Title VI Plan and Procedures

Title VI of the Civil Rights Act of 1964

ACCOMACK-NORTHAMPTON PLANNING DISTRICT COMMISSION

VDOT APPROVED ON NOVEMBER 17, 2026

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INTRODUCTION

Title VI of the Civil Rights Act of 1964 prohibits discrimination on the basis of race, color, or national origin in programs and activities receiving Federal financial assistance. Specifically, Title VI provides that "no person in the United States shall, on the ground of race, color, or national origin, be excluded from participation in, be denied the benefits of, or be subjected to discrimination under any program or activity receiving Federal financial assistance." (42 U.S.C. Section 2000d).

The Civil Rights Restoration Act of 1987 clarified the intent of Title VI to include all programs and activities of Federal-aid recipients, sub-recipients, and contractors, whether those programs and activities are federally funded or not.

This document details how Accomack-Northampton Planning District Commission (A-NPDC) incorporates nondiscrimination policies and practices in providing services to the public. The A-NPDC's Title VI policies and procedures are documented in this plan and its appendices and attachments. This plan will be updated periodically (at least every three years) to incorporate changes and additional responsibilities that arise.

I. POLICY STATEMENT AND AUTHORITIES

A-NPDC is committed to ensuring that no person shall, on the grounds of race, color, or national origin, as provided by Title VI of the Civil Rights Act of 1964 and the Civil Rights Restoration Act of 1987 (PL 100.259), be excluded from participation in, be denied the benefits of, or be otherwise subjected to discrimination under any program or activity, whether those programs and activities are federally funded or not.

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

November 9, 2026

Signature of Authorizing Official — Date

AUTHORITIES

Title VI of the 1964 Civil Rights Act provides 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 receiving federal financial assistance (refer to 49 CFR Part 21). The Civil Rights Restoration Act of 1987 broadened the scope of Title VI coverage by expanding the definition of the terms "programs or activities" to include all programs or activities of Federal Aid recipients, sub recipients, and contractors, whether such programs and activities are federally assisted or not.

Additional authorities and citations include: Title VI of the Civil Rights Act of 1964 (42 U.S.C. Section 2000d); Federal Transit Laws, as amended (49 U.S.C. Chapter 53 et seq.); Uniform Relocation Assistance and Real Property Acquisition Policies Act of 1970, as amended (42 U.S.C. 4601, et seq.); Department of Justice regulation, 28 CFR part 42, Subpart F, "Coordination of Enforcement of Nondiscrimination in Federally-Assisted Programs" (December 1, 1976, unless otherwise noted); U.S. DOT regulation, 29 CFR part 21, "Coordination of Enforcement of Nondiscrimination in Federally-Assisted Programs of the Department of Transportation – Effectuation of Title VI of the Civil Rights Act of 1964" (June 18, 1970, unless otherwise noted); Joint FTA/Federal Highway Administration (FHWA) regulation, 23 CFR part 771, "Environmental Impact and Related Procedures" (August 28, 1987); Joint FTA/FHWA regulation, 23 CFR part 450 and 49 CFR part 613, "Planning Assistance and Standards," (October 28, 1993, unless otherwise noted); U.S. DOT Order 5610.2; U.S. DOT Policy Guidance Concerning Recipients' Responsibilities to Persons desiring language access, (December 14, 2005), and Section 12 of FTA's Master Agreement, FTA MA 13 (October 1, 2006).

II. NONDISCRIMINATION ASSURANCES

In accordance with 49 CFR Section 21.7 (a), every application for financial assistance from the Federal Highway Administration must be accompanied by an assurance that the applicant will carry out the program in compliance with DOT's Title VI regulations.

As part of the Certifications and Assurances submitted to VDOT, A-NPDC submits a Nondiscrimination Assurance which addresses compliance with Title VI as well as nondiscrimination in hiring (EEO) and contracting (DBE), and nondiscrimination on the basis of disability (ADA).

In signing and submitting this assurance, A-NPDC confirms to VDOT the agency's commitment to nondiscrimination and compliance with federal and state requirements.

III. PLAN APPROVAL DOCUMENT

I hereby acknowledge the receipt of the FY 2027 A-NPDC Title VI Implementation Plan. I have reviewed and approve the Plan. I am committed to ensuring that no person is excluded from participation in, or denied the benefits of A-NPDC services on the basis of race, color, or national origin, as protected by Title VI.

_____

Signature of Authorizing Official

IV. ORGANIZATIONAL AND TITLE VI PROGRAMS AND RESPONSIBILITIES

The **A-NPDC Program Manager** is responsible for ensuring implementation of the agency's Title VI program. Title VI program elements are interrelated and responsibilities may overlap. The specific areas of responsibility have been delineated below for purposes of clarity.

OVERALL ORGANIZATION FOR TITLE VI

The Program Manager is responsible for coordinating the overall administration of the Title VI program, plan, and assurances, including complaint handling, data collection and reporting, annual review and updates, and internal education.

DETAILED RESPONSIBILITIES OF THE TRANSPORTATION PROGRAM MANAGER

The Program Manager is charged with the responsibility for implementing, monitoring, and ensuring compliance with Title VI regulations. Title VI responsibilities are as follows:

1. Process the disposition of Title VI complaints received.
2. Collect statistical data (race, color or national origin) of participants in and beneficiaries of agency programs, (e.g., affected citizens, and impacted communities).
3. Conduct annual Title VI reviews of agency to determine the effectiveness of program activities at all levels.
4. Conduct Title VI reviews of construction contractors, consultant contractors, suppliers, and other recipients of federal-aid fund contracts administered through the agency.
5. Conduct training programs on Title VI and other related statutes for agency employees.
6. Prepare a yearly report of Title VI accomplishments and goals, as required.
7. Develop Title VI information for dissemination to the general public and, where appropriate, in languages other than English.
8. Identify and eliminate discrimination.
9. Establish procedures for promptly resolving deficiency status and writing the remedial action necessary, all within a period not to exceed 90 days.

GENERAL TITLE VI RESPONSIBILITIES OF THE AGENCY

The Program Manager is responsible for substantiating that these elements of the plan are appropriately implemented and maintained, and for coordinating with those responsible for public outreach and involvement and service planning and delivery.

DATA COLLECTION

To ensure that Title VI reporting requirements are met, A-NPDC will maintain:

- A database or log of Title VI complaints received. The investigation of and response to each complaint is tracked within the database or log.
- A log of the public outreach and involvement activities undertaken to ensure that minority and low-income people had a meaningful access to these activities.

ANNUAL REPORT AND UPDATES

As a sub-recipient of federal funds, A-NPDC may be required to submit a Quarterly Report Form to various federal agencies that documents any Title VI complaints received during the preceding quarter and for each year. A-NPDC will also maintain and provide to requesting agencies on an annual basis, the log of public outreach and involvement activities undertaken to ensure that minority and low-income people had a meaningful access to these activities.

Further, we will submit to requesting federal agencies updates to any of the following items since the previous submission, or a statement to the effect that these items have not been changed since the previous submission, indicating date:

- A copy of any compliance review report for reviews conducted in the last three years, along with the purpose or reason for the review, the name of the organization that performed the review, a summary of findings and recommendations, and a report on the status or disposition of the findings and recommendations
- Language access plan
- Procedures for tracking and investigating Title VI complaints
- A list of Title VI investigations, complaints or lawsuits filed with the agency since the last submission
- A copy of the agency's notice to the public that it complies with Title VI and instructions on how to file a discrimination complaint

ANNUAL REVIEW OF TITLE VI PROGRAM

Each year, in preparing for the Annual Report and Updates, the Program Manager will review the agency's Title VI program to assure implementation of the Title VI plan. In addition, the Program Manager will review agency operational guidelines and publications, including those for contractors, to verify that Title VI language and provisions are incorporated, as appropriate. He or she will also review a Commission program or project for Title VI implications and report the findings to the Executive Director.

DISSEMINATION OF INFORMATION RELATED TO THE TITLE VI PROGRAM

Information on our Title VI program will be disseminated to agency employees, contractors, and beneficiaries, as well as to the public, as described in the "public outreach and involvement "section of this document, and in other languages when needed according to the LANGUAGE ACCESS plan as well as federal and State laws/regulations.

RESOLUTION OF COMPLAINTS

Any individual may exercise his or her right to file a complaint if that person believes that he, she or any other program beneficiaries have been subjected to unequal treatment or discrimination in the receipt of benefits/services or prohibited by non-discrimination requirements. A-NPDC will report the complaint to the relevant federal agency within three business days, and make a concerted effort to resolve complaints locally, using the agency's Title VI Complaint Procedures. All Title VI complaints and their resolution will be logged as described under the section Data Collection and reported annually (in addition to immediately) to the relevant federal agency.

WRITTEN POLICIES AND PROCEDURES

Our Title VI policies and procedures are documented in this plan and its appendices and attachments. This plan will be updated periodically to incorporate changes and additional responsibilities that arise. During the course of the Annual Title VI Program Review (above), the Title VI Program Manager will determine whether an update is needed.

INTERNAL EDUCATION/TRAINING

Our employees will receive training on Title VI policies and procedures periodically, including upon hiring. This training will include requirements of Title VI, our obligations under Title VI and the required data that must be gathered and maintained. In addition, training will be provided when any Title VI-related policies or procedures change, or as appropriate in resolving a complaint.

Title VI training is the responsibility of the Program Manager. The A-NPDC Executive Director will authorize appropriate training for the entire staff through staff meetings and through special training for the Program Manager and other selected staff.

TITLE VI CLAUSES IN CONTRACTS

In all federal procurement activities, A-NPDC's documentation will include appropriate non-discrimination clauses. The Program Manager who is responsible for public procurement to ensure appropriate, non-discrimination clauses are included.

SPECIAL EMPHASIS PROGRAM AREAS

The Program Manager, upon finding a questionable issue of compliance in the yearly review, will add it to the Special Emphasis Program Area and will monitor the program area annually. The Program Manager will develop recommendations to resolve the issue and report these to the Executive Director and subsequently provide assistance in meeting the recommendations. The Program Manager will also report progress in the Commission's annual reporting. Once a program area resolves the issue, it will be monitored for an additional year and, if no subsequent trend or pattern is detected, it will be removed from the Special Emphasis Program Area.

SUB RECIPIENT REVIEWS

The Commission does not have sub recipients.

V. PROCEDURES FOR NOTIFYING THE PUBLIC OF TITLE VI RIGHTS AND HOW TO FILE A COMPLAINT

Title 49 CFR Section 21.9(d) requires recipients to provide information to the public regarding the recipient's obligations under federal Title VI regulations and apprise members of the public of the protections against discrimination afforded to them by Title VI. At a minimum, A-NPDC shall disseminate this information to the public by posting a Title VI notice on the agency's website and in public areas of the agency's office(s), including the reception desk, meeting rooms, in federally-funded vehicles, etc. A sample Public Notice is included as APPENDIX A-Title VI Notice to the Public: List of Locations, and will be displayed in all vehicles and facilities.

TITLE VI COMPLAINT PROCEDURES

REQUIREMENT TO DEVELOP TITLE VI COMPLAINT PROCEDURES AND COMPLAINT FORM.

In order to comply with the reporting requirements established in 49 CFR Section 21.9(b), all recipients shall develop procedures for investigating and tracking Title VI complaints filed against them and make their procedures for filing a complaint available to members of the public. Recipients must also develop a Title VI complaint form. The form and procedure for filing a complaint shall be available on the recipient's website and at their facilities.

SAMPLE OF NARRATIVE

Any individual may exercise his or her right to file a complaint with the Accomack-Northampton Planning District Commission if that person believes that he or she has been subjected to unequal treatment or discrimination in the receipt of benefits or services. We will report the complaint to the relevant federal agency and make a concerted effort to resolve complaints locally, using the agency's Nondiscrimination Complaint Procedures. All Title VI complaints and their resolution will be logged and reported annually to the relevant federal agency.

A person may also file a complaint directly with the relevant federal agency through their office of civil rights.

A-NPDC includes the following language on all printed information materials, on the agency's website, in press releases, in public notices, or in published documents:

A-NPDC is committed to ensuring that no person is excluded from participation in, or denied the benefits of its services on the basis of race, color or national origin, as protected by Title VI. For additional information on A-NPDC's nondiscrimination policies and procedures, or to file a complaint, please visit the website at www.esvaplan.org or contact the Title VI Program Manager, 23372 Front Street, P.O. Box 417, Accomac, Virginia 23301.

Instructions for filing Title VI complaints are posted on the agency's website and in posters in the agency's facilities.

A copy of the Title VI Complaint Form is attached as APPENDIX B.

MONITORING TITLE VI COMPLAINTS

As part of the complaint handling procedure, the Program Manager investigates possible inequities in service delivery about which the complaint was filed. If inequities are discovered during this review, options for reducing the disparity are explored, and service changes are planned, if needed.

In addition to the investigation following an individual complaint, the Program Manager periodically reviews all complaints received to determine if there may be a pattern.

PROCEDURES FOR HANDLING AND REPORTING INVESTIGATIONS/COMPLAINTS AND LAWSUITS

The Federal Highway Administration (FHWA) Title VI Program is governed by several authorities. Title VI of the Civil Rights Act of 1964 (42 U.S.C. 2000d) provides that "[n]o person in the Unites States shall, on the ground 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 U.S. Department of Transportation (USDOT) implemented its Title VI program in 49 CFR Part 21. Specific provisions regarding the investigation of complaints are found at 49 CFR §21.11. The FHWA follows the USDOT regulations. Further, FHWA's regulations at 23 CFR §200.9(b)(3) direct State Departments of Transportation (State DOTs) to develop procedures for processing Title VI complaints filed with State DOTs against their Federal-aid highway sub recipients.

PROCEDURES

1. Any person who believes they – or a specific class of persons – were subjected to discrimination on the basis of race, color, or national origin in the programs and activities of a primary Recipient of Federal financial assistance (e.g., a State DOT) or sub recipient (e.g., a town, county, or planning organization that receives Federal financial assistance through a primary Recipient) may file a Title VI complaint.
    a. Complaints related to the Federal-aid highway program may be filed with a Recipient State DOT, FHWA Division Office, the FHWA Headquarters Office of Civil Rights (HCR), the USDOT Department Office of Civil Rights, or the USDOJ.
    b. According to USDOT regulations, 49 CFR §21.11(b), a complaint must be filed not later than 180 days after the date of the last instance of alleged discrimination, unless the time for filing is extended by the processing agency.
    c. Complaints should be in writing and signed and may be filed by mail, fax, in person, or email. However, the complainant may call the receiving agency and provide the allegations by telephone, and the agency should transcribe the allegations of the complaint as provided over the telephone and send a written complaint to the complainant for correction and signature. A complaint should contain the following information:
        - A written explanation of the alleged discriminatory actions;
        - The complainant'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);
        - The names of specific persons and respondents (e.g., agencies, organizations) alleged to have discriminated;

- Sufficient information to understand the facts that led the complainant to believe that discrimination occurred in a program or activity that received Federal financial assistance; and
- The date(s) of the alleged discriminatory act(s) and whether the alleged discrimination is ongoing.

d. All complaints should be routed to the FHWA Headquarters Office of Civil Rights (HCR) for processing. HCR is responsible for all determinations regarding whether to accept, dismiss, or transfer Title VI complaints filed against State DOTs or Sub recipients of Federal financial assistance.

e. Complaints should be forwarded from the initial receiving agency through the Federal-aid highway oversight hierarchy until the complaint reaches HCR. For example, if a complaint is filed with a Sub recipient, that receiving agency should forward the complaint to the State DOT, which should forward the complaint to the State's FHWA Division Office, which should forward the complaint to HCR. If a complaint is filed with a State DOT, then the State DOT should forward the complaint to the State's FHWA Division Office, which should forward the complaint to HCR.

f. State DOTs and Sub recipients must log all complaints received.

g. When HCR decides on whether to accept, dismiss, or transfer the complaint, HCR will notify the complainant, the FHWA Division Office, State DOT, and Sub recipient (where applicable).

h. Complaints may also be sent to HCR directly at:

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

TRANSPORTATION-RELATED TITLE VI INVESTIGATIONS, COMPLAINTS, AND LAWSUITS

BACKGROUND

All recipients shall prepare and maintain a list of any of the following that allege discrimination on the basis of race, color, or national origin:

- Active investigations conducted by FTA and entities other than FTA;
- Lawsuits; and
- Complaints naming the recipient.

This list shall include the date that the transportation-related Title VI investigation, lawsuit, or complaint was filed; a summary of the allegation(s); the status of the investigation, lawsuit, or complaint; and actions taken by the recipient in response, or final findings related to the investigation, lawsuit, or complaint. This list shall be included in the Title VI Program and information shall be provided as required. See Appendix C for a sample reporting form.

VI. PUBLIC OUTREACH AND INVOLVEMENT

PUBLIC PARTICIPATION PLAN

The Public Participation Plan (PPP) is a guide for ongoing public participation endeavors. Its purpose is to ensure that A-NPDC utilizes effective means of providing information and receiving public input on transportation decisions from low income, minority and language access populations, as required by Title VI of the Civil Rights Act of 1964 and its implementing regulations.

Under federal regulations, sub recipients must take reasonable steps to ensure that language access persons have meaningful access to their programs and activities. This means that public participation opportunities, normally provided in English, should be accessible to persons who have a limited ability to speak, read, write, or understand English.

In addition to language access measures, other major components of the PPP include: public participation design factors; a range of public participation methods to provide information, to invite participation and/or to seek input; examples to demonstrate how population-appropriate outreach methods can be and were identified and utilized; and performance measures and objectives to ensure accountability and a means for improving over time.

A-NPDC uses the Virginia Freedom of Information Act's public participation process that will determine how, when, and how often specific public participation activities should take place, and which specific measures are most appropriate. A-NPDC will publicize the public's rights and obligations in the Commission's decision-making processes. A-NPDC will design public participation outreach with a goal of improving access to the entire community. An example of the techniques that could be used include the Accomack-Northampton 2015 Community Survey methods description.

A-NPDC will make these determinations based on a demographic analysis of the population(s) affected, the type of plan, program, and/or service under consideration, and the resources available. Efforts to involve minority and LANGUAGE ACCESS populations in public participation activities may include both comprehensive measures, such as placing public notices, as well as targeted measures to address linguistic, institutional, cultural, economic, historical, or other barriers that may prevent minority and LANGUAGE ACCESS persons from effectively participating in our decision-making process.

VII. LANGUAGE ACCESS PLAN FOR PERSONS DESIRING LANGUAGE ACCESS

Language access is available to any individual wishing access to other languages or assistance in the use of the English language. Language access meets objectives set forth in Title VI of the Civil Rights Act, providing access to services for persons who desire it.

As required, A-NPDC developed a written Language Access Plan (below). Using 2025 Census and American Community Survey (ACS) data, A-NPDC has evaluated data to determine the extent of need for translation services of its vital documents and materials.

ASSESSMENT OF NEEDS AND RESOURCES

The need and resources for language access assistance were determined through a four-factor analysis:

FACTOR 1: ASSESSMENT OF THE NUMBER AND PROPORTION OF PERSONS LIKELY TO BE SERVED OR ENCOUNTERED IN THE ELIGIBLE SERVICE POPULATION

The agency has reviewed census data on the number of individuals in its service area and the languages they speak. Table 1 details the languages spoken among the population aged 5 years and above in Accomack and Northampton Counties as well as the population who speaks English less than "very well", as reported by the 2025 ACS. According to the data, approximately 6.3% (2,714 individuals) of the population in the covered region speak English less than "very well".

Table 1: Language Spoken at Home for the Population 5 Years and Over

Language	Population			Speaks English Less than "Very Well"			
	Accomack	Northampton	TOTAL	Accomack	Northampton	TOTAL	TOTAL Percent %
English	26,996	10,419	37,415	-	-	-	-
Spanish	3,091	845	3,936	1,602	384	1,986	50.5%
Other Indo-European Languages	1,145	185	1,330	427	40	467	35.1%
Asian and Pacific Island Languages	281	160	441	179	77	256	58%
Other	51	11	62	0	5	5	8.1%
TOTAL	31,564	11,620	43,184	2,208	506	2,714	6.3%

Source: US Census Bureau, 2019-2023 American Community Survey 5-Year Estimate

A-NPDC currently provides Spanish and Haitian Creole language outreach materials and obtains non-English translation services on an as-needed basis. The Haitian Creole population has emerged since the 2010 Haitian earthquake and subsequent sovereign crises. The Program Manager will continue to work to improve the number of materials available in Haitian Creole. The Program Manager will continue to monitor population change in the future and add language materials as needed. The A-NPDC website, www.esvaplan.org, offers a translation plug-in for individuals to utilize language access. Publications and other materials can be translated upon request.

FACTOR 2: ASSESSMENT OF FREQUENCY WITH WHICH INDIVIDUALS COME INTO CONTACT WITH THE AGENCY

In FY2025, there were five instances where there was a need for translation services. These translations services are immediately available.

The Program Manager will continue to identify emerging populations as updated Census and American Community Survey data become available for our service area. In addition, when language access persons contact our agency, we will attempt to identify their language and keep records on contacts to assess accurately the frequency of contact.

FACTOR 3: ASSESSMENT OF THE NATURE AND IMPORTANCE OF SERVICES TO THE POPULATION

A-NPDC currently provides planning and housing counseling services to the community; however, A-NPDC also staffs the Accomack-Northampton Regional Housing Authority. Some service programs of that agency are critical to all segments of the population. A-NPDC currently works with non-English speaking clients and will continue to make efforts to improve the client experience with the agency.

FACTOR 4: ASSESSMENT OF THE RESOURCES AVAILABLE TO THE AGENCY AND COSTS

We have noted that the costs of these activities have increased. Future budgets and staff trainings will reflect needs assessed.

MONITORING/UPDATING THE PLAN

This plan will be reviewed on a periodic basis, based upon feedback, updated demographic data, and resource availability. If new groups are identified, A-NPDC will strive to address the needs for additional language assistance.

LANGUAGE ACCESS IMPLEMENTATION PLAN

Through the four-factor analysis, A-NPDC has determined that a written Language Implementation Plan is not required at this time, which is permissible under FTA Circular C4702.1A. The A-NPDC understands that the absence of a written language access plan does not obviate the underlying obligation to ensure meaningful access by language access persons to our program or activities. When appropriate, A-NPDC will provide translation of vital documents, provide access to language assistance services, and provide staff training on policies and procedures related to assisting persons desiring language access. A summary of outreach efforts is attached as APPENDIX D.

MINORITY REPRESENTATION ON PLANNING AND ADVISORY BODIES

Title 49 CFR Section 21.5(b)(1)(vii) states that a recipient may not, on the grounds of race, color, or national origin, "deny a person the opportunity to participate as a member of a planning, advisory, or similar body which is an integral part of the program."

A-NPDC will seek additional diversity in race, color, and national origin on committees and work groups formed that make transportation planning-related decisions and will document recruitment efforts to encourage greater participation from minority segments of the community. These efforts will continue for each committee/work group formed in order to include representation of the entire community on transportation-related decisions and planning activities. Participation in future committees and/or work groups will be documented as indicated in Appendix E.

VIII. SERVICE CHANGES & PERIODIC REVIEW

A-NPDC follows the Commonwealth of Virginia's Freedom of Information Act public comment process. All planning efforts for changes to existing services, as well as new services, have a goal of providing equitable service.

The Program Manager will, at least annually, review a Commission program or project for Title VI implications and report their findings to the Executive Director.

The Program Manager's review report and update for FY2027

follows as **Appendix F.**

Title VI Public Notice

Title VI of the Civil Rights Act of 1964 prohibits discrimination on the basis of race, color, or national origin in programs and activities receiving Federal financial assistance. Specifically, Title VI provides that "no person in the United States shall, on the ground of race, color, or national origin, be excluded from participation in, be denied the benefits of, or be subjected to discrimination under any program or activity receiving Federal financial assistance" (42 U.S.C. Section 2000d).

A-NPDC is committed to ensuring that no person is excluded from participation in, or denied the benefits of its transportation services on the basis of race, color, or national origin, as protected by Title VI in Federal Transit Administration (FTA) Circular 4702.1B. If you think you are being denied participation in or being denied benefits of the transit services provided by A-NPDC or otherwise being discriminated against because of your race, color, national origin, gender, age, or disability, our contact information is:

Name/Title:	Anne Doyle/Director of Planning
Agency Name:	Accomack-Northampton Planning District Commission
Address:	23372 Front St, P.O. Box 417
City, State, Zip:	Accomac, Virginia 23301
Phone Number:	(757) 787-2936 x115
Email Address:	adoyle@esvaplan.org

APPENDIX B

TITLE VI COMPLAINT FORM

The link to the complaint form is available at www.esvaplan.org.

TITLE VI COMPLAINT FORM AND PROCEDURES

COMPLAINTS RELATED TO TRANSPORTATION: If you would like to submit a Title VI complaint to the Accomack-Northampton Planning District Commission (A-NPDC) that is related to the region's Transportation Safety Action Plan, please fill out the form below and send it to: Accomack-Northampton Planning District Commission, Attn: Title VI Coordinator, PO Box 417, Accomac, VA 23301. For complaints not related to Transportation Plans or Projects, please fill out the second form included in this document. For translation or other assistance, please contact the Title VI Coordinator at 757-787-2936.

For a copy of A-NPDC's full Title VI Plan, see www.esvaplan.org.

Name _____ Address _____

_____City _____Zip _____ Phone: Home

_____Work _____Mobile _____ Best time of

day to contact you about this complaint: _____

Email: _____

Basis of Complaint (circle all that apply):

Race	Color	National Origin (includes language access)

Date of alleged incident: _____ *Who*

discriminated against you?

Name _____ Name of Organization

_____

Address _____City _____Zip _____ Telephone

_____

Explain what happened, why you believe it happened, and how you were discriminated against. Indicate who was involved. Be sure to include how other persons were treated differently than you. If you have any other information about what happened, please attach supporting documentation to the form. (Attach additional pages if more space is needed.)

_____

_____

_____

_____

What remedy are you seeking for the alleged discrimination? Please note that this process will not result in the payment of punitive damages or financial compensation.

List any other persons that we should contact for additional information in support of your complaint. Please list their names, phone numbers, address, email address below.

Have you filed your complaint, grievance, or lawsuit with any other agency or court?

Who _____When

_____

Status (pending, resolved, etc.) _____Result, if known

_____

Complaint number, if known _____

Do you have an attorney in this matter? _____

Name (print) _____Phone _____ Address

_____City_____Zip_____ Signed

_____Date__

FHWA TITLE VI COMPLAINT PROCEDURES

Federal law prohibits discrimination on the basis of race, color, or national origin in any A-NPDC program, service, or activity. This prohibition applies to all departments of A-NPDC, its contractors, consultants, and anyone else who acts on behalf of the A-NPDC.

Complaints related to any federal-aid programs that are not related to the Safety Action Plan may be filed with A-NPDC and will be forwarded to the Virginia State Department of Transportation (VDOT) Office of Equity and Civil Rights. For complaints related to the other A-NPDC plans, please use the A-NPDC form and process outlined in the next section. If you need assistance to file your complaint or need interpretation services, please contact the A-NPDC Title VI Coordinator at 757-787-2936.

Anyone who believes they have been excluded from participation in, denied the benefits of, or otherwise subjected to discrimination under any A-NPDC program, service, or activity because of their race, color, or national origin may file a complaint.

These procedures cover any complaints filed under Title VI of the Civil Rights Act of 1964 as amended and the Civil Rights Restoration Act of 1987 relating to any program or activity administered by the RTC as well as sub-recipients, consultants, and contractors.

Federal Highway Administration (FHWA) Procedures

If a complaint is received by A-NPDC that relates to FHWA programs and activities the following steps will be taken. These procedures do not deny the right of the complainant to file formal complaints with other state or federal agencies or to seek private counsel for complaints alleging discrimination.

Reasonable efforts will be made to assist persons with disabilities, non-English speakers, and others unable to file a written complaint. For assistance in filing a complaint, please contact the A-NPDC Title VI Coordinator at 757-787-2936.

1. Any individual, group of individuals or entity that believes they have been subjected to discrimination prohibited by nondiscrimination requirements may file a written complaint with A-NPDC's Title VI Coordinator. A formal complaint must be filed within 180 calendar days of the alleged occurrence and be signed by the complainant. A-NPDC will not officially act upon or respond to complaints received verbally. Written complaints will be received by mail or email.

   Attn: Title VI Coordinator
   Accomack-Northampton Planning District Commission
   PO Box 417
   Accomac, VA 23301

   All Complaints must contain the following information:

- The complainant's contact information, including: full name, mailing address, phone number (and best time to call), and email address (if available)
- The basis of the complaint (e.g., race, color, national origin)
- The names of person(s) and/or agency/organization alleged to have discriminated
- A description of the alleged discriminatory actions
- The date(s) of the alleged discriminatory act(s) and whether the alleged discrimination is ongoing

2. Upon receipt of a verbal complaint, an A-NPDC representative will notify the party or parties of the A-NPDC Title VI Plan, direct them to the A-NPDC web page for the Plan and Complaint Form, and/or provide the complainant with a hard copy of as requested. The representative shall notify the Title VI Coordinator and Executive Director as soon as possible of the verbal complaint and action(s) taken to ensure policy compliance. The verbal complaint will be logged as such pending a formal and required written complaint.

3. Upon receipt of a written complaint, A-NPDC then forwards the complaint to VDOT Office of Equity and Civil Rights for processing by FHWA. VDOT investigates complaints only if delegated by FHWA after acceptance of a complaint. FHWA is responsible for all determinations regarding whether to accept, dismiss, or transfer the complaint and finding no violation or failure to comply.
   Complainants have the right to file a complaint directly with the federal funding agency. The following address is where Title VI complaints may be filed directly with FHWA: Federal Highway Administration U.S. Department of Transportation Office of Civil Rights 8th Floor E81-105
   1200 New Jersey Avenue, SE Washington,
   DC 20590 CivilRights.FHWA@dot.gov

4. When a complaint is forwarded to FHWA, the Complainant will be provided the name and contact information of the employee handling the complaint.
   Federal law prohibits retaliation against individuals because they have filed a discrimination complaint or otherwise participated in a discrimination investigation. Any alleged retaliation should be reported in writing to the investigator.

5. FHWA will render final decisions in all cases including those investigated by VDOT. There are no administrative appeal forums in Title VI complaints. Once FHWA issues its final agency decision, a complaint is closed.

6. The A-NPDC Title VI Coordinator will update the Title VI Complaint Log actions relating to the Title VI complaint throughout any complaint process and, as required, include the information in the Title VI Annual Accomplishments and Goals Report.

There is no prohibition against a complainant filing a Title VI complaint simultaneously with a local agency, VDOT, and FHWA.

TITLE VI COMPLAINT FORM AND PROCEDURES

COMPLAINTS NOT RELATED TO TRANSPORTATION: If you would like to

submit a Title VI complaint to the Accomack-Northampton Planning District Commission related to non-transportation plans, projects or other processes, please fill out the form below and send it to: Accomack-Northampton Planning District Commission, Attn: Title VI Coordinator, PO Box 417, Accomac, VA 23301. For translation or other assistance, please contact the Title VI Coordinator at 757-787-2936. For a copy of A-NPDC's full Title VI Plan, see www.esvaplan.org.

Name _____

Address _____City _____Zip _____

Phone: Home _____Work _____Mobile _____

Best time of day to contact you about this complaint: _____

Email: _____

Basis of Com	*plaint (circle all*	*that apply):*
Race	Color	National Origin (includes language access)

Date of alleged incident: _____

Who discriminated against you?

Name _____ Name

of Organization _____

Address _____City _____Zip _____

Telephone _____

Explain what happened, why you believe it happened, and how you were discriminated against. Indicate who was involved. Be sure to include how other persons were treated differently than you. If you have any other information about what happened, please attach supporting documentation to the form. (Attach additional pages if more space is needed.)

_____

_____

_____

_____

_____

_____

What remedy are you seeking for the alleged discrimination? Please note that this process will not result in the payment of punitive damages or financial compensation.

List any other persons that we should contact for additional information in support of your complaint. Please list their names, phone numbers, address, email address below.

Have you filed your complaint, grievance, or lawsuit with any other agency or court?

Who _____When

_____

Status (pending, resolved, etc.) _____Result, if known

_____

Complaint number, if known _____

Do you have an attorney in this matter? _____

Name (print) _____Phone _____

Address _____City_____Zip_____

Signed _____Date_____

TITLE VI COMPLAINT PROCEDURES

Federal law prohibits discrimination on the basis of race, color, or national origin in any A-NPDC program, service, or activity. This prohibition applies to all branches of A-NPDC, its contractors, consultants, and anyone else who acts on behalf of A-NPDC.

Complaints related to the Transportation Safety Action Plan or process may be filed with A-NPDC and will be forwarded to Virginia Department of Transportation (VDOT) Office of Equity and Civil Rights. If you need assistance to file your complaint or need interpretation services, please contact the A-NPDC Title VI Coordinator at 757-787-2936.

Anyone who believes they have been excluded from participation in, denied the benefits of, or otherwise subjected to discrimination under any A-NPDC program, service, or activity because of their race, color, or national origin may file a complaint.

These procedures cover any complaints filed under Title VI of the Civil Rights Act of 1964 as amended and the Civil Rights Restoration Act of 1987 relating to any program or activity administered by the RTC as well as sub-recipients, consultants, and contractors.

OTHER FEDERAL AGENCY PROCEDURES

These procedures do not deny the right of the complainant to file formal complaints with other state or federal agencies or to seek private counsel for complaints alleging discrimination. Every effort will be made to resolve complaints informally at the A-NPDC and sub-recipient level. The option of informal mediation meetings(s) between the affected parties and the A-NPDC Title VI Coordinator or a designated mediator may be utilized for resolution.

Reasonable efforts will be made to assist persons with disabilities, non-English speakers, and others unable to file a written complaint. For assistance in filing a complaint, please contact the A-NPDC Title VI Coordinator at 757-787-2936.

1. Any individual, group of individuals or entity that believes they have been subjected to discrimination prohibited by nondiscrimination requirements may file a written complaint with A-NPDC's Title VI Coordinator. A formal complaint must be filed within 180 calendar days of the alleged occurrence and be signed by the complainant. A-NPDC will not officially act upon or respond to complaints received verbally. Written complaints will be received by mail or in person.

   Attn: Title VI Coordinator
   Accomack-Northampton Planning District Commission
   PO Box 417
   Accomac, VA 23301

   All Complaints must contain the following information:

- The complainant's contact information, including: full name, mailing address, phone number (and best time to call), and email address (if available)
- The basis of the complaint (e.g., race, color, national origin)
- The names of person(s) and/or agency/organization alleged to have discriminated
- A description of the alleged discriminatory actions
- The date(s) of the alleged discriminatory act(s) and whether the alleged discrimination is ongoing

2. Upon receipt of a verbal complaint, an A-NPDC representative will notify the party or parties of the A-NPDC Title VI Plan, direct them to the A-NPDC web page for the Plan and Complaint Form, and/or provide the complainant with a hard copy of as requested. The representative shall notify the Title VI Coordinator and Executive Director as soon as possible of the verbal complaint and action(s) taken to ensure policy compliance. The verbal complaint will be logged as such pending a formal and required written complaint.

3. Upon receipt of the written complaint, A-NPDC will determine its jurisdiction, acceptability, the need for additional information, and the investigative merit of the complaint. In some situations, such as a conflict-of-interest determination, A-NPDC may request their cognizant agency, VDOT Office of Equity and Civil Rights or the appropriate state/federal agency to conduct the investigation. In the event an outside agency handles the investigation, they will follow their adopted procedures for investigating discrimination complaints, per their current Title VI Plan.

   Only qualified, well-trained investigators should conduct these investigations. No agency is allowed to investigate a complaint against itself.

4. If the complaint is against a sub-recipient, consultant, or contractor under contract with RTC, the appropriate division and/or agency shall be notified of the complaint within 15 days.

5. Once A-NPDC decides the course of action, the complainant and the respondent will be notified in writing of such determination within five (5) calendar days. The complaint will be logged into A-NPDCs Title VI records by the Title VI Coordinator along with the basis for the allegation.

6. In cases where A-NPDC assumes the investigation of the complaint, A-NPDC will provide the respondent with the opportunity to respond to the allegations in writing. The respondent will have ten (10) calendar days upon receipt to furnish A-NPDC with her/ his response to the allegations.

7. Within 60 days of receipt of the complaint, the Coordinator or outside agency investigator will prepare a written investigative report for A-NPDC's Executive Director. The report shall include a narrative description of the incident, identification of persons interviewed, findings, and recommendations for disposition.

8. The recommendation shall be reviewed by A-NPDC's legal counsel who may discuss the report and recommendations with the Coordinator and other appropriate staff. The report may be reviewed further and modified as needed, then approved by A-NPDC's Executive Director, and made final for its release to the parties. In some cases, an outside party will approve the final report.

9. Once the investigative report becomes final, briefings will be scheduled with each party within 15 calendar days. Both the complainant and the respondent shall receive a copy of the investigative report during the briefings and will be notified of their respective appeal rights.

10. A copy of the complaint and A-NPDC's investigative report will be forwarded to VDOT Office of Equity and Civil Rights or the appropriate oversight agency within 60 calendar days of the receipt of the complaint.

11. The Coordinator will update the Complaint Log actions relating to the Title VI complaint throughout any complaint process and, as required, include the information in the Title VI Annual Accomplishments and Goals Report.
If the complainant or respondent is not satisfied with the results of the investigation of the alleged discriminatory practice(s), she/he shall be advised of their rights to appeal A-NPDC's determination to the cognizant agency, Virginia Department of Transportation,
U.S. Department of Transportation, other federal agency providing the program funding or the U.S. Department of Justice. The complainant has 180 calendar days after the
appropriate agency's final resolution to appeal to the appropriate agency. Unless new facts not previously considered come to light, reconsideration of the final determination by the investigating agency will not be available.

In addition to the complaint process described above, a complainant may file a Title VI complaint with the following offices:

- Virginia Department of Transportation, Civil Rights Division Administrator, 1401 E. Broad Street, Richmond, VA 23219
- Federal Transit Administration Office of Civil Rights Attention: Title VI Program Coordinator East Building, 5th Floor – TCR 1200 New Jersey Ave., SE Washington, DC 20590
- United States Department of Justice Civil Rights Division Coordination and Review Section – NWB 950 Pennsylvania Avenue NW Washington, DC 20530

There is no prohibition against a complainant filing a Title VI complaint simultaneously with a Local Public Agency (LPA), VDOT, and FHWA.

APPENDIX C

INVESTIGATIONS, LAWSUITS, AND COMPLAINTS DOCUMENT

Table 2: FY2026 Investigations, Lawsuits, and Complaints

	Number Reported	Date	Summary (Include basis of complaint: race, color, or national origin)	Status	Action(s) Taken
Investigations	0				
1.					
Lawsuits	0				
1.					
Complaints	0				
1.					

APPENDIX D

SUMMARY OF OUTREACH EFFORTS

PUBLIC OUTREACH AND INVOLVEMENT

Public outreach and involvement apply to and affect A-NPDC's mission and work program as a whole, particularly agency efforts and responsibilities. The overall goal of the public outreach and involvement policy is to secure meaningful public notification about and participation in major actions and decisions. In seeking public comment and review, A-NPDC makes a concerted effort to reach all segments of the population.

PUBLIC OUTREACH ACTIVITIES

A-NPDC will take steps to ensure that minority, low-income, and members of the region desiring language access have meaningful access to public outreach and involvement activities when the need for additional public outreach is identified. Public notices appear currently in the local newspaper publication, on the community calendars of the region's radio stations, on the esvaplan.org website, on A-NPDC's social media, and are displayed on a screen in the A-NPDC office lobby. Additionally, a copy of the public portions of meeting packets are made available for public examination in the office lobby and on the website. Any changes to our program would be announced through the above media.

NON-ELECTED BOARD DIVERSITY

The Program Manager will make an effort to recruit steering committee and/or work group members that represent all segments of the community. The Program Manager will document these recruitment efforts.

APPENDIX E

TABLE OF MINORITY REPRESENTATION ON COMMITTEES BY RACE

1. ***Please provide a description of your selection process, including recruitment efforts made to encourage the participation of minorities on such committee(s)***

   There are no standing transportation committees at this time.

   A-NPDC staff request public bodies who appoint members to the Commission to consider the racial and ethnic diversity of their jurisdiction when recruiting and appointing members.

2. ***Please provide a table(s) depicting the racial breakdown of the membership of those committees***

Committee	Black or African American	White/Caucasian	Latino/Hispanic	American Indian or Alaska Native	Asian	Native Hawaiian or Other Pacific Islander	Other	Totals
Accomack-Northampton Planning District Commission Board	6 (46%)	7 (54%)						13

APPENDIX F

FY2027 ANNUAL REVIEW AND UPDATE

I. PROCEDURES FOR NOTIFYING THE PUBLIC OF TITLE VI RIGHTS AND HOW TO FILE A COMPLAINT

1. A complaint form is available to anyone at the front desk.
2. A copy of the complaint form is available in this report under Appendix B.
3. The complaint form is also available to be downloaded from the A-NPDC website (https://www.esvaplan.org/)
4. The Title VI Plan and Procedures and the A-NPDC's Affirmative Action Statement are also available on the website.
5. Copies of the complaint form were placed in all work vehicles.
6. Zero complaints were received in FY2026.

II. LANGUAGE ASSISTANCE PLAN FOR PERSONS DESIRING LANGUAGE ACCESS

7. In FY2025, A-NPDC renewed its contract with a language service, Liberty Language Services, to assist staff in communicating with clients with limited English proficiency.
    a. All A-NPDC staff received updated instructions on how to utilize the service.
    b. The service was not used in FY2026 for language translation.
8. Because Liberty Language Services provides interpretation for more than 200 languages, A-NPDC staff have the ability to communicate with all prospective clients.
9. The Commission and Board of Director packets for the Accomack-Northampton Planning District Commission, Eastern Shore of Virginia Housing Alliance, and Accomack-Northampton Regional Housing Authority have been updated with translation service availability language.
10. All A-NPDC Committee packets have been updated with translation service availability language.
11. The A-NPDC website has been updated with translation service availability language and now has a translation plug-in that allows viewers to auto-translate the entire website.

III. NEPA COMPLIANCE

12. A-NPDC Planning staff continues progress in the development of a region-wide comprehensive Safety Action Plan. Staff has recruited diverse community leaders to participate in the Save Streets and Roads for All Steering Committee to advise and oversee the preparation of the Safety Action Plan and subsequent safety implementation projects.
13. In 2026, USDOT obligated funds for A-NPDC to administer BUILD grant to design and construct a 17-mile segment of the Eastern Shore Rail Trail, a project that will connect towns and communities across Accomack and Northampton Counties. In compliance with NEPA, public outreach has been conducted for the Eastern Shore Rail Trail. Public meetings will be conducted specifically for the BUILD portion of this ongoing regional transportation project.