

ROCHESTER-OLMSTED COUNCIL OF GOVERNMENTS



Community Engagement Plan 2026





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Title VI assurance

ROCOG operates its programs and services without regard to race, color, and national origin in accordance with Title VI of the Civil Rights Act. Any person who believes they have been aggrieved by any unlawful discriminatory practice under Title VI may file a complaint with ROCOG, MnDOT, or USDOT. For more information, or to obtain a Title VI Discrimination Complaint Form, call the Olmsted County Planning Department at (507) 328-7100, visit our website, or email us at planningweb@olmstedcounty.gov.

Section 508 compliance

Section 508 is an amendment to the federal Rehabilitation Act of 1973. It ensures that people with disabilities have equal access to government information. Every reasonable effort has been made

to make this document 508 compliant. If you need assistance reading this document, please call the Olmsted County Planning Department at (507) 328-7100.

Map disclaimer

The information in the maps found in the Rochester-Olmsted Council of Governments' (ROCOG) Community Engagement Plan (CEP 2026) is a compilation of data derived from federal, state, county, regional, and municipal sources. Geographic information has limitations due to the scale, resolution, date, and interpretation of the original source materials. Maps and data are to be used for reference purposes only and ROCOG is not responsible for any inaccuracies herein contained. No responsibility is assumed for damages or other liabilities due to the accuracy, availability, use, or misuse of the information provided.

Plan adoption



Acronyms and definitions

Acronyms

ADA	Americans with Disabilities Act
CEP	Community Engagement Plan
FHWA	Federal Highway Administration
FTA	Federal Transit Administration
LAP	Language Access Plan
LEP	Limited English Proficiency
MnDOT	Minnesota Department of Transportation
MPO	Metropolitan Planning Organization
ROCOG	Rochester-Olmsted Council of Governments
STIP	State Transportation Improvement Program
TIP	Transportation Improvement Program
USDOT	United States Department of Transportation

Title VI definitions (as found in FTA Circular 4702.1B.)

Discrimination: Any action or inaction, whether intentional or unintentional, in any program or activity of a federal aid recipient, subrecipient, or contractor that results in disparate treatment, disparate impact, or perpetuating the effects of prior discrimination based on race, color, or national origin.

Limited English Proficiency (LEP) Person: A person for whom English is not their primary language and who have a limited ability to read, write, speak, or understand English, including those who reported to the U.S. Census that they speak English less than very well, not well, or not at all.

Low-Income Person: An individual whose family income is at or below 150 percent of the poverty line as defined in section 673(2) of the Community Service Block Grant Act (42 U.S.C. 9902(2)), including any revision required by that section for a family of the size involved.

Low-Income Population: Any readily identifiable group of low-income persons who live in geographic proximity, or geographically dispersed/transient persons (such as migrant workers or Native Americans) who will be similarly affected by a proposed program, policy or activity.

Metropolitan Planning Organization (MPO): The transportation policy-making organization created and designated to carry out the federally required metropolitan transportation planning process.

Minority Person: Includes the following:

- **American Indian and Alaska Native:** People having origins in any of the original peoples of North, Central, and South America and who maintain tribal affiliation or community attachment.
- **Asian:** People 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.
- **Black or African American:** People having origins in any of the Black racial groups of Africa.
- **Hispanic or Latino:** Persons of Cuban, Mexican, Puerto Rican, South or Central American, or other Spanish culture or origin, regardless of race.
- **Native Hawaiian or Other Pacific Islander:** People having origins in any of the original peoples of Hawaii, Guam, Samoa, or other Pacific Islands.

Subrecipient: An entity that receives federal financial assistance through ROCOG.



Contents

Introduction	10
1.1 Executive summary	10
1.2 About ROCOG	10
The Title VI Program	13
2.1 Title VI objectives	13
2.2 Title VI program requirements	13
2.3 Additional Title VI requirements	14
2.4 Statutory authorities	14
The Title VI Plan	16
3.1 Title VI nondiscrimination assurances	16
3.2 ROCOG responsibilities	16
3.3 ROCOG's Title VI Coordinator	17
3.4 Title VI Notice to the Public	18

3.5 Title VI complaint procedure	18
The Language Access Plan	22
4.1 Four Factor analysis	22
4.2 Language assistance	24
4.3 Staff training	25
4.4 Monitoring	25
The Public Participation Plan	26
5.1 ROCOG's vision	26
5.2 Outreach toolbox	26
5.3 ADA and accessibility provisions	29
5.4 How ROCOG uses public input	30
5.5 Opportunities for participation	30
5.6 Community Engagement Plan (CEP)	36
5.7 Potential stakeholder groups	36
Expanding Community Access	38
Appendices	55

Appendix 1 : ROCOG Title VI / Nondiscrimination Policy Statement. 56

Appendix 2 : ROCOG Title VI Nondiscrimination Assurances. 57

Appendix 3 : ROCOG Title VI Complaint Form 65

Appendix 4 : ROCOG Title VI Complaint Log 67

Appendix 5 : ROCOG Title VI Employee Training Log 68



Introduction

1.1 Executive summary

As an MPO, ROCOG must adopt a Title VI Program to receive federal transportation funding from the Federal Highway Administration (FHWA) and/or Federal Transit Administration (FTA). This program must follow the Civil Rights Act of 1964 and FTA Circular 4702.1B and include the following components:

- **Title VI Plan:** Ensures transportation planning and services are offered fairly and without discrimination.
- **Language Access Plan:** Provides language support and makes sure the public is informed in ways that overcome language barriers.
- **Public Participation Plan:** Ensures everyone has a fair chance to participate in transportation decision-making.

ROCOG understands that people experience transportation differently and aims to create a system that works for everyone. The Community Engagement Plan (CEP 2026) documents ROCOG's Title VI Program and provides information on effective ways to involve the public in ROCOG's planning and programming.

1.2 About ROCOG

ROCOG was established in November 1971 after a federal rule required every urbanized area with more than 50,000 people to form a metropolitan planning organization (MPO). MPOs give local elected officials a way to help decide how federal transportation funds are used. They do this through regional planning that is continuing, cooperative, and comprehensive.

ROCOG is staffed by the Olmsted County Planning Department and serves as the MPO for unincorporated Olmsted County and the cities of Byron, Dover, Eyota, Oronoco, Rochester, Stewartville, Chatfield, and Pine Island (see Figure 1).

Two standing committees guide ROCOG's work.

- ROCOG Policy Board:** The ROCOG Policy Board reviews and approves transportation policies, plans, and programs to ensure the region stays eligible for state and federal transportation funding. It consists of 16 local elected officials from across the ROCOG planning area and two citizen members. They represent Rochester, Olmsted County, the Greater Olmsted cities, townships, and school districts.
- Transportation Technical Advisory Committee (TTAC):** TTAC reviews the technical aspects of transportation issues in the ROCOG area and gives recommendations to the Policy Board. It is made up of 16 members from local governments that have dedicated transportation staff, including ROCOG staff.

ROCOG does not have any control over potential candidates for Policy Board and TTAC membership; that is determined by the jurisdiction they represent. ROCOG recognizes, however, that having diverse voices on its staff and committees leads to stronger policies that better reflect the needs of the whole community. Thus, the press and social media are used to encourage residents and minorities to apply for the Policy Board's citizen representative spots. ROCOG staff are hired using Olmsted County policies.

The current membership of these groups is described in Table 1 and compared to the composition of the planning area population.

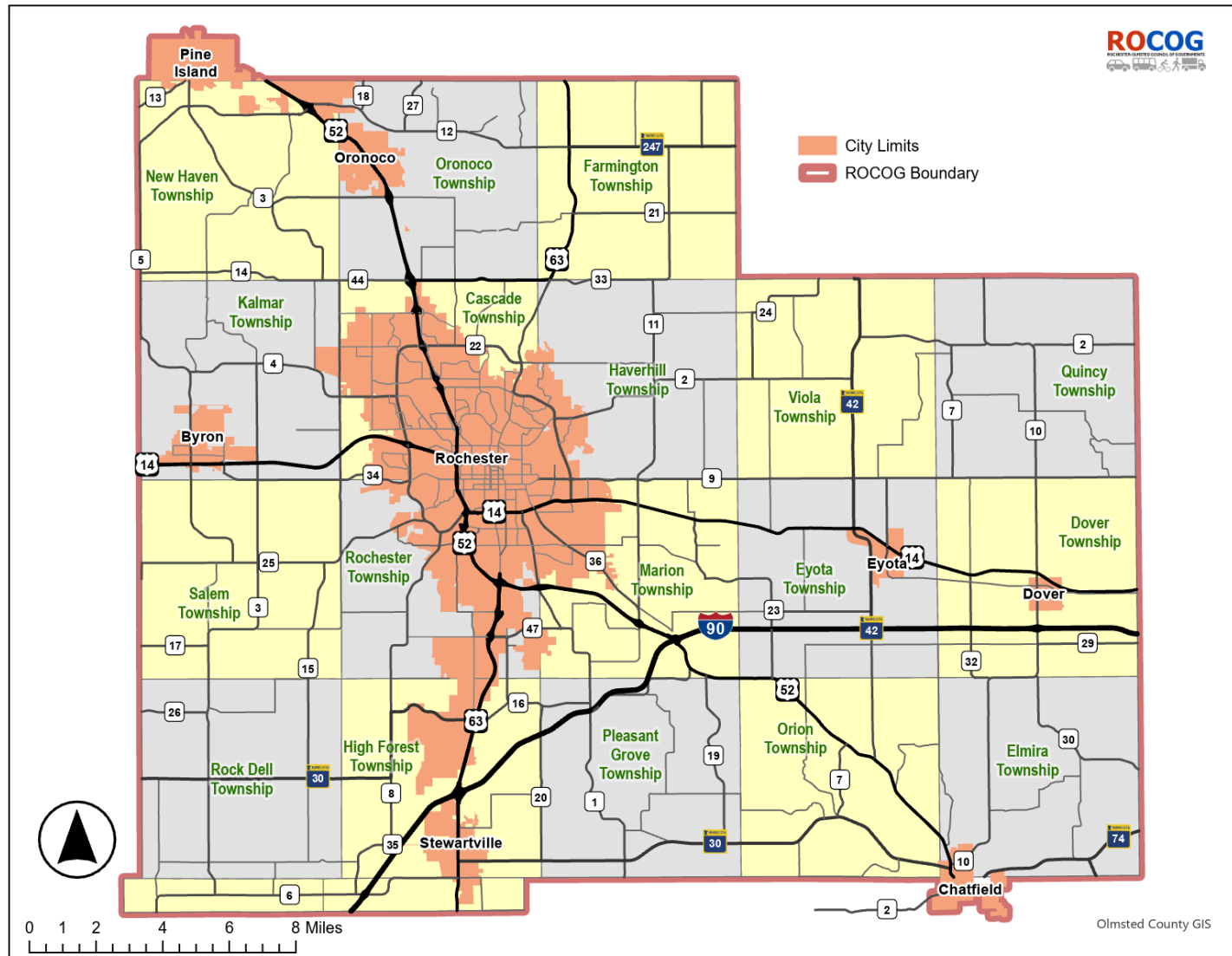
Table 1: ROCOG Demographics

Source: American Community Survey (2024) and ROCOG Survey

	Planning Area (169,224)	Policy Board (16)	TTAC (16)	Staff (6)
Race				
American Indian or Alaska Native	307	0	0	0
Asian/Asian American	10,538	0	0	1
Black/African American	12,431	0	0	0
Hispanic or Latino	9,872	0	0	0
Native Hawaiian or Other Pacific Islander	0	0	0	0
White (Not Hispanic or Latino)	131,547	13	10	4
Two or More Races	11,114	0	1	1
Other	NA	0	0	0
No Response	NA	3	5	0
Sex				
Female	86,621	2	4	4
Male	82,603	11	7	2
Prefer to Self-Describe	NA	0	0	0
No Response	NA	3	5	0



Figure 1: ROCOG Planning Area





ROCOG supports the key role that transportation facilities and services play in the community. In accordance with Title VI of the Civil Rights Act of 1964, and the Civil Rights Restoration Act of 1987 (P.L. 100-259), ROCOG commits to assuring that no person is excluded from participation in, denied the benefits of, or otherwise subjected to discrimination under any of their federally funded transportation programs or activities.

To receive federal funding, MPOs are required to update their Title VI program every three years. ROCOG's program must be approved by their Policy Board and submitted to MnDOT. ROCOG adopted its last Title VI Non-Discrimination Program in 2022.

2.1 Title VI objectives

ROCOG's Title VI program strives to ensure that:

- All transportation planning activities are carried out fairly and without discrimination.
- Public engagement opportunities allow everyone to participate fully in transportation decisions, regardless of race, color, or national origin.

People with limited English proficiency (LEP) have meaningful access to participation in transportation planning-related programs and activities.

2.2 Title VI program requirements

The general requirements for a Title VI program, as outlined in FTA Circular 4702.1B, include:

The Title VI Program

- ROCOG's Title VI Notice to the Public.
- ROCOG's Title VI Assurances (signed).
- Procedures and forms for filing a discrimination complaint.
- A report of any public transportation-related Title VI investigations, complaints, or lawsuits filed against ROCOG.
- ROCOG's public participation plan.
- ROCOG's language access plan (formerly known as a limited English proficiency plan, or LEP).
- An overview of minority representation on ROCOG's planning and advisory bodies.

2.3 Additional Title VI requirements

As the MPO for the Rochester-Olmsted County area, ROCOG is also required to include a summary of its planning area's demographics, showing where minority populations live.

This summary, found in Chapter 6, must be used in ROCOG plans and projects to:

- Explain how ROCOG identifies and considers the transportation needs of minority communities.
- Provide maps and charts showing minority and non-minority population patterns and how state and federal transit funds are distributed across these areas.
- Evaluate whether any planned actions might negatively affect people based on race, color, or national origin.

2.4 Statutory authorities

Section 601 of Title VI of the Civil Rights Act of 1964 states:

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

The Civil Rights Restoration Act of 1987 makes it clear that Title VI applies to an entire organization, not just the parts that receive federal money. This means that if any part of a department, agency, or government unit gets federal funding, then all of its operations must follow Title VI's nondiscrimination requirements.

Since the Civil Rights Act of 1964, other nondiscrimination laws have been enacted that expand the range and scope of Title VI coverage and applicability, including:

- **The Uniform Relocation Assistance and Real Property Acquisition Policies Act Of 1970** prohibits unfair treatment of people displaced or whose property will be acquired because of federal and federal-aid programs and projects.
- **The Federal Aid Highway Act of 1973** states that no person shall, on the grounds 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.
- **Section 504 of the Rehabilitation Act of 1973** states that no qualified disabled person shall, solely by reason of their disability, 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.

- **The Age Discrimination Act of 1975** states that no person 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.
- **The American Disabilities Act (ADA) of 1990** prohibits discrimination against people with disabilities in employment, transportation, public accommodation, communications, and governmental activities.



The Title VI Plan

No person or group will be excluded from participation in, denied benefits of, or discriminated against in any ROCOG programs, services, or activities because of their race, color, national origin, sex, age, or disability. This applies to all ROCOG activities, whether or not they receive federal funding.

ROCOC's official Title VI Nondiscrimination Policy Statement is in Appendix 1.

3.1 Title VI nondiscrimination assurances

The USDOT requires any agency that receives federal transportation funding to prove that its programs and activities follow Title VI, as described in 49 CFR 21.7(a). To meet this requirement, agencies must sign the standard Title VI Nondiscrimination Assurances in USDOT Order 1050.2A before they can receive federal funds.

ROCOC has signed these required assurances, which are included in Appendix 2. This agreement contains specific language that ROCOC must include in its bid solicitations, requests for proposals, contracts, and real estate documents.

3.2 ROCOC responsibilities

As an MPO, ROCOC must:

- Monitor funding subrecipients for compliance with Title VI regulations, in accordance with 49 CFR 21.9(b).
 - Determine the scope of the subrecipient's activities and the related Title VI responsibilities.

- Guarantee the subrecipient is aware of the identified Title VI responsibilities within the scope of its activities.
- Insert Appendices A and E of the Title VI Nondiscrimination Assurances into all contracts with subrecipients.
- Ensure the subrecipient's operations under its contract with ROCOG are carried out in accordance with ROCOG's Community Engagement Plan.
- Promote inclusive public participation in accordance with Chapter 5 of CEP 2026. The CEP is available at ROCOG's office and on their [website](#).
- Provide access to limited English proficient (LEP) persons. See Chapter 4 of CEP 2026 for details.
- Encourage minority representation on planning and advisory committees.
- Ensure that ROCOG staff will complete one hour of training per calendar year. The Title VI Coordinator will annually determine the required training. The Title VI Training Log for Employees will be recorded as Appendix 5 of this document.

3.3 ROCOG's Title VI Coordinator

Allison Sosa, ROCOG Executive Director
 2122 Campus Drive SE, Rochester, MN 55904
 Phone: 507-328-7100
 Email: planningweb@olmstedcounty.gov

The Title VI Coordinator is responsible for making sure ROCOG follows all Title VI requirements. Their duties include:

- **Program administration**
 - Review ROCOG's planning and programming processes to ensure they follow Title VI requirements.
 - Regularly check administrative procedures to confirm they work effectively, staffing is sufficient, and resources support full compliance.
- **Complaints**
 - Process all Title VI complaints received by ROCOG.
 - Set procedures to quickly correct any identified issues and document agreed-upon corrective actions.
 - Complete corrective actions within 90 days.
- **Data collection**
 - Maintain up-to-date, publicly available demographic data (race, color, national origin) needed for Title VI compliance.
 - Collect demographic data during public engagement and compare it to local demographics to evaluate outreach success.
- **Title VI Plan Update**
 - Update the Title VI Plan and Language Access Plan as required by federal regulations.
 - Analyze how state and federal funds are distributed and whether investments create disparate impacts.

- **Complaint report**

- Keep a record of all Title VI investigations, lawsuits, and complaints.
- Report them to USDOT when required.

- **Public dissemination**

- Share Title VI information with the public, including translations when appropriate.
- Post the CEP online and have a public copy available in the ROCOG office.
- Ensure communication strategies and language needs are addressed.
- Include a nondiscrimination notice in press releases and on the website.
- Provide accommodations such as interpreters, translators, or Braille materials when requested in advance.

- **Consultant contracts**

- Monitor consultant contracts to ensure Title VI compliance.
- Work with contractors to resolve any compliance issues.

- **Staff training**

- Ensure staff receive Title VI training and have the resources needed to assist minority and LEP populations.
- Work with federal, state, and local partners to provide

regular training opportunities.

3.4 Title VI Notice to the Public

The Rochester Olmsted Council of Governments (ROCOG) operates its programs without regard to race, color, or national origin in accordance with Title VI of the Civil Rights Act. 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 ROCOG, MnDOT, or USDOT and are encouraged to submit complaints at: <https://www.dot.state.mn.us/civilrights/nondiscrimination-complaint-form.html>

Complaint forms and instructions are found in CEP 2026. If you would like a printed copy of the complaint instructions and forms mailed or emailed to you, or if you need this information to be provided in another language or format, please contact the ROCOG office at:

Allison Sosa, ROCOG Executive Director
2122 Campus Drive SE, Rochester, MN 55904
Phone: 507-328-7100
Email: planningweb@olmstedcounty.gov

A Title VI complaint may also be made by calling MnDOT's Office of Civil Rights at 651-366-3071 or submitting an [online complaint form](#). Hard copy complaint forms are available from MnDOT in Spanish and Somali upon request.

3.5 Title VI complaint procedure

No person or group may be excluded from participation, denied benefits, or subjected to discrimination in any ROCOG program, service, or activity based on race, color, national origin, sex, age,

disability, or low-income status. Anyone who believes they were discriminated against by ROCOG or its contractors may file a Title VI complaint.

3.5.1 Scope of Title VI complaints

Title VI covers all ROCOG internal and external activities and those of their contractors. The following actions are prohibited under Title VI (See 49 C.F.R. 21.5):

- Excluding individuals or groups from participation in programs or activities.
- Denying program services or benefits to individuals or groups.
- Providing a different service or benefit or providing them in a manner different from what is provided to others.
- Denying an opportunity to participate as a member of a planning, advisory or similar body that is an integral part of the program.

3.5.2 How to file a formal Title VI complaint

Title VI complaints should be in writing and signed and may be filed by mail, fax, in person, or e-mail. Complaints must be received no more than 180 days after the alleged incident unless the time for filing is extended by the processing agency.

A complaint should contain the following information:

- A written explanation of the alleged discriminatory actions.

- The applicant's contact information, including, if available: full name, postal address, phone number, and email address.
- The basis of the complaint (e.g., race, color, national origin, etc.).
- The names of specific people and respondents (e.g., agencies/organizations) alleged to have discriminated against the applicant.
- Sufficient information to understand the facts that led the applicant to believe that discrimination occurred in a program or activity that receives federal financial assistance.
- The date(s) of the alleged discriminatory act(s) and whether the alleged discrimination is on-going.

Applicants are encouraged to submit complaints directly to MnDOT via its [online complaint form](#). MnDOT also has hard copy complaint forms available in [Spanish](#), [Somali](#), and [Hmong](#). Language assistance is available for limited English proficient individuals. If necessary, the applicant may call MnDOT at the phone number below and provide the allegations by telephone. MnDOT will transcribe the allegations of the complaint as provided over the telephone and send a written complaint to the applicant for correction and signature.

Minnesota Department of Transportation (MnDOT)
Office of Civil Rights
385 John Ireland Boulevard, Mail Stop 170
St. Paul, MN 55105
Online: [Complaint Form](#)
Fax: 651-366-3129
Phone: 651-366-3073

Complaints can also be filed by completing and submitting the complaint form available in Appendix 3 of this document, at [ROCOG's website](#), at ROCOG's office, or by sending an email or letter with the required information to ROCOG at:

Rochester-Olmsted Council of Governments
2122 Campus Dr. SE, Suite 200
Rochester, MN 55904
planningweb@olmstedcounty.gov
507-328-7100

Complaints can be filed directly with the FHWA:

Federal Highway Administration
U.S. Department of Transportation Office of Civil Rights
1200 New Jersey Avenue, SE
8th Floor E81-105
Washington, DC 20590
Email: CivilRights.FHWA@dot.gov
Fax: 202-366-1599
Phone: 202-366-0693

3.5.3 Complaint review process

After submitting a complaint, the applicant will receive correspondence informing them of the status of the complaint within ten (10) business days of ROCOG or another agency receiving the complaint.

When ROCOG's Title VI Coordinator receives a complaint, it is sent to MnDOT's Office of Civil Rights (OCR), which then forwards it to the FHWA Minnesota Division Office with an initial processing recommendation. The Division Office then sends the complaint to the FHWA Headquarters Office of Civil Rights

(HCR).

ROCOG does not investigate complaints. All investigations are handled by FHWA HCR, which may assign MnDOT OCR to conduct interviews, gather information, and prepare a Report of Investigation (ROI). MnDOT OCR has 60 business days to complete the ROI and send it to HCR. HCR reviews the report and issues a Letter of Finding.

There are four potential outcomes for processing complaints. FHWA HCR is responsible for all determinations regarding whether to accept, dismiss, or transfer Title VI complaints.

- **Accept:** If a complaint is filed on time, contains sufficient information to support a claim under Title VI, and concerns matters under the FHWA's jurisdiction, then HCR will send a written notice to the applicant, the respondent agency, and the FHWA Minnesota Division Office that it has accepted the complaint for investigation.
- **Preliminary review:** If it is unclear whether the complaint allegations are sufficient to support a claim under Title VI, then HCR may dismiss it or conduct a preliminary review to get additional information from the applicant and/or respondent before deciding whether to accept, dismiss, or refer the complaint.
- **Procedural dismissal:** If a complaint is late, not in writing and signed, or has other procedural issues, HCR will dismiss it and send written notice to the applicant, the respondent, and the FHWA Minnesota Division Office.
- **Referral/dismissal:** If a complaint meets the basic filing requirements but FHWA does not have jurisdiction over the issue or the agency involved, HCR will either dismiss it or refer

it to the correct agency. If the complaint is dismissed, HCR will send a written notice to the applicant, the respondent, and the FHWA Division Office. If it is referred, FHWA will send a referral notice and a copy of the complaint to the appropriate federal agency and to the USDOT Departmental Office of Civil Rights.

For further information about the FHWA investigation process and potential complaint outcomes, please visit the [Questions and Answers for Complaints Alleging Violations of Title VI of the Civil Rights Act of 1964](#).

3.5.4 Complaint records

All recipients of federal financial assistance are required to maintain a list of any Title VI complaints. ROCOG maintains a complaint log recorded in Appendix 4.

As of July 2026, there have been no Title VI investigations, complaints, or lawsuits filed with ROCOG.



The Language Access Plan

ROCOG reviews how language barriers may limit public participation in transportation planning, as required by Title VI. Federal rules support ROCOG's efforts to ensure people with limited English proficiency (LEP) can access its programs and services. Although smaller MPOs like ROCOG are not expected to offer the same level of language support as larger agencies, ROCOG is committed to giving LEP individuals meaningful opportunities to participate in regional transportation decisions.

The Language Access Plan explains how ROCOG identifies people who may need language help, what types of assistance can be offered, the staff training required, and how the public is informed that language services are available.

4.1 Four Factor analysis

To prepare this plan, ROCOG uses a four-factor analysis recommended by federal transportation agencies.

Factor 1: The number and proportion of LEP people in the ROCOG planning area who may be served or are likely to require ROCOG services.

Under Title VI, anyone who says they speak English less than "very well" when completing the U.S. Census is considered to have "limited English proficiency" (LEP). ROCOG staff reviewed data from the 2020-2024 American Community Survey for Olmsted County and those parts of Chatfield and Pine Island in neighboring counties. Tables 2 and 3 show that in the ROCOG Planning Area, 4.1% of the population age 5 years and older speak English "less than very well" and may require language assistance.

Table 2: ROCOG LEP

Source: American Community Survey (2024)

Demographic	ROCOG Population	% of Population
Total population	169,224	100.0%
Population 5 years old and older	158,709	93.8%
Language spoken at home other than English (5+ years old)	21,991	13.9%
Speak English less than "very well" (5+ years old)	6,548	4.1%

Table 3: ROCOG LEP Percentage by City

Source: American Community Survey (2024)

City	% Language Other Than English at Home	% LEP
Byron	2.1%	0.8%
Chatfield	2.7%	1.1%
Dover	11.4%	2.8%
Eyota	0.3%	0.1%
Oronoco	3.3%	0.4%
Pine Island	0.1%	0.1%
Rochester	17.4%	5.3%
Stewartville	4.8%	0.5%

Data from the Minnesota Department of Education for School Districts within the ROCOG Planning Area indicate that Spanish, Somali, Arabic, Khmer/Cambodian and Chinese/Mandarin were

the most common non-English languages primarily spoken at home in 2025-2026.

The federal Safe Harbor Provision for translation states that ROCOG can show strong evidence of Title VI compliance by:

- Providing written translations of vital documents for each eligible LEP language group that constitutes five percent or 1,000, whichever is less, of persons eligible to be served or likely to be affected or encountered, or
- If a language group has fewer than 50 people but meets the five-percent threshold, ROCOG does not translate vital written materials. Instead, it provides a written notice in that group's primary language explaining that free, competent oral interpretation of those materials is available.

After reviewing available U.S. Census and Minnesota Department of Education data, ROCOG has determined that Spanish and Somali meet the Safe Harbor threshold in its planning area.

Factor 2: The frequency with which LEP people encounter ROCOG programs.

ROCOG's staff and Policy Board have rarely been contacted by LEP people about ROCOG services. Although ROCOG uses outreach methods like focus groups and open houses to gather input from minority communities, staff has had little direct interaction with LEP individuals. Agencies funded through ROCOG's Transportation Improvement Program, such as Rochester Public Transit, use similar outreach methods. While ROCOG has not been asked to provide interpreters or translated documents, it can provide these services upon request.

Factor 3: The nature and importance of programs and services provided by ROCOG to the LEP population.

ROCOG is a planning agency, primarily responsible for the preparation of the Metropolitan Transportation Plan (MTP) the annual Transportation Improvement Program (TIP), and other multimodal plans. ROCOG is only responsible for programming about 2% of federal funds in its planning area; the remaining projects and programs using federal funds are selected by MnDOT and its affiliated committees.

ROCOG uses a continuous, cooperative and comprehensive planning process that identifies the region's needs, sets priorities for the future, and commits to ensuring that all members of the public, including LEP individuals, have opportunities to become involved. These techniques and processes are detailed in Chapter 5.

Factor 4: The interpretation services available to ROCOG and overall cost to provide LEP assistance.

Language assistance is available upon request through Olmsted County's partnership with the Intercultural Mutual Assistance Association (IMAA). Because the LEP population in the ROCOG area is relatively small and resources are limited, full multi-language translations of large transportation plan documents, agenda packages, programs, and maps are not warranted at this time. However, within its limited budget and capabilities, ROCOG is committed to providing LEP individuals with meaningful opportunities to participate in the transportation planning process. The Title VI notice is translated into Spanish and Somali. Limited services are available in these languages as well as Arabic, Khmer/Cambodian, Chinese/Mandarin, and Vietnamese.

4.2 Language assistance

ROCOG has a small staff and does not have in-house translation capabilities or expertise. Staff can assist LEP individuals but cannot guarantee the accuracy of outside translation services.

When ROCOG identifies someone who needs language assistance, it will take reasonable steps to help. Language assistance includes both oral (interpretation) and written (translation) transfer of a message from one language into another. ROCOG, for example,

- Adds notice and contact information to ROCOG meeting agendas, public event notices, and other communications to let people know that language assistance is available with advance request.
- Shares information about available language services on the ROCOG website.
- Provides [ISPEAK](#) language identification flashcards at public meetings and other community input events.

After identifying LEP individuals, staff will notify a relevant point of contact to determine what translation or interpretation assistance can be provided. Although the LEP population in the area is small, ROCOG will make reasonable efforts to ensure meaningful participation for those who have difficulty communicating in English.

- Interpretation services for public meetings will be provided when requested in advance and available.
- Translated documents or translated sections will be provided upon request when feasible and within a reasonable

timeframe.

- ROCOG staff have access to Olmsted County employees who speak certain languages, and Olmsted County contracts with the Intercultural Mutual Assistance Association (IMAA) of Rochester for additional translation services.
- ROCOG can use Google Translate, located at Olmsted County's website, to provide basic information in other languages.

ROCOG will make a good-faith effort to accommodate translation requests. For special accommodations, please contact ROCOG's Executive Support staff at (507) 328-7100 at least three days before a meeting.

4.3 Staff training

ROCOG will take steps to ensure staff have appropriate training and resources available to assist LEP individuals including:

- Title VI Program and LEP responsibilities.
- Available language assistance services.
- The use of "ISPEAK" cards.
- How to document language assistance requests.
- How to handle potential Title VI/LEP complaints.
- Additional training based on feedback from LEP population in ROCOG Area

4.4 Monitoring

Every three years, as part of the CEP update, ROCOG will review the effectiveness of the Language Access Plan and improve it as needed. Factors to be studied include:

- The number of LEP contacts that occurred during the year.
- The current size and characteristics of the LEP population in the service area.
- Changes in the need for translation services.



The Public Participation Plan

Public input is essential to ROCOG's transportation planning efforts. It improves decision-making at all levels by adding real-world perspectives that data alone may miss. The Code of Federal Regulations [23 CFR §450.316](#) requires MPOs to have a public participation plan that explains how community members, agencies, and other stakeholders can meaningfully take part in the planning process. ROCOG uses a variety of tools throughout the planning process to reach different audiences and ensure many voices help shape its plans.

5.1 ROCOG's vision

ROCOG commits to:

- Involving the public in all ROCOG planning, project development, and service development activities that affect transportation services in the ROCOG planning area.
- Offering multiple ways for people to participate in ROCOG functions, with attention to communication needs, schedules, and accessibility.
- Providing clear, timely information about transportation issues, plans, and opportunities for input.
- Being transparent about planning options and the factors that influence decisions.
- Gathering broad community input and incorporating those perspectives into final plans.

5.2 Outreach toolbox

ROCOG staff plan ways for stakeholders to participate before

major decisions are made. Because each project is different, staff or consultants create a tailored outreach plan that identifies which groups should be involved. ROCOG uses both in-person and online tools to encourage public participation in transportation planning.

As mandated by federal Title VI Program requirements, ROCOG will make reasonable attempts to collect demographic information from those who participate in outreach activities. This can be done through survey cards at events, online surveys, or other ways for participants to report details like race, gender, and income. This data will be regularly reviewed to see whether ROCOG is reaching all community groups—especially those historically underrepresented—and adjust their outreach methods as needed.

5.2.1 Meetings

Public meetings are held in-person, online using Microsoft Teams, or both. Virtual public meetings will share the same information as in-person ones, so everyone stays equally informed.

Meetings will be scheduled to make it easier for people to attend. This may include offering meetings outside regular business hours, holding multiple sessions at different times or days, and avoiding conflicts with other community events. ROCOG will continue to follow the Minnesota Open Meeting Law.

5.2.1.1 Locations

ROCOG usually holds public meetings at its office but sometimes uses other public locations like the Rochester Public Library. Meetings are held in places that are accessible to people with disabilities and, when possible, near a transit route that operates

at that time and day.

If a meeting focuses on a specific area within the ROCOG region, it will be held in that area when possible. ROCOG will also notify or consult the appropriate local elected officials about outreach activities in their jurisdictions.

5.2.1.2 Meeting days and times

Public input sessions/open houses may be held before, during, or after regular work hours. Depending upon the topic, multiple occurrences of the same meeting may be offered, both in-person and online, to accommodate the large number of shift workers in the ROCOG planning area.

5.2.1.3 Meeting notices

All ROCOG Policy Board meetings are advertised at least one week in advance to provide adequate time for public participation or comment. Notices will be posted on the Olmsted County website and in the Rochester Post Bulletin.

5.2.1.4 Special accommodations

ROCOG is committed to ensuring all individuals regardless of race, color, national origin, sex, age, physical ability or income have access to ROCOG's programs and planning efforts. All meeting notices will include text that makes it clear that the meeting space is ADA accessible and that individuals may request accommodation of special needs, so that they may fully participate in the meetings. ROCOG will provide interpreters and prepare special-format materials upon request, with 5 days' advance notice.

5.2.2 Website

[ROCOG's website](#), hosted by Olmsted County, provides information about its transportation plans, policies, and projects. People can also use the site to contact ROCOG staff with questions or comments.

5.2.3 ROCOG Hub

The [ROCOG Hub](#) is a new online platform for ROCOG staff to share information about transportation plans and ongoing projects.

5.2.4 Social and news media

ROCOG staff works with Olmsted County's Communications team to share ROCOG news via press releases to print and social media. The Rochester Post Bulletin is the official newspaper for publishing ROCOG legal notices. ROCOG's Facebook page posts announcements about plans, meetings, and events. Olmsted County may also use its Instagram, Nextdoor, and YouTube accounts to share ROCOG information.

5.2.5 Surveys and interactive maps

Citizen and stakeholder surveys help ROCOG gather community input. Electronic maps allow people point out problem areas like unsafe intersections or roads needing repair. This feedback is summarized and used in transportation plans and studies.

5.2.6 Project websites and webpages

Webpages dedicated to a specific planning study or project make it easier for the public to find information. Instead of searching through an entire MPO website, people can click one link to learn about a project's purpose, goals, and ways to get involved.

Tools like Esri StoryMaps, Esri Hub, and PowerPoint help ROCOG staff quickly create project pages that engage the community. These tools combine maps, surveys, photos, and other details into clear, easy-to-follow stories that encourage public input and feedback.

5.2.7 Targeted outreach and focus groups

Some ROCOG studies and projects affect only a portion of its planning area, population, or transportation users. When this happens, ROCOG directly contacts nearby residents and property owners, local officials, and relevant organizations to encourage their participation and feedback. Countywide projects, such as the MTP, may use targeted focus groups made up of key stakeholders and one-on-one meetings with institutional partners.

5.2.8 Pop up displays/presentations

ROCOG sets up displays at busy public places and events to gather feedback on transportation issues. Past locations used include the Stewartville Farmers Market, Oxbow Park and Zollman Zoo, the Olmsted County Fair, and Thursdays Downtown.

5.3 ADA and accessibility provisions

ROCOG's goal is to make all information easy to read and use for everyone. To do this, we carefully choose fonts and formatting for all materials – reports, presentations, and websites – using recognized accessibility standards for both print and digital content. These standards align with ADA Section 508 and WCAG 2.1 AA.

5.3.1 Designing for readability

All ROCOG materials must use fonts and formatting that make them accessible to as many people as possible. This means choosing clear fonts, readable sizes, good color contrast, and layouts that are easy to follow.

5.3.1.1 Font type

Simple, clean, sans-serif fonts are required because they are easier to read. ROCOG avoids decorative, script, or serif fonts, especially in body text or anywhere clear communication is important.

5.3.1.2 Font size

To ensure text can be easily read across various formats, ROCOG documents must:

- Use a minimum 12-point font size.
- Use built-in heading and text styles.

- Size headings larger than body text to help organize content and guide the reader.

5.3.1.3 Formatting guidelines

ROCOG materials must:

- Use bold for emphasis instead of italics.
- Reserve underlining for hyperlinks.
- Avoid using all capital letters in body text, as they are harder to read.
- Maintain generous line spacing, ideally 1.5 times the font size, to prevent visual crowding.

5.3.1.4 Color and contrast

Good contrast is essential for readability, especially for users with low vision. Free tools like the [WebAIM Color Contrast Checker](#) can be used to test and verify color combinations. All ROCOG text must meet or exceed WCAG 2.1 Level AA contrast standards:

- Normal text must have a contrast ratio of at least 4.5:1.
- Large text (18-point or 14-point bold) must have a ratio of at least 3:1.

5.3.1.5 Alt text

ROCOG documents and webpages must describe essential visuals with concise alt text. Decorative images are marked as

“decorative”.

5.3.1.6 Tables

ROCOG must use simple tables with defined header rows. Merged cells and complex structures must be avoided when possible.

5.3.2 Implementation and oversight

This accessibility policy applies to all ROCOG staff and consultants who develop or distribute public materials. All documents and visuals must be reviewed to ensure they meet these standards.

5.4 How ROCOG uses public input

ROCOG staff documents and carefully considers all public input when developing transportation plans and projects. Comments may be grouped by main themes, and summaries—with staff responses—are shared with the Policy Board and TTAC during decision-making tasks. These comments are also included in draft and final documents.

ROCOG will regularly evaluate its public involvement process to ensure community participation goals are met. This may include looking at data such as website activity, newspaper reach, staff presentations, and meeting attendance.

5.5 Opportunities for participation

ROCOG offers ongoing opportunities for the public to participate

5. The Public Participation Plan

in transportation matters. Outreach tools used vary by project needs. These efforts give people the chance to help shape project ideas before funding decisions are made.

5.5.1 Metropolitan Transportation Plan (MTP)

The MTP explains how ROCOG will manage the region's transportation system—transit, roads, biking, walking, and accessible options—over the next 25 years. MnDOT, Olmsted County, cities, townships, and other agencies provide technical information, while public input contributes insight on how the system actually functions for daily travel needs.

The MTP is updated every five years. The goals of the update will determine the outreach tools that will be most valuable to the planning effort and when they will be used. It is encouraged that a project-specific public engagement plan be created early in the process and used throughout each update.

5.5.1.1 Public review process

When the draft MTP is complete, it is posted on the ROCOG website for public review. The public may comment in writing, in person, or virtually.

- At least 30 days before the ROCOG Policy Board is scheduled to adopt the plan, a public hearing is held during a regular Policy Board meeting.
- A public open house and/or a virtual meeting are encouraged to be held not more than 60 days before the plan is adopted at a Policy Board meeting.

- Public hearing minutes, including all public comments, are encouraged to be added to the MTP appendix.
- Following the formal public hearing, if major changes are needed, a new MTP draft is posted online and a new 30-day comment period is held with at least one ROCOG Policy Board meeting conducted within seven calendar days before the Board adoption meeting.
- The Policy Board then votes on the final resolution.

5.5.1.2 Amendments to the MTP

Sometimes the MTP is amended due, for example, to significant changes in critical data or proposed transportation projects. Staff should consult the ROCOG Policy Board if an amendment is needed. Staff may also coordinate with MnDOT Central Office and District 6, and if needed, the FHWA or FTA.

A 30-day public open comment period should be held along with a formal public hearing at a ROCOG Policy Board meeting. The Policy Board invites individuals to comment at the hearing. The Board may extend the comment period by 15 to 30 days if more time is needed.

5.5.2 Transportation Improvement Program (TIP)

The TIP is a four-year list of transportation projects that use federal funds or are considered regionally important. It helps decide how limited transportation money is spent based on the priorities in the MTP. The TIP is updated every year and the public is invited to participate in the programming process.

ROCOG may partner with cities, counties, or agencies on outreach for individual projects, and those agencies also provide their own opportunities for the public to give input. Projects can include road, bike, and pedestrian improvements, as well as transit projects.

5.5.2.1 Developing the TIP

ROCOG works with local, state, and federal partners to decide how projects will be funded, when they will be funded, and which projects will use federal funds. These projects are assumed to have already gone through public engagement during the development of the state's Capital Highway Investment Plan or local jurisdictions' Capital Improvement Plans.

The draft TIP is available for public comment for 30 calendar days before it is planned to be adopted. This usually occurs between the July or August ROCOG Policy Board meeting, when the draft is presented to ROCOG, and September, when the final draft must be adopted. If major concerns come up during this time, ROCOG may hold an additional meeting to review and respond to comments. The public is notified using ROCOG's standard outreach methods.

During the 30-day period, ROCOG will host in-person meetings and a virtual session with the same information so people can choose either option. Comments that do not significantly change the projects will be shared with the Policy Board when the final TIP is approved and added to the meeting packet. If significant changes are made to the draft TIP, a second public comment period of at least 15 days will be required before approval.

5.5.2.2 TIP amendment steps

- The transportation staff of each of the implementing agencies reviews the amendment for content accuracy.
- The ROCOG Transportation Technical Advisory Committee reviews and endorses the proposed amendment if time allows. Otherwise, notice is made to TTAC members via email.
- Public comments about formal TIP amendments will be welcomed at the ROCOG Policy Board meeting where the amendment is considered, or accepted in writing/email before the meeting. The TIP amendment will be on the agenda, which is posted at least 5 days before the meeting.
- Following formal action by ROCOG, the amendment is sent to MnDOT District 6 staff and the local jurisdiction(s) if other than MnDOT. MnDOT sends the amendment on to FHWA and FTA.

Since any changes to ROCOG's TIP must also appear in MnDOT's STIP, these agencies work closely together to ensure consistency. ROCOG, therefore, follows MnDOT's "Procedures for Amendments and Administrative Modifications to the Minnesota State Transportation Improvement Program (STIP)", last updated in October 2024. The following sections are excerpts from that MnDOT document.

5.5.2.3 Definitions

The following definitions related to STIP/TIP revisions are found in 23 CFR (Code of Federal regulations) 450.104. Revision means a change to current FHWA and FTA approved TIP, or STIP, that occurs between scheduled periodic updates. A

major revision is an "amendment", while a minor revision is an "administrative modification".

Amendment means a revision to a current FHWA and FTA approved TIP, or STIP, including the addition or deletion of a project or a major change in project cost, project/project phase initiation dates, or a major change in design concept or design scope (e.g. changing project termini or the number of through traffic lanes). Changes to projects that are included only for illustrative purposes do not require an amendment. An amendment is a revision that requires public review and comment, redemonstration of fiscal constraint, or conformity determination (for TIPs involving "non-exempt" projects in nonattainment and maintenance areas).

Administrative modification means a minor revision to a current FHWA and FTA approved TIP, or STIP, that includes minor changes to project/project phase costs, minor changes to funding sources of previously included projects, and minor changes to project/project phase initiation dates. An administrative modification is a revision that does not require public review and comment, redemonstration of fiscal constraint, or a conformity determination (in nonattainment and maintenance areas).

5.5.2.4 Formal TIP amendments

Amendments to the Minnesota STIP must be developed in accordance with the federal transportation planning and programming regulations specified in 23 CFR 450. Those regulations specify there must be in consistency between each MPO's TIP and the STIP. To meet 23 CFR 450.218(b) and 23 CFR 450.328(b) MPOs may not modify or amend their new TIP prior to FHWA and FTA approval of the pending STIP. MPO technical committees may review proposed changes and provide

5. The Public Participation Plan

recommendations to their new TIP, however, these proposed changes and recommendations may not be executed until after FHWA and FTA approve the pending STIP. In addition, amendments will need to follow each MPO's guidelines, procedures, and schedules. Therefore, the following steps must be followed to ensure that consistency exists.

Step #1: Coordinate with the MPO. The amendment request must be approved by either a TIP amendment or by a resolution from the policy board of the MPO before the STIP amendment request can proceed. The MPO will submit the TIP approval documentation to the appropriate MnDOT district staff.

Step #2: Forward the approved TIP amendment documentation to the MnDOT Office of Transportation System Management (OTSM) along with the STIP amendment request in CHIMES.

Step #3: OTSM posts pending amendments on [MnDOT's external website](#). This gives the public an opportunity to comment as part of public engagement requirement.

Step #4: Once the STIP amendment is approved by MnDOT, on behalf of the Governor, OTSM will forward the amendment to FHWA and/or FTA for federal approval according to the established submittal schedule.

Step #5: Once approved by FHWA/FTA, the amendment will be incorporated into Minnesota's STIP. OTSM will notify the appropriate district/MPO of the approved amendment, along with posting a copy of the approved amendment on [MnDOT's external website](#).

The following are those criteria which trigger a STIP amendment (note that criteria for MPO TIP amendment may be different).

1. Add a new project.
2. Revise a project scope such as changing the major work from bridge rehabilitation to replacement, resurface to reconstruct, removing or adding additional work/bridge/lane/intersection/route; removing or adding a phase of work such as preliminary engineering/right-of way/construction.
3. Change a project limit/termini/length greater than 0.3 miles in any direction.
4. Impact air quality conformity.
5. An increase or decrease in a project's total programmed cost that falls within the ranges as listed in Table 4.

Table 4: FHWA and FTA Amendment Cost Ranges

STIP Programmed Cost	Cost Increase* or Decrease More Than:
FWHA amendment	
< \$1,000,000	NA**
\$1,000,001 - \$3,000,000	50%
\$3,000,001 - \$10,000,000	35%
\$10,000,001 - \$50,000,000	20%
\$50,000,001 - \$100,000,000	15%
> \$100,000,000	10%
FTA amendment	
Any amount	20%

*Fiscal constraint justification required.

**No action is required if the current STIP cost and the cost on the amendment is less than \$1M.

5.5.2.5 Administrative TIP modifications

Administrative Modifications to the Minnesota STIP must be developed in accordance with the federal transportation planning and programming regulations specified in 23 CFR 450. Those regulations specify there must be consistency between each MPO's TIP and the STIP. In addition, administrative modifications will need to follow each MPO's guidelines, procedures, and schedules. Therefore, the following steps must be followed to ensure that consistency exists.

Step #1: Coordinate with the MPO. MPO staff will review all STIP administrative modification requests and determine what, if any, TIP action is needed. The MPO will forward to the MnDOT district either the approval of any needed TIP action related to the STIP administrative modification request or a document stating that no TIP action is necessary.

Step #2: Forward the STIP administration modification request to OTSM for approval. Include the MPO documentation (either the TIP approval action or letter stating no action necessary).

Step #3: Once approved by OTSM, on behalf of the Governor, the administrative modification will be incorporated into MnDOT's STIP. No federal action is required. OTSM will notify the appropriate district/MPO of the approved administrative modification and post a copy of the approved administrative modification on MnDOT's external website at <http://www.dot.state.mn.us/planning/program/stip.html>

Any of the following criteria would trigger an administrative modification action to a STIP project. (As a reminder, it is possible for project change to only trigger a STIP administrative modification but might trigger a TIP amendment depending upon the MPO's adopted TIP amendment criteria).

1. Remove a project.
2. Combine a new non-federally funded project to an existing federally funded project provided the cost of the administrative modification is within the ranges as listed in Table 5.
3. Convert a non-federally funded project to a federally funded project with no change to cost or scope.
4. Identify a new project from an existing federal set-aside in the same fiscal year;
5. Revise a project description without change to scope or conflict with the environmental document such as clarifying project description, adding/removing project smart code or incidental work.
6. Make a technical correction which includes changing State Project Number (SP), funding source, funding type, work type, or lead agency.
7. Change a funding year which includes advancing or deferring with no change to scope and cost (fiscal constraint justification required for advancing project).
8. Make a technical correction which includes changing State Project Number (SP), funding source, funding type, work type, or lead agency.
9. Change a funding year which includes advancing or deferring with no change to scope and cost (fiscal constraint justification required for advancing project).
10. Add, remove, increase, or decrease Advance Construction (AC).

11. Split or combine individually listed projects provided projects remain within the original planned location, no change in split/combine scope/cost, no shift in funding year, and logical termini maintained.

12. An increase or decrease in a project's total programmed cost that falls within the ranges as listed in Table 5.

Table 5: FWHA Amendment Cost Ranges

STIP Programmed Cost	Cost Increase* or Decrease More Than
< \$1,000,000	NA**
\$1,000,001 - \$10,000,000	20%
\$10,000,001 - \$100,000,000	10%
>\$100,000,000	***

*Fiscal constraint justification required.

**No action required if STIP programmed cost and the cost of the administrative modification is less than \$1M.

*** Prior collaborative discussion between MnDOT and FHWA required.

Note: No TIP administrative modification is required for cost increase or decrease under 20% on FTA projects.

5.5.2.6 Dispute resolution

If a question arises on the interpretation of the definition of an amendment or an administrative modification action, MnDOT, the MPO, FHWA and FTA will consult with each other to resolve the question. If after consultation, the parties disagree on the definition of what constitutes an amendment or an administrative

modification, the final decision rests with the FHWA for highway projects and FTA for transit projects.

5.5.3 ROCOG Policy Board meetings

The ROCOG Policy Board reviews and approves transportation policies, plans, and programs to ensure the region stays eligible for state and federal transportation funding. The Policy Board typically meets at noon on the fourth Wednesday of the month, and the packets are posted on the [Olmsted County website](#). This schedule may change due to holidays, and meetings are canceled if there are no items for consideration or discussion. Members of the public may attend these meetings in person or join online via Microsoft Teams. Public comments will be taken for agenda items designated as public hearings.

5.5.4 Corridor and planning studies

ROCOG involves the public early in the preparation of transportation plans such as corridor studies, planning studies, and environmental reviews. For corridor and area studies, ROCOG will reach out not only to the general public, but specifically to residents and groups who may be affected by potential changes.

5.5.5 Implement a Unified Planning Work Program (UPWP)

Each year, ROCOG approves a Unified Planning Work Program (UPWP) in order to ensure the timely implementation of a comprehensive, continuous, and coordinated (3-C's) transportation planning process. The UPWP outlines ROCOG's

planning tasks, administrative work, budgets, and funding sources for the upcoming two years.

While public involvement in creating the UPWP is not required, the plans and studies it includes reflect the transportation priorities for the Rochester–Olmsted County area. These priorities are developed in cooperation with the ROCOG Policy Board, TTAC, local governments, and state and federal agencies. Each year's UPWP is presented as a discussion item at TTAC and Policy Board meetings, and the public is invited to share feedback in person, by email, phone, or online comment.

5.6 Community Engagement Plan (CEP)

ROCOG's CEP combines three components of the federally required Title VI Program: the Title VI Plan, the Language Access Plan, and the Public Involvement Plan. This plan will be updated every three years. Outreach tools used for these updates will vary based on the project's scope. At the minimum, public education, comment, and hearing outreach tools will be used. The 30-day public comment period and public hearing date will be announced using ROCOG's standard communication tools.

5.7 Potential stakeholder groups

At the planning and program levels, ROCOG involves people of diverse backgrounds and interests in its advisory committees as part of its public outreach efforts. Examples of targeted groups include:

- Citizens/general public

- Individuals and groups directly impacted by the results and recommendations of the plan or study
- Neighborhood groups
- Civic groups and service organizations
- Government and public agencies
 - Local elected officials from the cities, counties, and townships within the ROCOG Planning Area or project study area
 - Prairie Island Indian Community
 - Staff from the local jurisdictions/agencies impacted by the plan or study
 - State and federal officials representing the study area
- Transportation agencies and organizations
 - Transit providers
 - Multimodal freight interests
 - Non-motorized, active transportation interests
 - Human Services transportation providers
- Communities of concern
 - Disabled
 - Low-income
 - Minority

- Refugees and immigrants
- Youth and elderly advocate groups
- Resource preservation and protection interests
- Business and economic development interests
- Education interests



Expanding Community Access

Community needs must be considered during plan development, programming, and project selection. Federal laws such as Title VI, the ADA, the Federal Aid Highway Act of 1973, and the Age Discrimination Act of 1975 identify demographic groups whose rights must be protected. ROCOG has identified additional populations who may face barriers to participating in the planning process or accessing transportation.

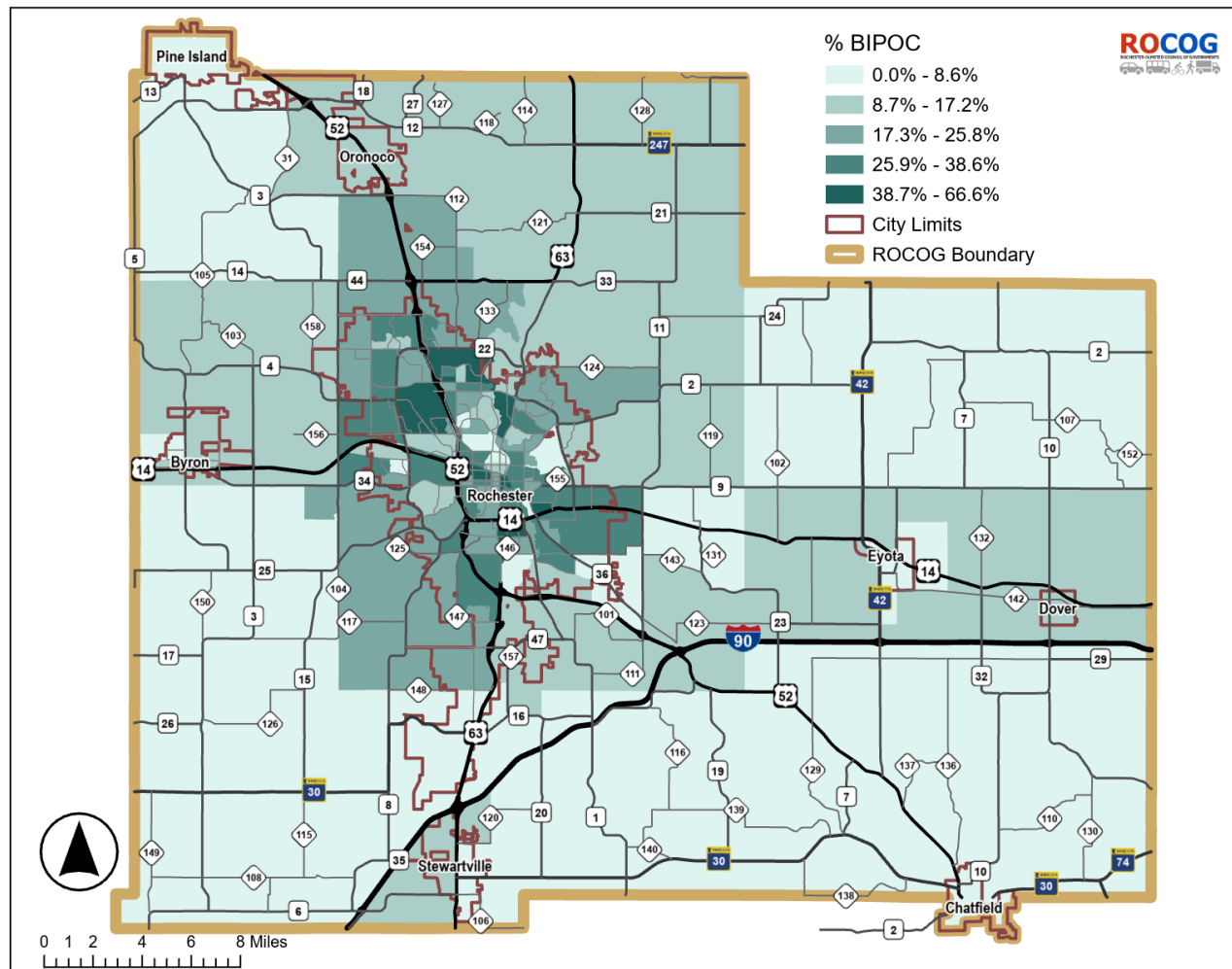
Using 2024 American Community Survey data, ROCOG identified which Census block groups these people live in. The resulting maps help planners and local agencies understand who may be affected by future transportation projects, how they may be impacted, and who should be contacted for input. They also aid projects in the evaluation of where federal monies have been distributed in the past.

These groups include:

- Black, Indigenous, and People of Color (BIPOC)
- People with disabilities
- People with limited English proficiency (LEP)
- Adults age 65 and older
- Youth under 18
- People with low incomes
- Individuals without access to a private vehicle
- People with no Internet access



Figure 2: BIPOC Individuals

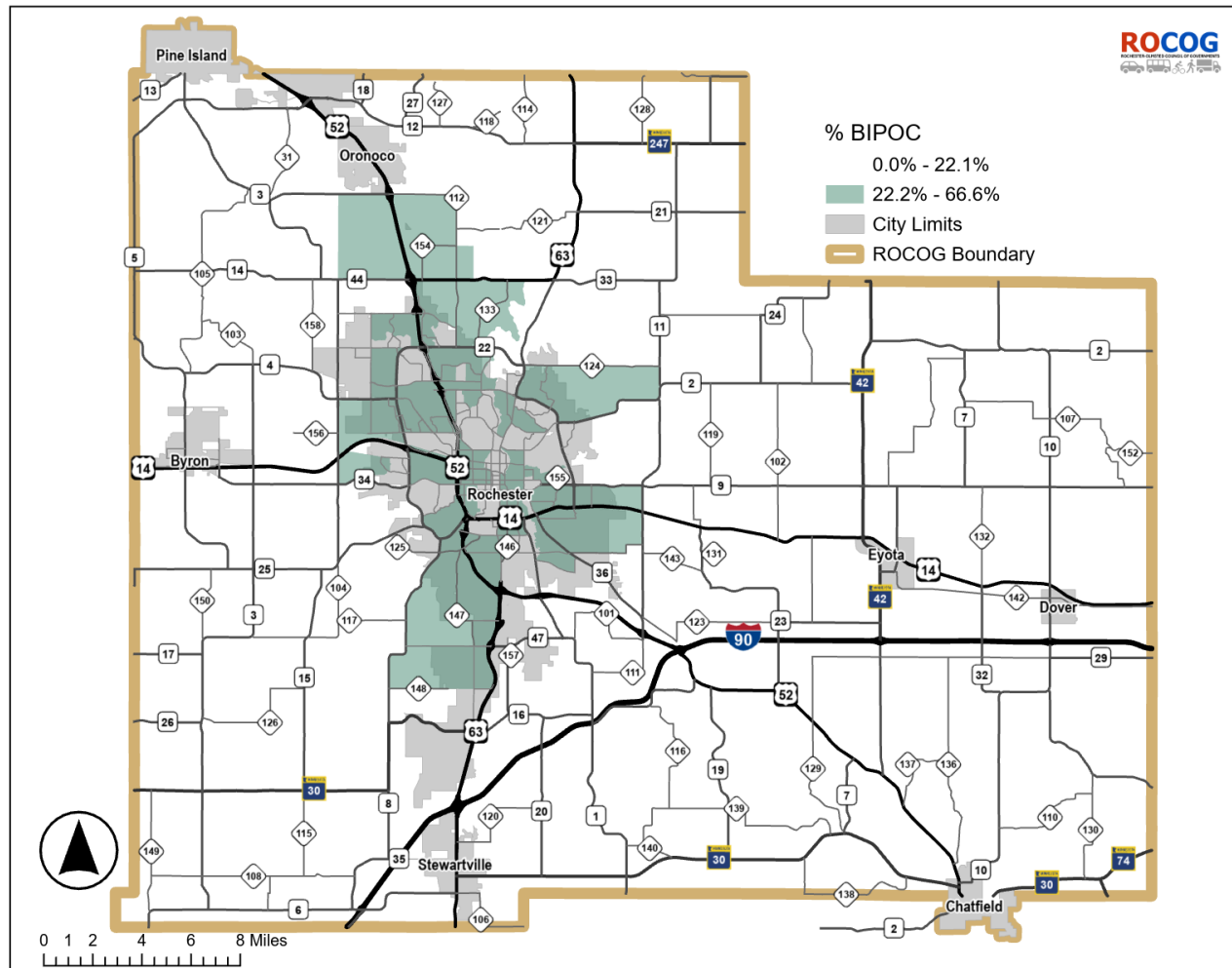


BIPOC individuals are protected by Title VI of the Civil Rights Act of 1964, which prohibits discrimination based on race, color, or national origin in any program or activity receiving federal financial assistance.

Total ROCOG Population	170,820
BIPOC Population in ROCOG Area	37,783
% BIPOC in ROCOG Area	22.1%



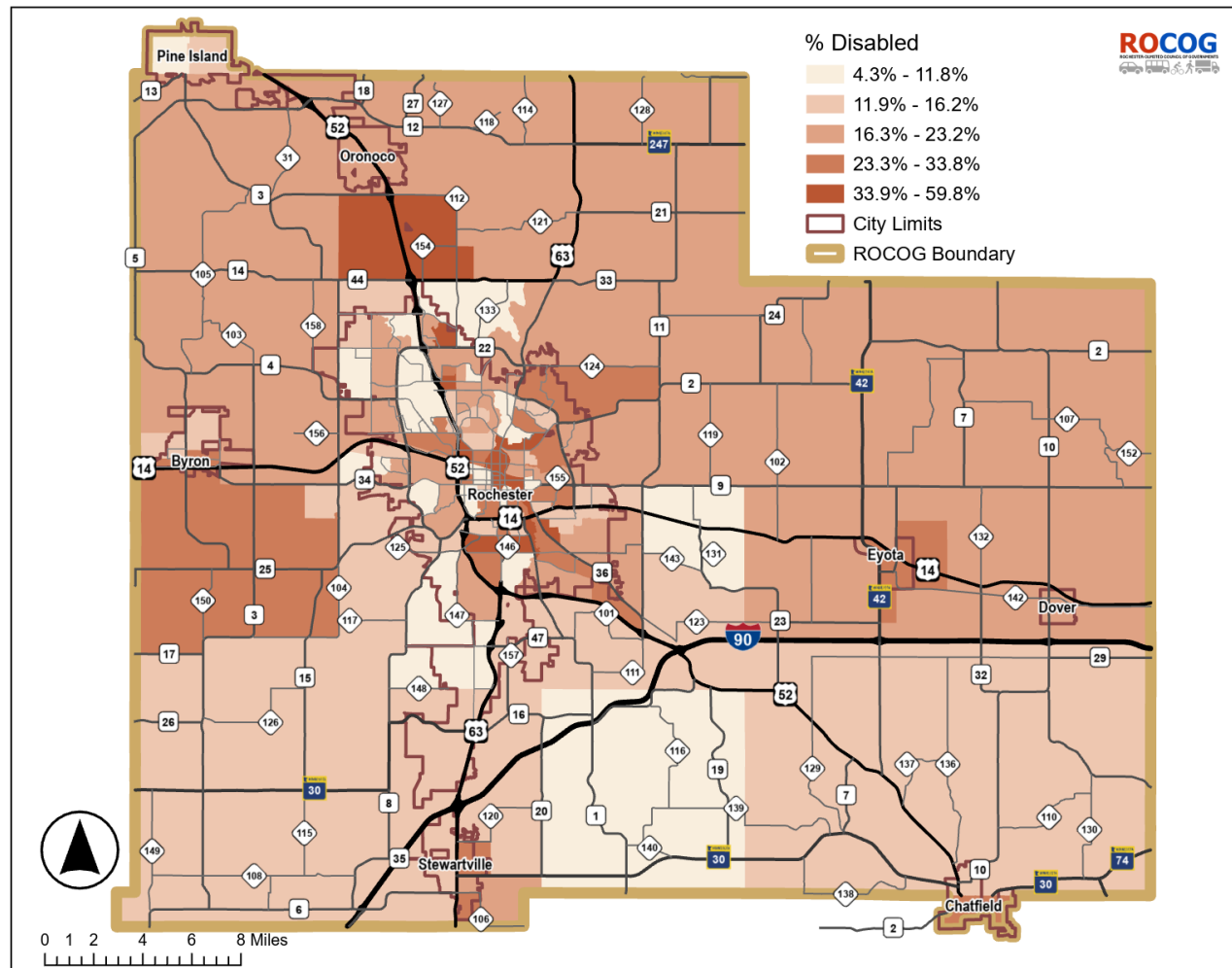
Figure 3: BIPOC Community Concentrations



Concentrations of BIPOC residents above the ROCOG planning area average of 22.1% are found throughout and to the north of Rochester.



Figure 4: Households With 1+ Disabled Members



The Americans With Disabilities Act of 1990 (ADA) and Section 504 of the Rehabilitation Act of 1973 prohibit discrimination based on disability and require reasonable access to services, transportation, and public involvement opportunities.

Total ROCOG Households	69,283
Households with 1+ Disabled Members in ROCOG Area	14,090
% Households with 1+ Disabled Members in ROCOG Area	20.3%



Figure 5: Disabled Household Concentrations

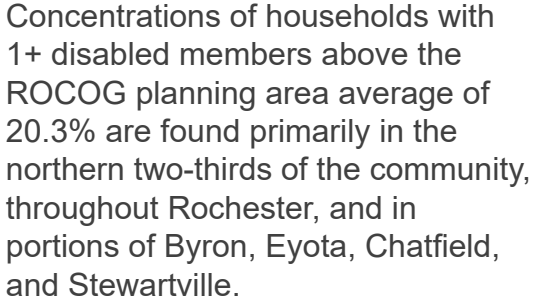
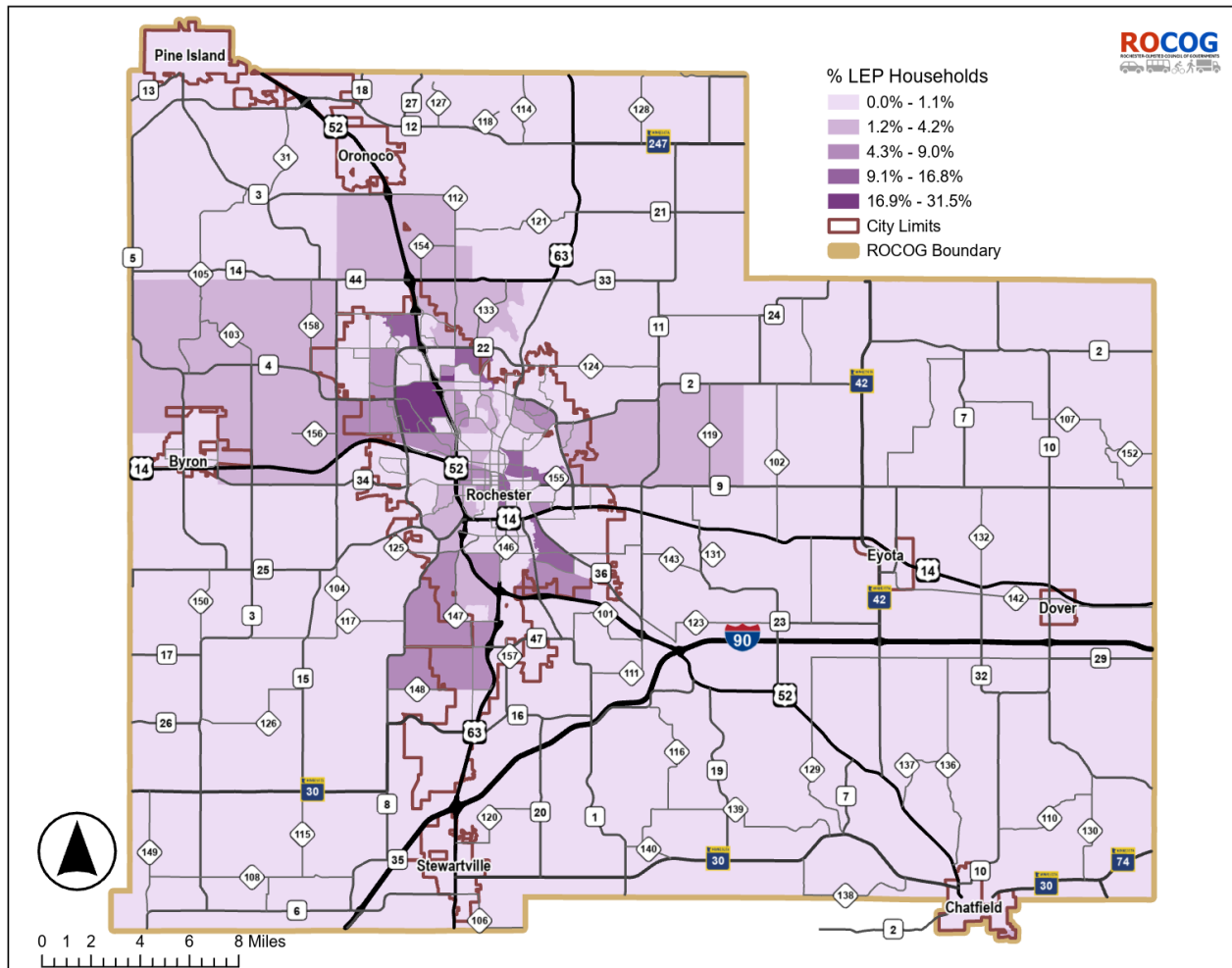




Figure 6: LEP Households

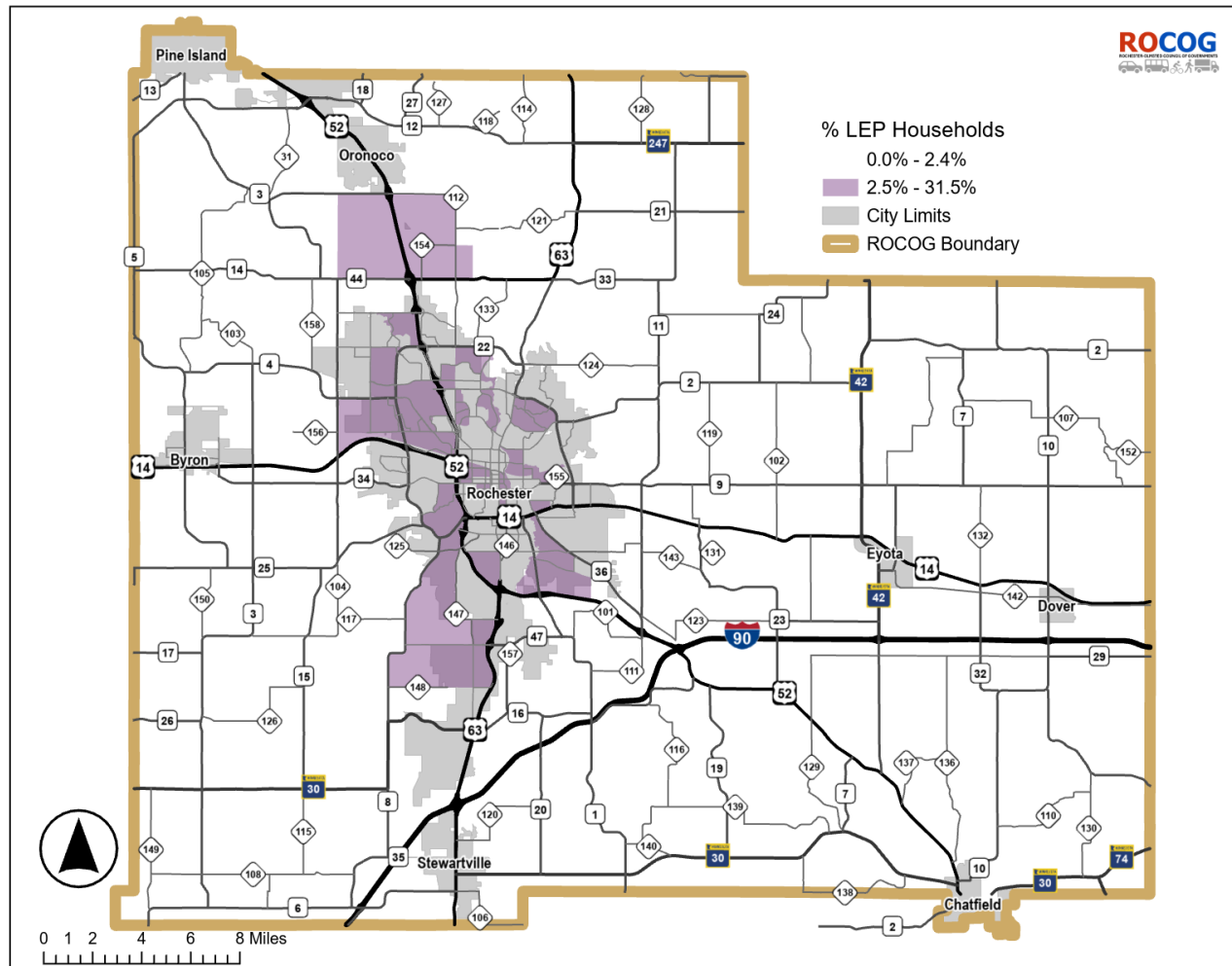


People with limited English proficiency (LEP) are protected under Title VI of the Civil Rights Act, as interpreted by federal agencies and courts to include national origin discrimination. These households describe themselves in the American Community Survey as speaking English less than “very well”.

Total ROCOG Households	69,283
LEP Households in ROCOG Area	1,667
% LEP Households in ROCOG Area	2.4%



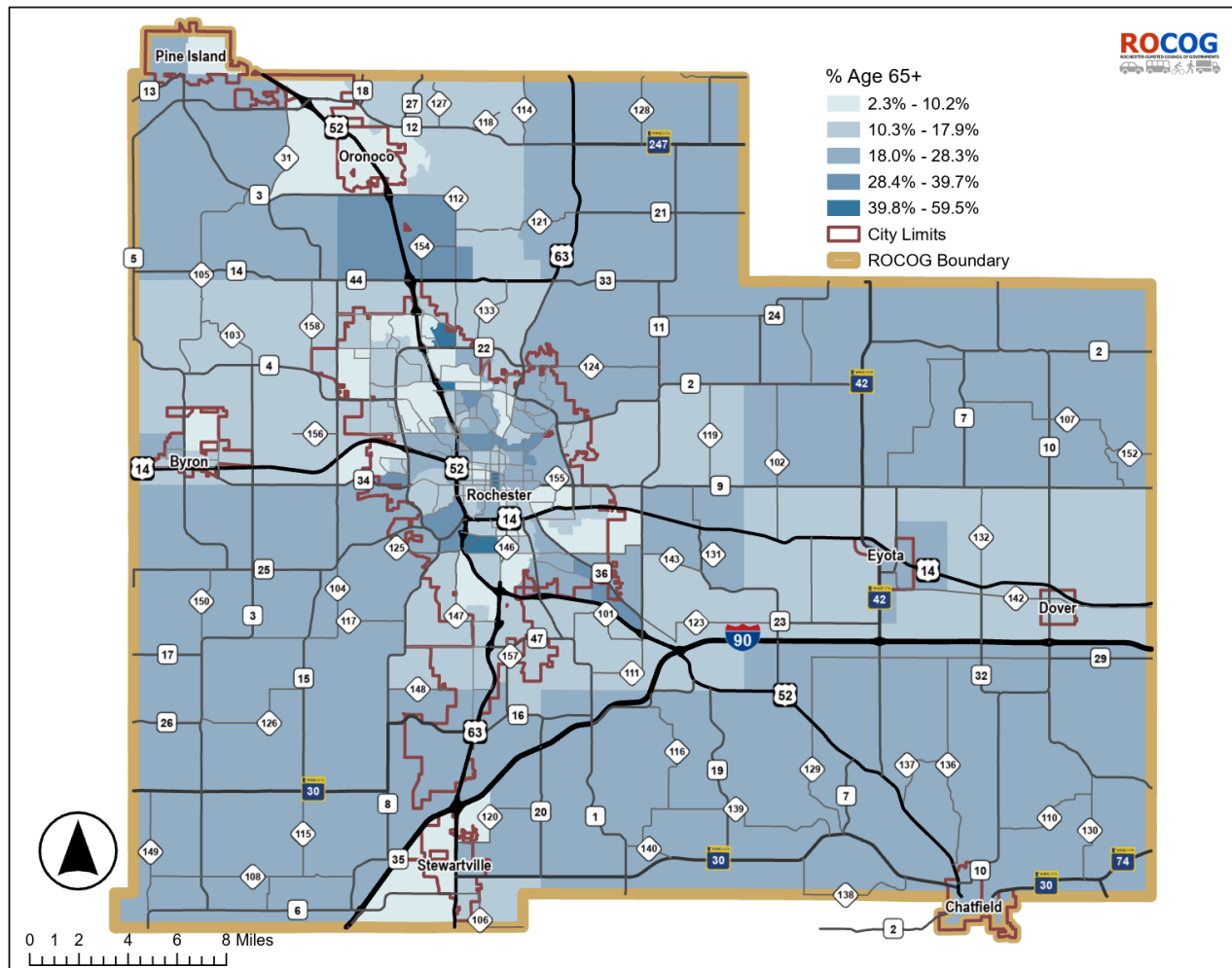
Figure 7: LEP Household Concentrations



The highest concentrations of LEP households above the ROCOG planning area average of 2.4% are primarily found in northwest and southeast Rochester.



Figure 8: Adults Age 65 and Older

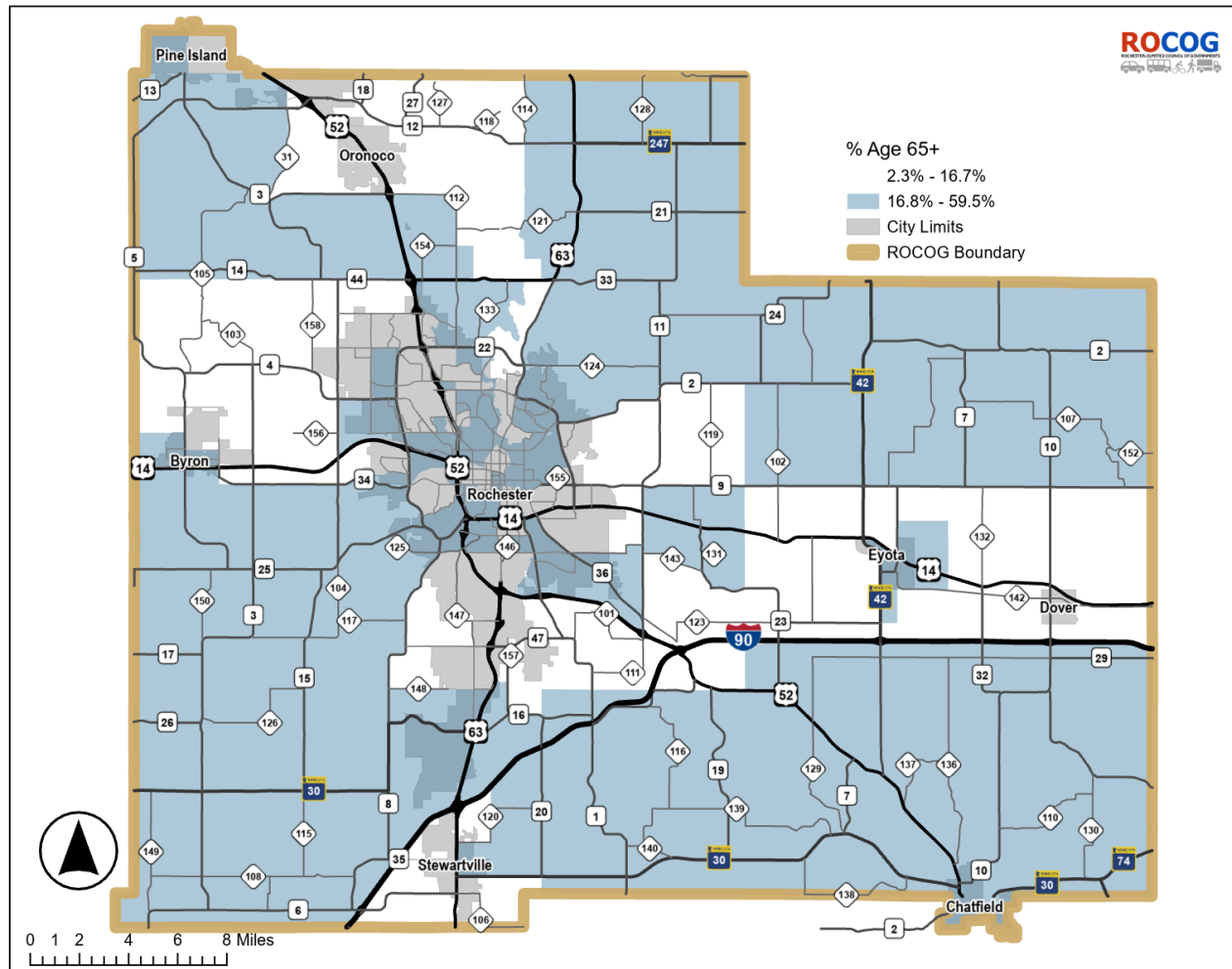


The Older Americans Act of 1965 supports planning and services for older adults, especially in transportation. Protections for older adults are also addressed in the Age Discrimination Act of 1975.

Total ROCOG Population	170,820
Adults Age 65+ in ROCOG Area	28,460
% Adults Age 65+ in ROCOG Area	16.7%



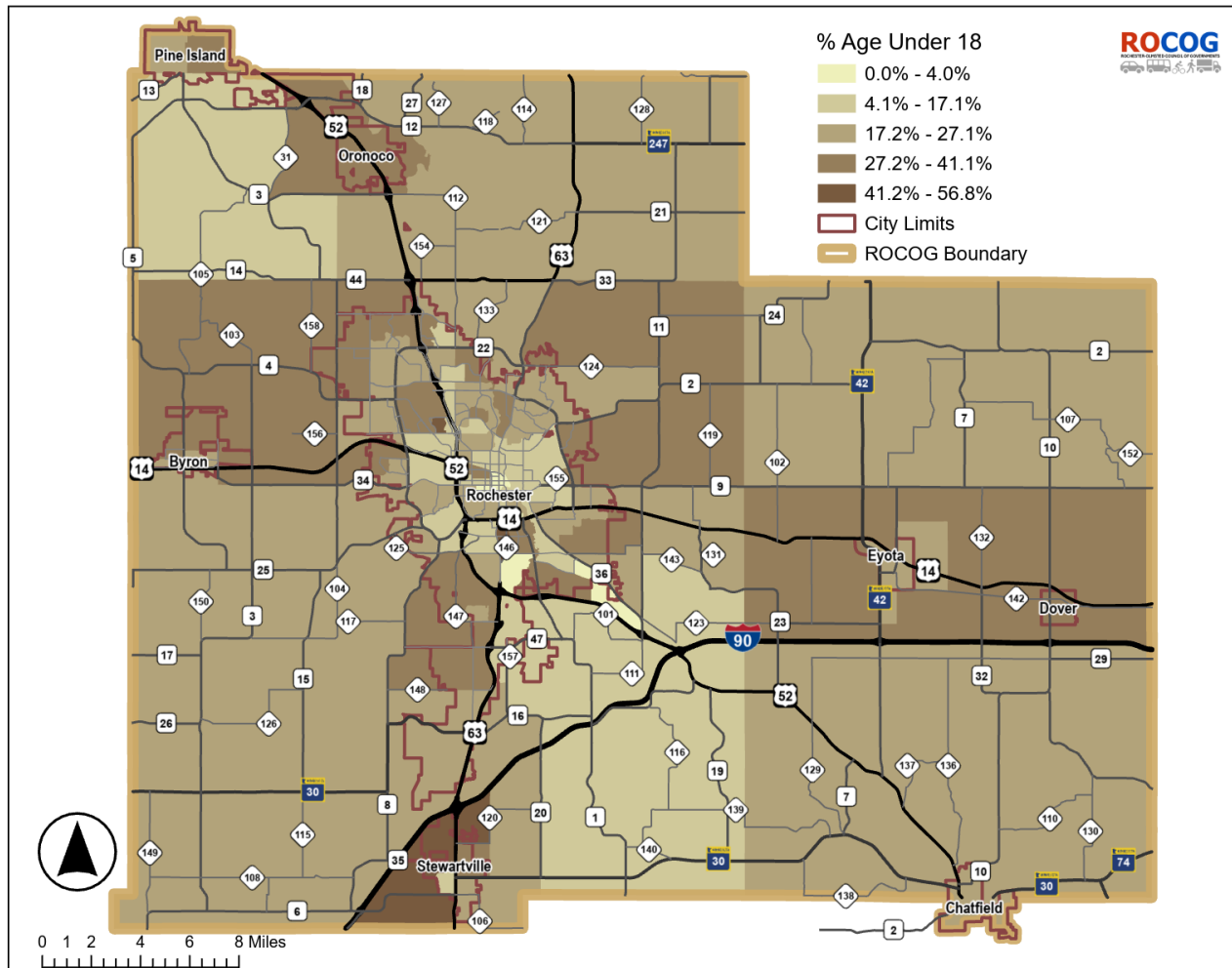
Figure 9: Concentrations of Age 65+



Concentrations of adults 65+ above the ROCOG average of 16.7% are found throughout the ROCOG planning area. The highest concentrations coincide with the location of senior living complexes in Rochester.



Figure 10: Youth Under Age 18

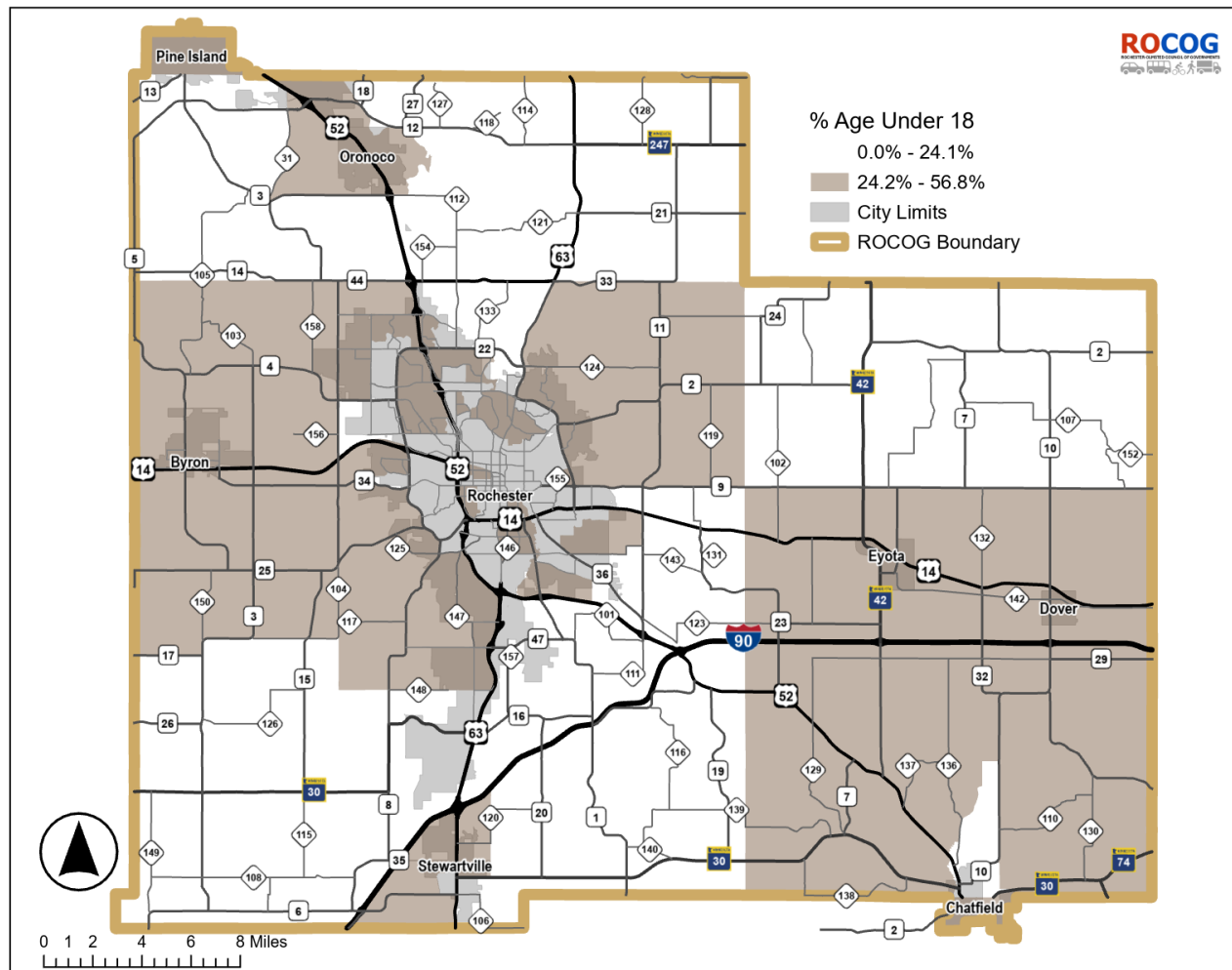


While attention to residents under age 18 is not specifically addressed in planning regulations, Title VI protections apply to individuals of all ages, including minors. As a group that is not old enough to drive, or chooses not to, planners must consider how youth get to school, work, and after-school activities, particularly in households where all of the adults work.

Total ROCOG Population	170,820
Youth Under 18 in ROCOG Area	41,184
% Youth Under 18 in ROCOG Area	24.1%



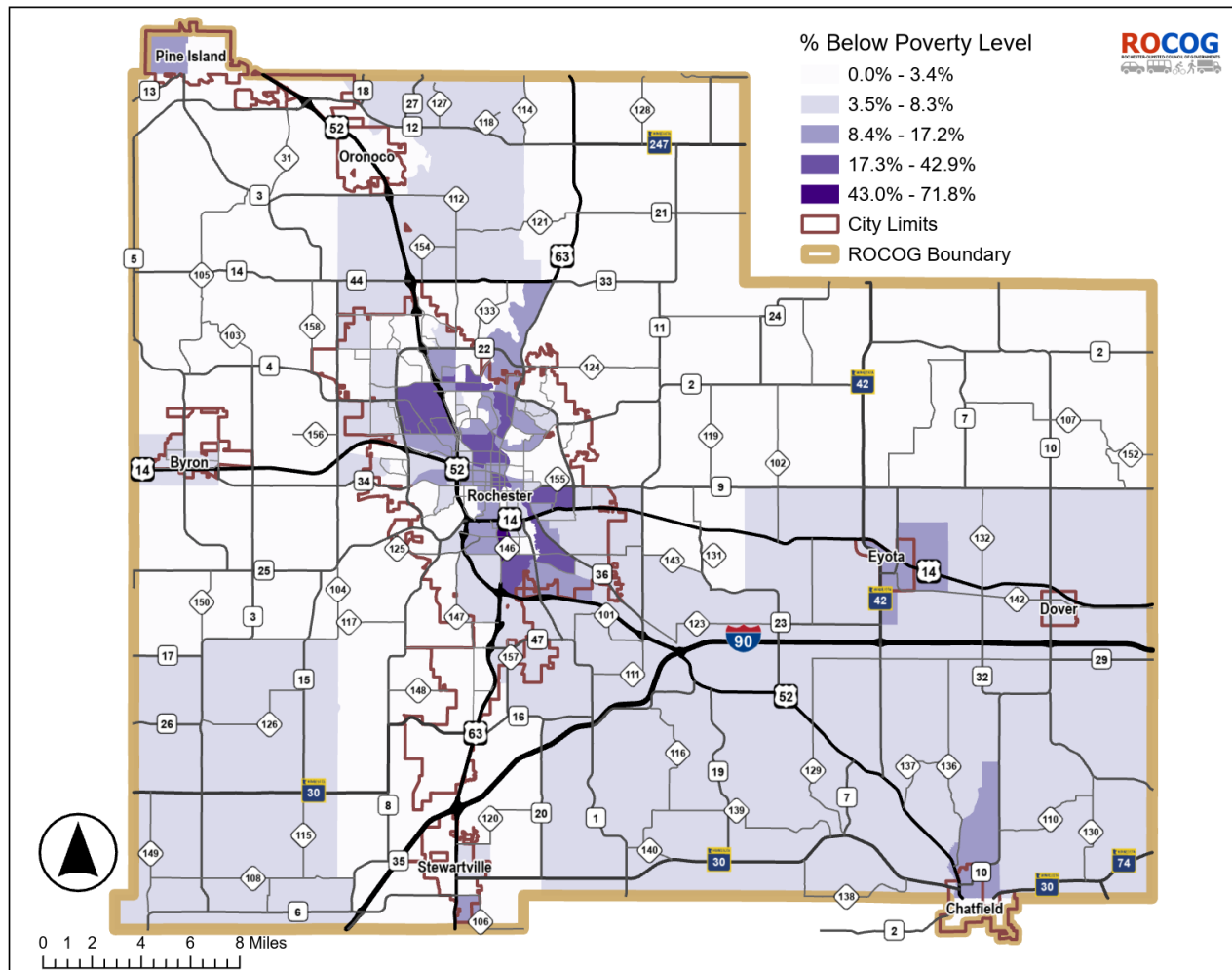
Figure 11: Concentrations of Youth Under Age 18



Concentrations of youth above the ROCOG average of 24.1% are found throughout the ROCOG planning area, but primarily outside central Rochester.



Figure 12: Low Income Residents



While income isn't a federally protected class, income disparities can affect a person's ability to participate in the planning process due to barriers caused by work schedules, lack of child care, limited access to transportation, and unreliable internet. Title VI compliance helps ensure that planning and services are reasonably accessible for everyone.

Total ROCOG Population	167,902
Population Below Poverty Level in ROCOG Area	12,355
% Population Below Poverty Level in ROCOG Area	7.4%



Figure 13: Low Income Concentrations

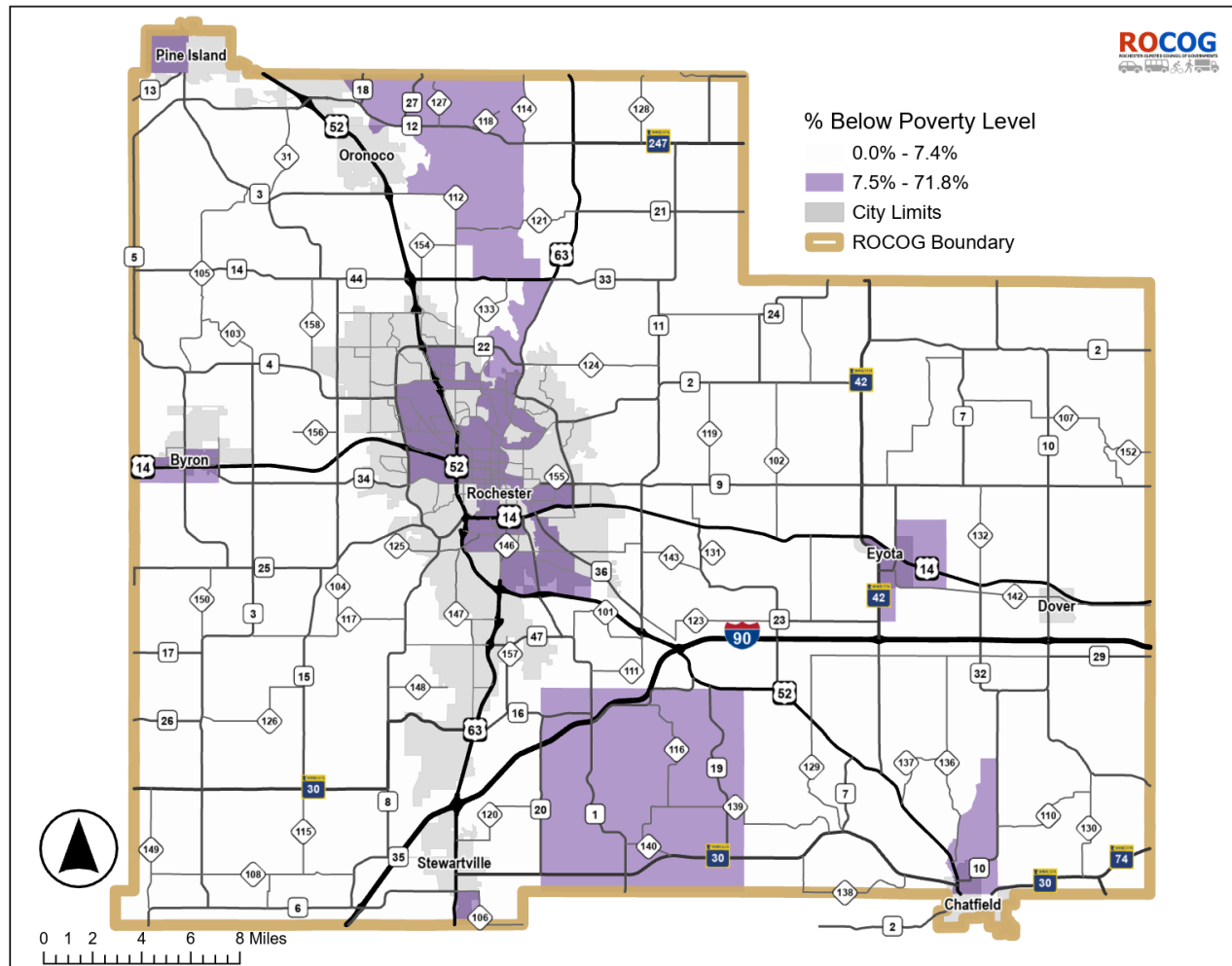
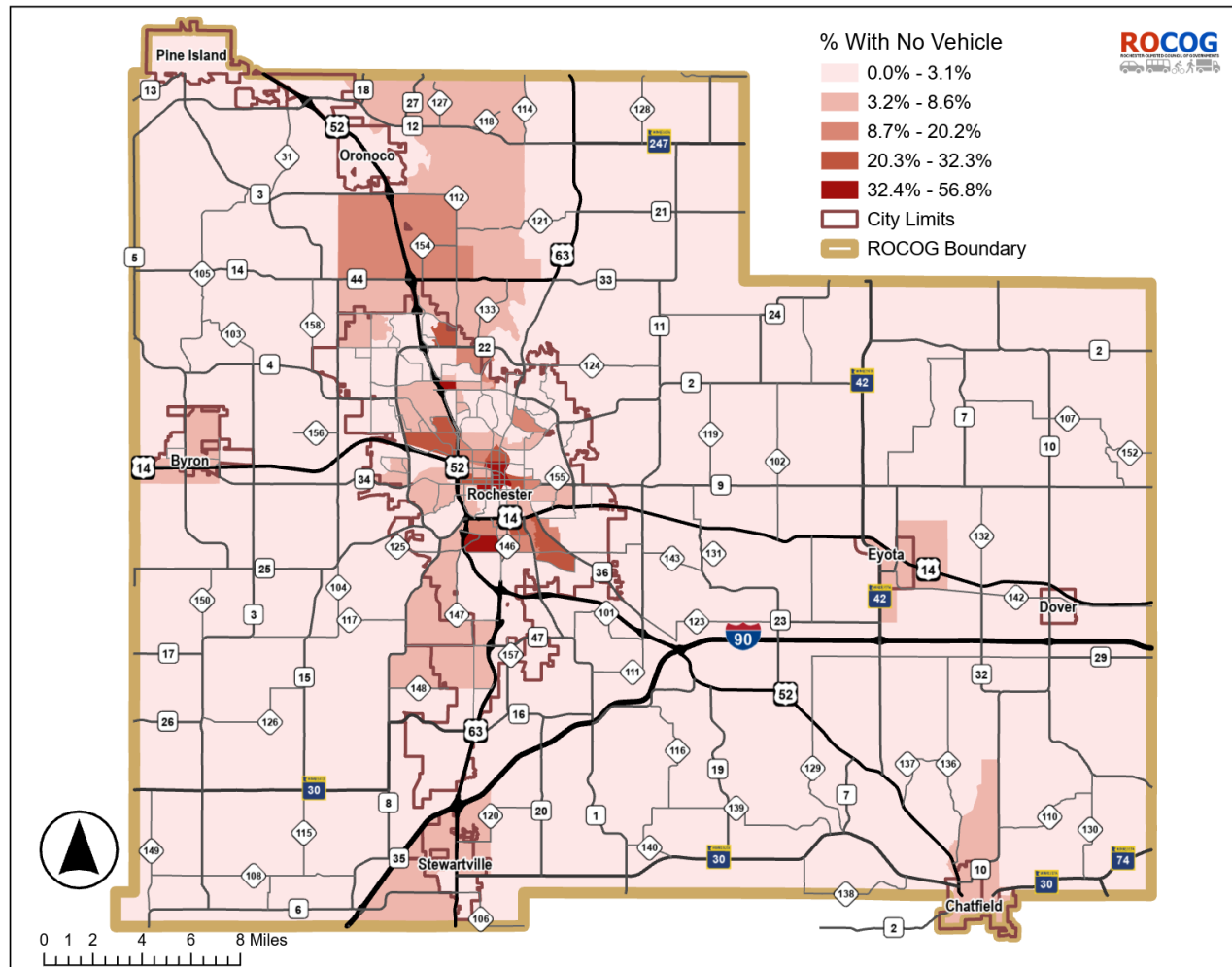




Figure 14: No Access to Private Vehicles

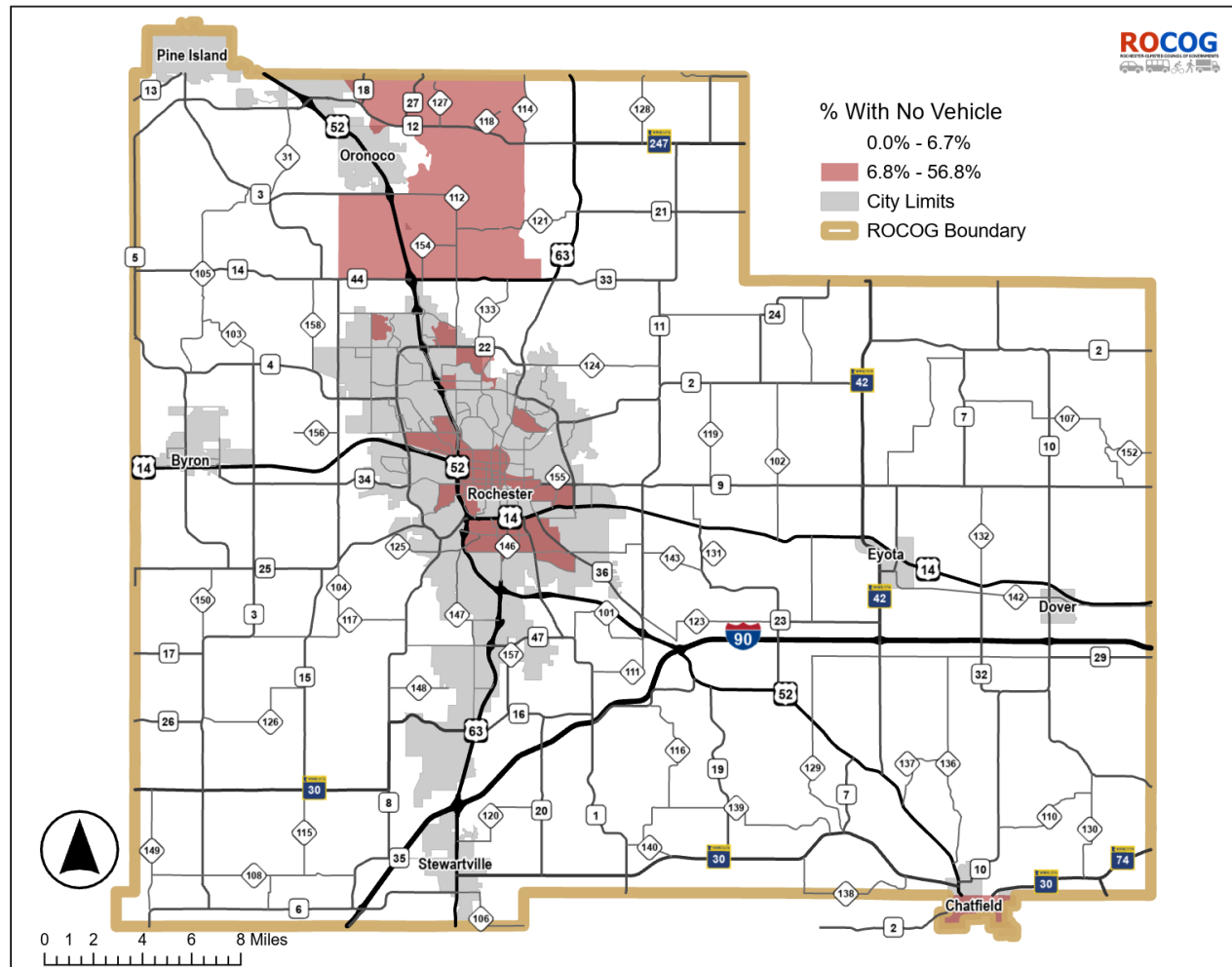


Having no access to a private vehicle is not directly tied to civil rights law, but it is a relevant planning factor when evaluating transportation access barriers.

Total ROCOG Households	69,283
Households With No Vehicle in ROCOG Area	4,676
% Households With No Vehicle in ROCOG Area	6.7%



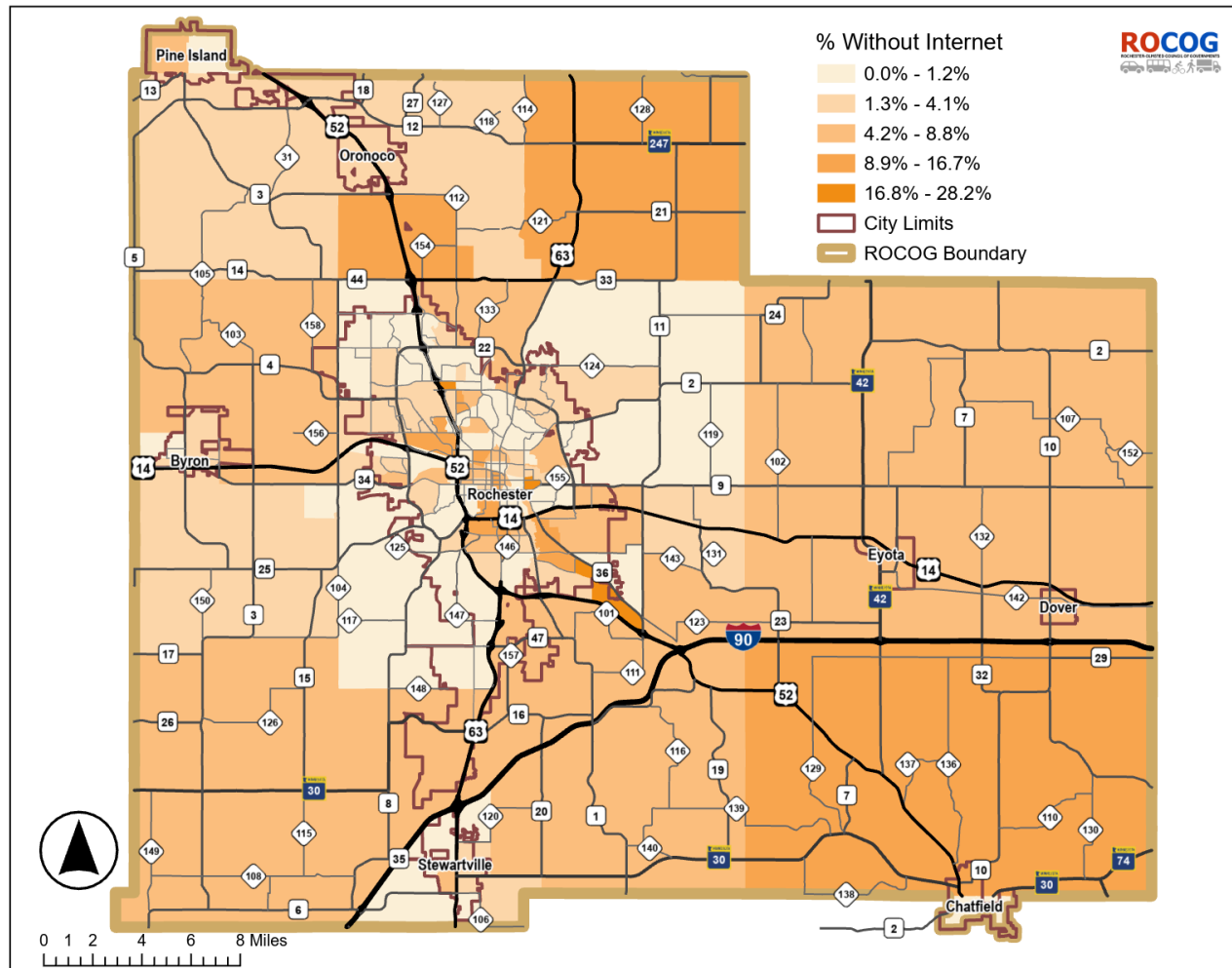
Figure 15: No Vehicle Concentrations



The highest concentrations of households with no vehicle are found in Rochester, the Oronoco area, and the southern portion of Chatfield.



Figure 16: No Internet Access



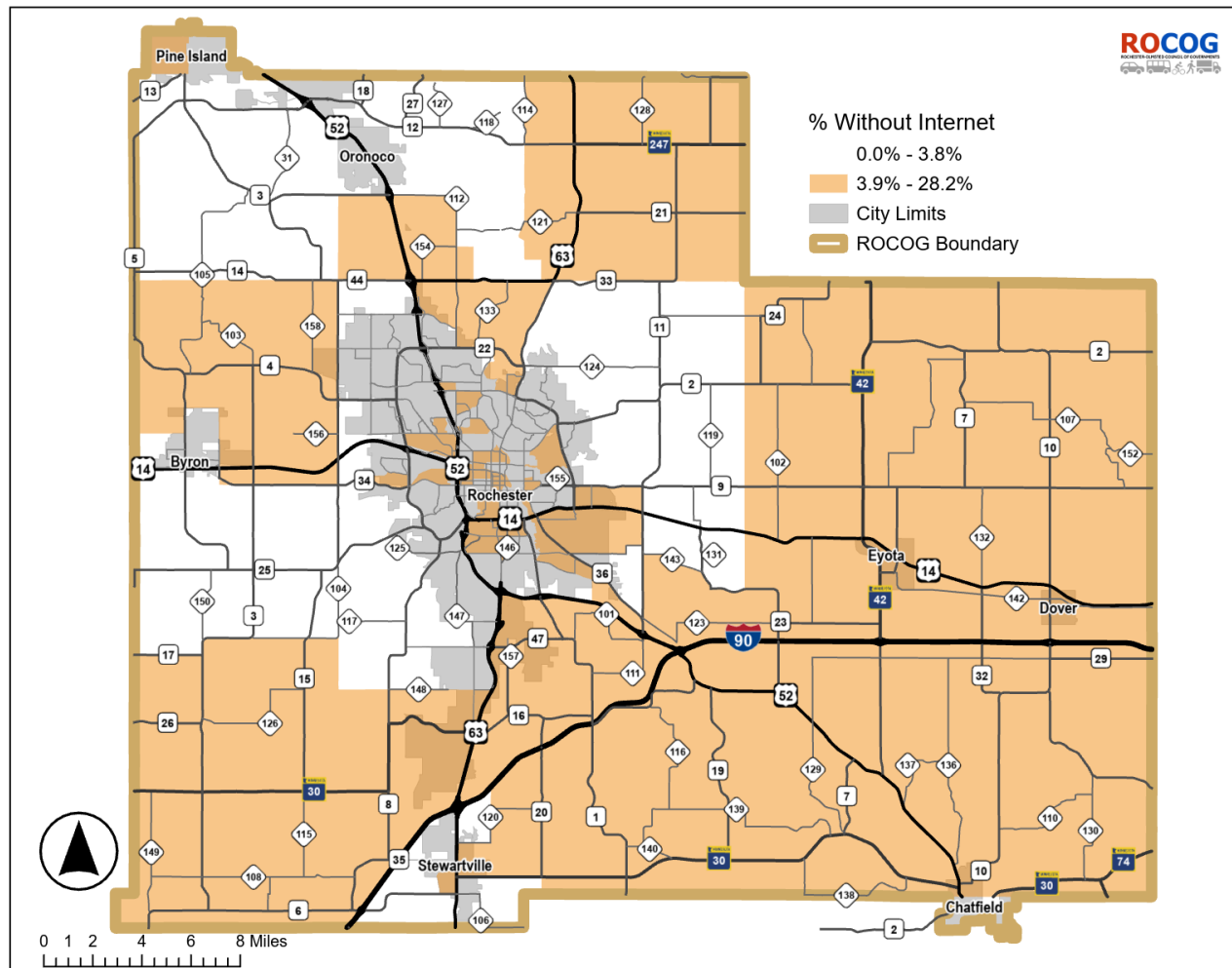
As digital tools become more central to work, education, healthcare, and civic participation, access to reliable internet service is increasingly considered a basic utility.

Households without internet access, whether due to lack of infrastructure, affordability, or other challenges, may face disadvantages in receiving information, accessing services, or participating in planning activities.

Total ROCOG Households	69,283
Households With No Internet Access in ROCOG Area	2,656
% Households With No Internet Access in ROCOG Area	3.8%



Figure 17: No Internet Concentrations



The rural areas are most likely to lack access to internet services as are pockets of Rochester.



Appendices



Appendix 1: ROCOG Title VI / Nondiscrimination Policy Statement

I, as Chair of the Policy Board of the Rochester-Olmsted Council of Governments (ROCOG), am personally committed to and support taking all steps to ensure that no person or groups of persons shall, on the grounds of race, color, national origin, sex, age, disability, limited English proficiency, or low-income status, be excluded from participation in, be denied the benefits of, or be otherwise subjected to discrimination under any and all programs, services, or activities administered by ROCOG, its recipients, sub recipients, and contractors. ROCOG will include Title VI language in all written agreements and will monitor for compliance.

The Executive Director of ROCOG, or their designees, is the appointed Title VI Coordinator. Thus, they are responsible for initiating and monitoring Title VI activities, preparing reports, and other responsibilities as required by 23 Code of Federal Regulations (CFR) 200 and 49 CFR 21, as is adopted.

Anyone who believes that they have been discriminated against should contact the Executive Director via mail, phone, or email. The Rochester Olmsted Council of Governments (ROCOG) operates its programs without regard to race, color, or national origin. If you believe you have been aggrieved by an unlawful discriminatory practice or wish to request more information about ROCOG's obligations under Title VI of the Civil Rights Act of 1964, please contact ROCOG at the following address and telephone number.

Allison Sosa, ROCOG Executive Director
2122 Campus Drive SE
Rochester, MN 55904
Phone: 507-328-7100
Email: planningweb@olmstedcounty.gov

ROCOG Board Chair

Date

ROCOG Executive Director

Date



Appendix 2: ROCOG Title VI Nondiscrimination Assurances

The United States Department of Transportation (USDOT) Standard Title VI / Nondiscrimination Assurances

DOT Order No. 1050.2A

The Rochester-Olmsted Council of Governments (herein referred to as the “Recipient”), **HEREBY AGREES THAT**, as a condition to receiving any federal financial assistance from the U.S. Department of Transportation (USDOT), through the Federal Highway Administration (FHWA), is subject to and will comply with the following:

Statutory/regulatory authorities

- Title VI of the Civil Rights Act of 1964 (42 U.S.C. § 2000d et seq., 78 stat. 252) – prohibits discrimination based on race, color, national origin.
- Federal-Aid Highway Act of 1973 (23 U.S.C. § 324 et seq.) – prohibits discrimination based on sex.
- Title IX of the Education Amendments of 1972, as amended (20 U.S.C. § 1681 et seq.) – prohibits discrimination based on sex in education programs or activities.
- Section 504 of the Rehabilitation Act of 1973, as amended (29 U.S.C. § 794 et seq.) – prohibits discrimination based on disability.
- The Age Discrimination Act of 1975, as amended (42 U.S.C. § 6101 et seq.) – prohibits discrimination based on age.
- Americans with Disabilities Act of 1990, as amended (42 U.S.C. § 12101 et seq.) – prohibits discrimination based on disability.
- Nondiscrimination in Federally Assisted Programs of the Department of Transportation – Effectuation of Title VI of the Civil Rights Act of 1964 (49 CFR Part 21)
- Nondiscrimination on the Basis of Disability in Programs or Activities Receiving Federal Financial Assistance (49 CFR Part 27).
- Enforcement of Nondiscrimination on the Basis of Handicap in Programs or Activities Conducted by the Department of Transportation (49 CFR Part 28).
- Transportation Services for Individuals with Disabilities (ADA) (49 CFR Part 37).
- Nondiscrimination on the Basis of Disability in State and Local Government Services (28 CFR Part 35).

- U.S. Department of Justice Guidelines for the Enforcement of Title VI of the Civil Rights Act of 1964 (28 CFR section 50.3).

The preceding statutory and regulatory cited hereinafter are referred to as the “Acts” and “Regulations,” respectively.

General assurances

In accordance with the Acts, the Regulations, and other pertinent directives, circulars, policy, memoranda, and/or guidance, the Recipient hereby gives assurance that it will promptly take any measures necessary to ensure that:

“No person in the United States shall, on the grounds of race, color, or national origin, be excluded from participation in, be denied the benefits of, or be otherwise subjected to discrimination under any program or activity”, for which the Recipient receives federal financial assistance from DOT, including the FHWA.

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

Specific assurances

More specifically, and without limiting the above general assurances, the Recipient agrees with and gives the following Assurances with respect to its federally assisted FHWA Program.

1. The Recipient agrees that each “activity,” “facility,” or “program,” as defined in §§ 21.23 (b) and 21.23 (e) of 49

C.F.R. § 21 will be (with regard to an “activity”) facilitated, or will be (with regard to a “facility”) operated, or will be (with regard to a “program”) conducted in compliance with all requirements imposed by, or pursuant to the Acts and the Regulations.

2. The Recipient will insert the following notification in all solicitations for bids, Requests for Proposals for work, or material subject to the Acts and the Regulations made in connection with all FHWA Programs and, in adapted form, in all proposals for negotiated agreements regardless of funding source.

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

3. The Recipient will insert the clauses of Appendices A and E of this Assurance in every contract or agreement subject to the Acts and the Regulations.
4. The Recipient will insert the clauses of Appendix B of this Assurance, as a covenant running with the land, in any deed from the United States effecting or recording a transfer of real property, structures, use, or improvements thereon or interest therein to a Recipient.
5. That where the Recipient receives federal financial assistance

to construct a facility, or part of a facility, the Assurance will extend to the entire facility and facilities operated in connection therewith.

6. That where the Recipient receives federal financial assistance in the form, or for the acquisition of real property or an interest in real property, the Assurance will extend to rights to space on, over, or under such property.
7. That the Recipient will include the clauses set forth in Appendices C and D of this Assurance, as a covenant running with the land, in any future deeds, leases, licenses, permits, or similar instruments entered into by the Recipient with other parties:
 - a. for the subsequent transfer of real property acquired or improved under the applicable activity, project, or program.
 - b. for the construction or use of, or access to, space on, over, or under real property acquired or improved under the applicable activity, project, or program.
8. That this Assurance obligates the Recipient for the period during which federal financial assistance is extended to the program, except where the federal financial assistance is to provide, or is in the form of, personal property, or real property, or interest therein, or structures or improvements thereon, in which case the Assurance obligates the Recipient, or any transferee for the longer of the following periods:
9. The period during which the property is used for a purpose for which the federal financial assistance is extended, or for another purpose involving the provision of similar services or benefits; or
10. The period during which the Recipient retains ownership or

possession of the property.

11. The Recipient will provide for such methods of administration for the program as are found by the Secretary of Transportation or the official to whom he/she delegates specific authority to give reasonable guarantee that it, other recipients, sub-recipients, sub-grantees, contractors, subcontractors, consultants, transferees, successors in interest, and other participants of federal financial assistance under such program will comply with all requirements imposed or pursuant to the Acts, the Regulations, and this Assurance.
12. The Recipient agrees that the United States has a right to seek judicial enforcement with regard to any matter arising under the Acts, the Regulations, and this Assurance.
13. By signing this ASSURANCE, the Rochester-Olmsted Council of Governments also agrees to comply (and require any sub-recipients, sub-grantees, contractors, successors, transferees, and/or assignees to comply) with all applicable provisions governing FHWA access to records, accounts, documents, information, facilities, and staff. It is also recognized that ROCOG must comply with any program or compliance reviews, and/or complaint investigations conducted by the FHWA. Records and reports must be kept, and the material submitted for review upon request to FHWA, or its designee in a timely, complete, and accurate way. Additionally, ROCOG must comply with all other reporting, data collection, and evaluation requirements, as prescribed by law or detailed in program guidance.
14. The Rochester-Olmsted Council of Governments gives this ASSURANCE in consideration of and for obtaining any federal grants, loans, contracts, agreements, property, and/or discounts, or other federal aid and federal financial

assistance extended after the date hereof to the recipients by the U.S. Department of Transportation under the FHWA. This ASSURANCE is binding on the Rochester-Olmsted Council of Governments, other recipients, sub-recipients, sub-grantees, contractors, subcontractors and their subcontractors', transferees, successors in interest, and any other participants in its programs. The person(s) signing below is (are) authorized to sign this ASSURANCE on behalf of the Recipient.

ROCOG Executive Director

Date

ROCOG Board Chair

Date

Assurance Appendix A

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

1. Compliance with regulations: The contractor (hereinafter includes consultants) will comply with the Acts and the Regulations relative to non-discrimination in federally assisted programs of the U.S. Department of Transportation, Federal Highway Administration (FHWA), as they may be amended from time to time, 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, will not discriminate on the grounds of race, color, national origin, sex, age, disability, income-level, or limited English proficiency in the selection and retention of subcontractors, including procurements of materials and leases of equipment. The contractor will not participate directly or indirectly in the discrimination prohibited by the Acts and the Regulations as set forth in Appendix E, including employment practices when the contract covers any activity, project, or program set forth in Appendix B of 49 CFR Part 21.
3. Solicitations for subcontracts, including procurements of materials and equipment: In all solicitations, either by competitive bidding, or negotiation made by the contractor for work to be performed under a subcontract, including procurements of materials, or leases of equipment, each potential subcontractor or supplier will be notified by the contractor of the contractor's obligations under this contract and the Acts and the Regulations relative to non-discrimination on the grounds of race, color, national origin, sex, age,

disability, income-level, or limited English proficiency.

4. Information and reports: The contractor will provide all information and reports required by the Acts, the Regulations, and directives issued pursuant thereto and will permit access to its books, records, accounts, other sources of information, and its facilities as may be determined by the Recipient or the FHWA to be pertinent to ascertain compliance with such Act, Regulations, and instructions. Where any information required of a contractor is in the exclusive possession of another who fails or refuses to furnish the information, the contractor will so certify to the Recipient or the FHWA, as appropriate, and will set forth what efforts it has made to obtain the information.
5. Sanctions for noncompliance: In the event of a contractor's non-compliance with the non-discrimination provisions of this contract, the Recipient will impose such contract sanctions as it or the FHWA may determine to be appropriate, including, but not limited to:
 - a. Withholding payments to the contractor under the contract until the contractor complies; and/or
 - b. Cancelling, terminating, or suspending a contract, in whole or in part.
6. Incorporation of provisions: The contractor will include the provisions of paragraphs one through six in every subcontract, including procurements of materials and leases of equipment, unless exempt by the Acts, the Regulations and directives issued pursuant thereto. The contractor will take action with respect to any subcontract or procurement as the Recipient or the FHWA may direct as a means of enforcing such provisions including sanctions for noncompliance. Provided, that if the contractor becomes involved in, or is threatened with litigation by a subcontractor, or supplier because of such direction, the contractor may request the Recipient to enter into any

litigation to protect the interests of the Recipient. In addition, the contractor may request the United States to enter into the litigation to protect the interests of the United States.

Assurance Appendix B

Clauses for Deeds Transferring United States Property

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

(Granting clause)

NOW, THEREFORE, the Rochester-Olmsted Council of Governments as authorized by law and upon the condition that the Rochester-Olmsted Council of Governments will accept title to the lands and maintain the project constructed thereon in accordance with Title 23, United States Code, the Regulations for the Administration of Federal Aid for Highways and the policies and procedures and procedures prescribed by the Federal Highway Administration of the U.S. Department of Transportation and, also in accordance with and in compliance with all requirements imposed by or pursuant to Title 49, Code of Federal Regulations, Department of Transportation, Subtitle A, Office of the Secretary, Part 21, Nondiscrimination in Federally Assisted Programs of the Department of Transportation (herein referred to as the Regulations) pertaining to and effectuating the provisions of Title VI of the Civil Rights Act of 1964 (78 stat. 252; 42 U.S.C. 2000d to 2000d-4), does hereby remise, release, quitclaim and convey unto the Rochester-Olmsted Council of Governments

all the right, title, and interest of the U.S. Department of Transportation in and to said lands described in Exhibit “A” attached hereto and made a part hereof.

(Habendum clause)

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

The Rochester-Olmsted Council of Governments, in consideration of the conveyance of said lands and interests in lands, does hereby covenant and agree as a covenant running with the land for itself, its successors and assigns, that (1) no person will on the grounds of race, color, national origin, sex, age, disability, income-level, or limited English proficiency be excluded from participation in, be denied the benefits of, or be otherwise subjected to discrimination with regard to any facility located wholly or in part on, over, or under such lands hereby conveyed [,] [and]* (2) that the Rochester-Olmsted Council of Governments will use the lands and interests in lands and interests in lands so conveyed, in compliance with all requirements imposed by or pursuant to Title 49, Code of Federal Regulations, Department of Transportation, Subtitle A, Office of the Secretary, Part 21, Nondiscrimination in Federally Assisted Programs of the U.S. Department of Transportation, Effectuation of Title VI of the Civil Rights Act of 1964, and as said Regulations and Acts may be amended, and (3) that in the event of breach of any of the above-

mentioned nondiscrimination conditions, the U.S. Department of Transportation will have a right to enter or re-enter said lands and facilities on said land, and that above described land and facilities will thereon revert to and vest in and become the absolute property of the U.S. Department of Transportation and its assigns as such interest existed prior to this instruction.*

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

Assurance Appendix C Clauses for Transfer of Real Property Acquired or Improved Under the Activity, Facility, or Program

The following clauses will be included in deeds, licenses, leases, permits, or similar instruments entered into by the Rochester-Olmsted Council of Governments pursuant to the provisions of Assurance 7(a).

The (grantee, lessee, permittee, etc. as appropriate) for himself/ herself, his/her/ heirs, personal representatives, successors in interest, and assigns, as part of the consideration hereof, does hereby covenant and agree [in the case of deeds and leases add “as a covenant running with the land”] that:

1. In the event facilities constructed, maintained, or otherwise operated on the property described in this (deed, license, lease, permit, etc.) for a purpose for which a U.S. Department of Transportation activity, facility, or program is extended or for another purpose involving the provision of similar services or benefits, the (grantee, licensee, lessee, permittee, etc.) will maintain and operate such facilities and services in

compliance with all requirements imposed by the Acts and Regulations (as may be amended) such that no person on the grounds of race, color, national origin, sex, age, disability, income-level, or limited English proficiency will be excluded from participation in, denied the benefits of, or be otherwise subjected to discrimination in the use of said facilities.

2. With respect to licenses, leases, permits, etc., in the event of breach of any of the above nondiscrimination covenants, the Rochester-Olmsted Council of Governments will have the right to terminate the (lease, license, permit, etc.) and to enter, re-enter, and repossess said lands and facilities thereon, and hold the same as if the (lease, license, permit, etc.) had never been made or issued.*
3. With respect to a deed, in the event of breach of any of the above nondiscrimination covenants, the Rochester-Olmsted Council of Governments will have the right to enter or re-enter the lands and facilities thereon, and be the above described lands and facilities will there upon revert to and vest in and become the absolute property of the Rochester-Olmsted Council of Governments and its assigns.*

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

Assurance Appendix D

Clauses for Construction/Use/Access to Real Property Acquired or Improved Under the Activity, Facility, or Program

The following clauses will be included in deeds, licenses, permits, or similar instruments/agreements entered into by the Rochester-Olmsted Council of Governments pursuant to the provisions of Assurance 7(b):

1. The (grantee, licensee, permittee, etc., as appropriate) for himself/herself, his/her heirs, personal representatives, successors in interest, and assigns, as a part of the consideration hereof, does hereby covenant and agree (in the case of deeds and leases add, “as a covenant running with the land”) that (1) no person on the grounds of race, color, national origin, sex, age, disability, income-level, or limited English proficiency will be excluded from participation in, denied the benefits of, or be otherwise subjected to discrimination in the use of said facilities, (2) that in the construction of any improvements on, over, or under such land, and the furnishing of services thereon, no person on the ground of race, color, national origin, sex, age, disability, income-level, or limited English proficiency will be excluded from participation in, denied the benefits of, or otherwise be subjected to discrimination, (3) that the (grantee, licensee, lessee, permittee, etc.) will use the premises in compliance with all other requirements imposed by or pursuant to the Acts and Regulations, as amended, set forth in this Assurance.
2. With respect to (licenses, leases, permits, etc.), in the event of breach of any of the above non-discrimination covenants, the Rochester-Olmsted Council of Governments will have the right to terminate the (license, permit, etc., as appropriate) and

to enter or re-enter and repossess said land and the facilities thereon, and hold the same as if said (license, permit, etc., as appropriate) had never been made or issued.*

3. With respect to deeds, in the event of breach of any of the above non-discrimination covenants, the Rochester-Olmsted Council of Governments will there upon revert to and vest in and become the absolute property of the Rochester-Olmsted Council of Governments and its assigns.*

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

Assurance Appendix E

During the performance of this contract, the contractor, for itself, its assignees, and successors in interest (hereinafter referred to as the “contractor”) agrees to comply with the following nondiscrimination statutes and authorizes; including but not limited to:

- Title VI of the Civil Rights Act of 1964 (42 U.S.C. § 2000d et seq., 78 stat. 252) – prohibits discrimination on the basis of race, color, national origin – as implemented by 49 C.F.R. § 21.1 et seq. and 49 C.F.R. § 303.
- The Uniform Relocation Assistance and Real Property Acquisition Policies Act of 1970 (42 U.S.C. § 4601) – prohibits unfair treatment of person displaced or whose property has been acquired because of federal or federal aid programs and projects.
- Federal Aid Highway Act of 1973 (23 U.S.C. § 324 et seq.) – prohibits discrimination on the basis of sex.

- Section 504 of the Rehabilitation Act of 1973 (29 U.S.C. § 794 et seq.), as amended– prohibits the discrimination on the basis of disability; and 49 CFR Part 27.
- The Age Discrimination Act of 1975, (42 U.S.C. § 6101 et seq.), as amended – prohibits the discrimination on the basis of age.
- Airport and Airway Improvement Act of 1982 (49 U.S.C. § 471, Section 47123), as amended – prohibits discrimination based on race, creed, color, national origin, or sex.
- The Civil Rights Restoration Act of 1987, (102 Stat. 28.), (“... which restore[d] the broad scope of coverage and to clarify the application of title IX of the Education Amendments of 1972, section 504 of the Rehabilitation Act of 1973, the Age Discrimination Act of 1975, and title VI of the Civil Rights Act of 1964.”).
- Titles II and III of the Americans with Disabilities Act, which prohibit discrimination on the basis of disability in the operation of public entities, public and private transportation systems, places of public accommodation, and certain testing entities (42 U.S.C. § § 12131 – 12189) as implemented by Department of Justice regulations at 28 C.F.R. parts 35 and 36, and Department of Transportation regulations at 49 C.F.R. parts 37 and 38.
- The Federal Aviation Administration’s nondiscrimination statute (49 U.S.C. § 47123) – prohibits discrimination on the basis of race, color, national origin, and sex.
- Title IX of the Education Amendments of 1972, as amended, which prohibits discrimination because of sex in education programs or activities (20 U.S.C. 1681 et seq.) as implemented by 49 C.F.R. § 25.1 et seq.



Appendix 3: ROCOG Title VI Complaint Form

Section I: Applicant Information (Print all items legibly)

Name _____

Street Address/P.O. Box _____

City _____ State _____ Zip _____

Telephone _____ E-Mail Address _____

Section II: Cause of discrimination based on (Check all appropriate boxes)

☐ Race ☐ Color ☐ National Origin ☐ Limited English Proficiency

Section III: Third party representative information

Are you filing this complaint on your own behalf? Yes _____ No _____

(If you answered “yes” to this question, go to Section IV)

If not, for whom are you filing this complaint?

Name: _____ Relationship: _____

Please explain why you have filed for this person. _____

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

Section IV: Describe the actions or incidents that are the basis for filing this complaint. Include names of individuals involved, dates and places of alleged discriminatory actions. If additional space is needed, attach extra sheet(s).

Section V: State the specific remedy sought to resolve the issue(s).

Section VI: Related Title VI actions by Applicant

Have you previously filed a Title VI complaint with ROCOG? Yes_____ No_____

If yes, what was your ROCOG Complaint Number? _____

(Note: This information is needed for administration purposes; we will assign the same complaint number to the new complaint.)

Have you filed this complaint with any of the following agencies? Yes_____ No_____

Agency	Case Number or Other Complaint Identification Information
U. S. Department of Transportation	
Minnesota Dept. of Transportation	
Department of Justice	
Equal Employment Opportunity Commission	
Local Governmental Jurisdiction	

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

If yes, please provide a copy of the complaint form. (Note: This above information is helpful for administrative tracking purposes. However, if litigation is pending regarding the same issues, we defer to the decision of the Court as to whether to release this information).

Section VII: Verification

Applicant's Signature _____

Date _____

Please mail or deliver your completed form to:

Rochester-Olmsted Council of Governments
 Attn: Executive Director
 2122 Campus Drive SE, Suite 200
 Rochester, MN 55904



Appendix 4: ROC OG Title VI Complaint Log

Name of Applicant (First Name, Last Name, Address, Phone, Email)	Date Received	Basis of Complaint (Race, sex, color, age, national origin, disability, limited English proficiency, income status, other)	Additional information regarding complaint	MPO Action	Complaint Status (Active, pending comment, closed)	Date Complaint Closed

Note: As of September 2022, there have been no Title VI complaints filed against the Rochester-Olmsted Council of Governments.



Appendix 5: ROCOG Title VI Employee Training Log

As a sub-recipient of MnDOT's federal funds, the Rochester-Olmsted Council of Governments (ROCOG) is required to comply with nondiscrimination laws and regulations. ROCOG staff are required to complete a minimum of one hour of Title VI training each year.

Position	Last Date Completed	2026	2027	2028	2029	2030
Executive Director						
Community Planning Manager						
Principal Transportation Planner						
Principal Transportation Planner						
Principal Planner						
Senior Planner						
Executive Support Supervisor						