Title VI Program Implementation Plan

Approved by the Policy Board
on June 29, 2026

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Title 23 United States Code sections 134-135 and Title 49 United States Code 8 sections 5303-5304 and other federal laws require that metropolitan planning organizations (MPOs) be designated based on a minimum population threshold as defined in federal law to act as a decision-making agency and to receive certain funds for the purpose of carrying out a continuing, cooperative, and comprehensive transportation planning process. Act 132 (2015) designated the Oahu Metropolitan Planning Organization (OahuMPO) to be the MPO for the island of Oahu. It was also designated as a transportation management area (TMA) to be administratively attached with the State Department of Transportation (HDOT).

This Title VI (T6) Program Implementation Plan for OahuMPO outlines how the OahuMPO will provide equal access to the transportation planning process and will ensure that it is non-discriminatory in its policies, programs and activities. It is guided by 23 CFR 200 for FHWA requirements and FTA Circular C 4702.1B for FTA requirements. The Plan was completed in close consultation with the Hawaii Department of Transportation Civil Rights Office which has oversight over OahuMPO on T6 program implementation.

Acronyms and Abbreviations

AARP	American Association of Retired Persons
ADA	American Disability Act
CAC	Citizen Advisory Committee
CFADAR	Citizens for a Fair ADA Ride
C.F.R.	Code of Federal Regulations
EBT	Electronic Benefit Transfer
FFY	Federal Fiscal Year
FHWA	Federal Highway Administration of the USDOT
FTA	Federal Transit Authority of the USDOT
HDOT	State of Hawai‘i Department of Transportation
LEP	Limited English Proficiency
MPO	Metropolitan Planning Organization
OahuMPO	Oahu Metropolitan Planning Organization
ORTP	Oahu Regional Transportation Plan
UPWP	Unified Planning Work Program
PPP	Public Participation Plan
T6	Title VI
TAC	Technical Advisory Committee
TIP	Transportation Improvement Program
U.S.C.	United States Code
USDOT	United States Department of Transportation

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OAHU METROPOLITAN PLANNING ORGANIZATION
Title VI Program Plan

Introduction

The Oahu Metropolitan Planning Organization (OahuMPO) Title VI Implementation Plan is a formal document that explains how the agency ensures its transportation planning work is free from discrimination and provides equitable access for all communities. It outlines policies, procedures, monitoring, and reporting requirements that keep OahuMPO in compliance with federal civil rights laws.

This plan is a combined document designed to meet FTA and FHWA requirements and has been updated to reflect recent federal changes. As such, it is reviewed annually by FHWA and every three years by FTA. The OahuMPO submits the annual update for HDOT and FHWA approval no later than September 30. It submits updates for HDOT and FTA approval every three years. When there are no changes, the OahuMPO simply renews signatures on the policy statement and assurances document. The OahuMPO also submits annual accomplishment reports for FHWA requirements and triennial accomplishment reports for FTA requirements. Accomplishment reports are submitted every October.

Statement of Policy

The OahuMPO complies with Title VI of the Civil Rights Act of 1964, 49 CFR, part 21, and all related regulations and directives. It assures that no person shall, on the grounds of race, color, national origin, gender, age, or disability be excluded from participation in, be denied the benefits of, or be subjected to discrimination under any program or activity under any of its program, activity or service. It also assures that every effort will be made to prevent the discrimination of low-income and disadvantaged populations. Finally, it assures that every effort will be made to provide meaningful access to persons that have Limited English Proficiency (“LEP”), following HRS §321C, 2025 Hawaii Revised Statutes Title 19. Health 321C. Office of Language.

A signed Statement of Policy is included as Attachment 1.

Title VI Assurances

This OahuMPO Title VI applies to all OahuMPO programs, activities, and services, regardless of funding source. As a recipient of federal transportation planning funds from the United States Department of Transportation, OahuMPO acknowledges the relevant authorities guiding the use of federal funds and signs on to several general and specific assurances that are required by the U.S. Department of Transportation of MPOs. The signed set of Assurances, including Appendices A-E, and as required by the Federal Highway Administration (FHWA) is presented in Attachment 2.

Organization and Staffing

The OahuMPO organizational structure is outlined in Figure 1. The Policy Board is OahuMPO's decision-making body, and is supported by the Executive Director and staff, plus two advisory committees: a Technical Advisory Committee ("TAC") and a Citizen Advisory Committee ("CAC"). The TAC is tasked with providing technical input while the CAC is tasked with providing public input.

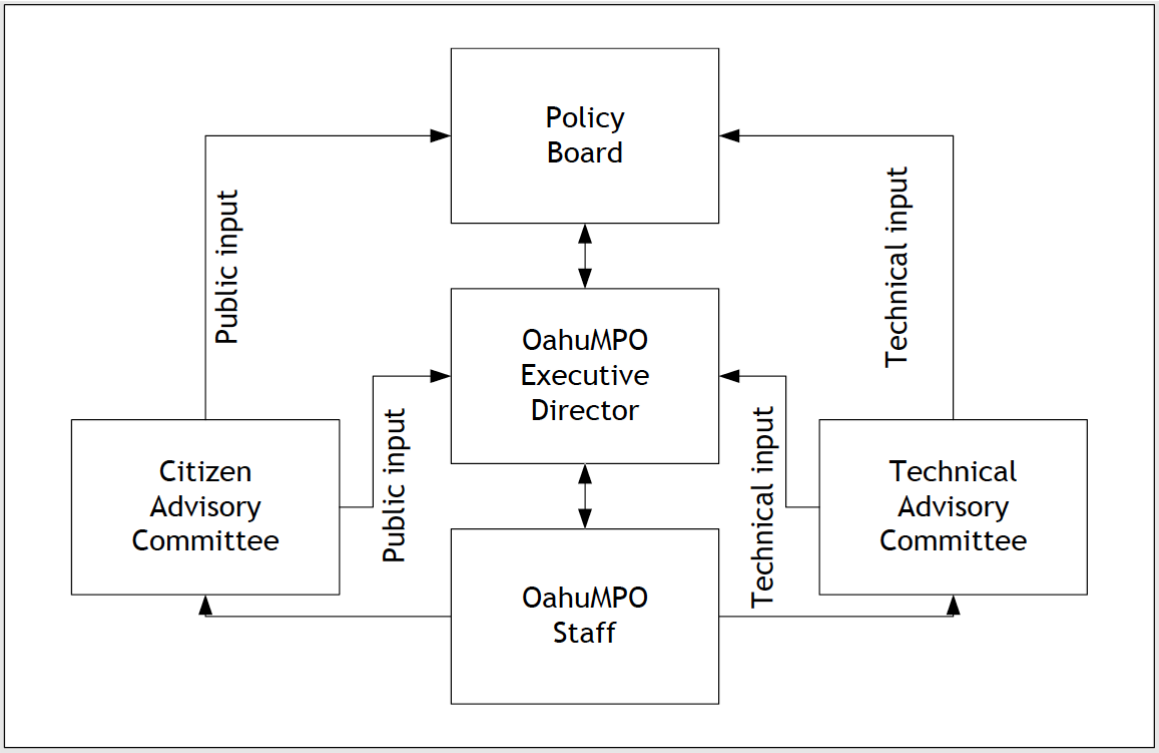


Figure 1. OahuMPO Organizational Structure

The Executive Director is the OahuMPO's designated Title VI Coordinator and Title VI Complaint Officer. This position leads the administration of the Title VI program and is invested with the authority to sign official documents on behalf of the OahuMPO. This ensures there are adequate resources, including qualified staff, to address the following T6 responsibilities:

- Coordinate T6 program development within the OahuMPO;
- Establish procedures for implementing T6 program review and subcontractors' review;
- Coordinate Title VI training for staff;
- Prepare required reports;
- Provide advice on T6 program to staff, Policy Board, CAC and TAC;
- Review and update this Plan as needed;

- Receive and respond to T6 complaints.

The Community Planner is the Title VI liaison to HDOT and a member of the HDOT interdisciplinary team.[1] Other staff members will support the T6 program based on their job descriptions and as assigned by the Executive Director.

Program Areas

The OahuMPO is specifically responsible for the following:

1. Oahu Regional Transportation Plan (ORTP)*.* This is the long-range, comprehensive, multimodal plan that identifies projects, programs, and policies to meet the transportation needs of Oahu. This plan looks at a 20- to 25-year period. Using various data collected by the OahuMPO, the ORTP identifies where disadvantaged populations live and measures investment in these census block groups. OahuMPO actions include:

- Identification of census block groups with high densities of disadvantaged populations;
- Allowing all populations the opportunity to provide comments on proposed projects, and reaching out to T6 populations.

2. Transportation Improvement Program (TIP)*.* This is a four-year program of federally funded projects and those that are regionally significant, that will be designed, engineered, and constructed within the near future. OahuMPO actions include:

- Analyze and compare investments in census block groups with high densities of disadvantaged populations to investments in census block groups without high densities of disadvantaged populations;
- Allowing all populations the opportunity to provide comments on proposed projects, and reaching out to T6 populations.

3. Unified Planning Work Program ("UPWP")*.* The UPWP is the bi-annual program of planning activities to be carried out by OahuMPO and eligible government agencies. Activities in the UPWP generally fall into these categories: OahuMPO operations, planning studies, other MPO work elements, and subrecipient work elements. OahuMPO actions include:

- Identification of planning activities that will encourage involvement by all, including T6 populations and stakeholders;
- Guidance and monitoring of OahuMPO's subrecipient agreements and work progress reports, including elements that are relevant in helping the OahuMPO meet its overall T6 program requirement;
- Use of project scoping and agreements to motivate subrecipients' cooperation.

[1] See page 11 of the HDOT Title VI Plan which is posted on https://hidot.hawaii.gov/administration/files/2026/01/SIGNED-FINAL-FHWA-FFY2026-Title-VI-Plan-11.24.2025-part-1-signed.pdf

The development of these work products is guided further by a set of Policy Board-approved policies and procedures.

Data Collection and Analysis

The OahuMPO uses data from the U.S. Census, public outreach, information on poverty guidelines from the U.S. Department of Health and Human Services, and others to inform it's planning work. The types and analysis are consistent with HDOT's data collection process outlined in HDOT's Title VI Plan Attachment D[2]. The OahuMPO uses a GIS-based T6 analysis tool developed to analyze the potential impacts of the Oahu Regional Transportation Plan (ORTP) and Transportation Improvement Program (TIP) projects on those populations. The data tool maps the concentration of T6 groups at a block group level, distinguishing between "T6 Population" and "Non T6 Population." The demographic analysis tool compares federally funded transportation projects between the two areas to determine Average Per Capita Investment from total project costs. Current procedures are documented in the OahuMPO Title VI and Minority and Low-Income Population Analysis. The OahuMPO will continue to explore new data analytics, reasonable use of available secondary data, be innovative in measuring equity, and collect primary T6 data for its planning processes and studies.[3]

Subrecipient Review Procedures

The term "subrecipient" has two contexts in this Plan. In the first context, the OahuMPO is a subrecipient of HDOT because federal funds apportioned to OahuMPO are received via HDOT. In this context, the OahuMPO will cooperate with any planned review set by HDOT and seek technical assistance from HDOT, FHWA or FTA as needed. In the second context, subrecipient refers to the eligible government agencies that receive planning funds through the UPWP. In this context, the OahuMPO monitors and reviews sub-award agreements, semi-annual work progress reports, and closeout reports. The OahuMPO also provides orientation or technical assistance to its subrecipients, as needed.

Staff Training

Key training for the Title VI program is coordinated with HDOT. As part of their orientation, all new Policy Board and technical advisory committee members, and OahuMPO employees are informed of this Plan and OahuMPO's T6 program obligations. All staff are encouraged to take advantage of free training opportunities, including those offered by FHWA National Highway Institute training and relevant State agencies (e.g., as the Office of Language

[2] See page 40 of HDOT Plan in https://hidot.hawaii.gov/administration/files/2026/01/SIGNED-FINAL-FHWA-FFY2026-Title-VI-Plan-11.24.2025-part-1-signed.pdf

[3] See page 9 of the 2023 USDOT FHWA and FTA TMA Federal Certification Review Report. The review recommends a more robust analysis of the benefits and impacts starting with the next ORTP and TIP. Refer to https://oahumpo.org/?wpfb_dl=2919

Access, Office of Information Practice, and the State Disability Communication and Access Board).[4] The OahuMPO staff also engage in periodic self-assessment, formally and informally, to identify competency gaps and solutions, distinguishing what can be improved through training and non-training methods. Opportunities for training are proactively sought as part of an effort to continuously improve compliance.

Complaint Procedures and Reporting

The public notification of rights under Title VI includes instructions on how to file a Title VI or discrimination complaint. In alignment with HDOT's Title VI Plan,[5] complaints received by the OahuMPO will be guided by the procedures outlined in Attachment 3.

The OahuMPO has not received any Title VI complaints nor lawsuits and has not been part of any investigation to date. If it does, it will include this in annual reports and cover the following, but not limited to said elements:

1. Item- complaint, investigation or lawsuit
2. Date Filed – month, day, and year
3. Summary, including basis of complaint (race, color, national origin or others)
4. Status of the complaint
5. Action(s) taken, if any

The OahuMPO Discrimination or Title VI Complaint Form can be found in Attachment 4.

Dissemination of Title VI Information

The following elements of information dissemination are meant to reduce barriers to participation by low income, minority, or disabled individuals:
Notifying the public of their right Under Title VI in vital documents, office, meeting places, and website. See Attachment 5.

- Disseminating public notice of meeting agenda to members of the public via accessible printed and electronic media, including posting on the OahuMPO website, City and County government event calendar, and State of Hawaii event calendar. The public notice will include instructions for auxiliary services like language interpretation and text telephone. See Attachment 6.
- Evaluation of Title VI action to ensure the effectiveness of information dissemination and other elements of public participation.
- Providing procedures and forms for filing a discrimination complaint against the OahuMPO.

[4] For examples, see 1) http://health.hawaii.gov/ola/training-and-conferences/
2) https://oip.hawaii.gov/training/ and 3) http://health.hawaii.gov/dcab/ada-curriculum-for-state-and-county-government-entities/

[5] See page 36 of the HDOT Title VI plan in https://hidot.hawaii.gov/administration/files/2026/01/SIGNED-FINAL-FHWA-FFY2026-Title-VI-Plan-11.24.2025-part-1-signed.pdf

- When possible, holding public meetings in locations that are convenient to low- and moderate-income neighborhoods and accessible to disabled populations.
- Upon request, all OahuMPO work products and documents will be made available in alternative formats (e.g., large type and languages other than English.)

Public Participation Plan

The OahuMPO maintains and updates a Public Participation Plan (PPP).[6] The PPP does the following:

- Outlines and demonstrates opportunities for public involvement and comments on key decision points during the development and planning of key OahuMPO work products.
- Requires the need to address participation of T6 populations.
- Recognizes the Citizen Advisory Committee (CAC) as a key entity in early and continuous public involvement. The CAC bylaws call for a CAC that is broadly-based to include minorities and disadvantaged groups.
- Requires further customization of public outreach and involvement for ORTP, TIP, and special studies. Partner agencies, like the City's Department of Transportation Services, and their consultants may choose to be guided by their public involvement methods and processes that meet federal requirements.
- Identification of resources on PPP techniques, tools, and methods.

Among others, customization of public outreach and involvement must address the following Title VI goals:

- To ensure full and fair participation by all potentially affected communities in the transportation decision-making process.
- To prevent the denial of, reduction in, or significant delay in the receipt of benefits by demographic minority and low-income populations.

Compliance and Enforcement Procedures

In alignment with the HDOT Title VI Plan, the OahuMPO cooperates with HDOT and participates in the latter's conduct of periodic Federal Title VI regulation compliance review. Self-reviews, as the need arises, are conducted from time to time to correct deficiencies.

The required annual report is completed not only for information, but also as an assessment of how the OahuMPO is faring in Title VI program implementation. An outline of this report is based on HDOT's Title VI Plan[7] and is presented in Attachment 7.

Limited English Proficiency

[6] The current OahuMPO's PPP is posted on https://oahumpo.org/public-participation-plan/

[7] See page 31 in https://hidot.hawaii.gov/administration/files/2026/01/SIGNED-FINAL-FHWA-FFY2026-Title-VI-Plan-11.24.2025-part-1-signed.pdf

An OahuMPO Language Access Plan, as required by Chapter 321C of the Hawaii Revised Statutes, aligned with the HDOT Language Access Plan[8], is presented in Attachment 8. It outlines the reasonable steps to assess and address the needs of Limited English Proficient persons, as defined at §321C-2, HRS, cannot fully and equally participate in or benefit from OahuMPO programs and activities.

Special Emphasis Program Areas

It is HDOT's role to identify areas that may exhibit potential discriminatory patterns. If warranted, the OahuMPO may recommend locations to HDOT for special emphasis consideration.

Additional FTA Requirements

A. A table depicting the membership of non-elected committee and councils, the membership of which is selected by the recipient, broken down by race, and a description of the process the agency uses to encourage the participation of minorities on subcommittees.

The Policy Board and the Technical Advisory Committee (TAC) are non-elected bodies, whose membership is established in the Comprehensive Agreement. The Citizen Advisory Committee (CAC) member organizations are based on member interest, require an application for membership, and approval by the Policy Board.

At present, 18 of the 36 Oahu's publicly elected neighborhood boards are members of the CAC. Of the 17 current non-neighborhood board members in the CAC, three entities advocate for subgroups of T6 and ADA population. They are the American Association of Retired Persons (AARP), Citizens for a Fair ADA ride (CFADAR), and the Hawai'i Association of the Blind.

A breakdown of the CAC by ethnicity/race is presented below alongside the population of Honolulu County to assess whether the CAC is representative of Honolulu's T6 and broader demographic population.

[8] See Page 45 in the above link.

Table 1. Ethnicity/Race Data Profile for Oahu Population and CAC members

	2026 CAC Survey	**2024 ACS 1-Year Estimates** (Honolulu County)
Total Population	30	998,747
One Race	71.4%	72.2%
Two or More	28.6%	27.8%
Ethnicity/Race (Alone or in combination with one or more races)	**2026 CAC Survey**	**2024 ACS 1-Year Estimates** (Honolulu County)
White	66.7%	18.3%
Black or African American	0%	2.3%
Asian	42.9%	41.2%
Native Hawaiian and Other Pacific Islander	14.3%	8.8%
Hispanic	0%	9.7%
Some other race	9.5%	4.8%

Notes: Data is derived from the CAC 2026 Survey Results as of April 15, 2026 and the 2024 American Community Survey 1-Year Estimates*. Both surveys asked respondents to select more than one ethnicity/race, if applicable. The 2026 CAC Survey reflects answers from 21 of 30 CAC representatives.*

In addition to the FTA requirements related to the race of CAC members, OahuMPO also collected other demographic information from members that would indicate whether they might represent a disadvantaged population. Other statistics include gender, age, employment status, primary mode of transportation, and identifying difficulties in hearing, vision, walking, etc. The following data details additional survey results:

- **Gender:**
  52.4% of members are female and 47.6% are male
- **Age:**
  80% are 65 years and older, 10% are 25-34 years old, 5% are 35-44 years old, 5% are 45-54 years old
- **Employment Status:**
  28.5% employed full time, 4.8% part time, 66.7% retired
- **Primary Mode of Transportation:**
  47.6% drive alone, 14.3% carpool, 23.7% use public transit, 4.8% bike, 4.8% use rideshare services, 4.8% uses another form of transportation
- **Use of Public Transit:**
  19% never, 47.6% rarely (a few times a year), 14.3% a few times a month, 14.3% a few times per week, 4.8% daily
- **Cars by Household:**
  57.1% have one car, 33.3% have two cars, 4.8% have 4 or more cars, 4.8% have none
- **Difficulties:**

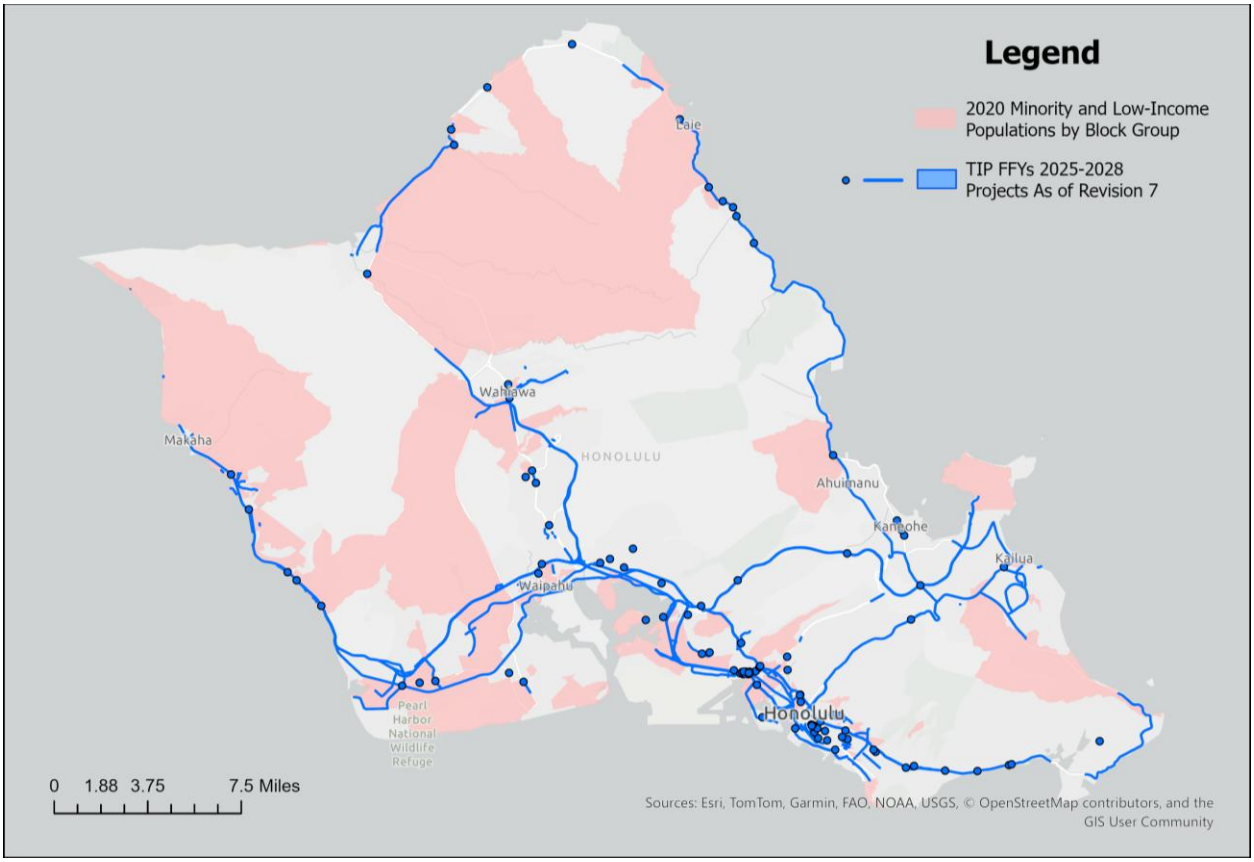
4.8% ambulatory difficulty, 4.8% hearing difficulty, 4.8% independent living difficulty, 4.8% vision difficulty, 80.8% did not identify a difficulty

Although members of non-elected committee and councils do not entirely represent the demographics of the region, the OahuMPO is making great efforts to reach disadvantaged communities through inclusive outreach events and by creating partnerships with local organizations that that directly serve these populations.

B. Demographic Profile of the Metropolitan Area

The map below visually summarizes the areas with larger T6 population. The areas were determined based on a methodology that is outlined in the OahuMPO's Minority and Low-Income Population Analysis.

Map 1. Minority and Low-Income Population Areas (updated April 2026)



Source: Transportation Improvement Program Federal Fiscal Years 2025-2028 As of Revision 7 Appendix C: Minority and Low-Income Population Analysis

C. Description of the procedures by which the mobility needs of minority populations are identified and considered within the planning process.

OahuMPO's procedures include secondary data analysis, stakeholder analysis, and a PPP that intentionally requires outreach to T6 populations and customized public involvement plans for the ORTP, TIP, and special studies. Customized public involvement plans may be presented to the advisory committees and Policy Board for comments. A working group of partner and implementing agencies may also be established as needed to vet customized public involvement plans and to support implementation. For special studies that are done by partner agencies, public involvement plans may be customized based on their respective public participation plans.

As an example of a customized public involvement plan, the recent ORTP 2050 Public Involvement Plan places value on inclusivity and the missing voices of planning processes. In previous evaluations of outreach efforts conducted in the ORTP 2045, several groups were identified as underrepresented in the ORTP development process. These subgroups were zero car households, houseless populations, limited English proficiency populations, single parent households, and youth populations (both 18 and under and those aged 18-24).

C. Demographic maps that show the distribution of State and Federal funds in the aggregate of public transportation projects.

Table 1 examines the distribution of the Transportation Improvement Program Federal Fiscal Years 2025-2028 As of Revision 7 funding and projects to assess how funding is distributed relative to Title VI and non-Title VI populations. OahuMPO evaluates whether planned TIP investments result in disproportionately high or low investments for T6 populations. All projects with specific locations were mapped and analyzed based on the estimated total project and per capita expenditures.

The table below shows that while only 36% of the planned investments are in T6 areas, on a per capita basis, these areas will receive $1,814 more per person compared to non-T6 areas.

Financial Summary by Population Group*	Minority & Low-Income Block Groups	Non-Minority and Low-Income Block Groups	Difference
Estimated Total Project Expenditures	$1,582,703,843	$2,802,948,157	-$1,220,244,313
% Estimated Total Project Expenditures	36%	64%	-28%
Total Population (2020)	281,317	735,191	-453,874
Per Capita Expenditures	$5,626	$3,813	$1,814

*For the OC16 Honolulu Rail Transit Project, rail stations were used as specific locations

Source: Transportation Improvement Program Federal Fiscal Years 2025-2028 As of Revision 7 Appendix C: Minority and Low-Income Population Analysis

Attachment 1

TITLE VI NON-DISCRIMINATION POLICY STATEMENT &
STATEMENT OF COMMITMENT

The Oahu Metropolitan Planning Organization, hereinafter also referred to as the "OahuMPO", will effectuate the provisions of Title VI of the Civil Rights Act of 1964, 49 Code of Federal Regulation (CFR) Part 21, 23 CFR Part 200 and other applicable directives. These authorities provide that no person in the United States shall, on the grounds of race, color, national origin, sex, age or disability be excluded from participation in, be denied the benefits of, or be otherwise subjected to discrimination under any program or activity for which the OahuMPO receives federal assistance.

Further, as a recipient of federal-aid funding, the OahuMPO strives to achieve nondiscrimination in all its programs and activities whether or not those programs and activities are federally funded. These efforts to prevent discrimination will address, but not be limited to, a program's impact upon access, benefits, participation, treatment, services, contracting opportunities, training opportunities, investigation of complaints, allocation of funds, prioritization of projects, and the functions of right-of-way, research, planning, design, construction, and project development. The OahuMPO will ensure that every manager, supervisor, employee, and sub-recipient of federal-aid funds administered by the OahuMPO is aware of and applies the intent and spirit of Title VI of the Civil Rights Act of 1964 and other nondiscrimination authorities in performing assigned duties.

Every employee and representative of the OahuMPO shall perform all official equal employment opportunity actions in an affirmative manner, and in full accord with applicable statutes, executive orders, regulations, and policies enunciated there under, to assure the equality of employment opportunity, without regard to race, color, national origin, sex, age, disability or low-income both in its own workforce and in the workforces of contractors, subcontractors, and material suppliers engaged in the performance of federal-aid highway construction contracts.

The Community Planner has been designated as the OahuMPO's Title VI Coordinator and is responsible for ensuring that all matters relating to nondiscrimination are administered effectively.

Employees of the OahuMPO, contractors or applicants with questions, problems or complaints regarding this statement, and the implementation of the stated provisions, should contact Executive Director, Mark Garrity at (808) 586-2308 and/or mark.garrity@OahuMPO.org.

Signed:

Mark Garrity, Executive Director

Date: 06/02/2026

Oahu Metropolitan Planning Organization
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Attachment 2

Title VI Standard Assurances

The O'ahu Metropolitan Planning Organization, (herein referred to as the "OahuMPO"), HEREBY AGREES THAT, as a condition to receiving any Federal financial assistance from the U.S. Department of Transportation (USDOT), through the *Hawai'i Department of Transportation (HDOT),* 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 on the basis of race, color, national origin);
- 49 C.F.R. Part 21 (entitled *Nondiscrimination In Federally-Assisted Programs Of The Department Of Transportation – Effectuation Of Title VI Of The Civil Rights Act Of 1964);*
- 28 C.F.R. section 50.3 (U.S. Department of Justice Guidelines for Enforcement of Title VI of the Civil Rights Act of 1964);

The preceding statutory and regulatory cites 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 O'ahu Metropolitan Planning Organization (OahuMPO) hereby assures that it will promptly take any measures necessary to ensure that:

"*No person in the United States shall, on the grounds of race, color, national origin, English language proficiency, religion, gender and sexual orientation, be excluded from participation in, be denied the benefits of, or be otherwise subjected to discrimination under any program or activity," for which the OahuMPO receives federal financial assistance from US Department of Transportation (USDOT), through the Hawai'i Department of Transportation (HDOT).*

The Civil Rights Restoration Act of 1987 clarified the original intent of Congress, with respect to Title VI and other Non-discrimination 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 non-discrimination statues and requirements to include all programs and activities of the Recipients, so long as any portion of the program is Federally-assisted.

Specific Assurances

More specifically, and without limiting the above general Assurances, the Oʻahu Metropolitan Planning Organization agrees with and gives the following Assurances with respect to its Federally-assisted programs and activities.

1. The OahuMPO 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 OahuMPO 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 Federal-Aid Highway Program and, in adapted form, in all proposals for negotiated agreements regardless of funding source:

> *"The* OahuMPO *in accordance with the provisions of Title VI of the Civil Rights Act of 1964 (78 Stat. 252, 42 US.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 OahuMPO will insert the clauses of Appendix A and E of this Assurance in every contract or agreement subject to the Acts and the Regulations.

4. The OahuMPO 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 OahuMPO 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 OahuMPO 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 OahuMPO will include the clauses set forth in Appendix C and Appendix 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 OahuMPO with other parties:

a. for the subsequent transfer of real property acquired or improved under the applicable activity, project, or program; and
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 OahuMPO 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 OahuMPO, or any transferee for the longer of the following periods:

    a. 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
    b. the period during which the OahuMPO retains ownership or possession of the property.

9. The OahuMPO 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.

10. The OahuMPO 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.

By signing this ASSURANCE, the OahuMPO also agrees to comply (and require any sub-recipients, sub-grantees, contractors, successors, transferees, and/or assignees to comply) with all applicable provisions governing the USDOT access to records, accounts, documents, information, facilities, and staff. You also recognize that you must comply with any program or compliance reviews, and/or complaint investigations conducted by the USDOT. You must keep records, reports, and submit the material for review upon request to USDOT, or its designee in a timely, complete, and accurate way. Additionally, you must comply with all other reporting, data

collection, and evaluation requirements, as prescribed by law or detailed in program guidance.

The OahuMPO 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 USDOT Federal Highway Administration or Federal Transit Administration. This ASSURANCE is binding on the *State of Hawaiʻi,* other recipients, sub-recipients, sub-grantees, contractors, subcontractors and their subcontractors, transferees, successors in interest, and any other participants in the *Federal-Aid Highway Program and Federal Transit Administration*. The person(s) signing below is authorized to sign this ASSURANCE on behalf of the OahuMPO.

FOR OAHU METROPOLITAN PLANNING ORGANIZATION

Mark Garrity
Executive Director

Date 06/02/2026

Attachment 2 - 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 Nondiscrimination in Federally-assisted programs of the U.S. Department of Transportation, the Federal Highway Administration, 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, or national origin 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, 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 Nondiscrimination on the grounds of race, color, or national origin.

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 Federal Highway Administration to be pertinent to ascertain compliance with such Acts, 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 Federal Highway Administration, 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 noncompliance with the Non discrimination provisions of this contract, the Recipient will impose such contract sanctions as it or the Federal Highway Administration 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 Federal Highway Administration 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.

Attachment 2 (Cont.) - 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 Assurance 4:

NOW, THEREFORE, the U.S. Department of Transportation as authorized by law and upon the condition that the OahuMPO will accept title to the lands and maintain the project constructed thereon in accordance with the Regulations for the Administration of the State of Hawai'i HDOT, FHWA, OahuMPO*, and* the Regulations for the Administration of the Federal-Aid Highway Program and the policies and procedures prescribed by the *Federal Highway Administration* of the U.S. Department of Transportation in accordance and in compliance with all requirements imposed by Title 49, Code of Federal Regulations, U.S. Department of Transportation, Subtitle A, Office of the Secretary, Part 21, Nondiscrimination in Federally-assisted programs of the U.S Department of Transportation 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 OahuMPO 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 OahuMPO 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 OahuMPO*,* its successors and assigns.

The OahuMPO 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, or national origin, 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 OahuMPO 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, U.S. 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 non-discrimination conditions, the Department 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 make clear the purpose of Title VI.)

Attachment 2 (Cont.) - 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 OahuMPO pursuant to the provisions of Assurance 7(a):

A. The (grantee, lessee, 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. In the event facilities are 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, or national origin, will be excluded from participation in, denied the benefits of, or be otherwise subjected to discrimination in the use of said facilities.

B. With respect to licenses, leases, permits, etc., in the event of breach of any of the above Nondiscrimination covenants, the OahuMPO 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.*

C. With respect to a deed, in the event of breach of any of the above Nondiscrimination covenants, the OahuMPO will have the right to enter or re-enter the lands and facilities thereon, and the above described lands and facilities will there upon revert to and vest in and become the absolute property of the OahuMPO and its assigns.*

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

Attachment 2 (Cont.) - Appendix D

CLAUSES FOR CONSTRUCTION/USE/ACCESS TO REAL PROPERTY ACQUIRED UNDER THE ACTIVITY, FACILITY OR PROGRAM

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

A. 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 ground of race, color, or national origin, 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, or national origin, 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.

B. With respect to (licenses, leases, permits, etc.), in the event of breach of any of the above Nondiscrimination covenants, the OahuMPO 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.

C. With respect to deeds, in the event of breach of any of the above Non-discrimination covenants, the OahuMPO will there upon revert to and vest in and become the absolute property of the OahuMPO and its assigns.*

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

Attachment 2 (Cont.) - 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 authorities; including but not limited to:

Pertinent Nondiscrimination Authorities:

- 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); and 49 CFR Part 21.
- The Uniform Relocation Assistance and Real Property Acquisition Policies Act of 1970, (42 U.S.C. § 4601), (prohibits unfair treatment of persons 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 discrimination on the basis of disability); and 49 CFR Part 27;
- The Age Discrimination Act of 1975, as amended, (42 U.S.C. § 6101 *et seq.),* (prohibits discrimination on the basis of age);
- Airport and Airway Improvement Act of 1982, (49 USC § 471, Section 47123), as amended, (prohibits discrimination based on race, creed, color, national origin, or sex);
- The Civil Rights Restoration Act of 1987, (PL 100-209), (Broadened the scope, coverage and applicability of Title VI of the Civil Rights Act of 1964, The Age Discrimination Act of 1975 and Section 504 of the Rehabilitation Act of 1973, by expanding the definition of the terms "programs or activities" to include all of the programs or activities of the Federal-aid recipients, sub-recipients and contractors, whether such programs or activities are Federally funded or not);
- 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 Transportation regulations at 49 C.F.R. parts 37 and 38;
- The Federal Aviation Administration's Non-discrimination 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 you from discriminating because of sex in education programs or activities (20 U.S.C. 1681 et seq).

Attachment 3

Title VI Complaint Procedures

The law prohibits intimidation or retaliation of a person who files a complaint.

1. Any person who believes that he or she, individually, as a member of any specific class, or in connection with any disadvantaged business enterprise, has been subjected to discrimination on the basis of race, color, national origin, age, disability or sex, protected categories under Title VI and other related statutes, may file a Title VI complaint with the OahuMPO Title VI Complaint Officer. A complaint may also be filed by a representative on behalf of such a person. A complaint should be directed to:

   OahuMPO Title VI Complaint Officer
   707 Richard Street Suite 200
   Honolulu, Hawai‘i 96813-4623

   or

   Office of Civil Rights
   Hawai‘i State Department of Transportation
   200 Rodgers Boulevard
   Honolulu, Hawai‘i 96819

   Complaints may also be filed directly with the relevant funding agency:

   FTA Office of Civil Rights (Attention: Title VI Program Coordinator)
   1200 New Jersey Avenue SE
   5th Floor TCR
   Washington DC 20590

   or

   FHWA Office of Civil Rights
   1200 New Jersey Avenue SE
   8th Floor E81-105
   Washington DC 20590

2. To have the complaint considered under this procedure, the complainant must file the complaint no later than one hundred eighty (180) days after:
   a) The date of the alleged act of discrimination; or
   b) Where there has been continuing course of conduct, the date on which that conduct was discontinued.

3. Complaint may be filed using the OahuMPO discrimination complaint form (see Attachment 7). If the complaint is received by phone or a written complaint provides incomplete information, the complainant will be requested to complete the OahuMPO discrimination complaint form. The written complaint must be signed and dated by the complainant or their authorized representative. The complaint must contain the complainant's name and address (or specify another means of contacting them) and must describe the allegation in sufficient detail to allow for a determination whether the OahuMPO has jurisdiction over the complaint.

4. If the complaint is received by the OahuMPO office, it will be logged by the Secretary or Office Manager and forwarded to the OahuMPO Title VI Officer who will review the complaint. If received by HDOT, it will be processed following the procedures of the respective agency. All complaints filed and relating to FHWA-funded projects will be routed the FHWA Civil Rights Office while FTA-funded projects will be routed to the FTA Civil Rights Office in for review and final determination of jurisdiction. Both offices are in Washington D.C.

5. Title VI complaints, after review of the FHWA or FTA and assignment of jurisdiction to OahuMPO, will be assigned to the OahuMPO Discrimination Complaint Officer and other designated OahuMPO staff who are trained in conducting such investigation.

6. The first step in conducting the investigation will be the preparation of an investigation plan, identifying the following elements: a) basis of complaint; b) issues to be addressed; c) information needed to answer the question posed (what actually happened, who was involved, past practices, etc.); d) sources from which the information will be obtained (witnesses, written document, etc.); e) how the information will be obtained (telephone interviews, travel to other offices, review of records, etc.); and f) projected timeline for completion.

7. Within ten (10) working days of receiving the complaint and determination of jurisdiction by the FHWA or FTA Civil Rights Office in Washington D.C., the complainant will be notified in writing by the OahuMPO Title VI Complaint Officer regarding who will be conducting the investigation and anticipated timeline for completion.

8. One of the first steps in the investigation will be to meet with the complainant to clarify the issues and obtain additional information.

9. The respondent/s (party/parties named in the complaint) will be notified of the complaint.

10. Proceed with the steps outlined in the investigation plan.

11. After completing the investigation, the information will be evaluated and a written report prepared. The report will contain the following elements: a) description of the allegation; b)

summary of the investigation; c) relevant facts (findings); and d) supporting documents attached, when appropriate.

12. The written investigation report will be submitted to the HDOT Civil Rights Coordinator within ninety (90) days of the time the complaint was received. If circumstances require additional time, a status report will be submitted and a request for a time extension will be forwarded to the Office of the Secretary of Transportation for approval.

13. A copy of the report shall be sent to the Attorney General's Office for their information and file.

14. The OahuMPO Title VI Complaint Officer will meet with the HDOT Civil Rights Coordinator and/or their designees to discuss the findings and what further action may be appropriate. The Civil Rights Coordinator and/or investigator will meet with the HDOT Director. The HDOT Director shall make the final decision.

15. Any complainant dissatisfied with the decision of HDOT will be notified of further appeal rights to the following authorities:
    a. The complainant may seek appeal via administrative hearing via internal HDOT process. This appeal process is governed by §91, Hawaii Revised Statutes.
    b. The complainant may also file a separate complaint via the FTA Office of Civil Rights, via the contact information below:
        Federal Transit Administration Office of Civil Rights
        Attention: Complaint Team East Building, 5th Floor-TCR
        1200 New Jersey Avenue, SE Washington, DC 20590
        Phone: (202) 366-4043
    c. The complainant may also file a separate complaint via the U.S. Department of Transportation Departmental Office of Civil Rights as detailed at the following link: https://www.transportation.gov/civil-rights/complaint- resolution/public-complaint-process.
    d. The complainant may also wish to file a separate complaint via the Hawaii Civil Rights Commission. More information about this process can be found here: http://labor.hawaii.gov/hcrc/ and the complaint form for doing so may be found here: https://labor.hawaii.gov/hcrc/files/2020/11/Intake-Form-PA-AS-10- 23-2020-SCRW-10-30-fillable-form-sample-tm-11-20-better-boxes-working- form.pdf.
    e. The complainant may also wish to contact the U.S. Commission on Civil Rights for more information about where to find out additional avenues for appeal or complaint, which they can do so at the following link: https://www.usccr.gov/filing/.

16. Copies of all OahuMPO Title VI complaint and investigative reports will be sent to the HDOT, who in turn will send such to the FHWA or the FTA Civil Rights Office within 60 days of the receipt of the complaint.

Attachment 4

OʻAHU METROPOLITAN PLANNING ORGANIZATION

Discrimination or Title VI Complaint Form (English)

SECTION I		
Name (First, Middle Initial, Last Name):		
Address:	City & State	Zip Code
Telephone Number: Home	Work	Cell
Email Address:		
Accessible Format Requirement/s: Large Print ___ TDD ___ Audio Tape ___ Other (Specify) _____		

SECTION II
Are you filing this complaint on own behalf? Yes ___ No___
If you answered "Yes," please go to SECTION III. If you answered "No" and filing on behalf of someone else, please provide the name and relationship to the person for whom you are complaining. Name (First, Middle Initial, Last) _____ Relationship _____ Do you have the permission of the above person to file a complaint on their behalf? Yes __ No __ Please explain below why you have filed for the above person:

SECTION III
I believe the discrimination I experienced was based on (Circle all items that apply): Race Color National Origin Other, specify _____ When did the alleged discrimination happen? (Specify dates, mm/dd/yy)_____ Explain as clearly as possible how, what, when, and where you believe you were discriminated against. Include as much background information, including who was involved, and if known, include the name/s and contact information of the person(s) who discriminated against you. If more space is needed, please use and attach a separate sheet of paper.
Signature of Complainant or Representative _____ Date_____

SECTION V
Have you filed this complaint with any other Federal or State agency? Yes___ No___ If yes, please name all agencies that received this complaint_____ If yes, please provide information about a contact person at each agency/court from where the complaint was filed: _____
Are you attaching written materials or other information that you think is relevant to this complaint? Yes ___ No ___
_____ _____ Signature of Complainant or Complainant Representative Date Please submit this form, and any attachment, in person at the address below, or mail to: OahuMPO Title VI Complaint Officer 707 Richards Street Suite 200 Honolulu, Hawai'i 96813 Form updated June 2026

This form will also be translated as needed and upon request.

Attachment 5

Notification to the Public of Title VI Rights

Notifying the Public of Rights under Title VI

The Oʻahu Metropolitan Planning Organization ("OahuMPO") operates its programs and services without regard to race, color, national origin, sex, age, or disability in accordance with Title VI of the Civil Rights Act and its implementing regulations. Any person who believes she or he has been aggrieved by any unlawful discriminatory practice under Title VI may file a complaint with the OahuMPO.

For more information on the OahuMPO's Title VI Program, including the procedures for filing a discrimination complaint, contact the OahuMPO office by calling (808) 587-2015, emailing oahumpo@oahumpo.org, or visiting the OahuMPO Title VI and Minority and Low-Income Population Analysis page on https://oahumpo.org/participate/

If information is needed in another language, please contact (808) 587-2015.

Updated June 2026

Attachment 6

Language Included in Public Notice and Agenda of OahuMPO Meetings

To request language interpretation, an auxiliary aid or service (i.e., sign language interpreter, or materials in alternative format), contact OahuMPO at 587-2015 and email oahumpo@oahumpo.org six (6) days before the meeting date. TTY users may use TRS to contact our office. Please note that requests made less than the six (6) days requested cannot be assured. Requests made as early as possible have a greater likelihood of being fulfilled. Upon request, this notice is available in alternate formats.

Attachment 7

Title IV Annual Report Outline[9]

I. Purpose
II. Policy Statement
III. The Organization, Staffing, Structure
IV. Title VI Monitoring and Review Process
V. Complaints
VI. Accomplishments for Each Program Area
Appendices

[9] Further details in HDOT Plan Attachment B- Format for Annual Accomplishment Report, page 31 https://hidot.hawaii.gov/administration/files/2026/01/SIGNED-FINAL-FHWA-FFY2026-Title-VI-Plan-11.24.2025-part-1-signed.pdf

Attachment 8

OahuMPO Language Access Plan

1. The OahuMPO's Community Planner will be designated as OahuMPO's Language Access Coordinator.
2. The OahuMPO is committed to providing oral language services in a timely and competent manner as well and to offer written translation of vital documents into the primary language of LEP persons.
3. The Four-factor analysis will be implemented to determine meaningful access:
    - *The number or proportion of persons with Limited English Proficiency ("LEP") to be served or served in the eligible service population.* For determining the population of persons with LEP, the OahuMPO will use the U.S. Census Bureau Language Use data for "Language Spoken at Home" and "Speak English than very well."
    - *The frequency with which persons with LEP comes in contact with the services, programs, or activities of OahuMPO*. The OahuMPO conducts public outreach as part of transportation planning. Contact with persons with LEP is not common but it may occur during periods of public outreach and comment period during major plan updates and planning studies.
    - *The nature and importance of the services, programs, or activities*. The OahuMPO does not provide direct transportation services to individuals nor manage the design or construction of transportation projects. However, it is responsible for information on how federal transportation funds will be expended which directly affects all members of the public. It is important for the needs and desires of persons with LEP to be heard in this planning process. The planning process is often the first of multiple points of contact and opportunities for public input in the project development process.
    - *The resources available to the recipient and the cost for two types of assistance service -oral (interpretation) and written (translation).* The OahuMPO can provide both written and oral assistance services, upon request, but the OahuMPO does not have the resources to translate all documents and provide translation serves at all public meetings as a regular course of business. It will provide, upon request, translations of its major documents. Led by the language access coordinator, it will review its documents and determine which ones are vital documents. If there is a consistent need for translations, it will consider additional appropriate measures to serve the language access needs of those persons. To address immediate needs, it will use the resources provided by the Hawai'i Office of Language Access to identify the need for interpretation in one of 22 languages that are likely to be the primary languages spoken by people with LEP in the island. It will also survey staff and create a volunteer OahuMPO Bilingual staff among those who are willing to help with interpretation. It will refer to the HDOT Language Access plan's list of service providers if it needs to hire an outside interpreter to provide meaningful access. It will prioritize using the services of those in the State Procurement list with the assumption that these vendors have been vetted.

4. *Informing the public about their right*s. The OahuMPO will be responsible for informing the public of the right to free language assistance in their spoken language. Language identification cards or posting signs in public areas can be used to provide such notice.

5. *Training and capacity building*. All staff members with direct roles in implementing all or any part of this Plan shall be trained. The Language Access coordinator shall facilitate needed training in coordination with the State Office of Language Access, the HDOT and/or the FHWA. Implementation procedures and protocols shall also be developed and updated to ensure that standards of language assistance need are consistently met.

6. *Accountability and reporting*. Language access will be monitored and reported on as part of regular Title VI compliance review. The Plan will be reviewed annually as part of OahuMPO's Title VI Plan updating.

Attachment 9

Approval by the Policy Board
(June 29, 2026 Meeting)

Links to Sources

https://hidot.hawaii.gov/administration/files/2026/01/SIGNED-FINAL-FHWA-FFY2026-Title-VI-Plan-11.24.2025-part-1-signed.pdf

https://www.transit.dot.gov/regulations-and-guidance/transportation-planning/certification-review

https://oahumpo.org/?wpfb_dl=2919

http://health.hawaii.gov/ola/training-and-conferences/

https://oip.hawaii.gov/training/

http://health.hawaii.gov/dcab/ada-curriculum-for-state-and-county-government-entities/

https://www.oahumpo.org/plans-and-programs/public-participation-plan/

https://www.honolulu.gov/dpp/resources/neighborhood-profiles-by-plan-area/

https://health.hawaii.gov/ola/files/2024/07/OCR-1.9137-2023-HDOT-Language-Access-Plan-FINAL-Web-Copy_Redacted.pdf