (42 U.S.C. § 6101) — Prohibits discrimination based on age

The Americans with Disabilities Act of 1990 (42 U.S.C. § 12101 et seq.) — Prohibits discrimination based on disability

Title IX of the Education Amendments of 1972 — Prohibits discrimination based on sex in education programs

Civil Rights Restoration Act of 1987 (P.L. 100-259) — Broadens scope of Title VI coverage

Any person who believes that he or she has, individually, or as a member of any specific class of persons, been excluded from the participation in, been denied the benefits of, or been otherwise subjected to discrimination under any program or activity for which the WPPDC provides assistance, and believes the discrimination is based upon race, color, or national origin has the right to file a formal complaint.

The Title VI Coordinator is responsible for initiating and monitoring Title VI activities, preparing required reports, and other responsibilities as required by Title 23 Code of Federal Regulations (CFR) Part 200, and Title 49 CFR Part 21.

To submit a formal complaint (Appendix D) or to request additional information on Title VI obligations, contact Michael Armbrister, WPPDC Title VI Coordinator, 1100 Madison Street, Martinsville, VA 24112; phone (276) 638-3987; email marmbrister@wppdc.org. For complainants who may be unable to file a written complaint, verbal information will be accepted by the WPPDC by phone or in person.

Appendix C: Certificate of Assurance

Danville MPO Title VI / Nondiscrimination Assurance (DOT Order No. 1050.2A) inclusive of Appendices A through E.

DANVILLE METROPOLITAN PLANNING ORGANIZATION
TITLE VI / NONDISCRIMINATION ASSURANCE
(DOT Order No. 1050.2A)

The West Piedmont Planning District 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 (FHWA), 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 Nondiscrimination 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 Assurance

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 ground 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 Nondiscrimination 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 nondiscrimination 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 Highway 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 Federal-Aid Highway Program and, in adapted form, in all proposals for negotiated agreements regardless of funding source:

"The West Piedmont Planning District 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(s), 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(s) 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(s) 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 West Piedmont Planning District 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 FHWA or the Virginia Department of Transportation (VDOT) 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 FHWA or VDOT. You must keep records, reports, and submit the material for review upon request to FHWA or VDOT, 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 West Piedmont Planning District 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 Federal-Aid Highway Program. This ASSURANCE is binding on the Commonwealth of Virginia, other recipients, sub-recipients, sub-grantees, contractors, subcontractors and their subcontractors, transferees, successors in interest, and any other participants in the Federal-Aid Highway Program.

West Piedmont Planning District Commission

by _____

Michael Armbrister, MPO Administrator

DATED _____

APPENDIX A

Contractor/Consultant/Supplier Agreement: U.S. DOT 1050.2A — 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:

11. **Compliance with Regulations:** The contractor (hereinafter includes consultants) will comply with the Acts and the Regulations relative to Nondiscrimination in Federally-assisted programs of the U.S. Department of Transportation, the 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.
12. **Nondiscrimination:** 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.
13. **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 Nondiscrimination on the grounds of race, color, or national origin.
14. **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.
15. **Sanctions for Noncompliance:** In the event of a contractor's noncompliance with the Nondiscrimination 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.
16. **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 West Piedmont Planning District Commission will accept title to the lands and maintain the project constructed thereon in accordance with the Virginia General Assembly, the Regulations for the Administration of the Federal-Aid Highway 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, Nondiscrimination 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 Danville 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 West Piedmont Planning District 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 West Piedmont Planning District Commission, its successors and assigns.

The West Piedmont Planning District 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 West Piedmont Planning District Commission will use the 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, Nondiscrimination 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 nondiscrimination conditions, the Department 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 West Piedmont Planning District 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 Nondiscrimination covenants, the West Piedmont Planning District Commission 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 Nondiscrimination covenants, the West Piedmont Planning District Commission 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 West Piedmont Planning District Commission 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 the West Piedmont Planning District Commission 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 Nondiscrimination covenants, the West Piedmont Planning District Commission 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, the above-described lands and facilities will there upon revert to and vest in and become the absolute property of the West Piedmont Planning District Commission 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

Contractor/Consultant/Supplier Agreements: U.S. DOT 1050.2A — 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 Nondiscrimination 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 U.S.C. § 471, Section 47123), as amended, (prohibits discrimination based on race, creed, color, national origin, or sex);
- The Civil Rights Restoration Act of 1987, (P.L. 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);
- 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.).

Appendix D: Title VI Complaint Form and Log of Complaints

The following Title VI Discrimination Complaint Form may be used for any of the programs and activities administered by or on behalf of the West Piedmont Planning District Commission.

The discrimination complaint form is available on the following page, and online at the following websites:

Danville MPO — www.danvillempo.org

WPPDC — www.westpiedmontpdc.org

The complaint form can be submitted by email, by mail, or in person at 1100 Madison Street, Martinsville, VA 24112. The Title VI Coordinator can assist the person in filing a complaint if needed. You can reach our office Monday through Friday from 8:30 a.m. to 5:00 p.m. at (276) 638-3987, or by email at marmbrister@wppdc.org.

List of Investigations, Lawsuits, and Complaints:

In the last 5 years related to Title VI investigations, lawsuits, and complaints:

Year	Complaints	Investigations	Lawsuits	Total
FY22: July 1, 2021 – June 30, 2022	0	0	0	0
FY23: July 1, 2022 – June 30, 2023	0	0	0	0
FY24: July 1, 2023 – June 30, 2024	0	0	0	0
FY25: July 1, 2024 – June 30, 2025	0	0	0	0
FY26: July 1, 2025 – June 30, 2026	0	0	0	0

West Piedmont Planning District Commission Title VI Discrimination Complaint Form

Section 1	
Name:	
Address:	
Telephone (Home/Cell):	
Email Address:	
Accessible Requirement Needed:	☐ Large Print Format ☐ TDD ☐ Audio Recording ☐ Other
If other, please describe:	
Section 2	
Are you filing this complaint on your own behalf? ☐ Yes ☐ No * If you answered "yes" to this question, go to Section 3	
If not, please supply the name and relationship of the person for whom you are filing a complaint:	
Please explain why you have filed on behalf of a third party:	
Please confirm that you have obtained the permission of the aggrieved party if you are filing on their behalf: ☐ Yes ☐ No	

Section 3	
I believe the discrimination I experienced was based on (check all that apply): ☐ Race ☐ Color ☐ National Origin	
Date of Alleged Discrimination (Month, Day, Year):	
Explain as clearly as possible what happened and why you believe you were discriminated against. Describe all persons who were involved. Include the name and contact information of the person(s) who discriminated against you (if known) as well as the names and contact information of any witnesses. If more space is needed, please use the back of this form:	
Section 4	
Have you previously filed a Title VI complaint with the Danville MPO or the West Piedmont Planning District Commission? ☐ Yes ☐ No	
Section 5	
Have you filed this complaint with any other Federal, State, or local agency, or with any Federal or State court? ☐ Yes ☐ No	
If you selected yes, check all that apply:	☐ Federal Agency _____ ☐ Federal Court _____ ☐ State Agency _____ ☐ State Court _____ ☐ Local Agency _____

Please provide information about a contact person at the agency/court where the complaint was filed:	
Name:	
Title:	
Agency:	
Address:	
Telephone:	
Section 6	
Name of the agency or organization the complaint is against:	
Contact person:	
Title:	
Telephone:	

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

Signature and date required below:

Signature

Date

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

Michael Armbrister, Title VI Coordinator
 West Piedmont Planning District Commission
 1100 Madison Street, Martinsville, VA 24112
 Phone: (276) 638-3987; Email marmbrister@wppdc.org

Comisión del Distrito de Planificación de West Piedmont

Formulario de Queja por Discriminación — Título VI

Sección 1	
Nombre:	
Dirección:	
Teléfono (casa/celular):	
Dirección de correo electrónico:	
Requisitos de formato accesible:	☐ Letra grande ☐ TDD ☐ Grabación de audio ☐ Otro
Si es otro, por favor descríballo:	
Sección 2	
¿Está presentando esta queja en su propio nombre? ☐ Sí ☐ No * Si su respuesta es "sí", vaya a la Sección 3	
Si no es así, sírvase proporcionar el nombre y la relación de la persona para quien se queja:	
Por favor, explique por qué usted ha presentado la queja en nombre de un tercero:	
Por favor, confirme que ha obtenido el permiso de la parte perjudicada si presenta la queja en su nombre: ☐ Sí ☐ No	

Sección 3	
Creo que la discriminación que experimenté fue basada en (marque todo lo que corresponda): ☐ Raza ☐ Color ☐ Origen Nacional	
Fecha de la discriminación presunta (mes, día, año):	
Explique lo más claramente posible lo que pasó y por qué cree que fue discriminado. Describa a todas las personas que estuvieron involucradas. Incluya el nombre y la información de contacto de la persona o personas que lo discriminaron (si se conoce), así como los nombres y la información de contacto de los testigos. Si se necesita más espacio, por favor use la parte de atrás de este formulario:	
Sección 4	
¿Ha presentado previamente una queja del Título VI con esta agencia? ☐ Sí ☐ No	
Sección 5	
¿Ha presentado esta queja ante alguna otra agencia federal, estatal o local, o ante algún tribunal federal o estatal? ☐ Sí ☐ No	
En caso afirmativo, marque todo lo que corresponda:	☐ Agencia Federal _____ ☐ Tribunal Federal _____ ☐ Agencia Estatal _____ ☐ Tribunal Estatal _____ ☐ Agencia Local _____

Sírvese proporcionar información sobre una persona de contacto en la agencia o tribunal donde se presentó la denuncia:	
Nombre:	
Título:	
Agencia:	
Dirección:	
Teléfono:	
Sección 6	
Nombre de la agencia u organización contra la cual se presenta la queja:	
Persona de contacto:	
Título:	
Teléfono:	

Puede adjuntar cualquier material escrito o cualquier otra información que usted piense que es relevante para su queja. Se requiere firma y fecha a continuación.

Firma

Fecha

Por favor, envíe este formulario en persona a la dirección indicada más abajo, o envíe este formulario a:

Michael Armbrister, Coordinador del Título VI
 West Piedmont Planning District Commission
 1100 Madison Street, Martinsville, VA 24112
 Teléfono: (276) 638-3987; Correo electrónico: marmbrister@wppdc.org

Appendix E: Public Notification

The West Piedmont Planning District Commission Title VI Notices are posted in the following locations:

- West Piedmont Planning District Commission offices (1100 Madison Street, Martinsville, VA 24112)

On our websites: www.danvillempo.org and www.westpiedmontpdc.org

- In all public notices, legal advertisements, and meeting agendas issued by the West Piedmont Planning District Commission

Appendix F: Data Collection and Regional Demographics

The West Piedmont Planning District Commission(WPPDC) collects and analyzes demographic data on an ongoing basis to ensure the organization is meeting Title VI obligations. Analysis of demographic trends within the region `allows the organization to evaluate the implications of past and present transportation investments — including whether those investments have supported the efficient movement of people and goods, expanded economic opportunity, and improved safety for all members of the traveling public — and to inform future decision-making accordingly.

Demographic data collection and analysis are conducted in furtherance of the following nondiscrimination obligations under Title VI of the Civil Rights Act of 1964 and applicable federal regulations:

- To ensure the level and quality of transportation services and benefits are provided without regard to race, color, or national origin
- To identify and avoid disproportionately high and adverse human health and environmental effects on low-income and minority populations
- To ensure full and fair participation by all potentially affected communities in the planning process
- To prevent the denial of, reduction in, or significant delay in receipt of benefits by low-income and minority populations; and
- To ensure meaningful access to the Danville MPO's programs, activities, and services by persons with language access barriers

The demographic analysis below is completed using the 2020 - 2024 American Community Survey (ACS) 5-Year Estimates. Disadvantaged groups within the metropolitan planning area include individuals experiencing poverty, disabled populations, zero-car households, minority populations, elderly populations, and individuals experiencing language access barriers.

Poverty

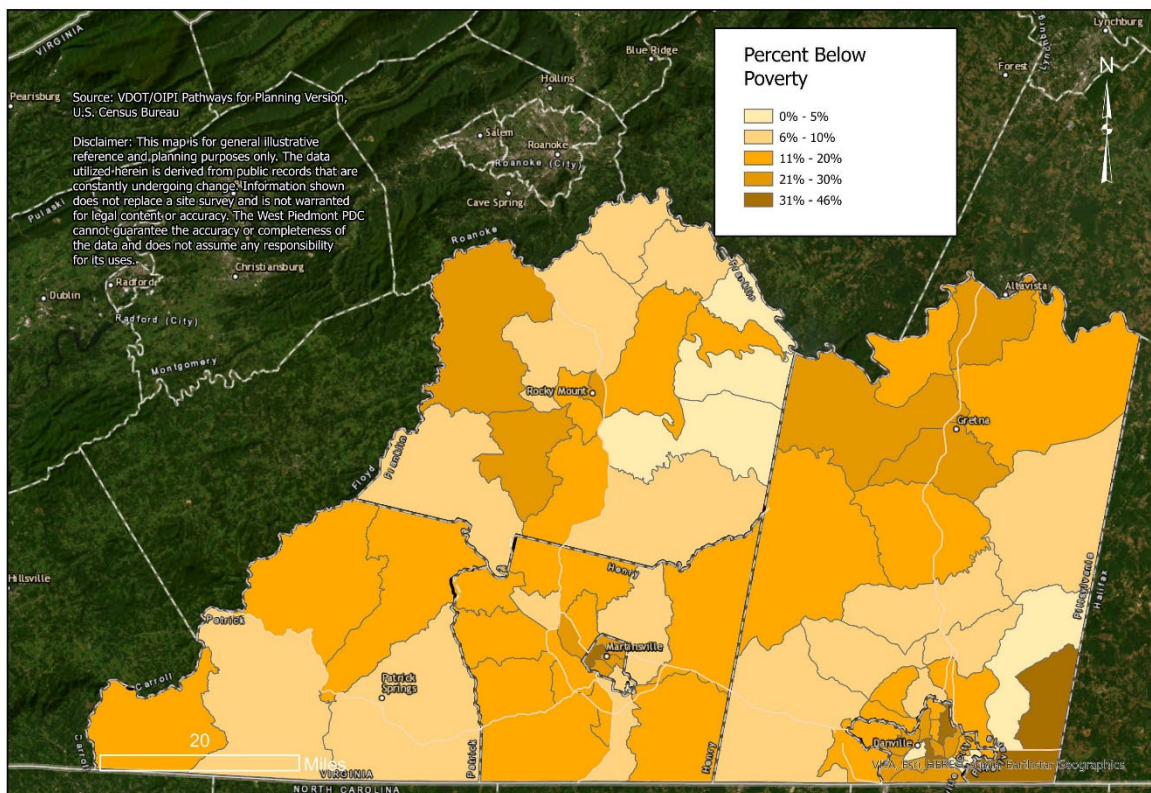
The WPPDC seeks to identify and address the needs of low-income populations with regard to transportation investments and services. Individuals and households living below the federal poverty level frequently face compounding barriers to transportation access, including limited vehicle ownership, reduced mobility, and geographic isolation from employment, healthcare, and essential services. Table 1, below, reveals that 16.5 percent of the region's population is below the poverty line.

Table 1. Population Below Poverty Level , West Piedmont Planning District Commission (ACS 5-Year Estimates, Table S1701)

Jurisdiction	Population for Whom Poverty is Determined	Population Below Poverty	Percentage
WPPD Region Total	232,324	38,299	16.5%

Source: 2020 – 2024 U.S. Census Bureau, American Community Survey 5-Year Estimates (Table S1701). Values to be populated from the most recent ACS release prior to adoption; census tract mapping prepared by WPPDC GIS staff. "Total Population," in this context, refers to the total population of the census tracts which constitute the MPO area for which poverty has been determined.

Percent Below Poverty by Census Tract



Disabled Populations

The Americans with Disabilities Act (ADA) of 1990 and Section 504 of the Rehabilitation Act of 1973 prohibit discrimination against individuals with disabilities in transportation programs and services receiving federal financial assistance. For Title VI planning purposes, understanding where concentrations of individuals with disabilities exist within the region is essential to ensuring that

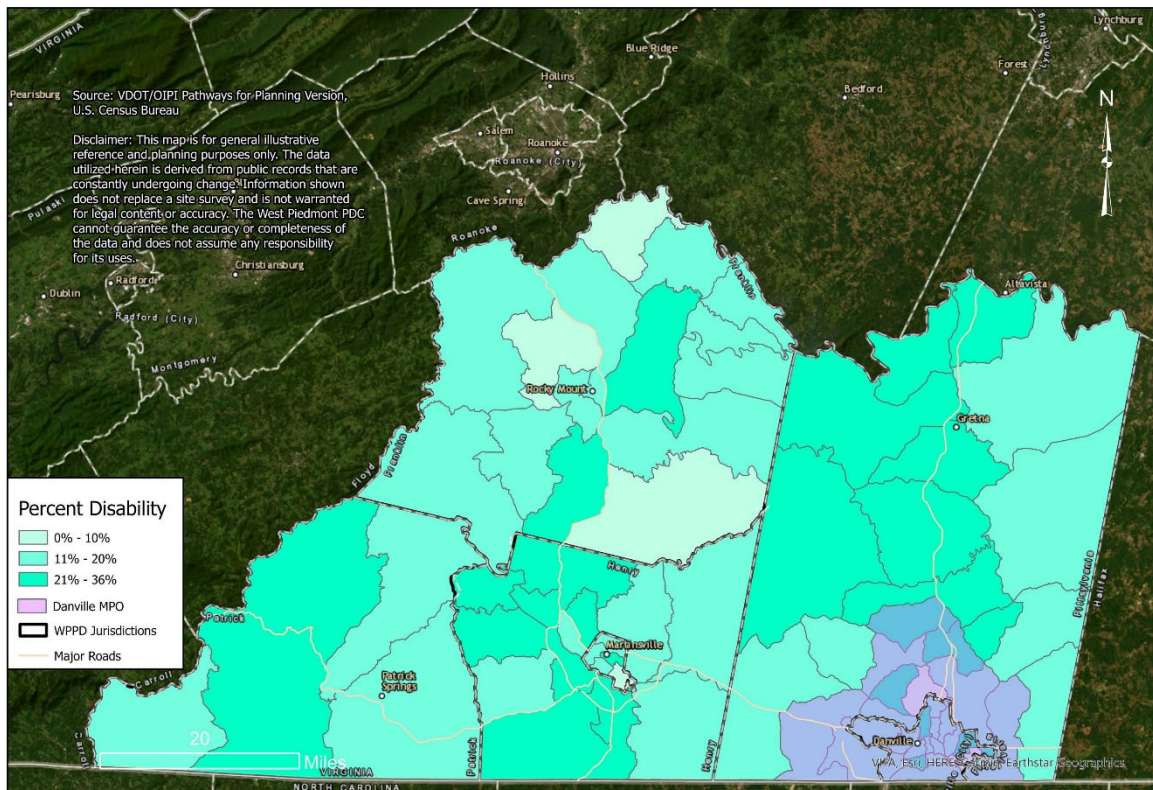
planning with regard to transportation investments, infrastructure improvements, and public participation processes is accessible. The figure entitled “Percent Disabled by Census Tract” shows that disability is not only an urban problem, but a rural one as well, as many of the census tracts containing high shares of disabled individuals can be found in rural areas. Table 2 indicates that nearly one in five of the region’s residents has a disability.

Table 2. Disabled Population , West Piedmont Planning District (2020 – 2024 ACS 5-Year Estimates, Table S1810)

Jurisdiction	Total Population	Persons with a Disability	Percentage
WPPD Region Total	233,751	44,996	19.2

Source: U.S. Census Bureau, 2020 – 2024 American Community Survey 5-Year Estimates. Values to be populated from the most recent ACS release prior to adoption; census tract mapping prepared by WPPDC GIS staff.

Percent Disabled, by Census Tract



Zero-Car Households

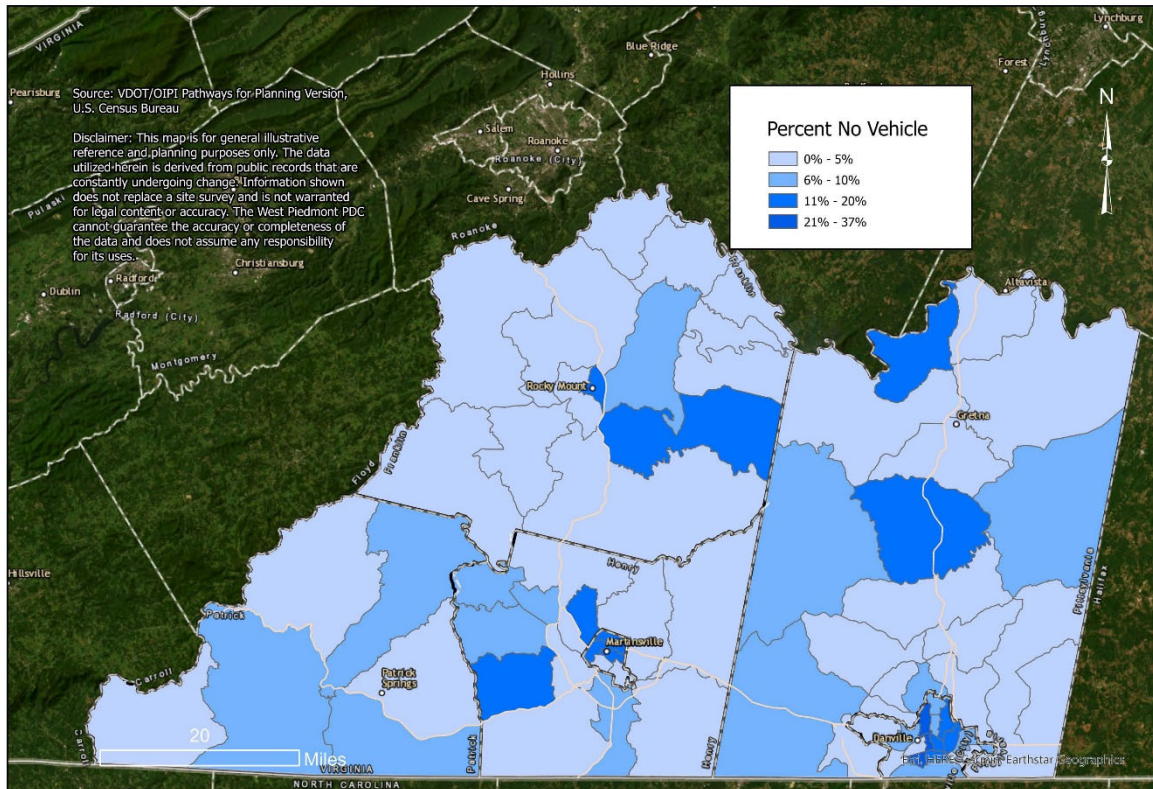
Households in which no member has access to a vehicle are classified by the U.S. Census Bureau as zero-car households. Households without vehicle access are concentrated in urban core areas and are more likely to include individuals who are also cost-burdened or living below the poverty level. Identifying these households is central to evaluating transit, sidewalk, and bicycle facility investments within the West Piedmont Region. The following figure, entitled “Percent Zero-Vehicle Households, by Census Tract,” shows that the greatest concentration of zero-vehicle households are, indeed, located within the City of Danville.

Table 3. Zero-Car Households in West Piedmont Planning District (2020 - 2024 ACS 5-Year Estimates, Table DP04)

Jurisdiction	Total Households	Zero-Car Households	Percentage
WPPD Region Total	101,620	7,016	6.9%

Source: U.S. Census Bureau, 2020 – 2024 American Community Survey 5-Year Estimates. Values to be populated from the most recent ACS release prior to adoption; census tract mapping prepared by WPPDC GIS staff.

Percent of Households without Vehicle, by Census Tract



Minority populations include all people who have not identified themselves as White (Non-Hispanic or Latino and Single Race Alone) in U.S. Census race and ethnicity questions. Higher minority populations are concentrated in and around the two cities of Danville and Martinsville, though minorities also appear in rural census tracts.

Jurisdiction	Total Population	Minority Population	Percentage
WPPD Region Total	238,350	73,707	30.9%

Percent Minority by Census Tract



Elderly Population

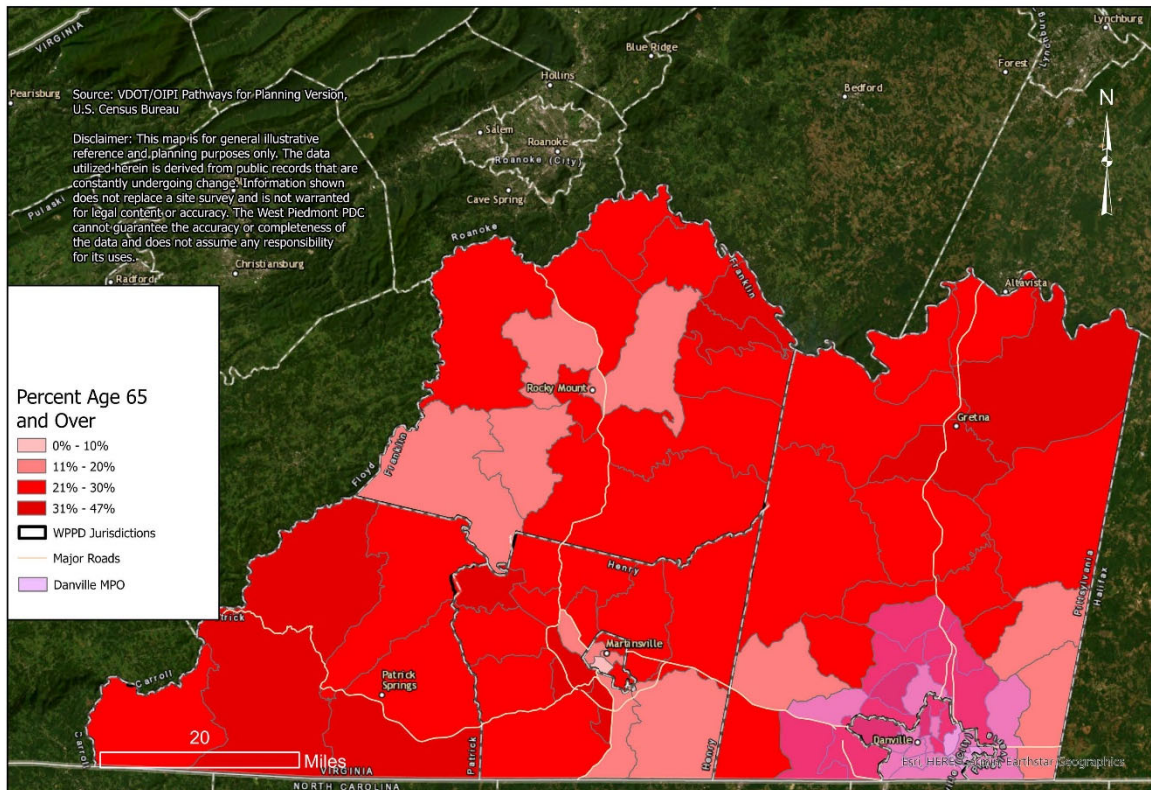
The elderly population is defined as those aged 65 years and older. Concentrations of elderly residents often overlap with other social planning factors, such as individuals with disabilities and zero-car households, and are a key consideration in the siting of pedestrian infrastructure, transit stops, and demand-response service.

Table 5. Elderly Population in the West Piedmont Planning District (2020 – 2024 ACS 5-Year Estimates, Table DP05)

Jurisdiction	Total Population	Total Population Age 65+	Percentage
WPPD Region Total	238,350	56,705	23.8%

Source: U.S. Census Bureau, 2020 – 2024 American Community Survey 5-Year Estimates. Values to be populated from the most recent ACS release prior to adoption; census tract mapping

Percent Age 65 and Over, by Census Tract



prepared by WPPDC GIS staff.

Language Access Barriers Four-Factor Analysis

To ensure meaningful access for all residents and stakeholders, the WPPDC regularly examines the need for services for individuals who experience language access barriers to participation in the planning process. This may include individuals for whom English is not their primary language, individuals who are vision impaired, and those who are deaf or hard of hearing. This is done by completing a four-factor analysis that assesses the following:

5. Demography — Number or proportion of individuals having language access barriers who are likely to be served or encountered within the service area.
6. Frequency — Rate of contact with services or programs
7. Importance — Nature and importance of programs and services to people's lives
8. Resources — Available resources, including language assistance services

Factor 1 — Demographics

Federal Title VI regulations require recipients of federal financial assistance to take reasonable steps to ensure meaningful access to programs and services for individuals with language access barriers. To assess the need for language assistance services, staff analyzed language use and English-speaking ability data from the U.S. Census Bureau's American Community Survey (ACS) 5-Year Estimates for all jurisdictions within the metropolitan planning area.

The Title VI Safe Harbor threshold for determining whether written translation of vital documents is required is the greater of 1,000 persons or 5% of the service area population that speaks a language other than English and speaks English less than "very well."

Table 6. Language Use and English-Speaking Ability in the West Piedmont (2020 – 2024 ACS 5-Year Estimates, Table S1601)

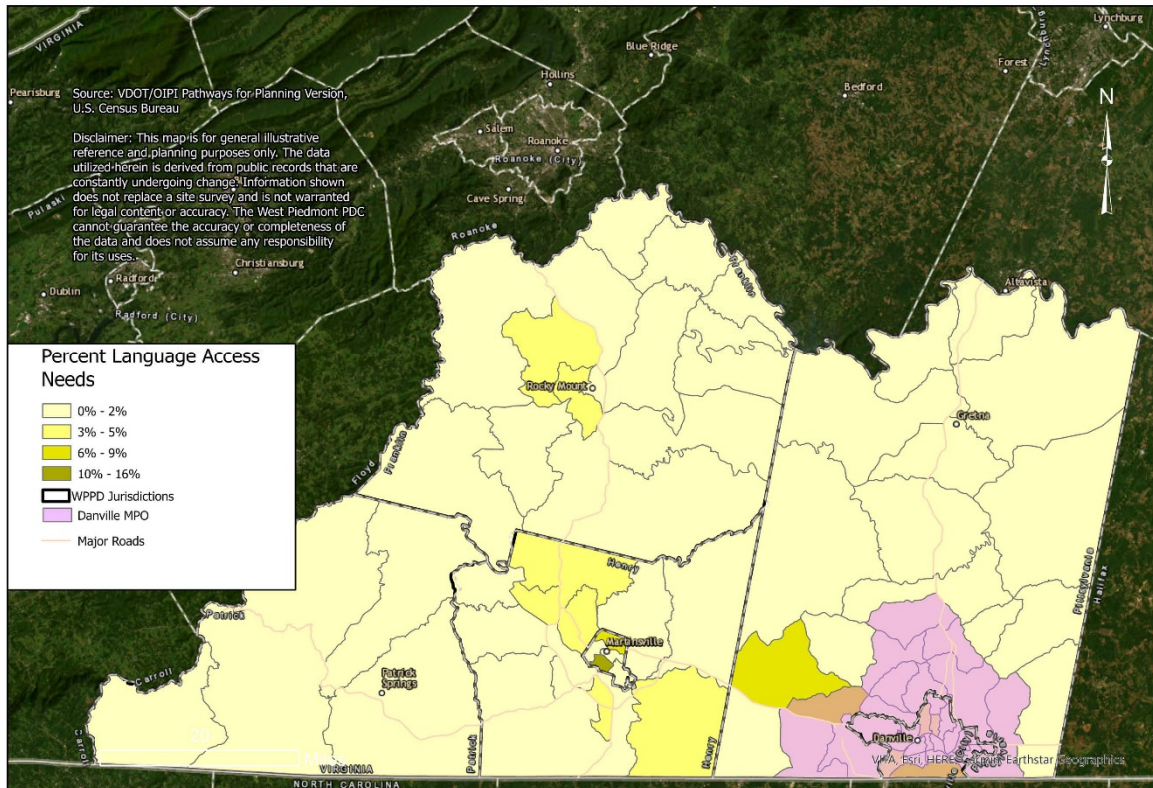
Jurisdiction	Population 18+	Language Access Barrier Population	% Language Access Barrier	Spanish
WPPD Region Total	188,372	1,441	0.76%	7,718

Source: U.S. Census Bureau, 2020 – 2024 American Community Survey 5-Year Estimates, Table S1601. Other Indo-European includes French, Haitian, or Cajun; German or other West Germanic languages; Russian, Polish, or other Slavic languages; and other Indo-European languages. Asian and Pacific Island includes Korean; Chinese (incl. Mandarin, Cantonese); Vietnamese; Tagalog; and other Asian and Pacific Island languages. Other languages constitutes Arabic along with other unspecified languages. Values to be populated from the most recent ACS release prior to adoption.

Table 6 indicates that Spanish is the most prevalent language, and should therefore be the focus of language access barrier outreach efforts. Secondary languages should also be considered in areas where those populations are concentrated, and the Title VI Coordinator will reassess prioritization

each time the four-factor analysis is updated. The image entitled “Percent Language Access Needs, by Census Tract,” shows where in the WPPDC populations who do not speak English are located.

Percent Language Access Needs, by Census Tract



Appendix G: Review Procedures

Procedures for Conducting Title VI Reviews of West Piedmont Planning District Program Areas

Reviews will be completed for all projects receiving federal funding on an annual basis. Federal regulations state the following:

All entities that receive federal financial assistance are required to create, establish, and maintain effective internal control over the Federal award that provides reasonable assurance that the entity is managing the award in compliance with Federal statutes, regulations, and the terms and conditions of the Federal award. 2 C.F.R. § 200.303(a).

Entities may not directly or through contractual or other arrangements utilize criteria or methods of administration which have the effect of subjecting individuals to discrimination because of their race, color, or national origin, or have the effect of defeating or substantially impairing accomplishments of the objectives of the program as respects individuals of a particular race, color, or national origin. 49 C.F.R. § 21.5(b); 28 C.F.R. § 42.104(b).

The West Piedmont Planning District Commission receives federal financial assistance, passed through the Virginia Department of Transportation, for the following programs:

- Metropolitan transportation planning (FHWA PL and FTA Section 5303 funds) carried out under the Unified Planning Work Program
- Federally funded discretionary planning awards, including Safe Streets and Roads for All (SS4A)
- Federal grants such as RAISE, BUILD, or SS4A

The WPPDC is committed to ensuring that all people are afforded equal opportunities to participate in all of its activities regardless of their race, color, ability, or national origin. Title VI requires nondiscrimination based on race, color, or national origin, and the Americans with Disabilities Act requires entities open to the public to reasonably accommodate people with disabilities. This review procedure intends to ensure that all WPPDC programs and projects do not discriminate based on either race or ability. The WPPDC will use this Title VI Implementation Plan, accompanying memoranda and statements, interpreter services, and annual program reviews to ensure that people are not discriminated against based on race, color, ability, or national origin.

The WPPDC operates on a fiscal year basis using a Rural Transportation Work Program (RTWP) that starts on July 1. The Title VI Coordinator will review the RTWP at the beginning of each fiscal year (July) by meeting with program staff to identify projects that need a four-factor analysis. During the annual program review, the Title VI Coordinator will review the Title VI Implementation Plan, which includes:

- Instructions to ensure nondiscrimination in communications and public participation;
- Instructions to ensure nondiscrimination in planning and programming;
- Instructions to evaluate and monitor consultant contracts for compliance with nondiscrimination authorities and disadvantaged business enterprise requirements; and

- Instructions for accommodating a person with language access barriers and language access and accommodation requests.

Where the Danville MPO passes federal funds through to a subrecipient, these review procedures will be expanded to include a regular review of the subrecipient's Title VI procedures, and the subrecipient will be required to execute the assurances contained in Appendix C.

Appendix H: West Piedmont Planning District Commission Public Participation Plan

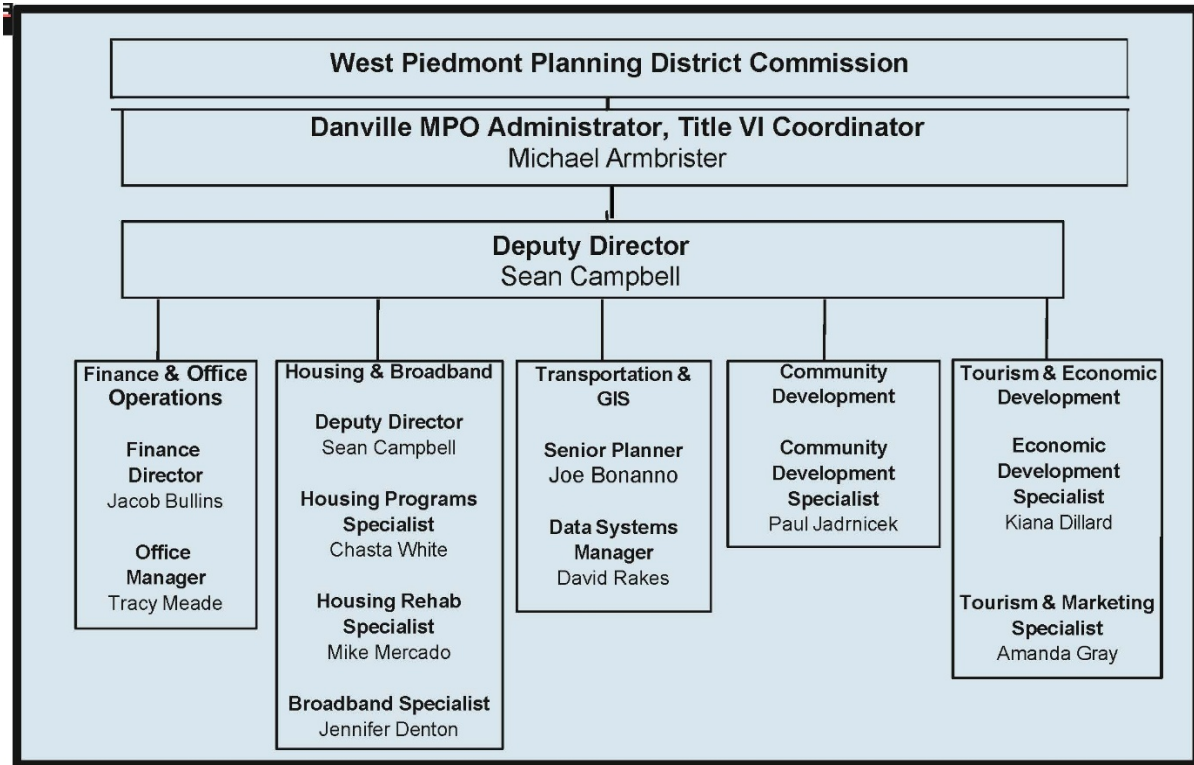
The West Piedmont Planning District Commission maintains a Public Participation Plan (PPP) governing public engagement activities related to the metropolitan transportation planning process. The plan establishes procedures and strategies for providing citizens, affected public agencies, representatives of public transportation employees, freight shippers, providers of freight transportation services, private providers of transportation, representatives of users of public transportation, representatives of users of pedestrian walkways and bicycle transportation facilities, representatives of the disabled, and other interested parties with reasonable opportunities to be involved in the rural transportation planning process, consistent with the requirements of 23 CFR 450.316.

The PPP reflects the unique demographic composition, geographic context, and transportation needs of the West Piedmont Region, and is developed and updated in coordination with member jurisdictions and the public.

The Public Participation Plan is available in print upon request at the WPPDC offices (1100 Madison Street, Martinsville, VA 24112) or on the MPO website at www.danvillempo.org.

Appendix I: Organizational Chart

The current WPPDC organizational chart, showing the MPO Administrator/Title VI Coordinator's line of responsibility for the metropolitan planning program and the staff assigned to it, is inserted immediately below.



Appendix J: List of Policy Board Members

WPPDC Board of Commissioners

The WPPDC Board of Commissioners serve as the body that oversees the West Piedmont Planning District Commission. The Board consists of 21 members, with three from each locality. Board members from localities each consist of two elected members and a non-elected resident.

Board of Commissioners	
Nick Mitchell	Franklin County
Tim Tatum, Vice-Chair	Franklin County
David Rotenizer	Franklin County
Jim Adams, Vice-Chair	Henry County
Pam Cobler	Henry County
Wesley E. George, III	Henry County
Jerry Adams	Patrick County
Jonathan Wood	Patrick County
Clayton Kendrick	Patrick County
Justin Brown	Pittsylvania County
Kenneth Bowman	Pittsylvania County
Dillard Jones	Pittsylvania County
Lee Vogler	City of Danville
Dr. Gary Miller	City of Danville
James Turner	City of Danville
Kathy Lawson, Treasurer	City of Martinsville
Aaron Rawls	City of Martinsville
Joe Martin	City of Martinsville
Fatemah Casey	Town of Rocky Mount
Ralph Casey	Town of Rocky Mount
Lucas Tuning	Town of Rocky Mount

Contact Information

West Piedmont Planning District Commission

1100 Madison Street, Martinsville, VA 24112

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