

# 2023

Nondiscrimination Compliance Plan  
for the Tulsa Transportation Management Area

## **TITLE VI** **PLAN UPDATE**



**INCOG**

**Transportation  
Planning  
Division**

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## PURPOSE

“The Federal Highway Administration's (FHWA's) and the Federal Transit Administration's (FTA's) longstanding policy [has been] to actively ensure nondiscrimination under Title VI of the 1964 Civil Rights Act in federally funded activities. Under Title VI and related statutes, each Federal agency is required to ensure that no person is excluded from participation in, denied the benefit of, or subjected to discrimination under any program or activity receiving federal financial assistance on the basis of race, color, or national origin. The Civil Rights Restoration Act of 1987 clarified the intent of Title VI to include all program and activities of federal-aid recipients, subrecipients, and contractors whether those programs and activities are federally funded or not.” (United States Department of Transportation)

*Title VI of the 1964 Civil Rights Act:*  
(<https://www.transit.dot.gov/title6>)

*Civil Rights Restoration Act of 1987 and Additional Nondiscrimination Requirements:*  
([https://www.fhwa.dot.gov/civilrights/programs/title\\_vi/](https://www.fhwa.dot.gov/civilrights/programs/title_vi/))

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## **SECTION 1 – INTRODUCTION**

### **1.1 About INCOG**

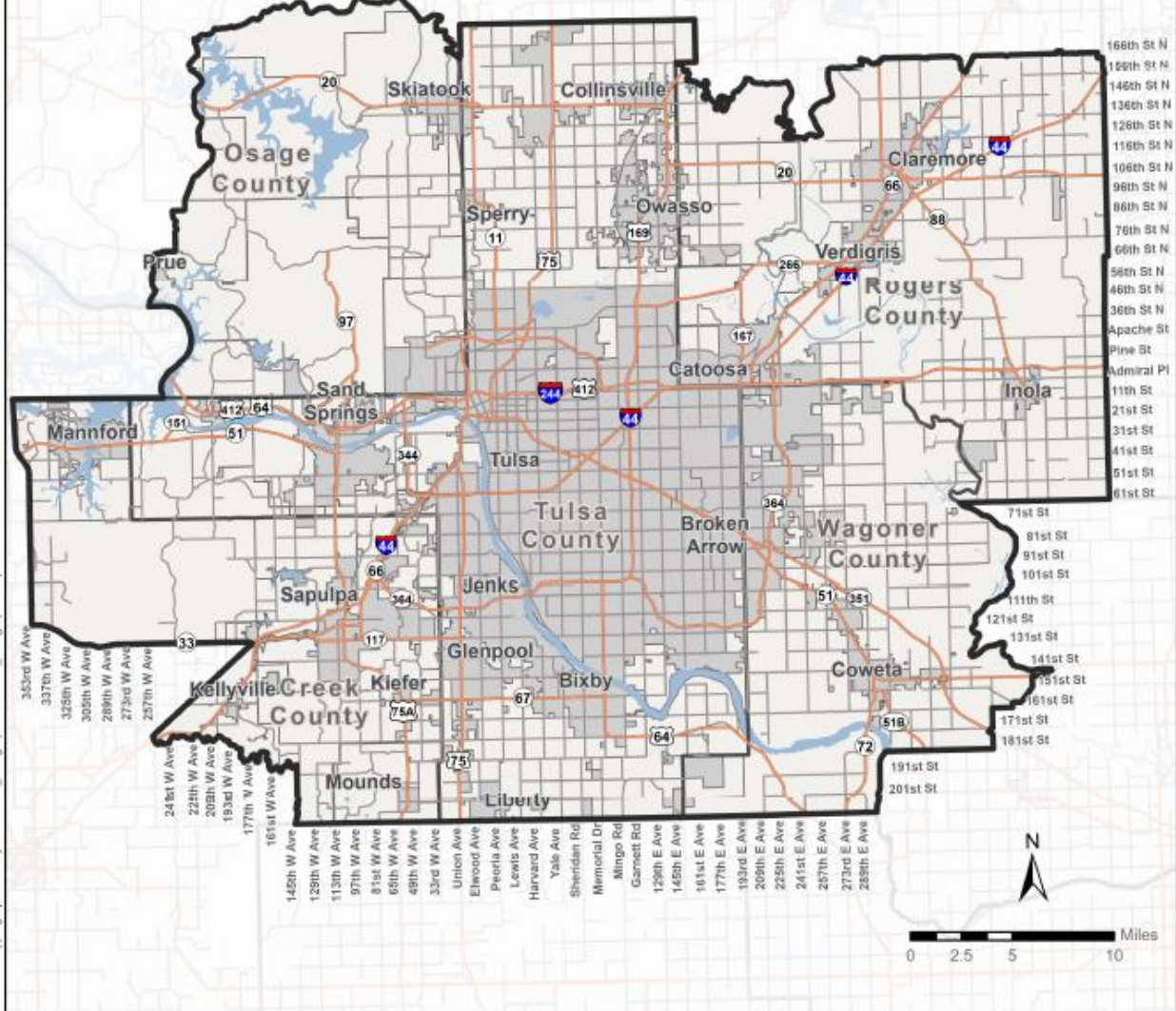
The Indian Nations Council of Governments (INCOG) is a voluntary association of northeast Oklahoma governments in Creek, Osage, Rogers, Tulsa, and Wagoner counties. INCOG’s purpose is to promote economy and efficiency in government by providing a forum for regional cooperation and by supporting members with planning, development, management, research, and coordination services.

INCOG was designated by the Governor of Oklahoma as the Metropolitan Planning Organization (MPO) for the Tulsa metropolitan area, in accordance with Federal law. As the MPO, INCOG, in cooperation with the Oklahoma Department of Transportation (ODOT) and the Metropolitan Tulsa Transit Authority (MTTA), is responsible for the development of regional transportation plans and programs for the Tulsa Transportation Management Area (TMA), as shown on *page 6*. The 1,694 square-mile TMA is comprised of Tulsa, and portions of Creek, Osage, Rogers, and Wagoner counties. The area includes the cities of Bixby, Broken Arrow, Catoosa, Claremore, Collinsville, Coweta, Fair Oaks, Glenpool, Inola, Jenks, Kellyville, Kiefer, Liberty, Lotsee, Mannford, Mounds, Owasso, Prue, Sand Springs, Sapulpa, Skiatook, Sperry, Tulsa, and Verdigris. According to the 2021 US Census estimate data, the Tulsa metropolitan area has 1,023,988 residents, all needing reliable, convenient, and safe transportation opportunities.

The process of developing transportation plans and programs provides for consideration of all modes of transportation and is continuing, cooperative, and comprehensive. The Transportation Technical Advisory Committee (TTC) serves as an advisory group to the Transportation Policy Committee (TPC), providing technical expertise in the development of transportation plans and programs for the Tulsa metropolitan area. The TPC is the forum in the local decision-making process for policy development and adoption related to transportation planning, program development, and operation within the Tulsa TMA. Upon approval by the TPC, transportation plans and programs are forwarded to the sponsoring local governments for information and review, to the INCOG Board of Directors for endorsement, and the Tulsa Metropolitan Area Planning Commission (TMAPC) for inclusion in the Comprehensive Plan.

The INCOG Transportation Planning Division staff is responsible for projects identified in the annual Unified Planning Work Program (UPWP). Staff members prepare transportation planning, policy, and program recommendations as required to complete UPWP work tasks or in response to specific requests from the TPC. Staff also provide routine technical support to the TPC, TTC, TMAPC, MTTA, INCOG Board of Directors, and various local governments and agencies.

# Tulsa Transportation Management Area (TMA)



## Legend

-  Highways
-  Major Streets
-  Bodies of Water
-  Corporate Limits (Cities and Towns)
-  County Boundaries
-  Transportation Management Area

## Location Map



## 1.2 Document Purpose

The purpose of this document is to ensure that the INCOG Transportation Planning Division complies with Title VI of the Civil Rights Act of 1964 and related statutes regarding nondiscrimination and environmental justice.

Enforcement of the latter statutes is covered by this document to the extent that they relate to prohibiting discrimination on the grounds of race, color, and national origin in programs receiving Federal financial assistance. Responsibility for enforcing Title VI and nondiscrimination rests with the Federal agencies that extend financial assistance. INCOG's actions in enforcing nondiscrimination will include:

- Consider all individual input.
- Ensure that the level and quality of transportation planning and products is provided equitably and without regard to race, color, national origin, disability or income.
- Recognize specific and prominent community issues and circumstances.
- Identify mechanisms for eliciting involvement from low-income, minority, and other residents and representatives as outlined in the Public Participation Plan.
- Provide access to information for all individuals and other interested parties.
- Avoid, minimize, or mitigate disproportionately high and adverse human health and environmental effects, including social and economic effects of transportation planning programs and activities on minority populations, persons with disabilities, and low-income populations.
- Ensure the full and fair participation of all affected populations to transportation planning programs and activities that affect minority populations, Limited English Proficiency (LEP) individuals, persons with disabilities, and low-income populations.



- Prevent the denial, reduction, or delay in assistance related to transportation planning programs and activities that benefit minority populations, Limited English Proficiency (LEP) residents, persons with disabilities, and low-income populations.
- Document all outreach, research, planning, project/program development and other activities.

## 1.3 Definitions

The following terms are defined for the purpose of this document.

### General Terms

**Title VI** - refers to Title VI of the Civil Rights Act of 1964, 42 U.S.C. 2000d to 2000d-4.

Where appropriate, this term also refers to the civil rights provisions of other Federal statutes to the extent that they prohibit discrimination on the grounds of race, color, and national origin in programs receiving Federal financial assistance of the type subject to Title VI itself.

**INCOG** - refers to the Indian Nations Council of Governments in its capacity as the Metropolitan Planning Organization for transportation planning for the Tulsa Transportation Management Area.

**DOJ** - refers to the United States Department of Justice.

**DOT** - refers to the United States Department of Transportation.

**FHWA** - refers to the Federal Highway Administration.

**FTA** – refers to the Federal Transit Administration.

**NHTSA** - refers to the National Highway Traffic Safety Administration.

**Program** - refers to programs and activities receiving Federal financial assistance subject to Title VI.

*Race, Color, and National Origin Classifications* (where designation of persons by race, color or national origin is required, the following groups, based on US Census definitions, shall be used).

**American Indian or Alaska Native** - refers to person(s) having origins in any of the original peoples of North and South America (including Central America), and who maintain tribal affiliation or community attachment.

**Asian** - A person having origins in any of the original peoples of the Far East, Southeast Asia, or the Indian subcontinent including, for example, Cambodia, China, India, Japan, Korea, Malaysia, Pakistan, the Philippine Islands, Thailand, and Vietnam.

**Native Hawaiian or Other Pacific Islander** - Refers to a person having origins in any of the original peoples of Hawaii, Guam, Samoa, or other.

**Black or African American (not of Hispanic Origin)** - refers to person(s) having origins in any of the Black racial groups of Africa.

**Hispanic or Latino** - refers to person(s) of Mexican, Puerto Rican, Cuban, Central or South American or other Spanish Culture or origin, regardless of race.

**White (not of Hispanic Origin)** - refers to person(s) having origins in any of the original peoples of Europe, the Middle East, or North Africa.

**Multiracial Populations** - refers to people having origins in more than one of the federally designated racial categories.

## Other Nondiscrimination Classifications

**Disparate Impact** – refers to a facially neutral policy or practice that disproportionately affects members of a group identified by race, color, or national origin, where the recipient's policy or practice lacks a substantial legitimate justification and where there exists one or more alternatives that would serve the same legitimate objectives but with less disproportionate effect on the basis of race, color, or national origin.

**Disproportionate Effect:** (1) an effect predominantly borne by members of identified populations; (2) an effect suffered by members of an identified populations that is appreciably more severe or greater in magnitude than the adverse effect that will be suffered by those not in the identified populations; (3) an incidence (or prevalence) of an effect, a risk of an effect, or likely exposure to environmental hazards, that would potentially cause

adverse effects on members of identified populations that significantly exceeds that experienced by a comparable reference population.

**Elderly** – person(s) age 65 and older.

**Individual with a disability** – person who has a physical or mental impairment that substantially limits one or more major life activities, has a record of such impairment, or is regarded as having such impairment.

**LEP** – (Limited English Proficiency) refers to persons for whom English is not their primary language and who have a limited ability to read, write, speak, or understand English. It includes people who reported to the U.S. Census that they speak English less than very well, not well, or not at all.

**Low Income** - person(s) who live in areas with 51% or more of households below 80% of the median household income for an area.

**Single Parent Female-Headed Household** – household including children younger than 18 headed by an unmarried female parent/guardian.

**Youth** – person(s) younger than 18.

*Refer to FTA Circular 4702.1B*

*([http://www.fta.dot.gov/documents/FTA\\_Title\\_VI\\_FINAL.pdf](http://www.fta.dot.gov/documents/FTA_Title_VI_FINAL.pdf)) for additional definitions.*

## 1.4 Groups Evaluated

The Federal Highway Administration (FHWA) 2000 publication *An Overview of Transportation and Environmental Justice* presented three fundamental Environmental Justice principles:

- To avoid, minimize, or mitigate disproportionately high and adverse human health and environmental effects, including social and economic effects, on minority populations and low-income populations.
- To ensure the full and fair participation by all potentially affected communities in the transportation decision-making process.

- To prevent the denial of, reduction in, or significant delay in the receipt of benefits by minority and low-income populations.

The Office of Management and Budget (OMB) issued *Policy Directive 15, Revisions to the Standards for the Classification of Federal Data on Race and Ethnicity*, in 1997, establishing five minimum categories for data on race. Executive Order 12898 and the DOT and FHWA Orders on Environmental Justice address persons belonging to any of the following groups (as defined in “An Overview of Transportation and Environmental Justice”): American Indian and Alaskan Native, Asian, Black or African American, Hispanic or Latino, or Low Income. Native Hawaiian or Other Pacific Islander was added in 2000.

Title VI of the Civil Rights Act of 1964 and the Civil Rights Restoration Act of 1987 (PL 100.259), also requires assurance that “no person shall on the grounds of race, color, or national origin, be excluded from participation in, denied the benefits of, or be otherwise subjected to discrimination under any program or activity.” For planning and outreach purposes, the INCOG transportation staff has focused on additional sub-groups often underrepresented in transportation planning. These additional groups are: low income, youth, elderly, female single-parent heads of household, multiracial individuals, and individuals with disabilities.

## 1.5 Authorities and Guidelines

*INCOG is subject to the following Federal acts, authorities, guidelines, regulations, and executive orders in regard to equal treatment and discrimination:*

### Nondiscrimination Statutes

**Title VI of the Civil Rights Act of 1964**, 42 USC 2000, provides in Section 601 that: “No person in the United States shall, on the ground of race, color, or national origin, be denied the benefits of, or be subjected to discrimination under any program or activity receiving Federal financial assistance.”

**Section 504 of the Rehabilitation Act of 1973**, 29 USC 790, provides: “No qualified handicapped person shall, solely by reason of his handicap, be excluded from participation

in, be denied the benefits of, or be subjected to discrimination under any program or activity that receives or benefits from Federal financial assistance.”

**Age Discrimination Act of 1975**, USC 6101, provides: “No person in the United States shall, on the basis of age, be excluded from participation in, be denied the benefits of, or be subjected to discrimination under any program or activity receiving Federal financial assistance.”

**23 USC 324** provides: “No person shall on the ground of sex be excluded from participation in, be denied the benefits of, or be subjected to discrimination under any program or activity receiving Federal assistance under this Title or carried on under this title.”

**The Civil Rights Restoration Act of 1987**, P.L. 100-209, provides: Clarification of the original intent of Congress in Title VI of the Civil Rights Act of 1964, Title IX of the Educations Amendments of 1972, the Age Discrimination Act of 1975, and Section 504 of the Rehabilitation Act of 1973. It also restores the broad, institution-wide scope and coverage of the nondiscrimination statutes to include all programs and activities of Federal-aid recipients, sub-recipients, and contractors, whether such programs and activities are federally assisted or not.

**Title II of the Americans with Disabilities Act of 1990**, P.L. 101-336, provides: “No qualified individual with a disability shall, by reason of such disability, be excluded from the participation in, be denied the benefits of, or be subjected to discrimination by a department, agency, special purpose district, or other instrumentality of a State or local government.”

## **Nondiscrimination Executive Orders**

**E.O. 12250**: DOJ Leadership and Coordination of Nondiscrimination Laws

**E.O. 12898**: Federal Actions to Address Environmental Justice in Minority Populations and Low-Income Populations

## **Nondiscrimination Regulations**

**28 CFR 35**: DOJ regulations governing Nondiscrimination on the basis of disability in State and Local Government Services

**28 CFR 36:** DOJ regulations governing nondiscrimination on the basis of disability in public accommodations and commercial facilities

**28 CFR 41:** Implementation of Executive Order 12250, Nondiscrimination on the basis of handicap in federally assisted programs

**28 CFR 42, Subpart C:** DOJ's regulation implementing Title VI of the Civil Rights Act of 1964

**28 CFR 50.3:** DOJ's Guidelines for enforcement of Title VI of the Civil Rights Act of 1964

**49 CFR 21:** FTA and DOT's Title VI regulation

**49 CFR 27:** DOT's regulation implementing Section 504 of the Rehabilitation Act of 1973

**23 CFR 200:** FHWA's Title VI regulation

**23 CFR 1235:** FHWA and NHTSA joint regulation governing Uniform System for Parking for People with Disabilities

### **Nondiscrimination Directives**

**DOT ORDER 1000.12:** Implementation of the DOT Title VI Program

**DOT ORDER 1050.2:** Standard Title VI Assurances

### **Additional Documents**

In addition to the above-listed statute and regulations the following documents incorporate Title VI principles:

**DOT LEP Guidance 70 FR 74087, (December 14, 2005):** The Department's Policy Guidance Concerning Recipients' Responsibilities to Limited English Proficient Persons. This guidance is based on the prohibition against national origin discrimination in Title VI of the Civil Rights Act of 1964, as it affects limited English proficient persons.

**Section 12 of FTA's Master Agreement:** Provides, in pertinent part, that recipients agree to comply, and assure the compliance of each subrecipient, lessee, third party contractor, or other participant at any tier of the Project, with all provisions prohibiting discrimination on

the basis of race, color, or national origin of Title VI of the Civil Rights Act of 1964, as amended, 42 U.S.C. §§ 2000d et seq., and with U.S. DOT regulations, “Nondiscrimination in Federally-Assisted Programs of the Department of Transportation—Effectuation of Title VI of the Civil Rights Act,” 49 CFR part 21. Except to the extent FTA determines otherwise in writing, recipients agree to follow all applicable provisions of the most recent edition of FTA Circular 4702.1B, “Title VI Requirements and Guidelines for Federal Transit Administration Recipients,” and any other applicable Federal directives that may be issued. Unless FTA states otherwise in writing, the Master Agreement requires all recipients to comply with all applicable Federal directives.

## **1.6 Non-discrimination Policy Statement**

INCOG Affirms:

1. Title VI of the Civil Rights Act of 1964 prohibits discrimination in federally assisted programs. Title VI was amended by the Civil Rights Restoration Act of 1987 (P.L. 100-259), effective March 22, 1988. This Act expanded the definition of the terms “programs or activities” to include all of the operations of an education institution, governmental entity, or private employer that receives Federal funds if any part of that entity receives Federal funds.
2. INCOG has been designated the Metropolitan Planning Organization (MPO) for the Tulsa Transportation Management Area (TMA). It is the policy of INCOG to ensure compliance with the Title VI of the Civil Rights Act of 1964 and all related statutes or regulations in all programs and activities it administers.
3. As part of the Transportation Planning process, INCOG will take steps to ensure that no person shall on the grounds of race, color, national origin, sex, age or disability be excluded from participation in, or be denied the benefits of, or be subjected to discrimination under any transportation program or activity, its recipients, sub-recipients, and contractors.

4. INCOG delegates nondiscrimination responsibilities to the program managers and charges them with the responsibility to develop and implement procedures and guidelines to adequately monitor their programs.
5. The Transportation Planning Division director is granted the authority for INCOG's transportation programs to administer and monitor nondiscrimination as promulgated under Title VI of the Civil Rights Act of 1964 and any subsequent legislation. The director will provide assistance to recipients, sub-recipients, and any person(s).
6. INCOG recognizes the need for continuous nondiscrimination training for personnel and will facilitate that training on a regular basis.
7. This Title VI document was approved by INCOG Board of Directors on April 11<sup>th</sup>, 2023.

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**INCOG Executive Director**

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**Date**



## **SECTION 2 - POLICIES AND ORGANIZATION STRUCTURE**

### **2.1 Staffing and Guidance**

Members of the INCOG Transportation Planning staff will be trained to recognize Title VI and other nondiscrimination issues as defined by the authorities listed in Section 1. All staff members are aware of the Division's responsibilities under Title VI and other nondiscrimination legislation, and if discrimination is discovered, know to refer to the complaint procedures. (The following staff listing is provided as a guide for individuals within the Tulsa TMA with questions or complaints.) All aspects of the compliance and complaint process are coordinated by the Transportation Planning Division director.

#### **INCOG Transportation Planning Staff**

<b>Name</b>	<b>Title</b>	<b>Phone</b>	<b>E-Mail</b>
<b>Rich Brierre</b>	INCOG Executive Director	918.584.7526	<b>rbrierre@incog.org</b>
<b>Thomas Dow</b>	Transportation Director	918.584.7526	<b>tdow@incog.org</b>
<b>Patricia Dinoa</b>	Principal Planner	918.584.7526	<b>pdinoa@incog.org</b>
<b>Zhao Wu</b>	Regional Public Outreach Planner	918.584.7526	<b>zwu@incog.org</b>

As appropriate, INCOG staff will coordinate efforts with ODOT, the Federal Highway Administration, and the Federal Transit Administration (FTA) especially during nondiscrimination plan reviews and revisions. If appropriate, individuals who need more information on Title VI regulations and responsibilities or other nondiscrimination issues will be referred to:

**Jessie Orange**

State Title VI Branch

Office of Civil Rights

Oklahoma Department of Transportation

200 N. E. 21<sup>st</sup> Street, Room 2-A1 - Oklahoma City, OK 73105-3204

Phone: 405.521.2072 – [civilrts@odot.org](mailto:civilrts@odot.org)

<https://www.odot.org/hqdiv/civilrtg.htm>

## 2.2 Committees/Boards Representation

The Transportation Technical Committee (TTC) serves the Transportation Policy Committee (TPC) in an advisory capacity on all technical matters concerning transportation systems in the Tulsa Transportation Management Area (TMA). The Committee reviews the Long-Range Transportation Plan, the Transportation Improvement Program (TIP), Unified Planning Work Program (UPWP), and special studies. It also reviews proposed amendments to the Major Street and Highway Plan (MSHP), as contained within the Comprehensive Plan, if requested by INCOG member entities.

The Transportation Policy Committee (TPC) serves as the forum for policy development and adoption in the local urban transportation planning process as it relates to present and future transportation systems within the Tulsa TMA. The TPC receives recommendations from the TTC to the items listed above. The TPC, upon approval, forwards transportation plans, programs, and documents to the INCOG Board of Directors, acting as the Metropolitan Planning Organization (MPO) for endorsement, to the Tulsa Metropolitan Area Planning Commission (TMAPC) for inclusion in the Comprehensive Plan, and the local governmental units for their information and review.

Members of the Transportation Technical Committee (TTC) and the Transportation Policy Committee (TPC) are appointed at the discretion of INCOG's individual member communities. Members are not chosen by INCOG, the MPO. Members typically include city planners, public works directors, engineers, city managers, and county commissioners of local governments in the TMA as well as modal representatives. The chairpersons of the TTC, the TPC, and the INCOG Board of Directors also have the authority to nominate or appoint representatives for several positions related to modal transportation interests. A list of Committee members can be found in the Appendix on *page 70*.

## SECTION 3 – AFFECTED ACTIVITIES

### 3.1 Data Collection

Data from the 2017-2021 ACS estimate was used to construct a demographic profile through Geographic Information System (GIS) analysis of the Tulsa TMA. This process identified the locations and needs of socioeconomic groups, including minority, low-income, persons with disabilities, elderly, and Limited English Proficiency (LEP) populations.

Area Population at a Glance								
Place Name	Population						% Change 2020-2021	% Change 2000-2020
	1980	1990	2000	2010	2020	2021 Estimate		
Bixby	6,969	9,502	13,336	20,884	28,609	29,242	2.2%	114.5%
Bristow	4,702	4,062	4,325	4,222	4,248	4,260	0.3%	-1.8%
Broken Arrow	35,761	58,082	74,859	98,850	113,540	116,330	2.5%	51.7%
Catoosa	1,772	3,133	5,449	7,151	7,440	7,410	-0.4%	36.5%
Claremore	12,085	13,280	15,873	18,581	19,580	19,419	-0.8%	23.4%
Collinsville	3,556	3,612	4,077	5,606	7,881	8,346	5.9%	93.3%
Coweta	4,554	6,159	7,139	9,943	9,654	10,149	5.1%	35.2%
Drumright	3,162	2,799	2,905	2,907	2,560	2,550	-0.4%	-11.9%
Fair Oaks	324	1,133	122	103	73	77	5.5%	-40.2%
Glenpool	2,706	6,688	8,123	10,808	13,691	13,859	1.2%	68.5%
Hominy	3,130	3,229	3,795	3,565	3,329	3,261	-2.0%	-12.3%
Jenks	5,876	7,484	9,557	16,924	25,949	26,661	2.7%	171.5%
Kiefer	912	962	1,026	1,685	2,187	2,202	0.7%	113.2%
Mannford	1,610	1,826	2,095	3,076	3,262	3,269	0.2%	55.7%
Mounds	1,086	980	1,153	1,168	935	946	1.2%	-18.9%
Owasso	6,149	11,151	18,502	28,915	38,240	38,732	1.3%	106.7%
Pawhuska	4,771	3,825	3,629	3,584	2,984	2,948	-1.2%	-17.8%

Prue	554	346	433	465	374	380	1.6%	-13.6%
Sand Springs	13,246	15,339	17,451	18,906	19,874	19,973	0.5%	13.9%
Sapulpa	15,853	18,074	19,166	20,544	21,929	22,213	1.3%	14.4%
Skiatook	3,596	4,910	5,396	7,397	8,450	8,560	1.3%	56.6%
Sperry	1,276	937	981	1,206	1,115	1,123	0.7%	13.7%
Tulsa	360,919	367,302	393,049	391,906	413,120	411,401	-0.4%	5.1%
Verdigris	N/A	N/A	N/A	3,993	5,256	5,461	3.9%	N/A
Creek County	59,210	60,915	67,367	69,967	71,754	72,029	0.4%	6.5%
Okmulgee County	39,169	36,490	39,685	40,069	36,706	36,843	0.4%	-7.5%
Osage County	39,327	41,645	44,437	47,472	45,818	45,772	-0.1%	3.1%
Pawnee County	15,310	15,575	16,612	16,577	15,553	15,741	1.2%	-6.4%
Rogers County	46,436	55,170	70,641	86,905	95,240	96,695	1.5%	34.8%
Tulsa County	470,593	503,341	563,299	603,403	669,279	672,858	0.5%	18.8%
Wagoner County	41,801	47,883	57,491	73,085	80,981	84,050	3.8%	40.9%
Tulsa Metropolitan Statistical Area (MSA)*	657,367	708,954	803,235	937,478	1,015,331	1,023,988	8.3%	8.3%

\*The Office of Management and Budget changed the boundaries of the Tulsa MSA from the 5 counties of Creek, Osage, Rogers, Tulsa, & Wagoner to 7 counties adding Okmulgee and Pawnee Counties in 2003

The subsequent pages include Tulsa TMA maps of the following:

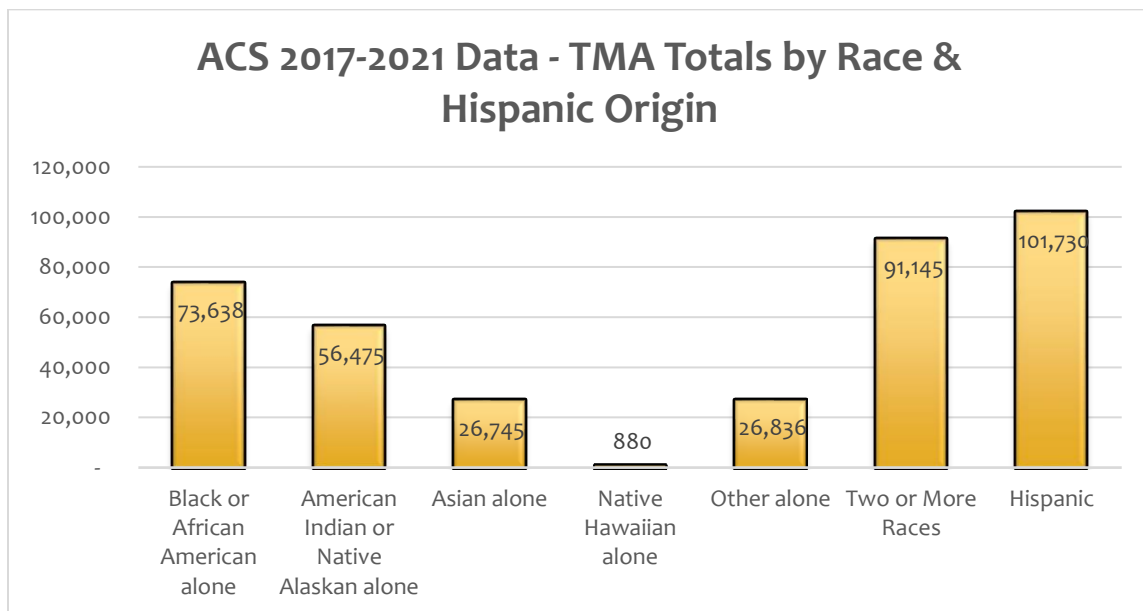
- African American Concentrations
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- Native Hawaiian Concentrations
- Other Race Concentrations
- Multiracial Concentrations
- Hispanic Concentrations
- Civilian Noninstitutionalized Population 5 Years & Older with a Disability
- Concentrations of Single Female-Headed Households with Children Less than 18

- Population Less than 18 Years Old Concentrations
- Population 65 and Older Concentrations
- Persons Below Poverty Levels Concentration
- Minority Concentrations
- Low to Moderate Income Areas and Median Household Income Below Poverty Levels

### Identification and Evaluation of Disparate Impacts

INCOG staff produces maps regularly displaying the geographic distributions of the socioeconomic groups relative to major highway and transit improvements from the Census data. The demographic profile, the maps and analysis are presented to and reviewed by the TTC and TPC committees. This data is routinely used to analyze the benefits and burdens of the Long-Range Transportation Plan, the Public Transit – Human Services Coordinated Plan, and other proposed transportation projects in the Tulsa TMA, on transportation-disadvantaged groups.

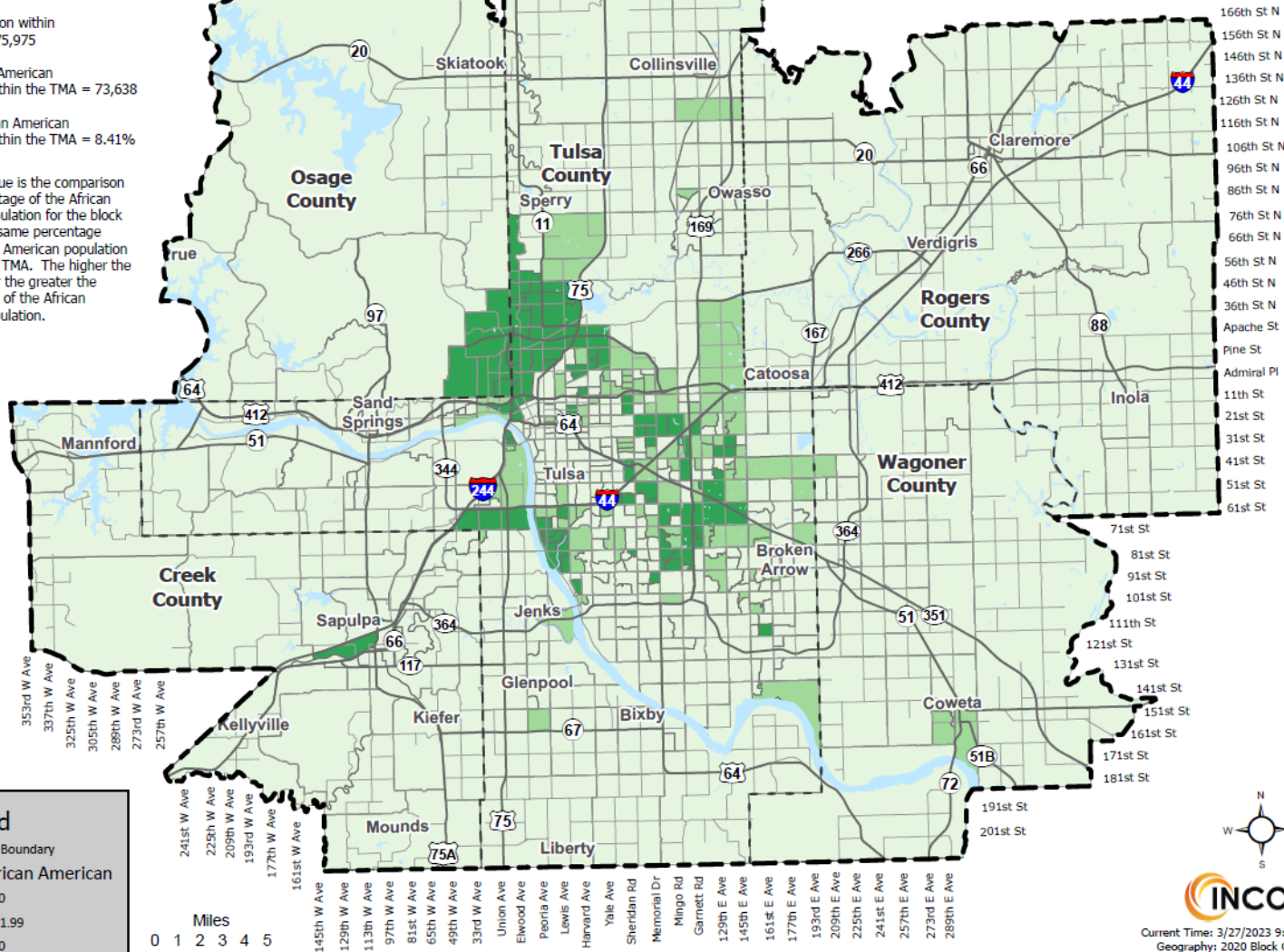
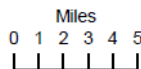
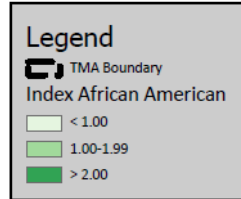
Minority population information obtained from 2017-2021 ACS estimate showed that the TMA minority population was approximately 31.5% of the general population. The chart below presents the number of TMA residents who belong to each race/ethnicity classification.



# African American Population Concentrations within the Transportation Management Area

Total population within the TMA = 875,975  
 Total African American population within the TMA = 73,638  
 Percent African American population within the TMA = 8.41%

The index value is the comparison of the percentage of the African American population for the block group to the same percentage of the African American population for the whole TMA. The higher the index number the greater the concentration of the African American population.



- 166th St N
- 156th St N
- 146th St N
- 136th St N
- 126th St N
- 116th St N
- 106th St N
- 96th St N
- 86th St N
- 76th St N
- 66th St N
- 56th St N
- 46th St N
- 36th St N
- Apache St
- Pine St
- Admiral Pl
- 11th St
- 21st St
- 31st St
- 41st St
- 51st St
- 61st St
- 71st St
- 81st St
- 91st St
- 101st St
- 111th St
- 121st St
- 131st St
- 141st St
- 151st St
- 161st St
- 171st St
- 181st St
- 191st St
- 201st St



Current Time: 3/27/2023 9:13 AM  
 Geography: 2020 Block Groups  
 Source: US Census Bureau ACS 2017-2021

Path: G:\Mapping\NCOG\_Divisions\Transportation\1\_E\_Maps\ACS2017\_2021\WorkingMap\WorkingMap.aprx

# American Indian Population Concentrations within the Transportation Management Area

Total population within the TMA = 875,975

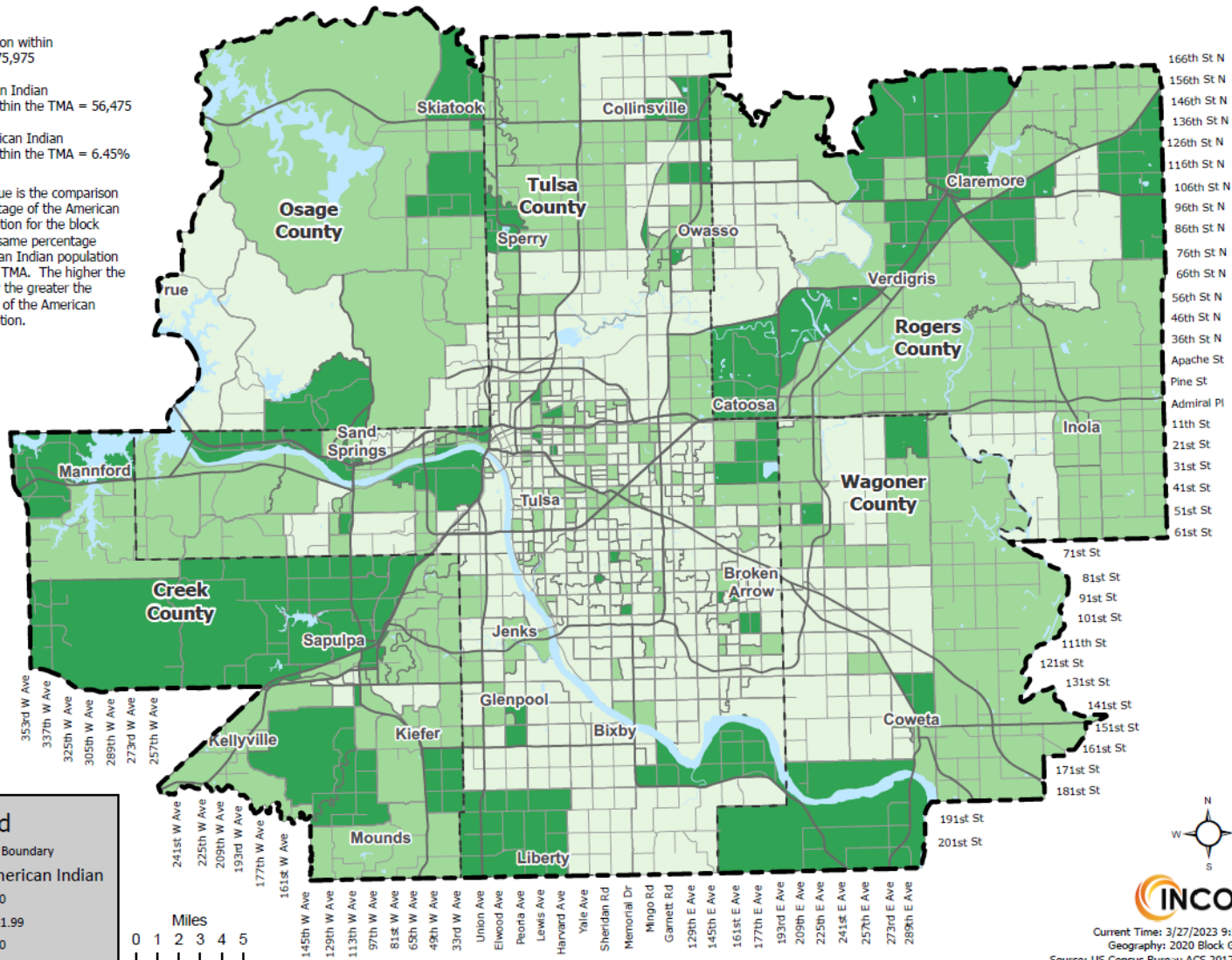
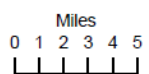
Total American Indian population within the TMA = 56,475

Percent American Indian population within the TMA = 6.45%

The index value is the comparison of the percentage of the American Indian population for the block group to the same percentage of the American Indian population for the whole TMA. The higher the index number the greater the concentration of the American Indian population.

**Legend**

- TMA Boundary
- Index American Indian
  - < 1.00
  - 1.00-1.99
  - > 2.00



Current Time: 3/27/2023 9:36 AM  
 Geography: 2020 Block Groups  
 Source: US Census Bureau ACS 2017-2021

Path: G:\Mapping\INCOG\_Divisions\Transportation\EL\_Maps\ACS2017\_2021\WorkingMap\WorkingMap.aprx

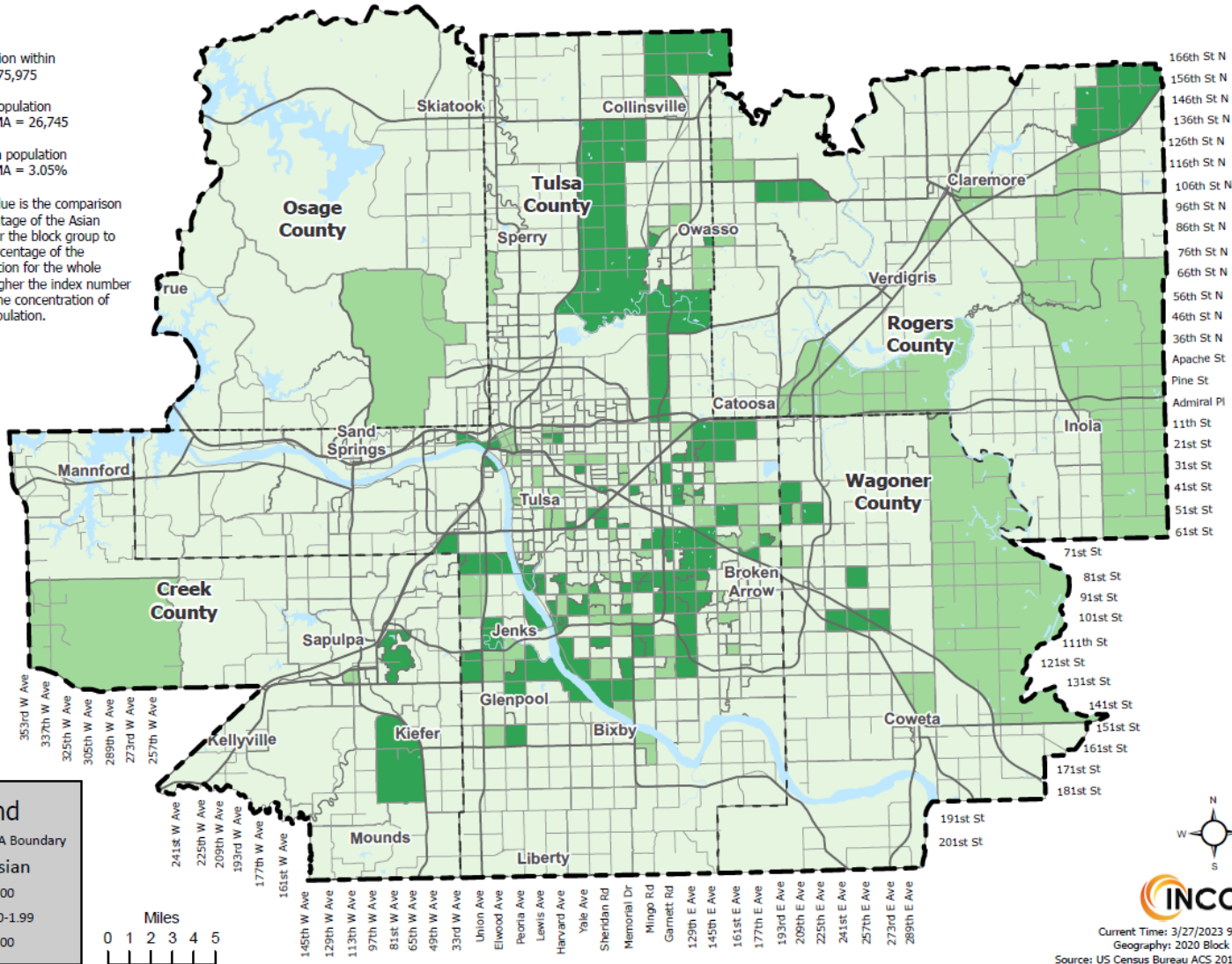
# Asian Population Concentrations within the Transportation Management Area

Total population within the TMA = 875,975

Total Asian population within the TMA = 26,745

Percent Asian population within the TMA = 3.05%

The index value is the comparison of the percentage of the Asian population for the block group to the same percentage of the Asian population for the whole TMA. The higher the index number the greater the concentration of the Asian population.



Path: G:\Mapping\INCOG Divisions\Transportation\EI\_Haps\ACS2017\_2021\WorkingMap\WorkingMap.aprx



# Native Hawaiian Population Concentrations within the Transportation Management Area

Total population within the TMA = 875,975

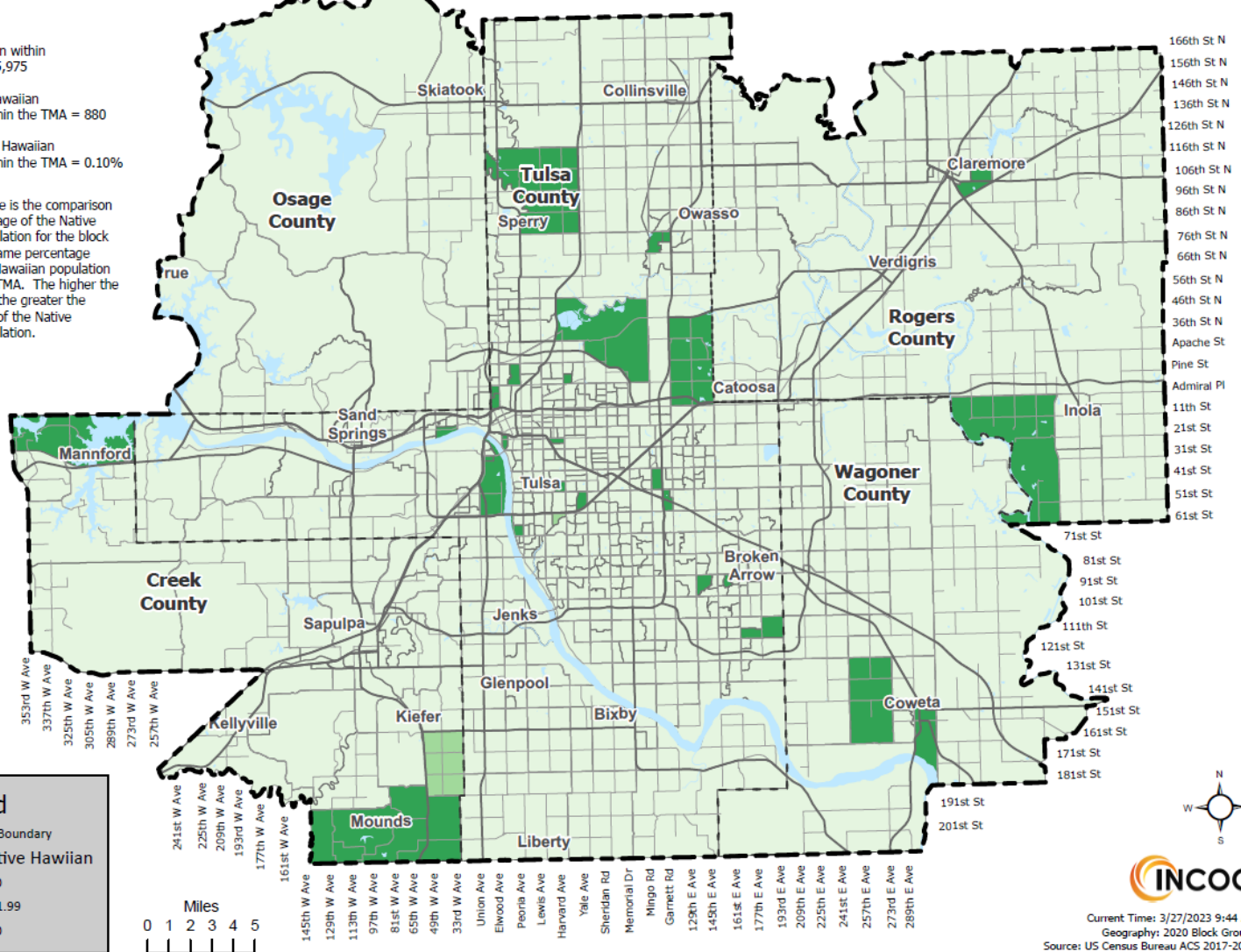
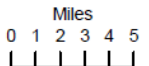
Total Native Hawaiian population within the TMA = 880

Percent Native Hawaiian population within the TMA = 0.10%

The index value is the comparison of the percentage of the Native Hawaiian population for the block group to the same percentage of the Native Hawaiian population for the whole TMA. The higher the index number the greater the concentration of the Native Hawaiian population.

**Legend**

- TMA Boundary
- Index Native Hawaiian
  - < 1.00
  - 1.00-1.99
  - > 2.00



Current Time: 3/27/2023 9:44 AM  
 Geography: 2020 Block Groups  
 Source: US Census Bureau ACS 2017-2021

Path: G:\Mapping\INCOG\_Division\Transportation\EI\_Maps\ACS2017\_2021\WorkingMap\WorkingMap.aprx

# Other Races Population Concentrations within the Transportation Management Area

Total population within the TMA = 875,975

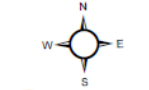
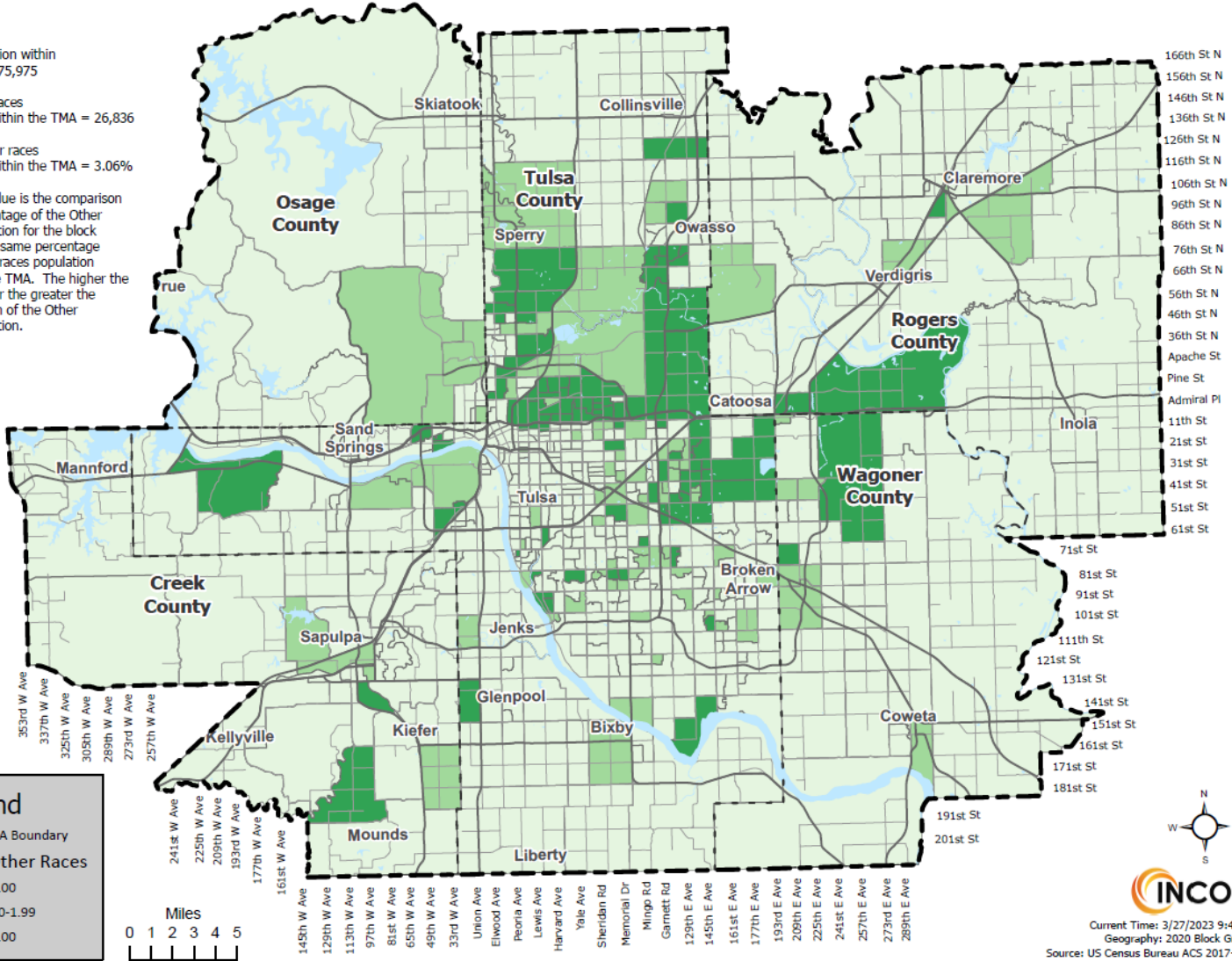
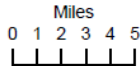
Total Other races population within the TMA = 26,836

Percent Other races population within the TMA = 3.06%

The index value is the comparison of the percentage of the Other races population for the block group to the same percentage of the Other races population for the whole TMA. The higher the index number the greater the concentration of the Other races population.

**Legend**

- TMA Boundary
- Index Other Races
  - < 1.00
  - 1.00-1.99
  - > 2.00



Current Time: 3/27/2023 9:44 AM  
 Geography: 2020 Block Groups  
 Source: US Census Bureau ACS 2017-2021

Path: G:\Mapping\INCOG\Division\Transportation\EI\_Haps\ACS2017\_2021\WorkingMap\WorkingMap.aprx

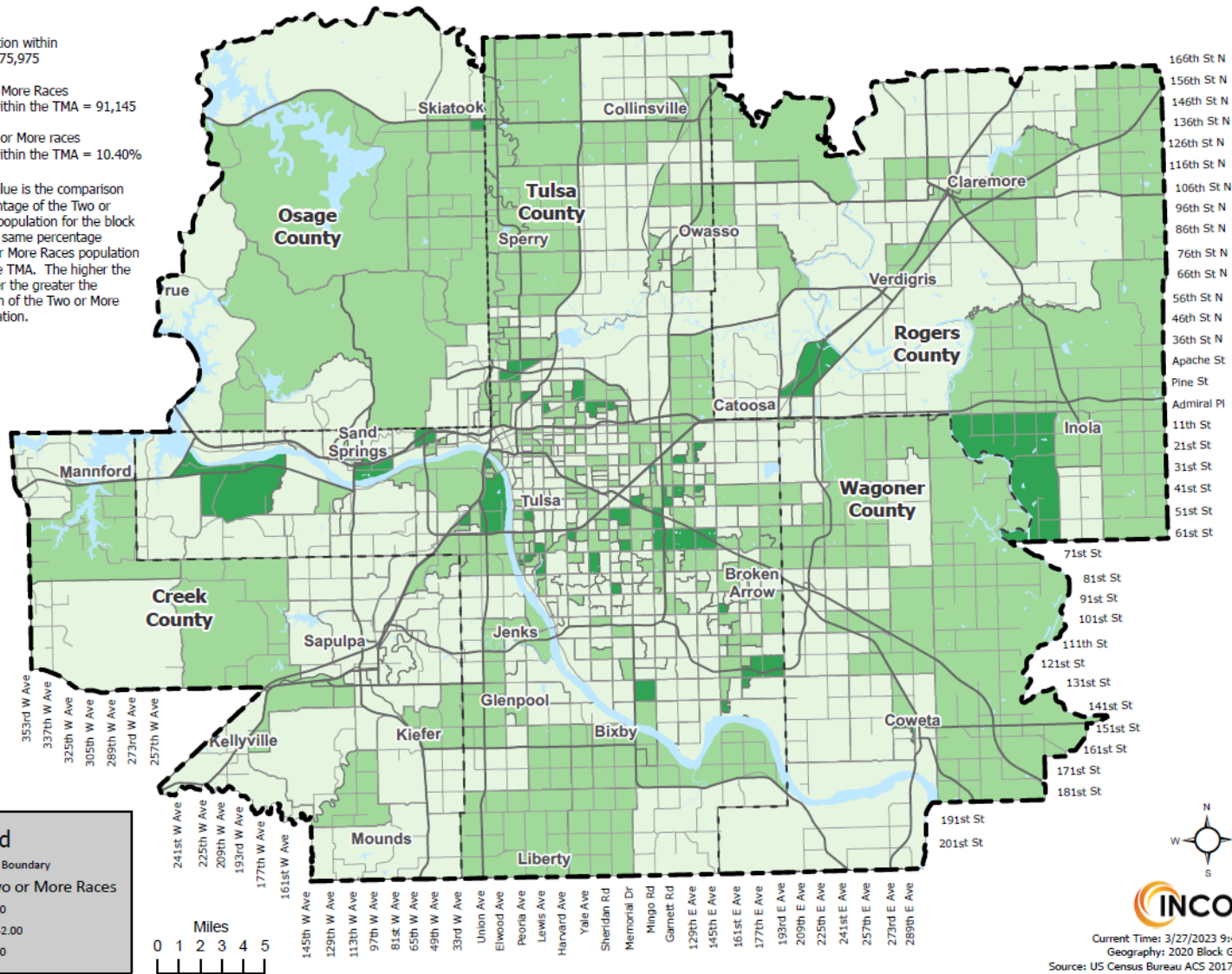
# Two or More Races Population Concentrations within the Transportation Management Area

Total population within the TMA = 875,975

Total Two or More Races population within the TMA = 91,145

Percent Two or More Races population within the TMA = 10.40%

The index value is the comparison of the percentage of the Two or More Races population for the block group to the same percentage of the Two or More Races population for the whole TMA. The higher the index number the greater the concentration of the Two or More Races population.



Path: C:\Mapping\TMC\GIS\Divisions\Transportation\TMA\_Map\ACS2017\_2021\WorkingMap\WorkingMap.aprx

Current Time: 3/27/2023 9:46 AM  
 Geography: 2020 Block Groups  
 Source: US Census Bureau ACS 2017-2021

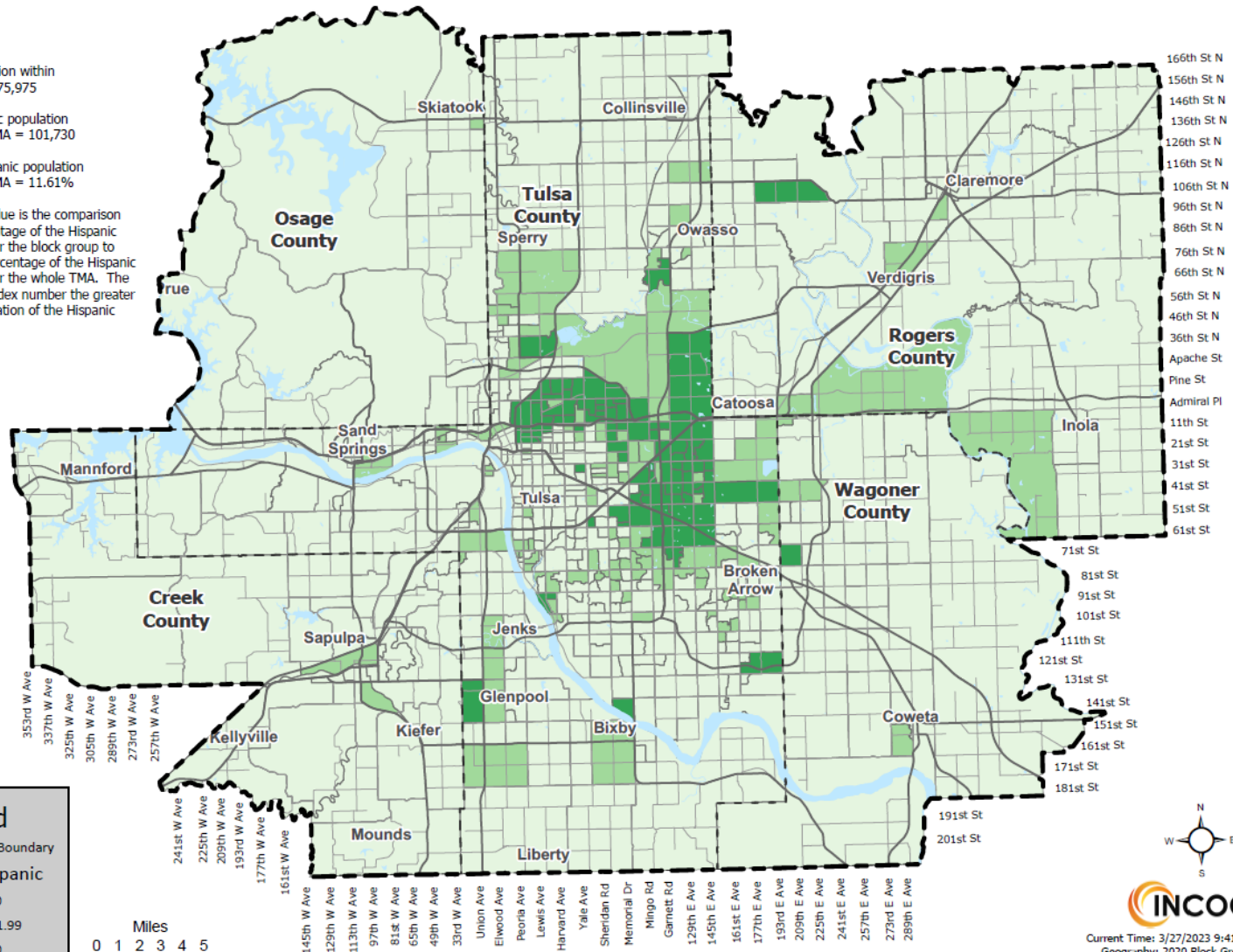
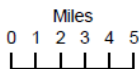
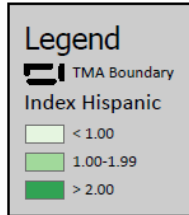
# Hispanic Population Concentrations within the Transportation Management Area

Total population within the TMA = 875,975

Total Hispanic population within the TMA = 101,730

Percent Hispanic population within the TMA = 11.61%

The index value is the comparison of the percentage of the Hispanic population for the block group to the same percentage of the Hispanic population for the whole TMA. The higher the index number the greater the concentration of the Hispanic population.



Current Time: 3/27/2023 9:41 AM  
 Geography: 2020 Block Groups  
 Source: US Census Bureau ACS 2017-2021

Path: G:\Mapping\INCOG Divisions\Transportation\ET\_Maps\ACS2017\_2021\WorkingMap\WorkingMap.aprx

# Persons with Disabilities Population Concentrations within the Transportation Management Area

Total Civilian noninstitutionalized Population within the TMA = 871,512

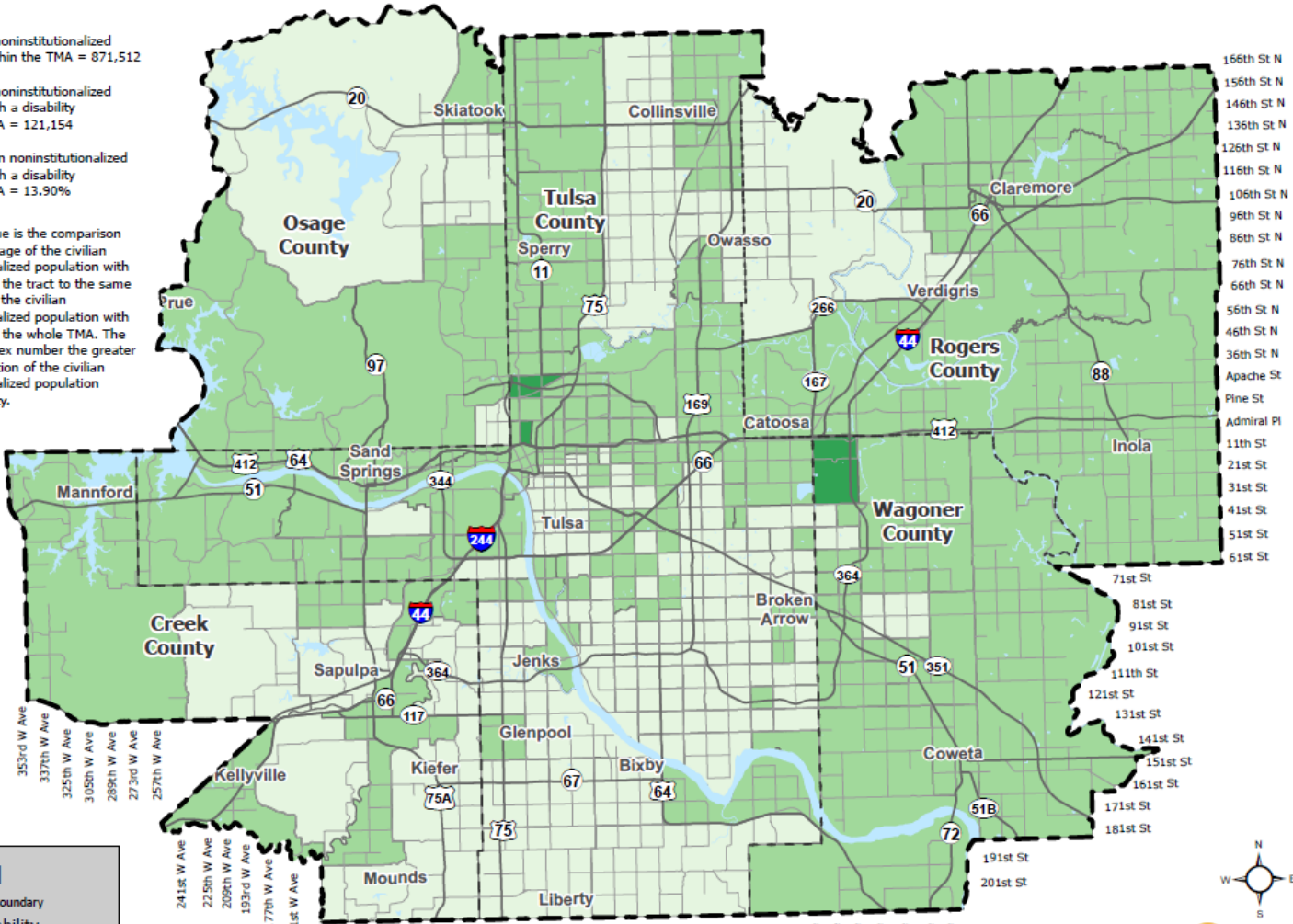
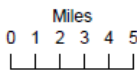
Total Civilian noninstitutionalized Population with a disability within the TMA = 121,154

Percent Civilian noninstitutionalized Population with a disability within the TMA = 13.90%

The index value is the comparison of the percentage of the civilian noninstitutionalized population with a disability for the tract to the same percentage of the civilian noninstitutionalized population with a disability for the whole TMA. The higher the index number the greater the concentration of the civilian noninstitutionalized population with a disability.

**Legend**

- TMA Boundary
- Index Disability
  - < 1.00
  - 1.00-1.99
  - > 2.00



INCOG  
Current Time: 3/29/2023 12:02 PM  
Geography: 2020 Census Tracts  
Source: US Census Bureau ACS 2017-2021

Path: G:\Mapping\MOOG Divisions\Transportation\GIS\_Maps\ACS2017\_2021\WorkingMap\WorkingMap.aprx

# Female Headed Households with Kids Population Concentrations within the Transportation Management Area

Total households within the TMA = 337,866

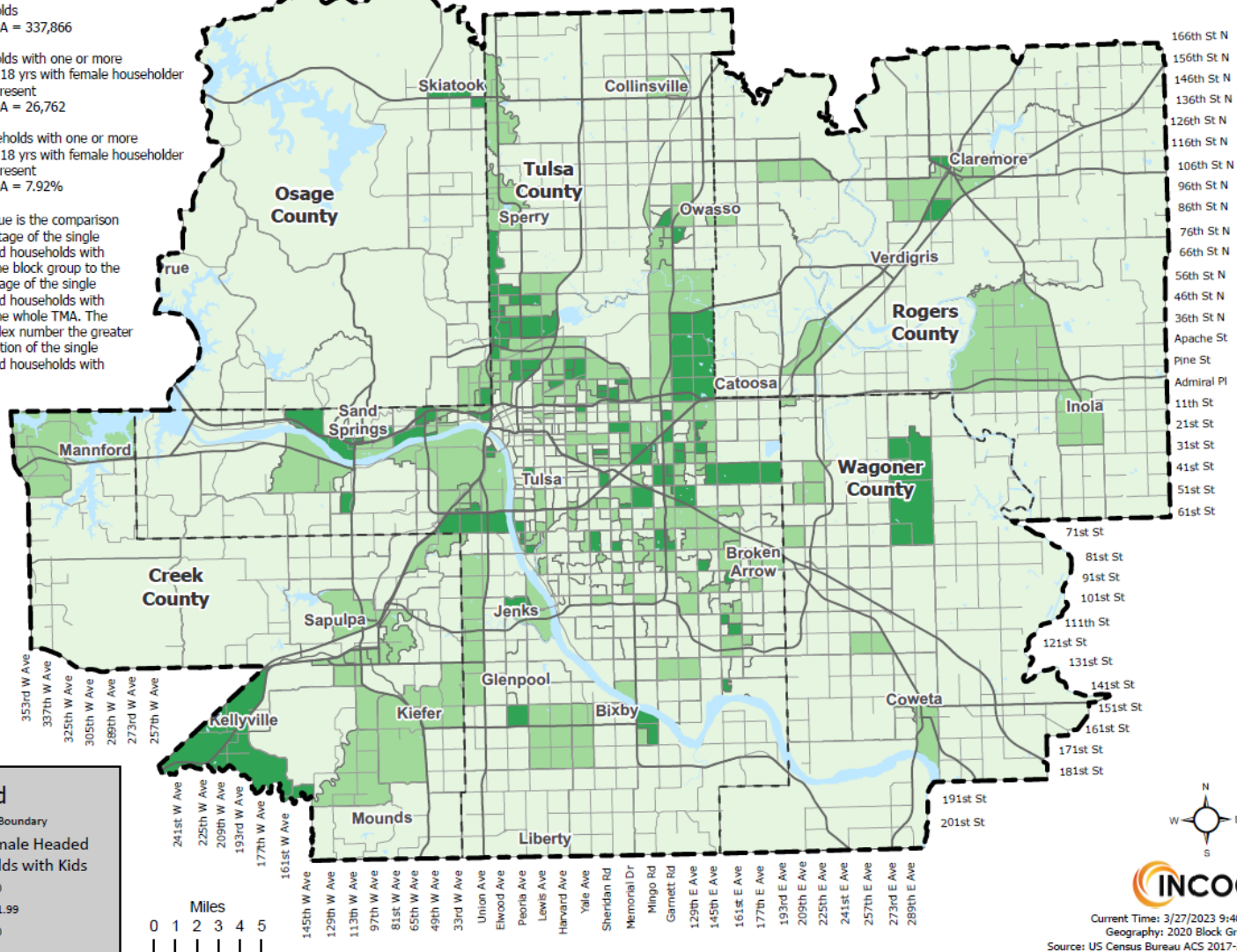
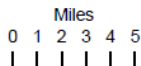
Total households with one or more People under 18 yrs with female householder no husband present within the TMA = 26,762

Percent households with one or more People under 18 yrs with female householder no husband present within the TMA = 7.92%

The index value is the comparison of the percentage of the single female headed households with children for the block group to the same percentage of the single female headed households with children for the whole TMA. The higher the index number the greater the concentration of the single female headed households with children.

**Legend**

- TMA Boundary
- Index Female Headed Households with Kids
  - < 1.00
  - 1.00-1.99
  - > 2.00



Current Time: 3/27/2023 9:40 AM  
 Geography: 2020 Block Groups  
 Source: US Census Bureau ACS 2017-2021

# Under 18 Population Concentrations within the Transportation Management Area

Total population within the TMA = 875,975

Total population under 18 years of age within the TMA = 219,216

Percent population under 18 years of age within the TMA = 25.03%

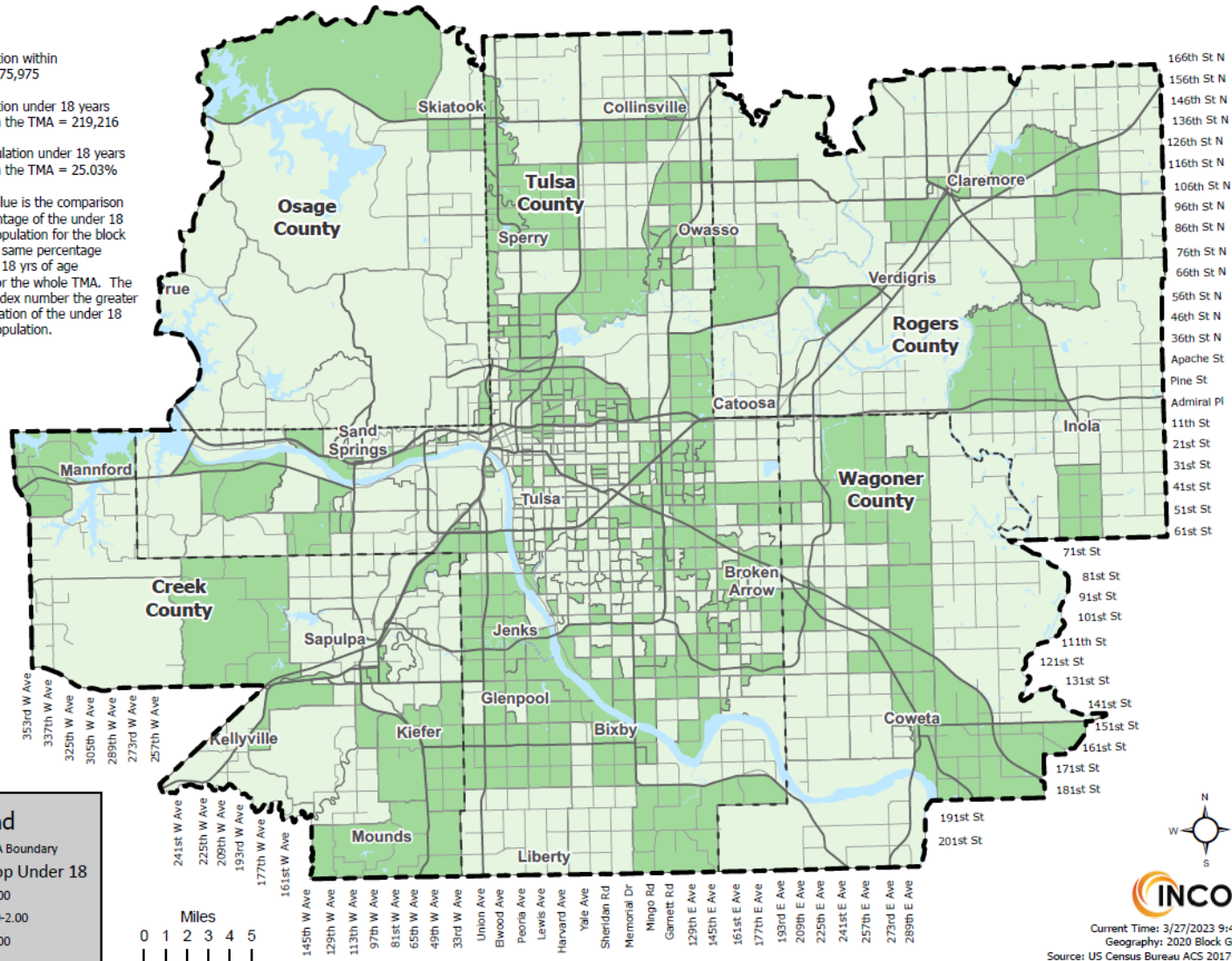
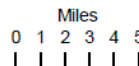
The index value is the comparison of the percentage of the under 18 yrs of age population for the block group to the same percentage of the under 18 yrs of age population for the whole TMA. The higher the index number the greater the concentration of the under 18 yrs of age population.

**Legend**

TMA Boundary

Index Pop Under 18

- < 1.00
- 1.00-2.00
- > 2.00



Current Time: 3/27/2023 9:47 AM  
 Geography: 2020 Block Groups  
 Source: US Census Bureau ACS 2017-2021

Path: G:\Mapping\INCOG\_Divisions\Transportation\EL\_Maps\ACS2017\_2021\WorkingMap\WorkingMap.aprx

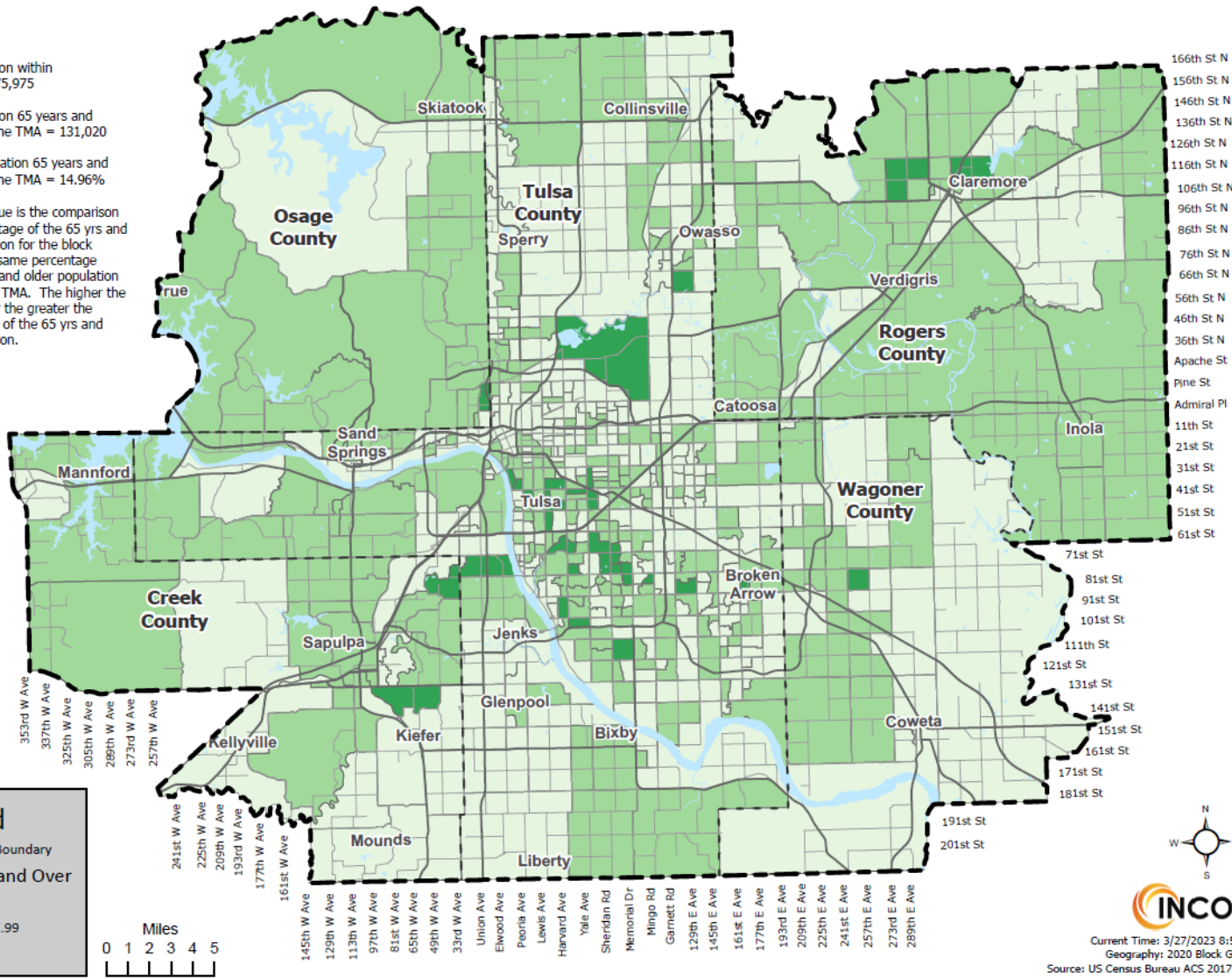
# 65 and Over Population Concentrations within the Transportation Management Area

Total population within the TMA = 875,975

Total population 65 years and older within the TMA = 131,020

Percent population 65 years and older within the TMA = 14.96%

The index value is the comparison of the percentage of the 65 yrs and older population for the block group to the same percentage of the 65 yrs and older population for the whole TMA. The higher the index number the greater the concentration of the 65 yrs and older population.



Path: G:\Mapping\TMC06\_Districts\Transportation\EL\_Map\ACS2017\_2021\WorkingMap\WorkingMap.aprx

Current Time: 3/27/2023 8:59 AM  
 Geography: 2020 Block Groups  
 Source: US Census Bureau ACS 2017-2021



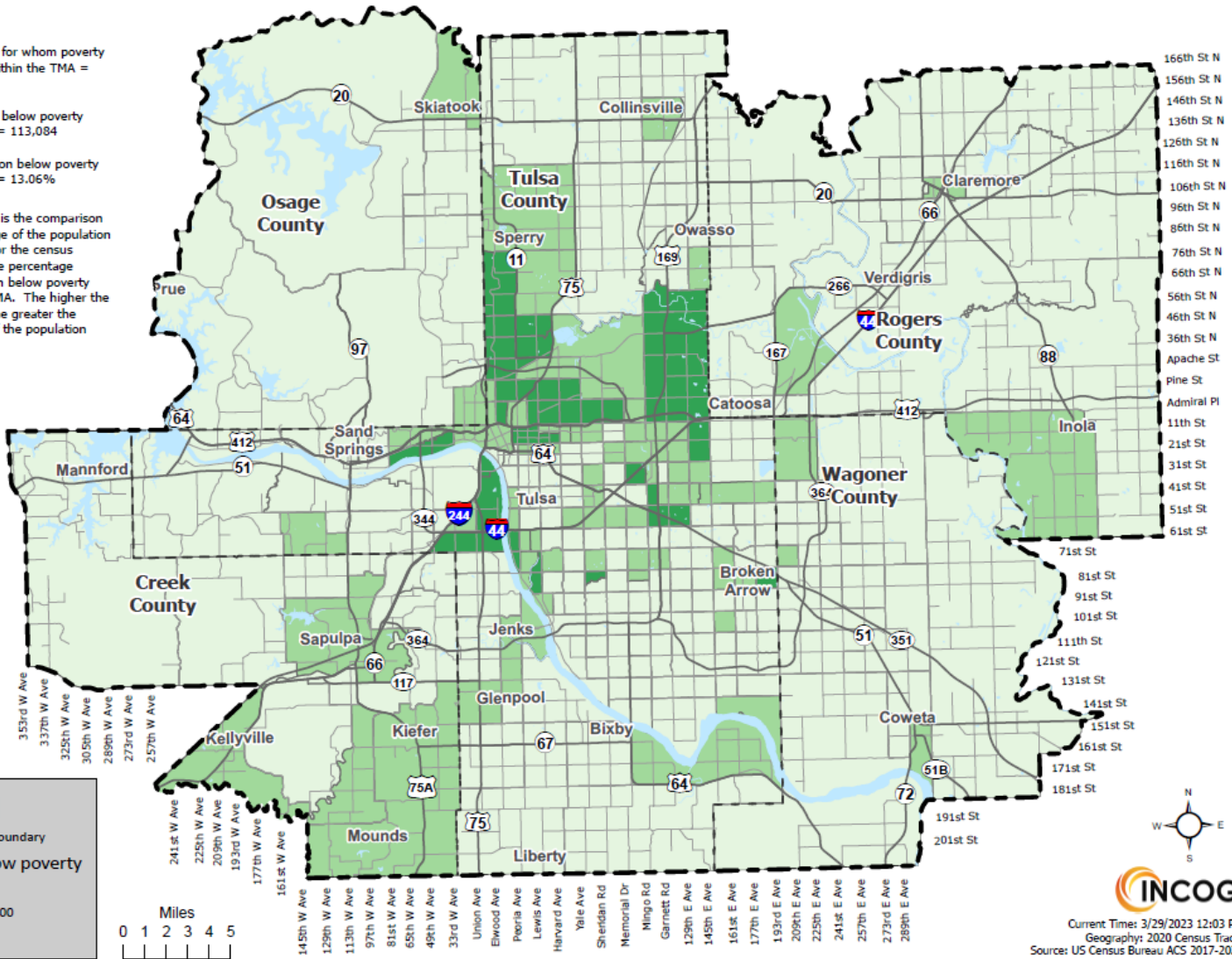
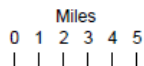
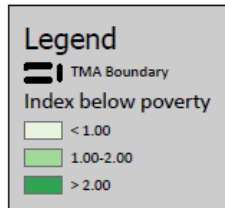
# Concentrations Below Poverty within the Transportation Management Area

Total population for whom poverty is determined within the TMA = 866,192

Total population below poverty within the TMA = 113,084

Percent population below poverty within the TMA = 13.06%

The index value is the comparison of the percentage of the population below poverty for the census tract to the same percentage of the population below poverty for the whole TMA. The higher the index number the greater the concentration of the population below poverty.



Current Times 3/29/2023 12:03 PM  
Geography: 2020 Census Tracts  
Sources: US Census Bureau ACS 2017-2021

Path: G:\Mapping\INCOG\Divisions\Transportation\Map\ACS2017\_2021\WorkingMap\WorkingMap.aprx

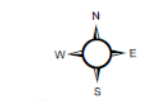
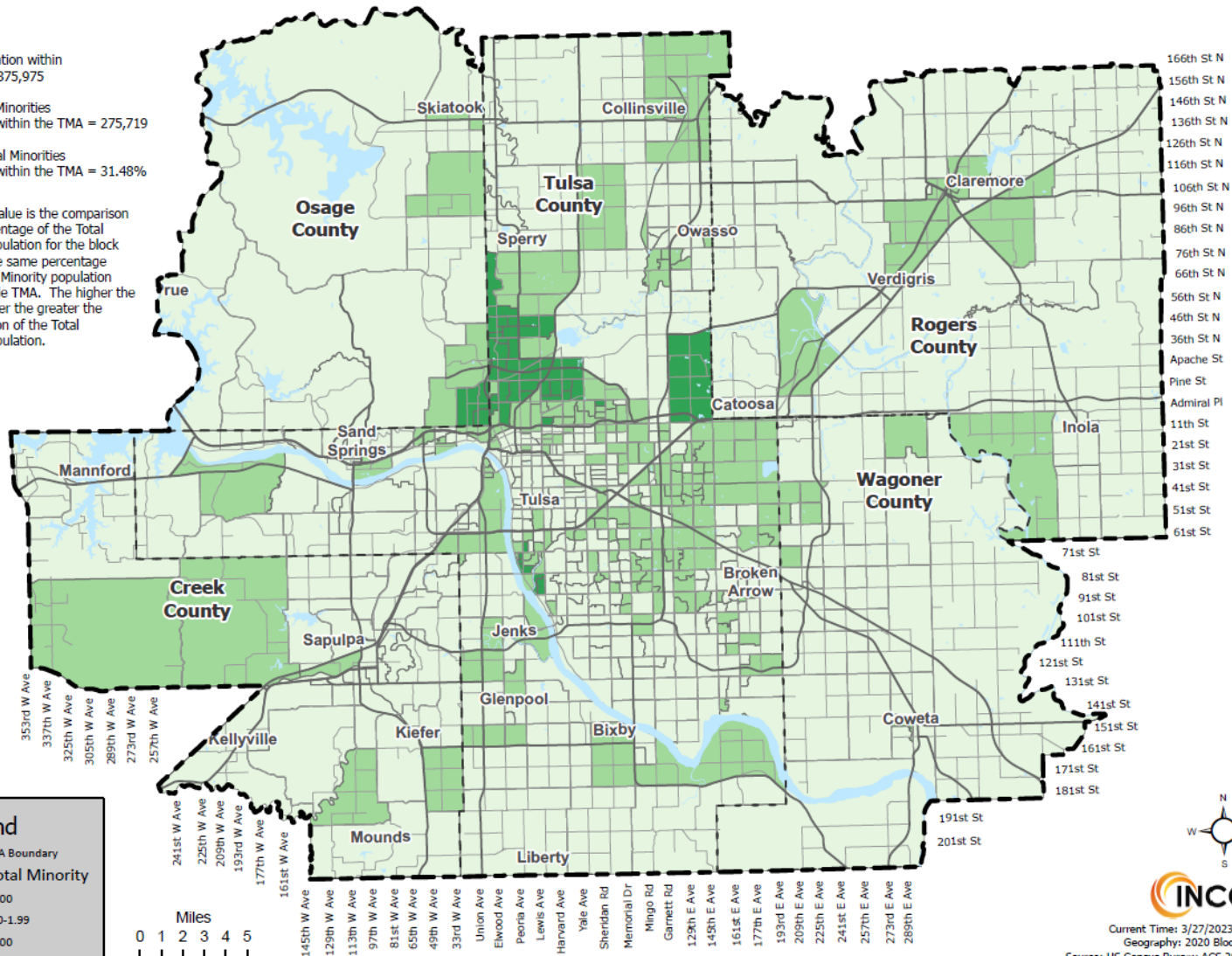
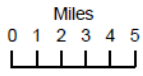
# All Minorities Population Concentrations within the Transportation Management Area

Total population within the TMA = 875,975  
 Total of all Minorities population within the TMA = 275,719  
 Percent Total Minorities population within the TMA = 31.48%

The index value is the comparison of the percentage of the Total Minority population for the block group to the same percentage of the Total Minority population for the whole TMA. The higher the index number the greater the concentration of the Total Minority population.

**Legend**

- TMA Boundary
- Index Total Minority
  - < 1.00
  - 1.00-1.99
  - > 2.00



**INCOG**

Current Time: 3/27/2023 9:43 AM  
 Geography: 2020 Block Groups  
 Source: US Census Bureau ACS 2017-2021

Path: G:\Mapping\INCOG Divisions\Transportation\1\_E\_Map\ACS2017\_2021\WorkingMap\WorkingMap.aprx

## Consideration of Special Populations in Outreach and Planning Activities

The Federal Highway Administration and the Federal Transit Administration reference Health and Human Services (HHS) Federal Poverty Guidelines in determination of poverty. These guidelines are based on the US Census Bureau's poverty thresholds. Tulsa TMA population determined by the 2017-2021 ACS estimate to be below the poverty threshold were mapped, as seen on the *Persons Below Poverty Levels in the Transportation Management Area* map on page 32 in this document.

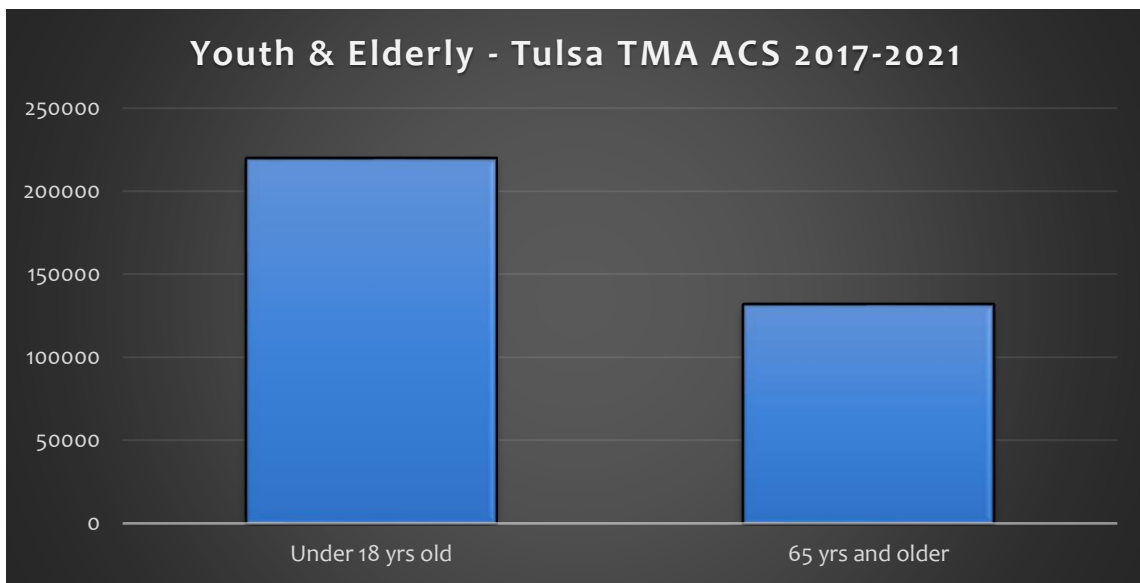
However, for public outreach and planning purposes, the INCOG Transportation Planning Division uses a broader definition of low income that includes more residents. In addition, areas with 51% or more of households that make less than 80% of the median household income (the U.S. Department of Housing and Urban Development (HUD) definition of low/moderate income) are also included in the planning process. Using these definitions of low income allows the Division to extend its planning and outreach considerations.

Although the US Census data give a demographic profile of the study area, further research was conducted to identify low-income populations and to gain a better awareness or "sense of place" within those communities. This research included insight from area planning officials and comments submitted by neighborhood and civic organization representatives, as well as the general public. Census data indicate a range of socioeconomic and demographic characteristics within the TMA. Statistically, most of the neighborhoods immediately north and west of Downtown Tulsa were found to have the greatest concentrations of minority populations and households with incomes below the national poverty level.

Areas having high concentrations of elderly and youth were also studied in order to identify possible needs for new or improved facilities and public involvement. Elderly is defined as TMA residents age 65 and older. According to the 2017-2021 ACS, 131,020 persons (14.96% of the general population) in the TMA are age 65 and over. Most of this group is situated within the east and southeast sections of Tulsa's corporate limits.

The youth demographic is often overlooked in the transportation planning process. Just over 219,216 persons in the Tulsa TMA are younger than 18 (almost 25.03% of the population). A key indicator of youth possibly lacking adequate transportation is the number of

single-parent female-headed households with children younger than 18. According to 2017-2021 ACS data, there are nearly 26,762 single-parent, female-headed households in the TMA, and this group represents nearly 7.92% of the total households. Many persons in this category, according to most statistics, live in low-income areas with little or no means of reliable transportation. Therefore, access to transportation facilities, such as transit routes and on-street bikeways, is vital and creates a dual benefit that serves not only the parent, who may need transportation to commute to work, but also the youth, who relies on safe transportation to school or community centers.



Residents with a disability also account for a significant portion of the TMA population. Just over 121,154 residents 5 years old or older have a reported disability, which accounts for 13.9% of the population.

### 3.2 Planning Analysis

During the planning process, Environmental Justice and Title VI compliance are major considerations. A review of the 2017-2021 ACS estimate data was conducted for the TMA for potential environmental justice issues including:

1. Displacement/relocation of minority and low-income residents

2. Impact on local commute times and availability of public transportation
3. Access to bike/pedestrian trails
4. Separating/bisecting minority and/or low-income communities

Analysis is also conducted to ensure the plans do not disproportionately affect any Socially Sensitive Areas (SSAs), a region defined as having a concentration of minority, Hispanic, low-income, elderly and/or single-parent female-headed households with children younger than 18. Research involved examining total linear miles of new or expanded facilities for each of the transportation modes in the TMA. In each of the modes, the projected mileage of new or expanded facilities for 2050 was analyzed on a per square mile basis for both the SSAs and the TMA. Across the board, the SSAs are projected to have more facility miles added per square mile than the TMA as a whole. This was particularly true with trails.

**Connected 2050 Plan Data**

Area in Square Miles	New/Expanded Roadway Linear Miles	Linear Miles of New/Expanded Roadways per Square Mile	Linear Miles of Planned Trails	Linear Miles of Planned Trails per Square Mile	Linear Miles of FastForward Transit Lines	Linear Miles of FastForward Transit Lines per Square Mile
1,694	TMA Area - 406	0.24	1,377	0.81	193	0.11
206	SSA Area - 109	0.53	278	1.35	97	0.47

Studies were also conducted for neighborhoods affected by planned roadway projects, the public transportation system, and the planned bicycle/pedestrian system. Results from that examination showed areas with high concentrations of minority and/or low-income households are well served by the proposed improvements and that consideration should be given to those areas when specific projects are implemented.

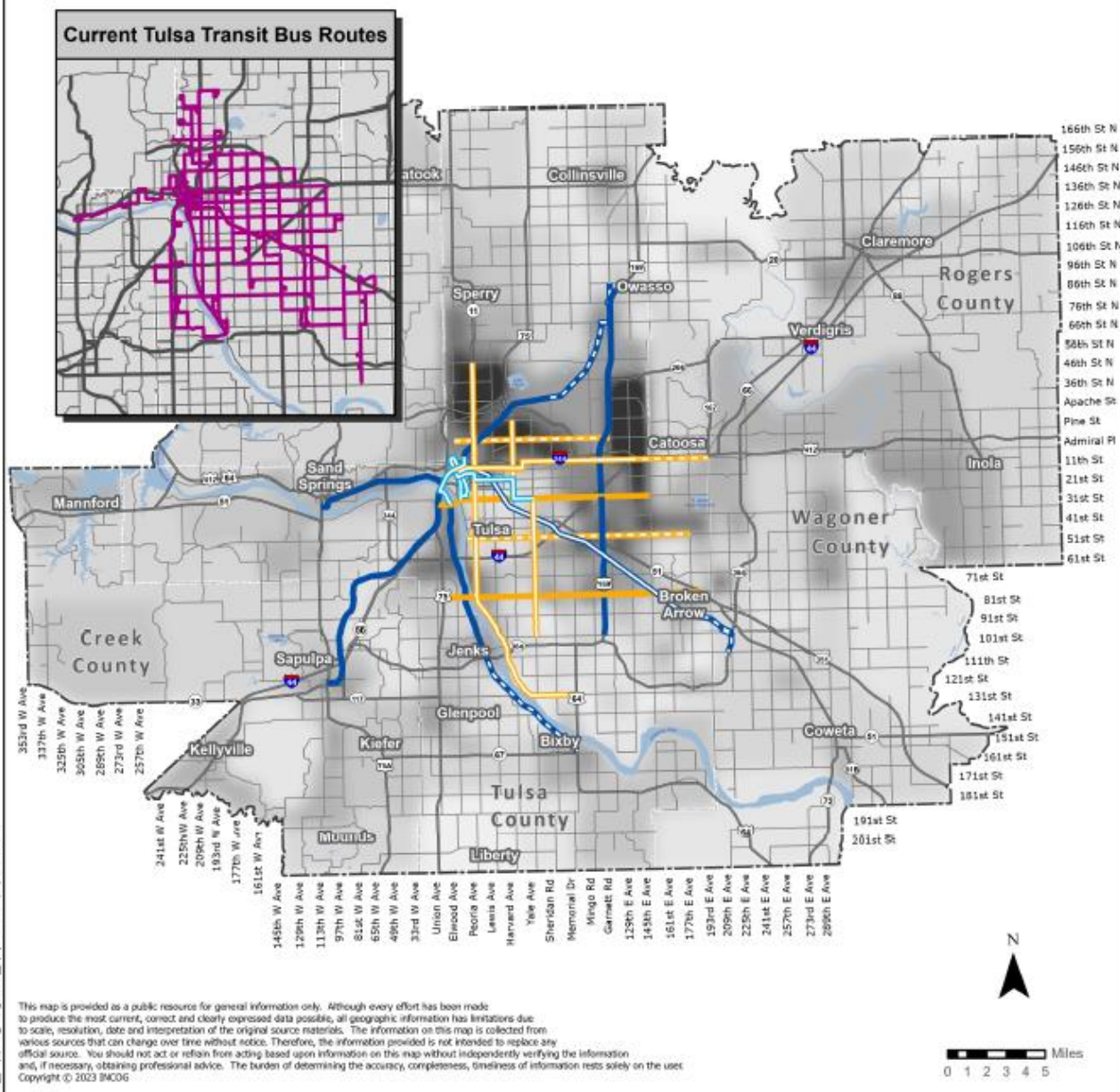
The subsequent pages include Tulsa TMA maps of the following:

- Social Environment and Planned Public Transportation
- Social Environment and Planned Trails and Bikeways
- Social Environment and Planned Roadways

In addition to looking at the geographical impacts of the proposed improvements, a broad analysis was conducted of the mean travel time for SSA residents relative to residents of the overall TMA. Median Commute Time for the Tulsa TMA was computed based on 2017-2021 ACS data and compared with the SSAs for the same year. The TMA median commute was 20.44 minutes when compared with the SSA commute time, which was 18.41 minutes. Therefore, it is expected that the median travel time for SSA residents will be proportional to that of TMA residents overall.

This analysis will be conducted on a regular basis as new data become available. To monitor compliance, INCOG will review how the goals outlined in this section were met and what will be done in future planning efforts. This review will include ensuring all complaints were addressed. An evaluation will also be conducted to determine which groups participated in the planning effort and how to reach additional groups in future efforts.

# Socially Sensitive Areas & Planned Transit Corridors



This map is provided as a public resource for general information only. Although every effort has been made to produce the most current, correct and clearly expressed data possible, all geographic information has limitations due to scale, resolution, date and interpretation of the original source materials. The information on this map is collected from various sources that can change over time without notice. Therefore, the information provided is not intended to replace any official source. You should not act or refrain from acting based upon information on this map without independently verifying the information and, if necessary, obtaining professional advice. The burden of determining the accuracy, completeness, timeliness of information rests solely on the user. Copyright © 2023 INCOG

Legend	
<b>Foundation</b>	<b>Extended</b>
Foundation, Circulator	Extended, Urban
Foundation, Urban	Extended, Commuter
Foundation, Commuter	<b>EJ Factor Concentrations</b>
Enhanced	Greater
Enhanced, Urban	Less
Enhanced, Commuter	

- This map is a combination of all the environmental justice factors considered, including the following:
- African American Race
  - American Indian Race
  - Asian Race
  - Native Hawaiian Race
  - Some Other Race
  - Two or More Races
  - Hispanic Origin
  - Persons 65 Years and Older
  - Persons Under 18 Years of Age
  - Persons with Disabilities
  - Persons below Poverty
  - Persons with Limited English Proficiency
  - Female Headed Households with Children

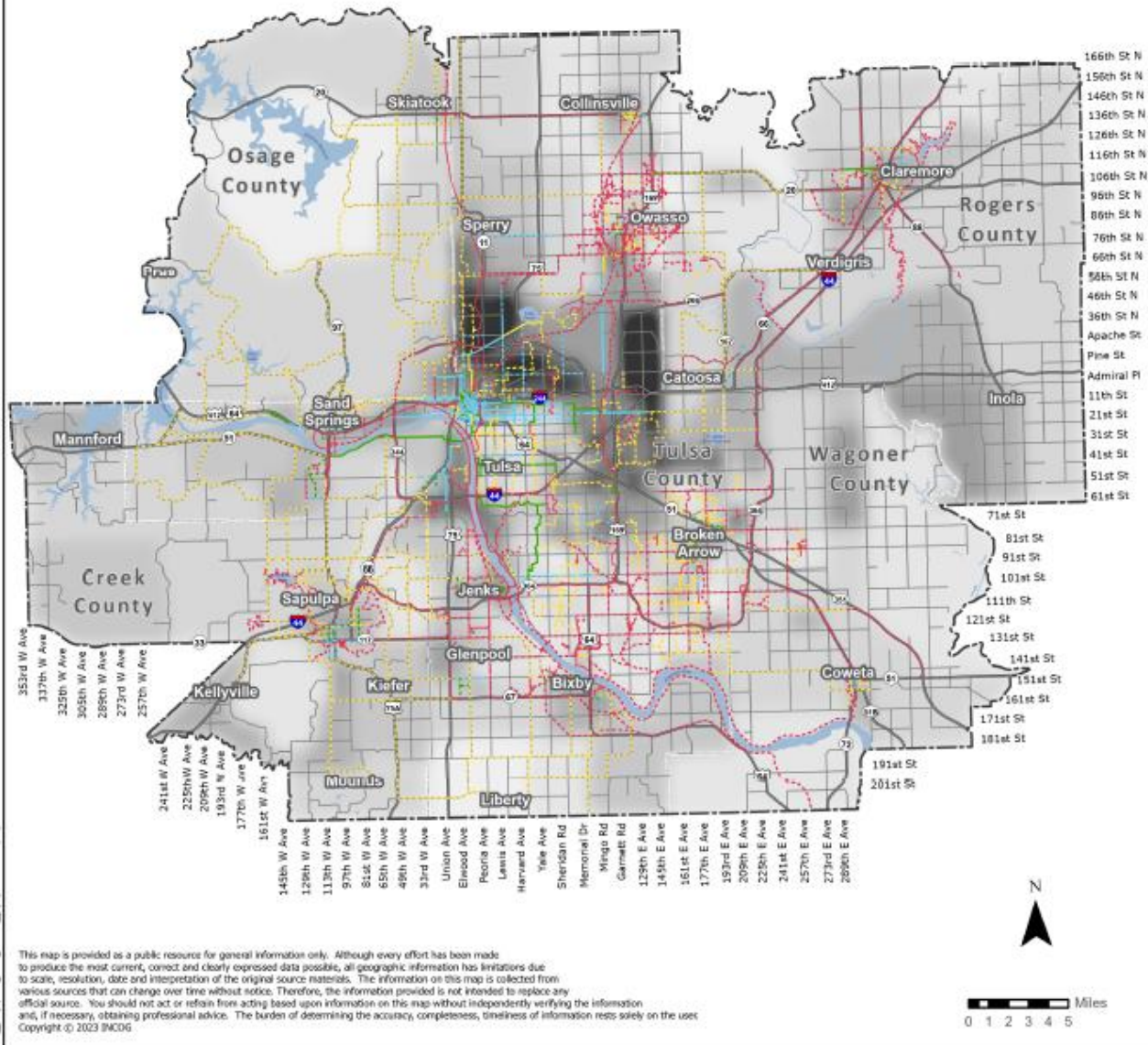


Source: U.S. Census Bureau, 2017-2021 American Community Survey 5-Year Estimates

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# Socially Sensitive Areas & GO Plan 2050



This map is provided as a public resource for general information only. Although every effort has been made to produce the most current, correct and clearly expressed data possible, all geographic information has limitations due to scale, resolution, date and interpretation of the original source materials. The information on this map is collected from various sources that can change over time without notice. Therefore, the information provided is not intended to replace any official source. You should not act or refrain from acting based upon information on this map without independently verifying the information and, if necessary, obtaining professional advice. The burden of determining the accuracy, completeness, timeliness of information rests solely on the user. Copyright © 2023 INCOG

- |                                  |                                  |
|----------------------------------|----------------------------------|
| <b>Legend</b>                    |                                  |
| <b>GO Plan Recommendations</b>   |                                  |
| --- Bike Lane/Buffered Bike Lane | --- Existing Facility            |
| --- Cycle Track                  | --- Bike Lane/Buffered Bike Lane |
| --- Priority Shared Lane/Sharrow | --- Sharrow                      |
| --- Signed Route                 | --- Signed Route                 |
| --- Sidepath/Trail               | --- Paved Trail                  |
|                                  | <b>EJ Factor Concentrations</b>  |
|                                  | Greater                          |
|                                  | Less                             |

- This map is a combination of all the environmental justice factors considered, including the following:
- African American Race
  - American Indian Race
  - Asian Race
  - Native Hawaiian Race
  - Some Other Race
  - Two or More Races
  - Hispanic Origin
  - Persons 65 Years and Older
  - Persons Under 18 Years of Age
  - Persons with Disabilities
  - Persons below Poverty
  - Persons with Limited English Proficiency
  - Female Headed Households with Children



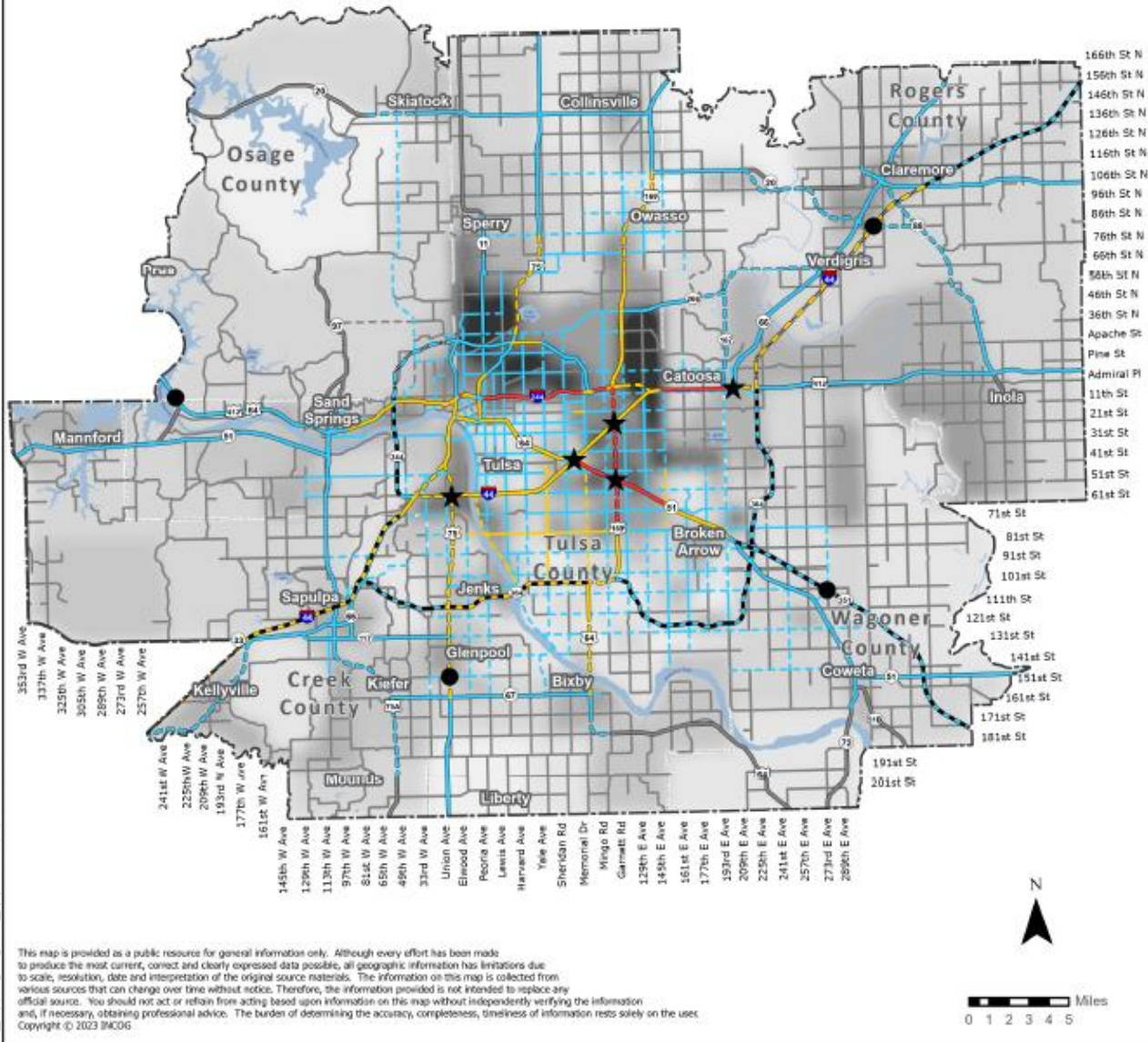
Source: U.S. Census Bureau, 2017-2021 American Community Survey 5-Year Estimates



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# Socially Sensitive Areas & Roadways 2050



## Legend

- ★ Expressway Interchange
- Grade-Separated Interchange
- Roadway Type**
- Arterial
- Highway
- Turnpike
- Roadway Status**
- New/Changed Roadway
- No Roadway Changes
- Roadway Through Lanes**
- 2 Lanes
- 4 Lanes
- 6 Lanes
- 8 Lanes
- EJ Factor Concentrations**
- Greater
- Less

This map is a combination of all the environmental justice factors considered, including the following:

- African American Race
- American Indian Race
- Asian Race
- Native Hawaiian Race
- Some Other Race
- Two or More Races
- Hispanic Origin
- Persons 65 Years and Older
- Persons Under 18 Years of Age
- Persons with Disabilities
- Persons below Poverty
- Persons with Limited English Proficiency
- Female Headed Households with Children

## Location Map



Source: U.S. Census Bureau, 2017-2021 American Community Survey 5-Year Estimates



### 3.3 Research

For research projects conducted by INCOG, the Transportation Planning Division will take steps to ensure nondiscrimination and Title VI compliance required by the Federal Highway Administration and the Federal Transit Administration, according to FTA C 4702.1B. These steps include making certain that all contracts include Title VI requirements and that Title VI and nondiscrimination regulations are adhered to in the selection of research contracts. INCOG will make efforts to ensure that protected groups are not discriminated against in the selection process. All contractors will be required to follow Title VI and nondiscrimination requirements. To monitor compliance, INCOG will review how the goals outlined in this section were met and what will be done in future research efforts. This review will include ensuring all complaints were addressed.

### 3.4 Project/Program Development

For transportation projects and programs that are administered solely by INCOG, the Transportation Planning Division will take steps, in addition to those mentioned throughout this report, to ensure nondiscrimination and Title VI compliance. First, INCOG will make certain that all aspects of the location/program selection process comply with the Title VI and nondiscrimination requirements. This goal will be achieved by using Census data and GIS technologies to identify affected populations. As outlined in the public participation procedures, staff will also consult area residents and seek input from affected populations. If minority, low-income, youth, elderly, disabled, or LEP (Limited English Proficiency) residents are identified, specific provisions will be made to overcome involvement barriers. See *Specific Environmental Justice and Limited English Proficiency (LEP) Considerations* on page 49.

As appropriate, residents and other interested parties will be asked to participate in the site or project selection process. Advertisements and news releases concerning all aspects of the project/program will be sent to media outlets that specifically target these groups, and appropriate public outreach efforts will continue for the duration of the project/program. Documentation and compliance reviews as outlined in this reports will also be conducted on a continuous basis.

To monitor compliance, INCOG will review how the goals outlined in this section were met and what will be done in future project/program development efforts. This review will include ensuring all complaints were addressed. An evaluation will also be conducted to determine which groups participated in the project/program development effort and how to reach additional groups in future efforts.

### **3.5 Contractors/ Subrecipients**

All contractors and subrecipients are required to comply with Title VI and other related Federal regulations. Contracts with INCOG's Transportation Planning Division include nondiscrimination responsibilities, non-compliance sanctions, and related information. Contractors and subrecipients are required to comply with the Regulations of the U.S. Department of Transportation relative to nondiscrimination in Federally-assisted programs of the U.S. Department of Transportation. The contractor or subrecipient agrees to not directly or indirectly discriminate on the grounds of race, color, or national origin, in the selection and retention of subcontractors, including procurement of materials and leases of equipment. Contractors and Subrecipients are required to include this information in all subcontractor solicitations and contracts.

INCOG requires all contractors and subrecipients to submit a Title VI Plan to INCOG when signing the contract. Subrecipients and Contractors may adopt INCOG's Title VI Plan, the Title VI notice, Title VI complaint investigation and tracking procedures, and complaint form developed by INCOG. INCOG will review contractors and subrecipients programs for compliance as well as its process to ensure compliance with Title VI requirements. See Contractual Assurances (Sample Forms on *page 102*) for more information.

### **3.6 Section 5310 Administration**

INCOG, as the designated recipient and pass through of Federal Transit Administration (FTA) for the Section 5310 (Enhanced Mobility of Seniors and Individuals with Disabilities) is responsible for developing a Public Transit – Human Service Transportation Coordination Plan for the Tulsa TMA. The Plan provides guidance and context for eligible activities under these programs without regard to race, color, or national origin and certifies that

minority populations are not denied the benefits of or excluded from participation in these programs.

According to FTA guidance, INCOG develops and implements the following:

- (1) A Competitive Selection Process and an annual Program of Projects submitted to FTA as part of its grant applications. The Competitive Selection Process emphasizes that methods used for distribution of funds to subrecipients to serve predominantly people with disabilities, minority and low-income populations, including Native American tribes, where present, will be equitable. The Competitive Selection Process is available at INCOG's website at [www.incog.org//Transportation/Documents/Coordinated%20Plan/2020PlanUpdate.pdf](http://www.incog.org//Transportation/Documents/Coordinated%20Plan/2020PlanUpdate.pdf)
- (2) Criteria for selecting transit providers to participate in any FTA grant program that ensure compliance with Title VI requirements.
- (3) A record of requests for Section 5310 grants identifying applicants that use grant program funds to provide assistance to predominantly senior populations, people with disabilities, minority and low-income populations. The record will also indicate whether those applicants were accepted or rejected for funding. See *Appendix page 79* for record of funding requests received for Section 5310.
- (4) Procedures to assist subrecipients in applying for Section 5310 funding, including efforts to assist applicants that will serve predominantly minority, people with disabilities, and low-income populations. During each annual solicitation for projects, INCOG transportation planning staff conducts pre-application assistance to all applicants. Staff reviews the application for funding with prospective applicants and provides comprehensive instructions on completing the application. INCOG staff also provides technical assistance to applicants who may have questions throughout the solicitation period. Coordination is encouraged by sharing contact information among prospective applicants.
- (5) Classification of applicants as providing service to predominantly people with disabilities, minority and low-income populations if the proportion of people with disabilities, minority and low-income people in the applicant's service area exceeds the statewide average minority, low-income population, and senior population.

## **Monitoring Subrecipients**

INCOG will request that subrecipients who provide transportation services verify that their level and quality of service is provided on an equitable basis and meet all Title VI requirements. INCOG will ask subrecipients to develop system-wide service standards and verify that service provided to predominantly people with disabilities, minority, and low-income communities meets these standards.

In order to monitor compliance with the DOT Title VI Regulations, INCOG will require that subrecipients provide or perform the following:

- a. Required Certifications and Assurances with authorized signatures and current dates.
- b. An up-to-date copy of subrecipient's Title VI Plan.
- c. Subrecipient has reviewed and is knowledgeable about Demographic Data of Access to Services by Persons with Limited English Proficiency (LEP). INCOG will provide county data showing LEP populations.

INCOG staff will:

- a. Review plans, reports, contractual agreements related to the project, and certifications submitted under the above items according to the provisions of the guiding Federal regulations and discuss with subrecipients to clarify all requirements as needed.
- b. Monitor monthly, quarterly and final reports and invoices sent for payment of costs incurred and process as efficiently as possible.
- c. Maintain regular contact with subrecipients to stay apprised of program status at a minimum of quarterly intervals, one of which may be a site visit.

## **Providing Assistance to Subrecipients**

INCOG will assist subrecipients in complying with FTA Title VI reporting requirements at the request of the subrecipient, or as deemed necessary and appropriate by the

State DOT, or other administrating agency. As appropriate, INCOG staff will provide the following information to subrecipients:

- a. Sample notices to the public informing beneficiaries of their rights under Title VI and procedures on how to file a Title VI complaint.
- b. Sample procedures for tracking and investigating Title VI complaints filed with a subrecipient.
- c. Demographic information on the race, income, and English proficiency (LEP) residents served by the subrecipient. (This information will assist the subrecipient in assessing the level and quality of service it provides to communities within its service area and in assessing the need for language assistance.)

## **SECTION 4 – PUBLIC PARTICIPATION AND OUTREACH ACTIVITIES**

### **4.1 Outreach Purpose**

Nondiscrimination, including Title VI compliance, is a major consideration for INCOG’s Public Participation Process (PPP), a document that outlines the public participation techniques undertaken for all aspects of Tulsa TMA transportation planning. The intent of the PPP is to encourage and support active public participation throughout the planning and decision-making process related to the development of proposed transportation plans, programs, and projects so that a safe, efficient transportation system, reflecting the needs and interests of all stakeholders, can be provided. The document serves as a guide for citizens, elected officials, decision makers and INCOG staff to gain a better understanding of the public participation process and as a tool for planners and decision-makers to better engage citizens, community groups, organizations, schools, and businesses in the process of planning our transportation system. The PPP is available on INCOG’s website ([http://www.incog.org/Transportation/Documents/PIP2020\\_Final.pdf](http://www.incog.org/Transportation/Documents/PIP2020_Final.pdf)) or at the INCOG offices (2 West 2nd Street, Suite 800, Tulsa - OK).

### **4.2 Existing Outreach Strategies**

It has long been a challenge to engage the public in plans and programs, providing the means for people to have direct and meaningful impact on the decision-making process. The following guidelines were developed reflecting Federal requirements with the purpose of facilitating this process:

- Build awareness, interest, and support in the general public and decision-makers using innovative tools, media campaigns and combinations of different public participation techniques designed to meet the needs of the public.
- Provide and encourage opportunities for direct citizen attendance and involvement from the early stages of the planning process.

- Develop methods to collect input from citizens who cannot attend meetings, such as direct mail and web-based input strategies providing “everyone” a reasonable opportunity to comment on the proposed plans or programs.
- Periodically review and revise the Public Participation Plan in terms of effectiveness to assure that the process provides full and open access to all.
- Provide the public with timely notice and reasonable access to technical and policy information used in the development of plans or programs.
- Require a public comment period of 45 days prior to the adoption or amendment of the Public Participation Plan.
- Develop and tailor public participation plans according to the complexities of particular plans, programs or projects.
- Ensure compliance with Title VI of the Civil Rights Act of 1964 and subsequent Federal legislation, including FTA C 4702.1B, which require that no person in the United States shall, on the ground of race, color, and 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. Therefore, policies should be adopted with specific plans and programs to ensure that the needs of those traditionally underserved by existing transportation systems and Environmental Justice principles are fully integrated in the process.
- Engage the public in a proactive effort by going to civic and cultural groups, churches, neighborhood organizations, and other citizen committees.
- Show consideration to comments from public participants, and respond to public input received during the planning and program development processes.



## Summary of Outreach Efforts

While various challenges stemming from the COVID pandemic continued to impact INCOG's outreach efforts, INCOG was able to return to in-person events over the summer of 2021. The following outreach efforts were undertaken in the last three years:

### **INCOG's Plans and Programs**

INCOG's public participation element includes work tasks that are required by the Federal Highway Administration (FHWA) and the Federal Transit Administration (FTA) to ensure public involvement throughout the transportation planning process. INCOG utilizes strategies to encourage citizens, businesses and other interested groups to be included in the development of planning documents that include: the Long- Range Transportation Plan (LRTP), the Transportation Improvement Program (TIP), the FTA Section 5310 grant program and for Congestion Mitigation and Air Quality (CMAQ) projects. INCOG publishes public notices through local newspapers and online media outlets to disseminate information as needed for public review and feedback.

The Connected 2050 Long Range Transportation Plan update was a multi-year process that began in late 2020 and was completed and adopted on November 08, 2022. Connected 2050 identifies goals, priorities, and projects for all modes of transportation in the Tulsa TMA. INCOG hosted stakeholder online meetings to brainstorm each element of the Connected 2050 and gather feedback from the communities that are part of the TMA.

### **GO Plan Public Involvement**

In 2021, INCOG created Tulsa Regional Bicycle & Pedestrian Master Plan (GO Plan) first 5-year implementation report that outlined key regional improvements and project highlights pertaining to walking and biking in the Tulsa region. These brochures have been distributed at Travel with Care Tulsa public outreach events.

### **Improve safety and security – Travel with Care Campaign**

INCOG's Travel with Care Tulsa campaign continued to receive funding through the Oklahoma Highway Safety Office (OHSO), throughout the timeframe of this Title VI reporting period (2020 - 2023). Travel with Care Tulsa is a multi-faceted "rules of the road" public safety awareness campaign with the goal of creating safer streets for all forms of

transportation. The campaign consists of social media, law enforcement training, public interactive displays, public art and other forms of education and outreach.

In 2020 TwC was involved in two public outreach events and in 2021 there were six events. In 2022, TwC was involved in 15 public outreach activities, including tabling at local community events, holding Walk/Bike to School Day ribbon cutting event at Cooper Elementary School, organizing Bike Maintenance Day event in the neighborhood etc.

TwC runs 6 ads on both YouTube and Facebook throughout the year using OHSO media funds to influence more people. On YouTube, there was a total of 543,000 video views with over 1 million impressions. Besides, Facebook ads reached 300,187 people, with 555,294 engagements. The videos had 550,238 views with 3,443 link clicks. Travel with Care Tulsa social media platforms (Facebook and Instagram) continued to be utilized for regular updates on road safety tips, traffic laws, and transportation-related news. Facebook “Likes,” Instagram Followers, and YouTube Views continued to increase in the past three years.

INCOG staff created a road fatality exhibit that mapped the locations of all cyclists, pedestrians, motorist fatalities and crashes in the Tulsa region. The memorial exhibit provided a place for people to write comments and suggestions and was displayed at five locations across the City of Tulsa, including Tulsa City Hall, Tulsa County, a booth at Tulsa Mayfest, Cox Business Convention Center, and United Way fundraising event in downtown Tulsa, over the past three years.

### **Tulsa Regional Transportation Survey (2021)**

INCOG conducted a survey of residents in the Tulsa Metropolitan Region during the summer of 2021. The purpose of the scientific survey was to gather input from residents about transportation issues that will affect short and long-range transportation planning initiatives in the Tulsa region. A total of 1,013 completed surveys were collected.

### **Tulsa Bike Share (TBS) and Bike to Work Week**

INCOG is involved with Tulsa Bike Share (TBS), a 501(c)3 organization, by attending events and helping to push more people towards using e-bikes for short trips. TBS set up a table downtown and talked to people to encourage biking to work, as well as handed out coffee and donuts. TBS did Bike to Work Week social media posts, including sharing

information about how to participate in Ride of Silence. TBS also brought bikes, helmets, and information to specific "Bike to Work" events in 2021 and 2022.

### **4.3 Specific Environmental Justice and Limited English Proficiency (LEP) Considerations**

State and Federal policies and regulations, including Environmental Justice initiatives, reinforce the need of agencies to focus attention on reaching low-income and minority households. There are many individuals whose primary language is not English. Individuals who do not speak English as their primary language and who have a limited ability to read, write, speak or understand English can be “Limited English Proficient”, or “LEP.” This language barrier may prevent individuals from accessing services and benefits. To include traditionally underserved communities in the decision-making process, it is necessary to identify key stakeholders that have low or no participation, what is preventing them from participating, and what can be done to overcome barriers and increase the levels of participation. Some explanations for the lack of participation include cultural and language barriers, disabilities, economic constraints, and lack of participation opportunities.

There are two pieces of legislation that provide the foundation for the development of an LEP plan: Title VI of the Civil Rights Act of 1964, and Executive Order 13166. In some circumstances, failure to ensure that LEP persons can effectively participate in federally assisted programs may constitute discrimination based on national origin under Title VI. In order to comply with Title VI, agencies should take reasonable actions for competent language assistance. Executive Order 13166 clarifies requirements for LEP persons under Title VI. The Executive Order requires the agency to examine the services it provides and develop and implement a system by which LEP persons can meaningfully access those services.

According to 2017-2021 ACS data, 20,530 people (2.51%) in the Tulsa TMA speak a language other than English at home. To reach the LEP population, a four-factor analysis outlined in the Department of Transportation policy guidance will be followed:

1. The number or proportion of LEP persons eligible to be served or likely to encounter by a program, activity, or service of the recipient or grantee.

2. The frequency with which LEP individuals come in contact with the program.
3. The nature and importance of the program, activity, or service provided by the recipient to people’s lives.
4. The resources available to the recipient and costs.

## 4.4 The Four-Factor Analysis

### Factor 1: The Proportion, Numbers and Distribution of LEP Persons

The Census Bureau has two classifications of how well people speak English. The classifications are ‘very well’ and ‘less than very well’. For our planning purposes, we are considering people that speak English ‘less than very well’ as Limited English Proficient (LEP) persons.

**Table 1**

Geography	Population 5 year old and older	Number of Limited English Proficient Persons*	Percent of Limited English Proficient persons
Creek County	67,519	426	0.63%
Osage County	43,741	94	0.21%
Rogers County	89,208	563	0.63%
Tulsa County	618,086	18,905	3.06%
Wagoner County	75,826	806	1.06%

Source: 2017-2021 ACS Data File

\*Speaks English "not well" or "not at all"

*Table 1* shows the number and percent of persons regarding their English language skills for the counties within the MPO Metropolitan Planning Area. Of the population 5 years old and older, 20,794 persons or 2.32% are LEP.

**Table 2**

LANGUAGE SPOKEN AT HOME BY ABILITY TO SPEAK ENGLISH – Universe: Population 5 years and over

<b>Geography</b>	<b>Creek County</b>	<b>Osage County</b>	<b>Rogers County</b>	<b>Tulsa County</b>	<b>Wagoner County</b>
Total Population 5 years and over	67,519	43,741	89,208	618,086	75,826
Speak Only English	65,141	42,529	84,297	525,127	70,320
Speak Spanish	1,787	689	2,731	64,156	3,705
Speak English less than "very well"	510	167	856	24,919	1,227
Speak Indo-European	161	137	596	7,966	506
Speak English less than "very well"	30	9	58	1,670	141
Speak Asian & Pacific Islander	237	134	1,120	15,571	1,045
Speak English less than "very well"	152	-	326	7,973	455
Speak Other Languages	193	252	464	5,266	250
Speak English less than "very well"	34	86	96	986	50

Source: 2017-2021 ACS Data File

According to *Table 2*, of the LEP persons within the Tulsa MPO Area, 8.8% speak Spanish, 1.1% speak Indo-European languages, 2.2% speak Asian languages, and 0.7% speak other languages.

**Table 3****HOUSEHOLD LANGUAGE BY HOUSEHOLD LIMITED ENGLISH-SPEAKING STATUS**

<b>Table C16002</b>	<b>Creek County, Oklahoma</b>	<b>Osage County, Oklahoma</b>	<b>Rogers County, Oklahoma</b>	<b>Tulsa County, Oklahoma</b>	<b>Wagoner County, Oklahoma</b>
Universe: Households					
Total:	27,031	16,824	34,465	260,639	29,280
English only	25,809	16,275	32,330	223,664	27,111
Spanish:	767	285	1,086	23,341	1,382

Limited English speaking household	98	7	155	5,088	140
Not a limited English speaking household	669	278	931	18,253	1,242
Other Indo-European languages:	142	95	300	4,761	233
Limited English speaking household	-	5	6	292	12
Not a limited English speaking household	142	90	294	4,469	221
Asian and Pacific Island languages:	156	37	434	5,995	397
Limited English speaking household	98	-	46	1,669	56
Not a limited English speaking household	58	37	388	4,326	341
Other languages:	157	132	315	2,878	157
Limited English speaking household	4	-	18	158	10
Not a limited English speaking household	153	132	297	2,720	147

*Table 3* shows the number of households by language spoken for the counties that are part of the Tulsa MPO. As seen in Table 1, Creek County and Osage County together have 520 persons that are linguistically isolated. Rogers County has 563 persons while Wagoner County has 806 persons that are linguistically isolated. Tulsa County has the majority of the LEP, with 18,905 persons.

The map below shows the distribution of non-English speaking people. LEP persons residing in Osage County are located in one census block group in the southern portion of the county. In Rogers County there are several areas with LEP persons. There is a cluster within the City of Owasso, Catoosa, and Claremore. The largest cluster of LEP persons is located along the eastern portion of the Tulsa County portion of the MPO Area.

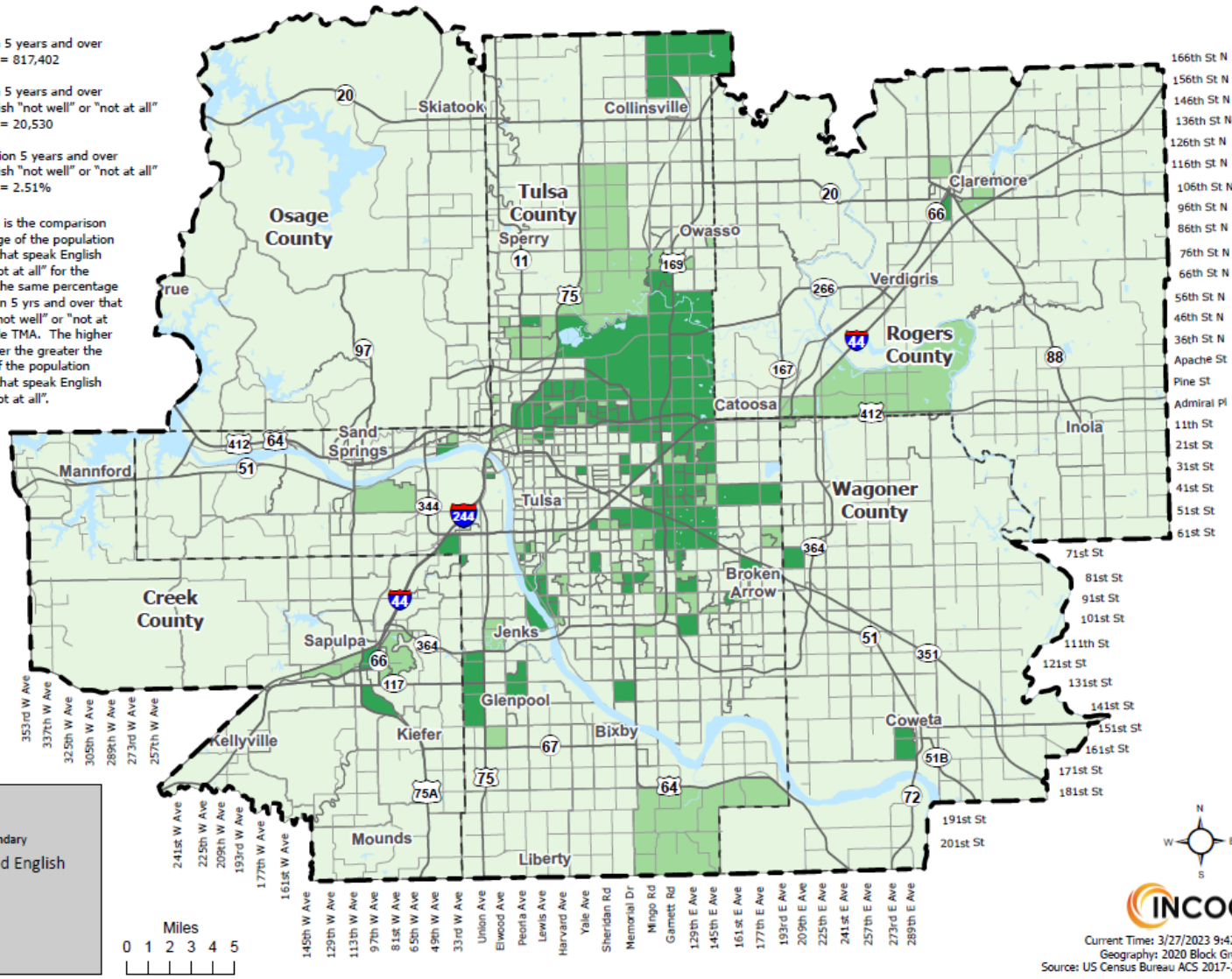
# Limited English Language Proficiency Population Concentrations within the Transportation Management Area

Total population 5 years and over within the TMA = 817,402

Total population 5 years and over that speak English "not well" or "not at all" within the TMA = 20,530

Percent population 5 years and over that speak English "not well" or "not at all" within the TMA = 2.51%

The index value is the comparison of the percentage of the population 5 yrs and over that speak English "not well" or "not at all" for the block group to the same percentage of the population 5 yrs and over that speak English "not well" or "not at all" for the whole TMA. The higher the index number the greater the concentration of the population 5 yrs and over that speak English "not well" or "not at all".



Path: G:\Mapping\INCOG\GIS\Information\Map\_VACS2017\_2021\WorkingMap\Working\_Map.aprx

## **Factor 2: Frequency of Contact with LEP Individuals**

INCOG's public participation process is designed to be open, inclusive, and comprehensive. The major transportation planning documents – Long Range Transportation Plan, TIP, Public Transit – Human Service Coordinated Transportation Plan, and other major transportation studies are made available at numerous locations and times to allow access and input to as many different populations as possible.

For the Long-Range Transportation Plan, INCOG holds several stakeholders' meetings to brainstorm each element of the Plan, Bike/Ped, Freight, Transit, and Roadways. Meetings are also held in several cities in the region to gather community feedback. The purpose is to hear about needs and preferences for transportation in the TMA. Materials, available in both English and Spanish versions, are posted on the INCOG Web site, e-mails are sent, and notices are distributed to local media publications. With COVID-19, INCOG is taking the appropriate measures to make sure staff and the members of the community can still participate in the planning process while keeping them safe.

Careful thought and planning is given at every level and every activity to achieve maximum involvement and reaching underserved populations. Any request for Spanish versions of materials is granted. Translation and interpreter services have been used as needed. There have not been many requests in the last three years. It is likely, however, that there will be an increase in requests since the Hispanic population is growing in the TMA.

INCOG's public participation procedures are defined in the Public Participation Plan available at [http://www.incog.org/Transportation/Documents/PIP2020\\_Final.pdf](http://www.incog.org/Transportation/Documents/PIP2020_Final.pdf).

## **Factor 3: The Nature and Importance of the Program, Activity, or Service to LEP Community**

As the agency responsible for coordinating the regional transportation planning process, INCOG must make sure that all segments of the population, including LEP persons, have been involved or have had the opportunity to be involved with the planning process. The impact of proposed transportation investments on underserved and underrepresented population groups is part of the evaluation process. INCOG provides oversight and helps ensure that LEP



and other disadvantaged population groups are not overlooked in the transportation planning process.

INCOG's main function is to support cooperative, comprehensive, and continuing transportation planning as outlined in Federal transportation acts. In doing so, INCOG develops three main documents – the Long Range Transportation Plan, the Transportation Improvement Program (TIP) and Unified Planning Work Program (UPWP), as well as other studies. The Long Range Transportation Plan provides direction for transportation investments out to 20 years in the future. The TIP is a program or schedule of short-range transportation improvements and activities intended to be implemented through a combination of State, Federal and local funding. The UPWP outlines tasks to be performed in the upcoming year.

INCOG is also the designated recipient for the Section 5310 (Enhanced Mobility of Seniors and Individuals with Disabilities). One of the primary responsibilities of the designated recipient is the development of a Public Transit – Human Service Transportation Coordinated Plan. This plan is also a primary planning document that is reviewed by the Transportation Technical and Policy Committees and endorsed by the INCOG Board of Directors. See *Section 3.6 on page 42* for Section 5310 Programs Implementation.

INCOG uses Federal funds to plan for transportation projects and does not provide any direct service or program that requires vital, immediate or emergency assistance, such as medical treatment, or services for basic needs, such as food or shelter. Lack of access of LEP persons to public transportation may, however, affect their ability to obtain crucial services such as health care, education, and employment.

#### **Factor 4: The Resources Available to the MPO and Overall Cost**

Outreach strategies to ensure all communications and public participation efforts comply with Title VI include:

- Coordination with individuals, institutions, or organizations to reach out to members in the affected minority and/or low-income communities.

- Follow LEP and Persons with Disabilities guidelines to ensure information is available in a variety of formats and provide notice to participants that LEP and other assistance is available upon request.
- Provide information in languages other than English, as needed. Maintain an inventory of translation services in the Tulsa area, especially resources for Spanish-speaking residents. Publish meeting notices in Spanish in *Hispano de Tulsa* and *La Semana Del Sur*.
- Provision of opportunities for public participation through means other than written communication, such as personal interview or use of audio or video recording devices to capture oral comments.
- Use of locations and facilities that are local, convenient, and accessible to identified populations.
- Hold meetings and events during the day, at night, and on weekends to encourage participation from identified populations.
- Use of different meeting sizes or formats, including small group exercises that encourage full participations from each individual.
- Disseminate information to minority median and ethnic/gender related organizations, to help ensure all social, economic, and ethnic interest groups in the region are represented in the planning process.
- Provide assistance to persons with disabilities, including individuals who are blind, have low-vision, or are hearing impaired.
- Provide continued training in nondiscrimination, outreach, equitable planning/research, and foreign language skills for INCOG staff.

In all activities, INCOG Transportation Planning will seek out and consider the viewpoints of LEP, minority and low-income populations. Because there is wide latitude in determining what specific measures are most appropriate, the determination will be based on the composition of the population affected by the planning program/project, the type of public participation process planned, and the resources available to the agency. INCOG staff will also

continue correspondence with organizations that represent LEP, minority, disabled, youth, elderly, and low-income residents. Additional innovative strategies will be researched and developed to ensure all residents are aware of the outreach process in which they are able and encouraged to participate.

INCOG has public participation funds included in the MPO annual budget. Fees for translation services, interpreter services, and LEP advertisement services are included in the eligible public participation expenses. Costs are estimated to be up to \$5,000 including staff time for providing language assistance.

#### 4.5 Language Assistance Plan

The “Four Factor” Analysis was key to determine if interpretation and translation of documents needs to be performed to ensure INCOG’s programs participation by persons with Limited English Proficiency (LEP). With this analysis it was possible to determine what languages are most commonly used by LEP populations in the Tulsa TMA. According to *Table 2*, of the LEP persons within the Tulsa MPO Area, 8.17% speak Spanish. It is likely that there will be an increase in requests for Spanish translations since the Hispanic population is growing in the TMA.

To assist the LEP populations in the Tulsa TMA and assure that persons with limited ability to speak, read, write, and understand the English language participate in all INCOG’s programs, the following elements will be implemented:

1. INCOG will develop a list of vital plans and documents that require translation. Webpages considered essential for public participation should also be translated. Google Translate may be utilized to provide immediate access to translation.
2. Public participation meetings notices will be posted in accessible locations both in English and Spanish with INCOG’s contact for further assistance to other languages translation.
3. INCOG will keep a database of personnel with foreign language skills that will be posted on INCOG’s website and internal website.
4. Once a year, INCOG personnel will be trained on how to effectively provide assistance to the LEP population and how to use telephone translation services when needed.

5. A language chart will be available to help identify what language an LEP person speaks and will be located in public areas.
6. The public will be notified of the availability of translation services for all public meetings. Upon request, interpreters will be made available to assist LEP persons.
7. INCOG will forward emails written in foreign languages for translation and an interpreter will provide assistance to the sender.
8. INCOG will maintain the “Four Factor” Analysis updated to monitor and evaluate the Language Assistance Plan and to keep it updated to better serve the LEP population. Vital documents can then be translated into the language of each frequently encountered LEP group eligible to be served and/or likely to be affected by INCOG’s programs and services.

#### **4.6 Safe Harbor Provision**

DOT has adopted DOJ’s Safe Harbor Provisions that can be used to demonstrate that an agency has met the translation obligations of written materials for LEP populations. The Safe Harbor Provision stipulates that, if a recipient provides written translation of vital documents for each eligible LEP language group that constitutes five percent (5%) or 1,000 persons, whichever is less, of the total population of persons eligible to be served or likely to be affected or encountered, then such action will be considered strong evidence of compliance with the recipient’s written translation obligations. Translation of non-vital documents, if needed, can be provided orally.

To use the Safe Harbor provision, INCOG will translate vital documents in the language most commonly used in the Tulsa TMA. If there are fewer than 50 persons in a language group that reaches the five percent (5%) trigger, INCOG is not required to translate the written materials but will provide written notice in the primary language of the LEP language group of the right to receive competent oral interpretation of those written materials, free of cost.

## 4.7 Nondiscrimination Monitoring and Review

The following criteria are used to determine the effectiveness of the Public Participation Process:

1. The number of citizens' responses that occurred:
  - Types of media used to contact participants (including publications that focus on minority, disabled, youth, elderly, low-income, or LEP residents)
  - Meeting convenience (time, place, accessibility)
  - Participation by a broad cross-section of the affected community
2. The input received demonstrates individual understanding:
  - Effectiveness of communication tools
  - Types of techniques used
  - Input received from the citizens provided decision-makers and funding agencies with reliable and useful information
3. The public process was responsive:
  - Documentation of how public input affected decisions
  - Evaluation of the effectiveness of the program from participants' perspective (feedback)
  - Involvement process tailored to specific community needs and accessible to all segments of the public
  - Efforts to improve performance
4. Environmental Justice was achieved:
  - Strategies for engaging minority, disabled, youth, elderly, low-income, and LEP populations in the decision-making process
  - Utilization of media targeted to minority, disabled, youth, elderly, low-income, and LEP populations
  - Reduction of participation barriers for non-traditional transportation stakeholders
  - Feedback from minority, disabled, youth, elderly, low-income, and LEP participants

- Consideration and documentation of their concerns and input in the decision-making process

A public participation evaluation form based on these criteria will be completed at the conclusion of each event or public review period (see Sample Forms on *page 75*). At each event, a short, anonymous survey including voluntary questions (attendees' demographic information, principal language, household income, and how participants were informed of the meeting) will be distributed (see Sample Forms on *page 75*). Together, these methods of data collection will allow a thorough evaluation and encourage brainstorming for improved future events.

The Public Participation Process is dynamic and must remain so to address the needs of the community. As techniques are proven effective and institutionalized, the process will evolve to reflect those advancements. Participating stakeholders and INCOG staff will immediately assess the effectiveness of every public participation activity. Revisions to the process will be promptly incorporated. The TTC, TPC, and INCOG Board of Directors will review revisions requiring formal amendment of the Public Participation Process document after consultation with stakeholders and a thorough opportunity for public review. To ensure the process is periodically evaluated, INCOG will, at a minimum, review and assess the process and results every two years and recommend any revisions that may be appropriate.

INCOG will periodically review the overall plan implementation strategy and update the Nondiscrimination Plan every three years as required by the Federal Government.

## **4.8 Documentation Process**

In accordance with Federal regulations, INCOG documents all aspects of the public participation process, available for public review during normal business hours at INCOG offices.

This information includes:

- Sign-in sheets;
- Meeting minutes;
- Outreach materials; and
- Various other essential meeting details and data.

## **SECTION 5 – COMPLAINT PROCESS**

### **5.1 Complaint Procedure**

**1. Submission of Complaint:** Any person who feels that he or she, individually or as a member of any class of persons, on the basis of race, color, or national origin has been excluded from or denied the benefits of, or subjected to discrimination by INCOG or any of their recipients may file a written complaint by completing and submitting INCOG’s Title VI Complaint Form. A sample complaint form is available in this document (see Sample Forms on *page 75*) and upon request. It is also available on INCOG’s TITLE VI and ADA Information web page with link at [http://www.incog.org/Transportation/transportation\\_main.html](http://www.incog.org/Transportation/transportation_main.html). Such complaints should be filed within 180 days of the date the person believes the discrimination occurred or when there’s been a continuing course of conduct, date on which that conduct was discontinued. INCOG will process complaints that are completed. Note: Upon request, assistance, in preparation of any necessary written material, will be provided to a person(s) who is unable to read or write. Complaints should be mailed to:

**INCOG Executive Director**

**Nondiscrimination Administration**

**2 W. 2<sup>nd</sup> St., Suite 800**

**Tulsa, OK 74103**

**2. Referral to Review Officer:** Upon receipt of the signed complaint form, INCOG Executive Director will give the complaint to the designated Title VI Coordinator/Public Outreach Planner who will log-in the complaint, determine the basis of the complaint, authority/jurisdiction, and who should conduct the investigation. The designated Title VI Coordinator/Public Outreach Planner reviews and determines the appropriate action regarding every Title VI complaint.

Within ten (10) business days, the designated Title VI Coordinator/Regional Public Outreach Planner will acknowledge receipt of the allegation, inform the complainant of action taken or proposed action to be taken to process the allegation. The notification letter contains:

- a. The basis of the complaint.
- b. A brief statement of the allegation(s) over which INCOG has jurisdiction.
- c. A brief statement of INCOG's jurisdiction over the recipient to investigate the complaint; and
- d. An indication of when the parties will be contacted.

If more information is needed to resolve the case, INCOG will contact the complainant and the complainant will have 10 business days from the date of the letter to send requested information to INCOG Title VI Coordinator/Public Outreach Planner. If the Coordinator is not contacted by the complainant or does not receive the additional information requested within 10 business days, INCOG can administratively close the case. A case can be administratively closed if the complainant no longer wishes to pursue their case.

The designated Title VI Coordinator/Public Outreach Planner also notifies the Oklahoma Department of Transportation (ODOT) within ten (10) calendar days of receipt of the allegations who will notify the appropriate Federal Agency. Generally, the following information will be included in every notification to the Oklahoma Department of Transportation's Civil Rights Division:

- a. Name, address, and phone number of the complainant.
- b. Email address, if available.
- c. Basis of complaint (i.e., race, color, national origin).
- d. Date of the alleged discriminatory act(s).
- e. Date of complaint received by the recipient.
- f. A statement of the complaint.
- g. Other agencies (State, Local, or Federal) where the complaint has been filed.
- h. An explanation of the actions the recipient has taken or proposed to resolve the issue(s) raised in the complaint.

Within sixty (60) calendar days from the date the original complaint was received, the designated Title VI coordinator will conduct and complete an investigation of the allegation(s) and based on the information obtained, will issue one of two letters to the complainant: a closure letter, summarizes the allegations and states that there was not a Title VI violation and that the case will be closed, or a letter of finding (LOF), summarizes the allegations



and the interviews regarding the alleged incident, and explains whether any disciplinary action, additional training of the staff member, or other action will occur. If the complainant wishes to appeal the decision, she/he has 10 days after the date of the letter or the LOF to do so. The designated Title VI Coordinator/Public Outreach Planner will conduct in-depth, personal interview with the complainant(s). Information gathered in this interview includes: identification of each complainant by race, color, sex, age, national origin, disability/handicap, or income status; name of the complainant; a complete statement concerning the nature of the complaint, including names, places, and incidents involved in the complaint; the date the complaint was filed; and any other pertinent information the investigation team feels is relevant to the complaint. The interviews are recorded either on audio tape or by taking notes. The designated Title VI Coordinator/Public Outreach Planner arranges for the complainant to read, make necessary changes to, and sign the interview transcripts or interview notes. Every effort will be made to obtain early resolution of complaints at the lowest possible level.

The designated Title VI Coordinator/Public Outreach Planner will forward the investigative report to the Oklahoma Department of Transportation. The Oklahoma Department of Transportation will review the report and forward the investigative report to the appropriate Federal Agency. Included with the reports is a copy of the complaint, copies of all documentation pertaining to the complaint, the date the complaint was filed, the date the investigation was completed, the disposition and the date of the disposition, and any other pertinent information. If, for some reason, the investigation cannot be completed within this timeframe, a status report shall be submitted to the Oklahoma Department of Transportation at this stage and the report shall follow upon completion. The appropriate Federal Agency reviews and issues the official Letter of Findings to the complainant.

**Submission of Complaint to the Oklahoma Department of Transportation, Federal Transit Administration, Federal Highway Administration, US Department of Transportation, or US Department of Justice:**

**• • •**

**U.S. Department of Transportation  
Federal Transit Administration  
East Building, 4<sup>th</sup> Floor  
ATTN: Office of Civil Rights  
1200 New Jersey Avenue, SE  
Washington, DC 20590  
Phone: (888) 446-4511**

**• • •**

**U.S. Department of Transportation  
Federal Highway Administration  
Office of Civil Rights  
1200 New Jersey Avenue, SE  
Washington, DC 20590  
Title VI Coordinator: 202-366-0693  
Email: [CivilRights.FHWA@fhwa.dot.gov](mailto:CivilRights.FHWA@fhwa.dot.gov)**

**• • •**

**U.S. Department of Justice  
Civil Rights Division  
Coordination and Review Section or Disability Rights Section – NYA  
950 Pennsylvania Avenue, N.W  
Washington, DC 20530  
(202) 514-3847  
Telephone Device for the Deaf (TTY) (202) 514-0716**

**3. Title VI Investigations, Complaints, and Lawsuits:** In order to comply with 49 CFR Section 21.9(b), INCOG and subrecipients shall prepare and maintain a list of any active investigations conducted by entities other than FTA, lawsuits, or complaints naming INCOG and/or subrecipient that allege discrimination on the basis of race, color, or national origin. This list shall include the date of the investigation, lawsuit, or complaint was filed; a summary of the allegation(s); the status of the investigation, lawsuit, or complaint; and actions taken by INCOG or subrecipient in response to the investigation, lawsuit, or complaint.

a. A list of all active lawsuits or complaints alleging discrimination on the basis of race, color, or national origin with respect to service or other transit benefits.

*INCOG's legal counsel states that MPO has no active lawsuits or complaints on the basis of race, color or national origin at this time (April, 2023).*

b. A description of all pending applications for financial assistance currently provided by other Federal agencies to the grantee.

*The MPO has no pending grant applications.*

c. A summary of all civil rights compliance reviews conducted by other Local, State or Federal agencies in the last 3 years.

*Civil rights compliance review was included in the MPO certification in 2021. Reviewing agencies included the Oklahoma Department of Transportation, FHWA, and FTA. The MPO was found in compliance.*

d. The most recent date of the grantees signed Annual Certifications and Assurances.

*The Federal fiscal year 2023 FTA Certifications and Assurance for INCOG, as the MPO, were approved and electronically pinned in TRAMS on 2/2/2023 by Meredith Baker, Legislative and Legal Affairs.*

## Appendix

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## Notice to The Public

The paragraph below will be inserted into all significant publications that are distributed to the public, such as future versions and updates of the long-range transportation plan. The text will be placed permanently on the agency's website ([www.incog.org](http://www.incog.org)) and in public areas of the agency's office, including the reception desk and meeting rooms. The version below is the preferred text, but where space is limited or in publications where cost is an issue, the abbreviated version can be used in its place.

The Indian Nations Council of Governments (INCOG) hereby gives public notice that it is the policy of the agency to assure full compliance with Title VI of the Civil Rights Act of 1964, the Civil Rights Restoration Act of 1987, Executive Order 12898 on Environmental Justice, and related statutes and regulations in all programs and activities. Title VI requires 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 INCOG receives Federal financial assistance. Any person who believes they have been aggrieved by an unlawful discriminatory practice under Title VI has a right to file a formal complaint with INCOG. Any such complaint must be in writing and filed with INCOG's Title VI Coordinator/Public Outreach Planner within one hundred and eighty (180) days following the date of the alleged discriminatory occurrence. For more information, or to obtain a Title VI Discriminatory Complaint Form, please see our website at [www.incog.org](http://www.incog.org) or visit our administrative office at: 2 West 2nd Street, Suite 800, Tulsa OK, 74103.

A complainant may file a complaint directly with the Federal Transit Administration by filing a complaint with the Office of Civil Rights, Attention: Title VI Program Coordinator, East Building, 5<sup>th</sup> Floor-TCR, 1200 New Jersey Ave., SE, Washington, DC 20590. If information is needed in another language, email [transportation@incog.org](mailto:transportation@incog.org) or call 918-584-7526. A shortened version of the above paragraph, such as the example below, may be used in publications where space or cost is an issue:

INCOG programs do not discriminate against anyone on the basis of race, color or national origin, according to Title VI of the Civil Rights Act of 1964. For more information, or to obtain a Title VI Complaint Form, see [http://www.incog.org/Transportation/transportation\\_nondiscrimination.html](http://www.incog.org/Transportation/transportation_nondiscrimination.html) or call 918-584-7526.

## List of Committee Members

### INCOG Board of Directors

#### Officers

##### **Chair**

Commissioner Karen Keith, Tulsa County

##### **Vice-Chair**

Chris Bengé, Tulsa County

##### **Secretary**

Mike Burdge, Sand Springs

##### **Treasurer**

Commissioner Newt Stephens - Creek County

#### Members

Bixby	Brian Guthrie - Mayor
Bristow	Kris Wyatt - Council Member
Broken Arrow	Christi Gillespie - Vice Mayor
Broken Arrow	Debra Wimpee - Council Member
Broken Arrow	Michael Spurgeon - City Manager
Catoosa	Thomas Sweet - Vice Mayor
Cherokee Nation	Chuck Hoskin, Jr. - Principal Chief
Claremore	Bill Flanagan - Mayor
Collinsville	Larry Shafer - Mayor
Coweta	Evette Young - Mayor
Creek County	Leon Warner - Commissioner
Creek County	Newt Stephens - Commissioner
Creek County	Jarrold Whitehouse - Commissioner
Creek County	Mark Whinnery - Creek County Towns
Glenpool	Joyce Calvert - Mayor
Jenks	Cory Box - Mayor

Muscogee Nation	David Hill. - Principal Chief
Okmulgee	Mickey Baldwin - Mayor
Osage County	Charlie Cartwright - Commissioner
Osage County	Steve Talburt - Commissioner
Osage County	Everett Piper - Commissioner
Osage County	Vacant - Osage County Towns
Osage Nation	Geoffrey M. Standing Bear - Principal Chief
Owasso	Bill Bush - Mayor
Rogers County	Dan DeLozier - Commissioner
Rogers County	Steve Hendrix - Commissioner
Rogers County	Ron Burrows - Commissioner
Rogers County	Frank Johnson - Rogers County Towns
Sand Springs	Mike Burdge - Council Member
Sapulpa	Craig Henderson - Mayor
Skiatook	Joyce Jech - Council Member
Tulsa	GT Bynum - Mayor
Tulsa	Vacant
Tulsa	James Wagner - Finance Director
Tulsa	Jed Cochran - Chief of Intergovernmental Relations
Tulsa	Cathy Carter - Auditor
Tulsa	Grant Miller - Council Member
Tulsa	Laura Bellis- Council Member
Tulsa	Chris Bengel - Council Member
Tulsa	Jayne Fowler - Council Member
Tulsa County	Karen Keith - Commissioner
Tulsa County	Kelly Dunkerley - Commissioner
Tulsa County	Stan Sallee - Commissioner
Tulsa County	Don Newberry - Court Clerk
Tulsa County	Michael Willis - County Clerk
Tulsa County	Chris Benge - Tulsa County
Tulsa County	Richard Carter - Tulsa County



Tulsa County	Robert Gardner - Tulsa County Towns
Tulsa County	Frazier Henke - Tulsa County
Tulsa County	Pete Regan - Tulsa County
Verdigris	Keith Crawford - Mayor
Wagoner	Albert Jones - Mayor
Wagoner County	Chris Edwards - Commissioner
Wagoner County	James Hanning - Commissioner
Wagoner County	Tim Kelley - Commissioner
Wagoner County	Vacant - Wagoner County Towns
INCOG General Assembly	Jim Spoon - Sand Springs Mayor

**Transportation Policy Committee**

Jared Cottle	City of Bixby
Travis Small	City of Broken Arrow
Eddie Faulkner	City of Catoosa
Vacant	City of Claremore
Craig Stokes	City of Collinsville
Roger Kolman	City of Coweta
David Tillotson	City of Glenpool
Robert Carr	City of Jenks
Doug Bonebrake	City of Owasso, Vice-Chairman
Derek Campbell	City of Sand Springs
Joan Riley	City of Sapulpa
Vacant	City of Skiatook
James Wagner	City of Tulsa, Mayor's Designee
Paul Zachary	City of Tulsa, Chairman
Newt Stephens	Commissioner, Creek County
Steve Talburt	Commissioner, Osage County
Ron Burrows	Commissioner, Rogers County
Alex Mills	Tulsa County
Rachel Cooper	Wagoner County

Rob Endicott	Cherokee Nation of Oklahoma
Jesse Allen	Muscogee (Creek) Nation of Oklahoma
Vacant	Osage Nation of Oklahoma
Jeff Edwards	Pedestrian/Bikeways
Scott Marr	Metropolitan Tulsa Transit Authority
Vacant	Railroad Interest
Vacant	Trucking
Frank Relja	Tulsa Airport Improvement Trust
David Yarbrough	Tulsa-Rogers County Port of Catoosa
Joe Echelle	Oklahoma Turnpike Authority
Clinton Johnson	INCOG Air Quality Committee
Dawn Sullivan	ODOT, Planning & Research Division
Chris Wallace	Oklahoma Transportation Commission, District 1
Randle White	Oklahoma Transportation Commission, District 8
Rich Brierre	Indian Nations Council of Governments
John Shivel	Tulsa Metropolitan Area Planning Commission

**Transportation Technical  
Committee**

Bea Aamodt	City of Bixby
Travis Small	City of Broken Arrow
Chris Cieslak	City of Catoosa
Vacant	City of Claremore
Craig Stokes	City of Collinsville, Vice-Chairman
Roger Kolman	City of Coweta
David Agbetunsin	City of Glenpool
Chris Cloyde	City of Jenks
Roger Stevens	City of Owasso, Chairman
Derek Campbell	City of Sand Springs
Steve Hardt	City of Sapulpa
Vacant	City of Skiatook
Kurt Kraft	City of Tulsa, City Traffic Engineering

Matt Liechti	City of Tulsa, Engineering Services
Newt Stephens	Commissioner, Creek County
Steve Talburt	Commissioner, Osage County
Ron Burrows	Commissioner, Rogers County
Roger Hughes	Tulsa County, County Engineer
Rachael Cooper	Wagoner County
Rob Endicott	Cherokee Nation of Oklahoma
Jesse Allen	Muscogee (Creek) Nation of Oklahoma
Vacant	Osage Nation of Oklahoma
Jeff Edwards	Pedestrian/Bikeways
Chase Phillips	Metropolitan Tulsa Transit Authority
Vacant	Railroad Interest
Vacant	Trucking
Frank Relja	Tulsa Airport Improvement Trust
Daniel Grisham	Tulsa-Rogers County Port of Catoosa
Joe Echelle	Oklahoma Turnpike Authority
Clinton Johnson	INCOG Air Quality Committee
Mike Provence	Oklahoma Department of Environmental Quality
Randle White	ODOT, Division VIII Engineer
Vacant	ODOT, Transit Branch
Sarah McElroy	ODOT, Planning & Research Division
Darita Huckabee	Indian Nations Council of Governments

## Title VI Complaint Form

<b>Section I:</b>				
Name:				
Address:				
Telephone (Home):			Telephone (Work):	
Electronic Mail Address:				
Accessible Format Requirements?	Large Print		Audio Tape	
	TDD		Other	
<b>Section II:</b>				
Are you filing this complaint on your own behalf?			Yes*	No
*If you answered "yes" to this question, go to Section III.				
If not, please supply the name and relationship of the person for whom you are complaining:				
Please explain why you have filed for a third party: _____				
Please confirm that you have obtained the permission of the aggrieved party if you are filing on behalf of a third party.			Yes	No
<b>Section III:</b>				
I believe the discrimination I experienced was based on (check all that apply):				
<input type="checkbox"/> Race <input type="checkbox"/> Color <input type="checkbox"/> 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 names and contact information				



## CONTRACTUAL ASSURANCES

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

**(1) Compliance with Regulations:** The contractor shall comply with the Regulations relative to nondiscrimination in Federally assisted programs of the Department of Transportation (hereinafter “DOT”), Title 49, Code of Federal Regulations, Part 21, as they may be amended from time to time, (hereinafter referred to as the Regulations), which are herein incorporated by reference and made a part of this contract.

**(2) Nondiscrimination:** The Contractor, with regard to the work performed by it during the contract, shall not discriminate on the grounds of race, color, national origin, age, sex or disability in the selection and retention of subcontractors, including procurements of materials and leases of equipment. The contractor shall 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) Solicitation of Subcontractors, 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 shall be notified by the contractor of the contractor’s obligations under this contract and the Regulations relative to nondiscrimination on the grounds of race, color, national origin, sex, age, or disability.

**(4) Information and Reports:** The contractor shall provide all information and reports required by the Regulations or directives issued pursuant thereto, and shall permit access to its books, records, accounts, other sources of information, and its facilities as may be determined by ODOT or INCOG as appropriate, and shall set forth what efforts it has made to obtain the information.

**(5) Sanctions for Noncompliance:** In the event of the contractor’s noncompliance with the nondiscrimination provisions of the contract, INCOG shall impose such contract sanctions as it or ODOT may determine to be appropriate, including but not limited to withholding of payments to

the contractor under the contract until the contractor complies, and/or cancellation, termination or suspension of the contract, in whole or in part.

**(6) Incorporation of Provisions:** The contractor shall include the provisions of paragraphs (1) through (6) in every subcontract, including procurements of materials and leases of equipment, unless exempt by the Regulations, or directives issued pursuant thereto.

The contractor shall take such action with respect to any subcontract or procurement as INCOG or ODOT may direct as a means of enforcing such provisions including sanctions for non-compliance, provided, however, that in the event a contractor becomes involved in, or is threatened with, litigation with a subcontractor or supplier as a result of such directions, the contractor may request INCOG to enter into such litigation to protect INCOG, and, in addition, the contractor may request the United State to enter into such litigation to protect the interests of the United States.

## FTA Section 5310 Funding

### FTA Enhanced Mobility for Seniors and People with Disabilities

Beginning in FFY 2013, FTA expanded the Section 5310 program to focus on transportation for seniors and people with disabilities, suballocating funds based on metropolitan area population, maintained eligibility for all individuals with disabilities and enhanced the flexibility to include “traditional/capital” and “operational assistance” to public transportation providers in the region.

With the newly enhanced Section 5310 program, INCOG granted over \$5.6 Million in federal funds for traditional capital needs such as vehicles and non-traditional needs such as operating expenses, contracts, and connection to transit facilities improvements. Flexibility allowed by FTA for awarding projects benefited all recipients.

Following the guidance from FTA, the allowable limits related to capital and operational, are regularly reviewed and awards are made in accordance with those allowances. The flexibility allows providers to seek contract services, utilize grant funds for preventative maintenance, or to provide for operational needs. INCOG also monitors all awardees for usage of vehicles funded in addition to reimbursing the costs allowed.

<b>INCOG Section 5310 for Seniors and Disabled Individuals (FY13 to FY21 Funds)</b>		<b>% Award</b>
Kibois Transit	\$ 929,796	17%
Cimarron Transit	\$ 923,371	16%
Pelivan Transit	\$ 580,923	10%
A New Leaf, Inc.	\$ 517,577	9%
Life Senior Services	\$ 445,792	8%
Morton Health services	\$ 379,159	7%
Gateway Foundation	\$ 316,935	6%
The Spring	\$ 238,073	4%
Rogers County Adult Day Center	\$ 155,061	3%
City of Tulsa	\$ 142,867	3%
Veterans Ride Connect	\$ 134,115	2%
Others	\$ 871,400	15%
<b>Total</b>	<b>\$ 5,635,069</b>	<b>100%</b>



## **Vehicles — Traditional Capital Funding**

A total of 59 vehicles purchased and serving Tulsa and surrounding areas:

Ki Bois Area Transit System  
Cimarron Public Transit System  
Pelivan Transit (Grand Gateway EDA)  
Morton Comprehensive Health Services  
The Springs (Day Spring Villa)  
A New Leaf, Inc.  
Life Senior Services  
Rogers County Adult Day Center  
Gateway Foundation

On average, six new ADA accessible vehicles each year are purchased using INCOG 5310 funding to agencies meeting regional service needs.

### **Operating Expenses – Non-Traditional Using Flexible Share as Allowed by FTA**

The City of Coweta connects residents to Tulsa and surrounding areas using KiBois Transit.

Human trafficking and domestic violence victims connect to employment and health care services by The Spring.

People with disabilities connect to social activities and health care facilities in Broken Arrow, Owasso, and other surrounding communities using A New Leaf Inc., and Gateway Foundation.

Life Senior Services, serving affordable senior housing developments in Tulsa, Broken Arrow, Owasso, Bixby, Jenks, Sapulpa, Sand Springs, Glenpool, Coweta, Skiatook and Collinsville, connects clients to services and social activities.

### **Service Contracts**

NewView OK provides vouchers to Uber/Lyft services for blind/partially blind.

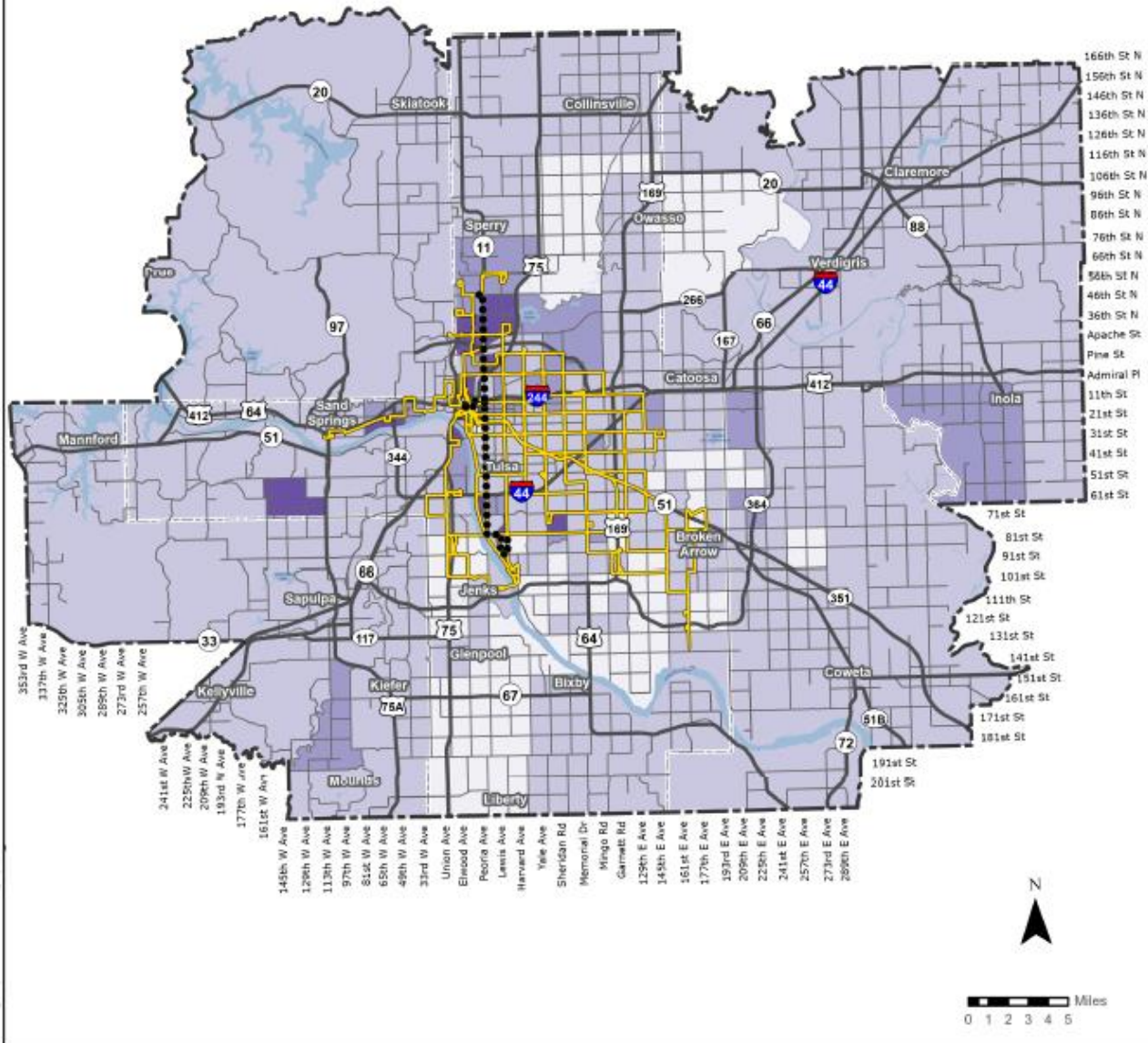
INCOG contract with the Veterans Ride Connect (VRC), a consortium of transit agencies including Pelivan Transit, Cimarron Transit, Ki Bois Transit, Muskogee Transit, and Muscogee Creek Nation, to provide transit services to veterans.

Youth Services of Tulsa contract with MODUS to provide services to youth suffering from mental health and substance abuse issues, connecting them to health care, counseling, and other services.







The City of Tulsa provides transportation to patients in need of inpatient mental health treatment at the Crisis Care Center (CCC) of Family and Children's Services.

Life Senior Services contracts with a transportation provider to deliver services to the elderly residents to health-related appointments.

# Concentrations of Vulnerable Populations



## Legend

-  Tulsa Transit Route
-  Peoria AERO BRT
- Vulnerable Population Concentrations**
-  Very High
-  High
-  Average
-  Low

Concentrations of vulnerable populations are based on an index value, which is calculated by taking the percentage of **persons below poverty, persons aged 65 and over, and persons with a disability** at the census tract level and dividing that by the percentage of these populations at the regional level. Index values for each vulnerable population were summed and then categorized. Average concentrations represent the mean of the summed index values (sum score) plus/minus one standard deviation, High concentrations represent sum score values above one standard deviation but less than two, and Very High concentrations represent sum score values two or more standard deviations above the mean. Low concentrations represent sum scores that are one standard deviation below the mean or lower.

Source: ACS 2017-2021 5-year data set, US Census Bureau

## Location Map

