



Nondiscrimination program

Board of Directors: July 17, 2024

Public hearing documents

- Title VI Implementation Plan.
- Limited English Proficiency Plan.
- Americans with Disabilities Act Program Access Plan.
- 5310 Disadvantaged Business Enterprise Program Plan.

Title VI Implementation Plan



- Demonstrates DRCOG has the **procedures and resources** to ensure services are provided in a nondiscriminatory manner.
- Documents activities conducted by DRCOG over the previous three years, including **major plans and programs**.
- Informs the public and funding recipients of the **standard process for reviewing** programs, projects and grant recipients to ensure compliance.

Demographic profile of the Denver region

People of color

The U.S. Census Bureau defines racial categories generally as "a social definition of race recognized in this country and not an attempt to define race biologically, anthropologically or genetically." An individual can report as white, Black or African American, Asian, American Indian and Alaska Native, Native Hawaiian and other Pacific Islander,

some other race, or multiple races. Ethnicity is used to determine whether an individual is of Hispanic origin or not, so an individual of Hispanic origin may report as any race. The number of people of color is calculated by subtracting the non-Hispanic or Latino white population from the total population, which yields all people of color and Hispanic or Latino people.

Table 2.1 People of color by county

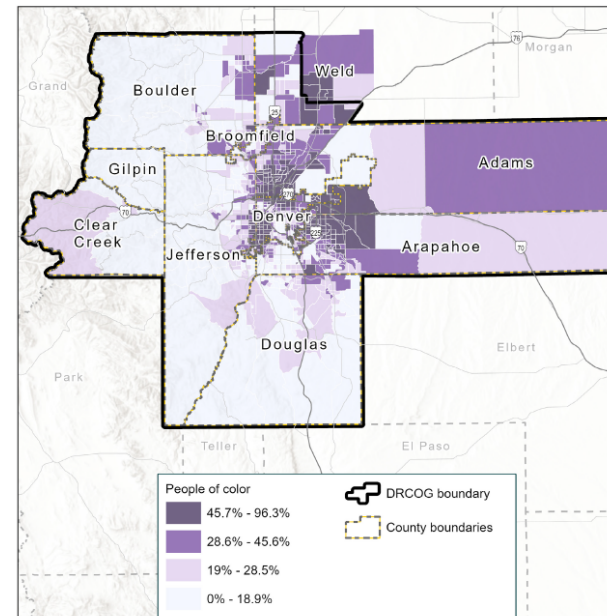
County	Number	Percent
Adams County	273,104	22.36%
Arapahoe County	276,506	22.64%
Boulder County	78,078	6.39%
Broomfield		1.54%
Clear Creek		0.11%
Denver		26.85%
Jefferson		6.08%
Weld		0.07%
		11.17%
		2.80%
		100.00%

Marginalized communities:

- People of color.
- People with low income.
- People with limited English proficiency.
- Older adults ages 60 and older.
- Youth ages 17 and younger.
- People with a disability.
- Households without a motor vehicle.
- People born outside the United States.
- Single-parent households.
- Housing-cost burdened households.

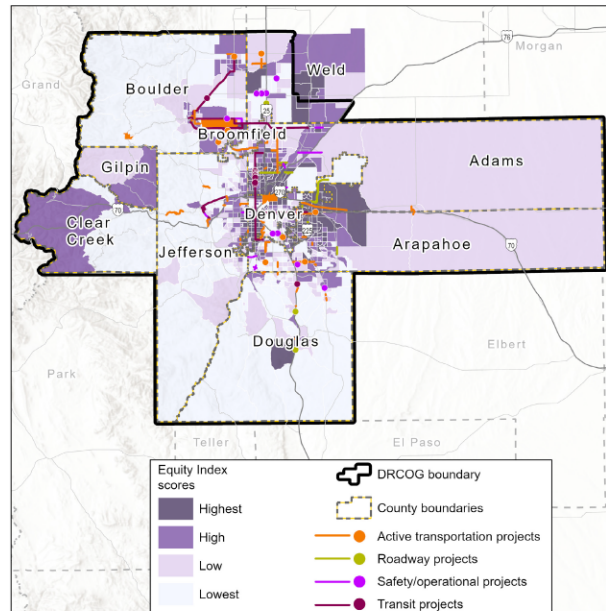
Map 2.1 illustrates information related to people of color (including racial and ethnic minorities) for the population within the Denver region. This information was collected at the census tract level. Individuals of color account for approximately 36% of the total population within the region.

Map 2.1 Distribution of people of color



Transportation investment analysis

Map 5.1 Transportation investments compared to equity index scores



Project types

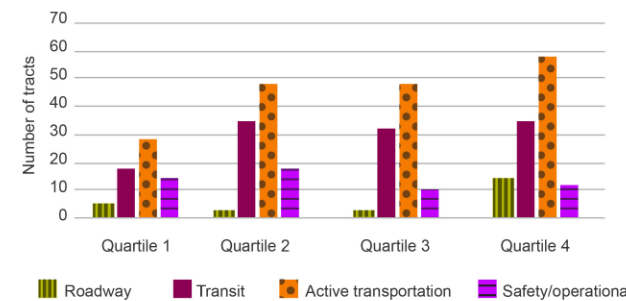
Adjacent to project locations, there are 120 tracts in the fourth quartile, while only 66 tracts fall in the first quartile, indicating that

projects are generally distributed in more marginalized communities, as shown in the following chart, with the exception of safety/operational projects.

Table 5.3 Equity index scores by project type

Project type	Mean equity index score	Median equity index score
Roadway	33.0	38.0
Transit	27.7	23.9
Active transportation	28.7	24.9
Safety/operational	24.9	22.1
All projects	28.2	24.7
Region	25.7	23.0

Project proximity to marginalized communities by project type



Additional information included



Policies and procedures.



Board and committee structure.



Staff divisions and major plans and programs.



Subrecipient monitoring.

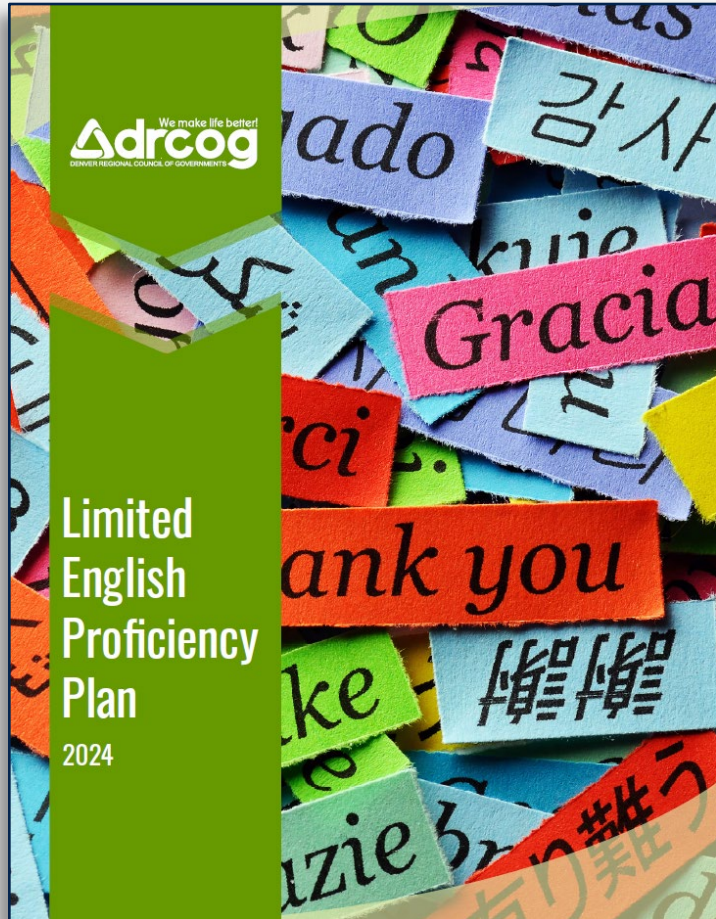


Data.



Public participation.

Limited English Proficiency Plan



- Goal is to ensure all residents of the DRCOG region can, to the fullest extent practicable, **participate in DRCOG activities**.
- Outlines how individuals who may need language assistance are **identified**, the ways assistance is **provided**, and how they are **notified** that assistance is available.
- Describes **staff training** required and the **resources** available.

Limited English proficiency assessment of the Denver region

Map 2.1 Distribution of people with limited English proficiency

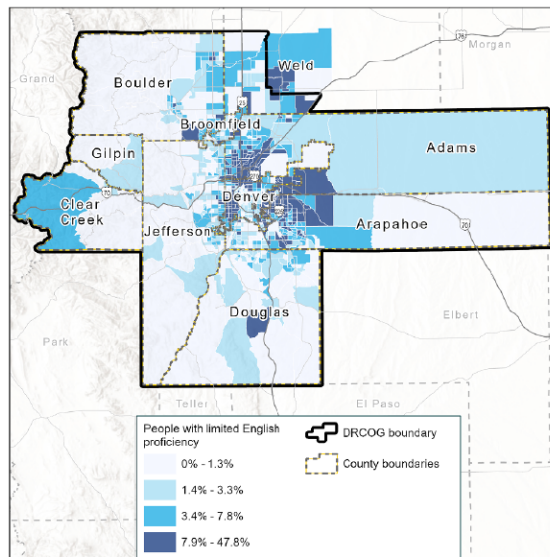


Table 2.1: Language groups spoken at home by people 5 years and older with limited English proficiency

Language	Total	Percent
Spanish	136,422	4.32%
Asian and Pacific Island languages	33,951	1.07%
Other Indo-European languages	22,713	0.72%
Other Languages	14,470	0.46%
Total population with limited English proficiency (5 years and older)	207,556	6.57%
Total regional population (5 years and older)	3,160,836	100%

Table 2.1, derived from the 2017-2022 American Community Survey, shows top language groups spoken at home in the Denver region by the number of people 5 years old and older with limited English proficiency who speak those particular languages.

Transportation and the Colorado Department of Transportation recommend consulting school board data because it is easy to obtain, reliable and accurate. Such data for the entire state, compiled by the Colorado Department of Education, is available in [Appendix B](#) as a map limited to the Denver region.

Table 2.2, derived from the 2017-2022 American Community Survey, shows top language groups spoken by people 5 years old and older with limited English proficiency, by county, within the DRCOG planning area.

In addition to the previous information:

Additional information:

- County-level breakdowns.
- Language identification flashcards.
- Map of English language learners by school district.

Four-factor analysis

- **Factor 1:** The number or proportion of LEP persons eligible to be served or likely to be encountered by a program, activity, or service of the recipient or grantee.
- **Factor 2:** The frequency with which LEP individuals come in contact with the program.
- **Factor 3:** The nature and importance of the program, activity, or service provided by the recipient to people's lives.
- **Factor 4:** The resources available to the recipient and costs.

Americans With Disabilities Act Program Access Plan



- Outlines the **requirements** of the Americans with Disabilities Act of 1990 and the Rehabilitation Act of 1973 **that apply to DRCOG**.
- Documents how DRCOG makes its programs, activities, and services **accessible to individuals with disabilities**.
- Incorporates **new Colorado accessibility requirements** and DRCOG's response.

Information included



Office space.



Website features.



Public meetings.



Planning process.



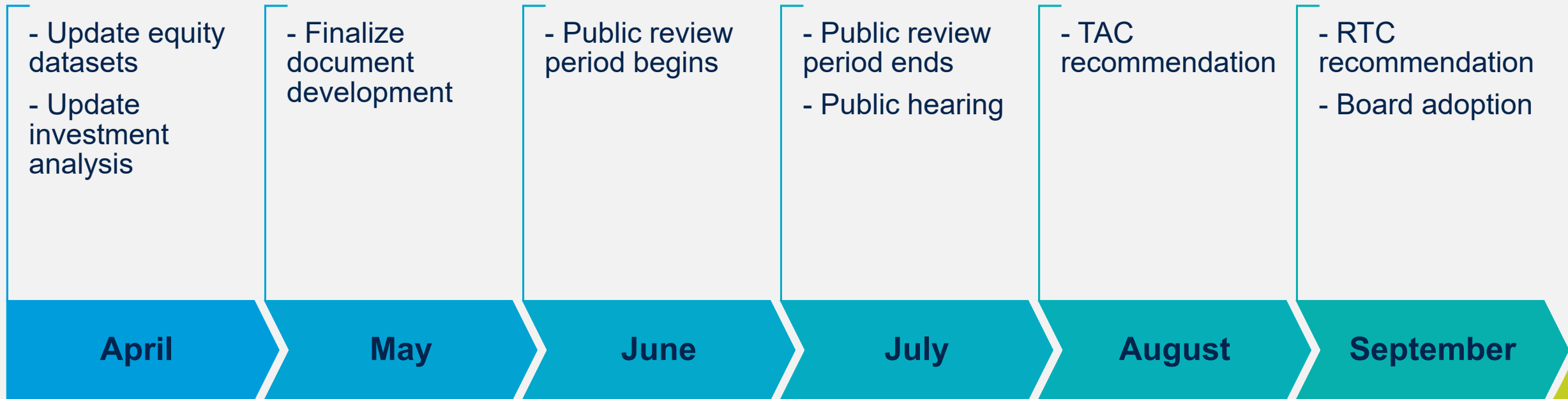
Subrecipient monitoring.

5310 Disadvantaged Business Enterprise Program Plan



- DRCOG anticipates issuing contracts to recipients and subrecipients **greater (in total) than \$250,000.**
- Outlines the overall program, including **reporting** and **monitoring** requirements, **goal calculation**, and agency **forms and processes.**

Schedule (tentative)



- Federal deadline: **October 1**

Thank you!

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