

**YORK AREA METROPOLITAN PLANNING
ORGANIZATION (YAMPO)
TITLE VI
ANNUAL COMPLIANCE REPORT

FY 2018-19**

Submitted to: The York Area Metropolitan Organization (YAMPO)

Submitted by: The YAMPO Title VI Compliance Officer and Transportation Staff, York County
Planning Commission

INTRODUCTION

In 2012, the York Area Metropolitan Planning Organization (YAMPO) adopted procedures to investigate complaints generated by the public, while ensuring due process for complainants and respondents. These procedures apply to complaints filed relating to any YAMPO program, procedure or activity and/or its sub-recipients covered under *Title VI of the Civil Rights Act of 1964*. An update to the YAMPO Title VI Compliance Policy and Complaint Procedures was adopted by the YAMPO Coordinating Committee on June 23, 2016.

Our process requires that an annual report should be filed with the YAMPO on public complaints fielded by the YAMPO staff and Title VI Compliance Officer. The report should also address efforts that the YAMPO and YCPC staff has undertaken to remain active in these processes. The following items are provided in this report:

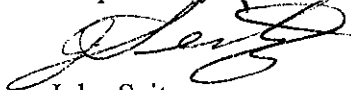
- Complaints received between July 1, 2018 and June 30, 2019; and,
- Efforts to educate/train the York County Planning Commission (YCPC) staff about Title VI, Environmental Justice (EJ) and Limited English Proficiency (LEP) initiatives for the YAMPO. Activities undertaken by the YAMPO to address Title VI, EJ and LEP issues are also addressed below. This information provides an account of all YCPC staff and the YAMPO efforts to comply with Title VI, EJ and LEP requirements.

COMPLAINTS RECEIVED (July 1, 2018 through June 30, 2019)

No formal or informal complaints (i.e., grievances) were filed during this time. A log of this activity has been attached to this report.

This report provides a factual record of events that have occurred through the administration of the *YAMPO Title VI Complaint Procedures* over the past year to the best of my knowledge.

Respectively Submitted,



John Seitz
Title VI Compliance Officer, YAMPO
July 1, 2019

EDUCATION/TRAINING EFFORTS FOR THE YAMPO/ACTIVITIES UNDERTAKEN BY THE YAMPO

Education/Training

- YCPC staff members attended a Title VI seminar presented by the PennDOT Civil Rights Division held during the Department's Annual Planning Partners Meeting in fall 2018.

Activities Undertaken by the YAMPO

- The York County Planning Commission (YCPC) staff together with the YAMPO Committees developed a concept by which to conduct an Environmental Justice (EJ) Benefits and Burdens (B/B) Analysis for all aspects of the MPO transportation planning process. The full name of this process analysis is the *South Central Pennsylvania Environmental Justice Unified Process and Methodology Guide*. The YCPC/YAMPO staff has enlisted the help of the other MPO's in PennDOT District 8-0 to develop this concept. The ultimate goal of this effort is develop an EJ B/B model that can easily be adapted for use by all MPO's in District 8-0, as well as the Commonwealth. The report was adopted by the YAMPO Coordinating Committee in June.
- Staff prepared a draft of the YAMPO Limited English Proficiency (LEP) Plan in 2019. The plan involves a four factor assessment of language interpretation and translation services available for LEP persons through the York County Planning Commission. The document provides a record of the number of LEP residents in the County, as well as the breakdown of the specific languages spoken. The report also addresses resources available for LEP residents through the York County Planning Commission. The draft report was submitted to the YAMPO Coordinating Committee (CC) and the Federal Highway Administration (FHWA) for review. The YAMPO CC will adopt the Plan after FHWA completes its review.
- The YCPC staff uses **Translationspa.com** as its interpretive service for LEP customers for all activities undertaken by the Commission. This service provides interpretive assistance for most major languages used worldwide. Our staff contracts this service through the York County Court System. Moreover, the YCPC employs two staff members who are well versed in the Spanish language.
- Staff had an exchange with the Washington (D.C.) Council of Governments (WASHCOG) Civil Rights Division staff about each MPO's Title VI Complaint Process.
- In late June, the YCPC staff completed a detailed review of the YAMPO Title VI and Environmental Justice (EJ) Processes with FHWA and FTA representatives during the Quadrennial Federal Certification Review of the YAMPO Planning and Programming Process.
- When completing all *PennDOT Connects Forms* and *Transportation Set-Aside Program applications* for candidate projects, a map is created utilizing the above GIS technology to identify Environmental Justice (EJ) populations. The map data will be utilized in the Benefits and Burdens (B/B) Analysis for each candidate project.
 - The same information will be used to develop the proposed *2021-2024 YAMPO Transportation Improvement Program (TIP)*. Analysis is conducted evaluating the impact of the proposed projects to the Census Block Groups with populations that are under-represented or disproportionately disadvantaged. The analysis will determine whether there is a disproportional existence of TIP projects programmed

for York County communities compared with their level of proportional disadvantage.

- The YCPC staff now can aid in the fielding of complaints filed by individuals with Limited English Proficiency (LEP). Information on the YCPC website can be translated into 57 different languages using the *Google Translate™* language module. Further, the YCPC staff will provide interpretation services as per request from such individuals as part of the complaint process.
 - In 2014, the YCPC staff prepared a report for the YAMPO, entitled *Verification of YCPC Website Translation Service*. This report addressed website translation issues for LEP residents in the county.
 - Added this year, a request for PDF documents to be translated into other languages has been added to the YCPC Website. This accommodation satisfies a translation need addressed in the 2014 YAMPO Report.
- *DBE Data Collection/Submission with Unified Planning Work Program (UPWP)*: The YCPC staff reports on the amount of work they have provided to third party consultants through the YAMPO *Unified Planning Work Program*. This report is prepared for each quarter of the fiscal year. The YCPC then submits this report with the *YAMPO UPWP* quarterly invoicing to PennDOT.
- Each advertisement for the YAMPO committee meetings includes a clause that states the YAMPO's efforts to comply with the nondiscrimination requirements of applicable civil rights statutes, executive orders, regulation and policies. It also mentions that the YAMPO has adopted a procedure by which the public can file a complaint for alleged discriminatory practice under *Title VI*.
 - The same statement is included in the inside cover for all documents produced by the YCPC Transportation Department.

YAMPO TITLE VI COMPLAINT LOG, FY 2018-2019

Case No.	COMPLAINANT Name	Address	Telephone No.	BASIS OF COMPLAINT (see attached)	DESCRIPTION OF INCIDENT (see attached)	DATE/DATES OF DESCRIMINATION INCIDENT/INCIDENTS	OTHER AGENCIES CONTACTED	OTHER PARTIES ASSOCIATED WITH COMPLAINT (see attached)
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Log Kept for Complaints Lodged between July 1, 2018 and June 30, 2019

Complaints received as of June 30, 2019

SIGNED: 

, YAMPO Title VI Compliance Officer DATE: 7/1/19