



**Miami Valley Regional Planning Commission**

**Title VI Program Plan and Procedures Description**

**Updated: June 1, 2023**

**Miami Valley Regional Planning Commission  
Title VI Program Plan and Procedures Description**

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- 
1. Documentation of Review and Approval of the Title VI Program Plan by the MVRPC Board of Directors



# MIAMI VALLEY

Regional Planning Commission

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## RESOLUTION 23-026 APPROVING THE MIAMI VALLEY REGIONAL PLANNING COMMISSION TITLE VI PROGRAM

**WHEREAS**, the Miami Valley Regional Planning Commission is designated as the Metropolitan Planning Organization (MPO) by the Governor acting through the Ohio Department of Transportation in cooperation with locally elected officials for Greene, Miami and Montgomery Counties including the jurisdictions of Carlisle, Franklin, Franklin Township and Springboro in Warren County; and

**WHEREAS**, the MVRPC's Board of Directors serves as the policy and decision making body through which local governments guide the MPO's transportation planning process for the Dayton Metropolitan Area; and

**WHEREAS**, federally funded programs require Title VI programs and assurances; and

**WHEREAS**, MVRPC has developed and used a Title VI program for many years and has periodically submitted a program description to FTA and ODOT/FHWA as required; and

**WHEREAS**, FTA Title VI regulations require Board approval of the MPO's Title VI program every three years; and

**WHEREAS**, the MVRPC Board of Directors adopted a resolution on October 1, 2020 that Ensures Diversity, Equity, and Inclusion in all MVRPC processes and decision, and that supports compliance with Title VI of the Civil Rights Act of 1964 as an important tool to ensure an equitable Region.

**NOW, THEREFORE BE IT RESOLVED** that the Commission approves the Miami Valley Regional Planning Commission Title VI program.

**BY ACTION OF THE** Miami Valley Regional Planning Commission's Board of Directors.

**Brian O. Martin, AICP**  
Executive Director

6/1/2023

Date

**Greg Simmons, Chairperson**  
Board of Directors of the  
Miami Valley Regional Planning Commission

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2. Agency Disclaimer of Organizational Scope and Operations

**Miami Valley Regional Planning Commission Information**

The Miami Valley Regional Planning Commission (MVRPC) is a regional planning commission and is the Metropolitan Planning Organization (MPO) for the Dayton, Ohio urbanized area. MVRPC is not a transit agency and does not operate any transit equipment or facilities.

MVRPC is composed of a board of delegates who represent the communities of the region. Unlike appointed members, the MVRPC governmental board delegates are voluntary members who are elected by their constituents to serve as representatives of their communities on the MVRPC Board of Directors. MVRPC board delegates from other/non-governmental members are employees of the other/non-government members. Advisory Committees are formed in a similar way. MVRPC does not select board members or other committee members and therefore is not required to provide a demographic profile.

During the past three years, MVRPC has not received any transit related investigations, complaints, or lawsuits.

MVRPC has not constructed any transit facilities and therefore is not required to perform a facility site equity analysis.

MVRPC does not provide any transit services and does not operate any fixed route service.

MVRPC is not actively an FTA recipient and, thus, does not have FTA sub-recipients.

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**This document is a compilation of the Miami Valley Regional Planning Commission’s (MVRPC) Title VI program procedures for all agency planning activities, consultant contracting and agency administration.**

### 3. Designation of Agency Title VI and DBE Program Coordinator

MVRPC has assigned a staff member – Fabrice Juin, Regional Equity Initiative Program Manager – to monitor and review Title VI issues. This staff member is part of MVRPC’s planning team and attends all meetings of the Board of Directors and Executive Committee. The job description of this position states the staff member will serve as the Agency’s Title VI leader and expert on diversity, inclusion and equity. Title VI duties include responsibilities for monitoring compliance, consultant contracts and MVRPC employee policies.

### ORGANIZATION CHART



## Organization Chart



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4. Agency Non-Discrimination Policy Statement and Assurance of Compliance with Title VI

The following Non-Discrimination Policy Statement is posted publicly on the agency website (<https://www.mvrpc.org/non-discrimination-policy>):

*As a recipient of federal transportation funds, the Miami Valley Regional Planning Commission provides Assurance of Compliance with U. S. Department of Transportation requirements in regards to Title VI and Civil Rights. MVRPC's Title VI program is described in a document entitled, "Miami Valley Regional Planning Commission Title VI Program Plan and Procedures Description", which includes instructions on how to file a complaint and a complaint form. As recipients of federal funds, the Miami Valley Regional Planning Commission and their contractors, subcontractors, material suppliers, vendors, and consultants must:*

- *Ensure nondiscrimination in all of their programs and activities, whether those programs and activities are federally-funded or not. The factors prohibited from consideration as a basis for discriminatory action or inaction include race, color, national origin, biological sex, sexual orientation and gender identity, disability, age, religion, genetic information, military status, low-income status, or limited English proficiency.*
- *Provide Equal Employment Opportunity by not discriminating in employment based on race, religion, color, sex, national origin, disability, genetic information, age, sexual orientation, or military status.*

The Assurance of Compliance, Title VI Program Plan and Procedures and Description, and Title VI Complaint Form documents are made publicly available via the agency website (<https://www.mvrpc.org/non-discrimination-policy>) and physical copies are maintained within the agency office (front desk and bulletin board) for public access.

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ASSURANCE OF COMPLIANCE WITH EQUAL OPPORTUNITY NON-DISCRIMINATION,  
INCLUDING TITLES VI AND VII OF THE CIVIL RIGHTS ACT OF 1964, THE AGE  
DISCRIMINATION IN EMPLOYMENT ACT, THE REHABILITATION ACT, THE AMERICANS  
WITH DISABILITIES ACT and Other \*FEDERAL NON-DISCRIMINATION LAWS

Per Title VI of the Civil Rights Act of 1964 which states that “No person in the United States shall, on the ground of race, color, or national origin, be excluded from participation in, be denied benefits of, or be subjected to discrimination under any program or activity receiving Federal assistance”, the Miami Valley Regional Planning Commission agrees that it will comply with this mandated regulation as it applies to the planning process and planning products produced by metropolitan planning organizations that act as beneficiaries of Federal assistance.

Additional laws forbid discrimination on the basis of certain protected classes:

- Federal Highway Act of 1973 §162(a) prohibits discrimination based on sex
- Rehabilitation Act of 1973 §504 prohibits discrimination based on disability
- Age Discrimination Act of 1975 prohibits discrimination based on age
- Americans with Disabilities Act of 1990 prohibits discrimination based on disability

The Miami Valley Regional Planning Commission agrees to also comply with these additional protections under any program from recruitment, employment, employee training or activity for which it receives federal financial assistance either directly or indirectly from the federal departments, and other federal, state and local government sources as well as any and all national, regional, and local private funds; and hereby gives assurance that it will in all phases and levels of program and activities, act affirmatively to achieve equal opportunities for participation by actively seeking out qualified people for due consideration for availability and job opportunities and encouraging the involvement of the socially and/or physically disadvantaged population in all phases of the program.

In all cases, this assurance shall obligate this agency, the Miami Valley Regional Planning Commission, for the period during which the federal, state and local financial assistance are extended to it.

This assurance is given in consideration of and for the purpose of obtaining either directly or indirectly any and all federal grants, loans, contracts, property, or discounts, or other federal financial assistance extended after the date hereof to Miami Valley Regional Planning Commission by the United States federal departments and any and all other governmental agencies — including installment payments after such date on account of applications for financial assistance which were approved before such date; and any and all sources of private funding. Miami Valley Regional Planning Commission recognizes and agrees that such financial assistance will be extended in reliance on the representations and agreements made in this assurance, and that the United States Government as well as state and local Civil Rights Commissions duly recognized shall have the right to seek judicial enforcement of this assurance. This assurance is binding on Miami Valley Regional Planning Commission, its successors, transferees, and assignees.

Any person who believes that they have been discriminated against by any of the protected classes established by Title VI and the additional laws listed above may contact the Title VI Coordinator of MVRPC who will advise the complainant of their rights for filing a complaint. The complainant shall,

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within 180 days of the alleged occurrence, submit a completed Title VI Complaint Form to initiate Title VI complaint as outlined in the MVRPC Title VI Complaint Procedure & Complaint Form.

### **\*Non-Discrimination 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 U.S.C. § 471, Section 47123), as amended (prohibits discrimination based on race, creed, color, national origin, or sex)
- The Civil Rights Restoration Act of 1987 (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 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 (42 U.S.C. §§ 12131-12189), as implemented by Department of Transportation regulations at 49 CFR parts 37 and 38 (prohibits 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)
- 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)
- Executive Order 12898, Federal Actions to Address Environmental Justice in Minority Populations and Low-Income Populations (ensures non-discrimination against minority populations by discouraging programs, policies, and activities with disproportionately high and adverse human health or environmental effects on minority and low-income populations)
- Executive Order 13166, Improving Access to Services for People with Limited English Proficiency, and resulting agency guidance, national origin discrimination includes discrimination because of limited English proficiency (LEP). To ensure compliance with Title VI, you must take reasonable steps to ensure that LEP persons have meaningful access to your programs (70 Fed. Reg. at 74087 to 74100)
- Title VIII of the Civil Rights Act of 1968 (Fair Housing Act), as amended (prohibits discrimination in the sale, rental, and financing of dwellings on the basis of race, color, religion, sex, national origin, disability, or familial status (presence of child under the age of 18 and pregnant women)
- Title IX of the Education Amendments Act of 1972, as amended (20 U.S.C. 1681 *et seq.*) (prohibits discrimination on the basis of sex in education programs or activities).



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5. Title VI Complaint Procedure and Complaint Form

- a. Any individual, group of individuals, or entity that believes they have been subjected to discrimination prohibited by Title VI nondiscrimination provisions may submit a Title VI Complaint Form to the MVRPC Executive Director. The form must be filed within 180 calendar days of the alleged occurrence. The complainant has the right to also file a complaint with relevant oversight agencies; this could include the Ohio Department of Transportation (ODOT), the Federal Highway Administration (FHWA), or the Federal Transit Administration (FTA).
- b. Upon receipt of the Title VI Complaint Form, MVRPC will determine MVRPC's jurisdiction, acceptability of the complaint, and need for additional information. MVRPC will also acknowledge receipt of the complaint by notifying the complainant.
- c. If the complaint is determined to be within MVRPC's jurisdiction, then MVRPC will log the complaint and designate a staff person to investigate the merit of the complaint.
- d. MVRPC's investigator will prepare an investigative report for MVRPC Executive Director's review.
- e. The investigative report and its findings shall be sent to MVRPC's legal counsel for review.
- f. MVRPC's investigator will review any comments or recommendations provided by MVRPC's legal counsel on the investigative report with the Executive Director. The report will be modified as necessary based on this review.
- g. MVRPC's investigative report and a copy of the Title VI Complaint Form will be forwarded to the appropriate oversight agency providing the federally funded assistance to pursue a final determination regarding the complaint; this could include the Ohio Department of Transportation (ODOT), the Federal Highway Administration, (FHWA), or the Federal Transit Administration (FTA).
- h. Once the complaint determination becomes final, the involved parties will be properly notified of the final determination of the complaint, of recommendations to remedy any discriminatory practice (if any), and of any appeal rights allowed to the complainant.

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Miami Valley Regional Planning Commission Title VI Complaint Form	
NAME (Complainant):	PHONE: (    )
HOME ADDRESS (Include City, State and ZIP):	E-MAIL (If Applicable):
Basis of Discriminatory Action(s): ___ Race    ___ Color    ___ National Origin    ___ Other:	
Date of Alleged incident:	Location and position of person(s) who alleged discriminated against you if known:
Explain briefly and clearly as possible what happened and how you believe you were discriminated against. Indicate who was involved. Be sure to include how you feel other persons were treated differently than you. Please attach additional pages as needed or any additional written material about your complaint.	

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What other information do you think is relevant to this complaint?

How can this issue or issues be resolved to your satisfaction?

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Please list below the names, addresses, phone numbers and job titles of person(s) we may contact for additional information about your complaint (witnesses, fellow employees, supervisors, others):

NAME	ADDRESS	PHONE NUMBER	JOB TITLE

Signature:

Date:

\*A Spanish language version of the Title VI Complaint Form is also available and publicly accessible via the agency website or by public request.

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### **6. Transportation Planning Processes**

#### **A. Public Participation Summary**

MVRPC's Long Range Transportation Plan includes extensive public participation efforts. The public participation efforts are made in the form of special public participation meetings in all MPO counties (Miami, Montgomery, Greene and northern Warren); presentations in various media; placing ads with minority-focused radio stations and newspapers. As well as less traditional methods such as placing surveys on RTA buses are used in an effort to insure the broadest range of public input possible into the process. For Plan updates, TV advertising and social media outreach was also utilized in an effort to reach new audiences. Similar efforts are utilized in seeking input for the TIP.

Also in accordance with MAP-21 and Executive Order 12898 on Environmental Justice requirements, an updated public participation policy with very detailed requirements and procedures, entitled "Public Participation Policy for Transportation Planning", has been adopted and implemented by the MVRPC Board of Directors. For example, MVRPC planning processes include enhanced ways to further seek input from traditionally disadvantaged populations or otherwise EJ-target groups and to include them in the public participation process.

Summaries of public participation activities are included in both the Long Range Transportation Plan (LRTP) and the Transportation Improvement Plan (TIP). Additionally, MVRPC engages the public in outreach related to bikeways, rideshare, education campaigns, air/water quality, and may other relevant regional topics and matters. Some recent outreach efforts have included:

- Expanding the mailing list to include EJ-target populations (low-income, minority, elderly and disabled);
- Adapting advertising for ease of understanding, including special articles and flyers; this includes translation into Spanish;
- Adapting public meeting times and locations for accessibility and ADA compliant locations;
- Advertising at Greater Dayton Regional Transit Authority (GDRTA) Hubs;
- Advertising directed toward minority-marketed newspapers and radio stations;
- Advertising directed to the largest newspaper publication in the region;
- Advertising directed to regional newspaper related to the project;
- Sharing press releases and posters (English/Spanish) with Dayton Metro Libraries for posting at their locations.
- Sharing press releases and posters (English/Spanish) with other libraries in the area not affiliated with Dayton Metro Libraries.
- Mailing press releases upon request to citizens who do not have an email address.
- Posting notices to MVRPC's website, calendar, and social media accounts.

MVRPC's public participation efforts encourage the involvement of the public and socially and/or physically disadvantaged populations in all phases of our programs, including assurances that no person in the United States shall be denied the benefits of, or be otherwise subjected to discrimination under any program. Every press release for public

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meetings includes the following verbiage related to interpreter services:

“Public participation is solicited without regard to race, color, sex, age, national origin or disability. MVRPC is committed to providing access and inclusion and reasonable accommodation in its services, activities, programs and employment opportunities in accordance with the Americans with Disabilities Act (ADA) and other applicable laws. To request a reasonable accommodation due to a disability, or language interpretation or translation services to participate in this meeting, please contact Marketing & Public Outreach.”

MVRPC’s Public Participation Policy is reviewed annually and revised as necessary, with a comprehensive update completed in FY2020. (<http://www.mvrpc.org/services/public-information-office/mvrpc-public-participation-policy>)

### **B. Public Outreach and Language Assistance**

Posters advertising public participation meetings are displayed at Greater Dayton Regional Transit Authority hubs, and Greene CATS and Miami County Transit offices. Posters (translated into Spanish) are also distributed to the Latino Connection, a local Hispanic community-based outreach organization and East End Community Services. Public notice newspaper ads are printed in both Spanish and English in La Mega Nota, a free newspaper distributed throughout the region. Public notice newspaper advertisements are also printed in the Dayton Weekly News which is an African American news publication. Translation services for the hearing-impaired are provided via the Family Services Association. C-print translation services are provided upon request. In SFY2013 MVRPC completed a Limited English Proficiency (LEP) analysis for the MPO area. The analysis indicates that less than 1 percent of the population 5 years or older (approximately 5,400 individuals) is not proficient in English. Approximately 50 percent of the LEP individuals speak Spanish as their primary language with the remainder speaking other Indo-Euro, Asian Pacific, or other languages. As a result, MVRPC is focusing its outreach efforts in the Spanish speaking population. English (95.2%) and Spanish (1.7% second highest population) represent 97% of the population of our three county region.

(<http://www.mvrpc.org/sites/default/files/LimitedEnglishProficiencyAnalysis.pdf>)

When appropriate, MVRPC has sought participation from target populations by posting flyers/posters and meeting notices in locations such as government centers, neighborhood shops, religious institutions, social service agencies, employment centers, senior centers, public health clinics, public libraries, community centers and popular meeting places.

Individuals with limited English proficiency are encouraged to request translators. Translating efforts are focused on Spanish speakers as it is the predominant concentration of non-English speaking individuals in the Miami Valley.

### **C. MPO Transportation Planning Process**

MVRPC uses extensive outreach processes to inform neighborhood and citizen's groups, particularly those in minority areas, of MVRPC's functions and opportunities for citizen participation in its planning process. The MVRPC web site ([www.mvrpc.org](http://www.mvrpc.org)) also includes a

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Spanish translation option. As noted above, this has been particularly emphasized in the TIP (<http://www.mvrpc.org/transportation/short-range/current/>) and Long Range Plan (<http://www.mvrpc.org/transportation/long-range>) processes.

MVRPC uses the Census and the American Community Survey (ACS) as primary data sources for analysis of environmental justice populations. Conversely, MVRPC identifies environmental justice target areas by examining the concentration of the environmental justice target populations at the traffic analysis zone (TAZ) level using geographic information systems (GIS). A concerted effort is made to further seek input. In addition to the strategies referenced under “A. Public Participation Summary”, MVRPC efforts include:

- Offering free parking passes for meetings at MVRPC offices in Downtown Dayton;
- Acquiring and utilizing public notices in English/Spanish publications, and the Dayton City Paper, a free distribution newspaper;
- Offering a web-based English-to-Spanish translator on MVRPC’s website; and
- Posting information about upcoming meetings on agency social media accounts.

MVRPC will continue to improve public involvement with environmental justice populations. In fiscal year 2022, MVRPC and the U.S. Environmental Protection Agency partnered to launch the first Environmental Justice Academy (EJA) in Region 5 (which includes Illinois, Indiana, Michigan, Minnesota, Ohio, Wisconsin, and 35 Tribes) through MVRPC’s Institute for Livable & Equitable Communities. Through a series of nine modules, EJA participants (a combination of emerging community, non-profit, and environmental leaders) were empowered and equipped to leverage human, social, intellectual, technical, legal, and financial resources to make innovative and sustainable environmental progress across communities. Participants also use consensus-building processes and skills to help ensure successful collaboration and negotiations and increase individual/community capacity to address environmental issues impacting public health as well as gaining a basic understanding of environmental justice and environmental regulations. MVRPC has plans to continue similar engagement with the regional community around environmental justice.

Data relative to minority persons, neighborhoods, income levels, physical environments, travel habits is provided in the profiles of the urbanized area in our State of the Region Report and more detailed subsequent reports on topics such as Economics and Housing. These reports, coupled with the more specific types of data generated through such activities as the Long Range Transportation Plan (particularly the section on Environmental Justice and the associated adverse impact analyses), the Long Range Plan and TIP public participation processes, origin/destination studies, traffic volume studies, household travel surveys, travel time studies, and surveys of the elderly and handicapped, are used as tools to guide policy and plan development.

This data is used at all levels of plan development, as well as throughout the decision-making process: planners utilize the data to develop various alternatives from which the system with the least negative impacts will be chosen; the various task forces and committees consider this data in making their recommendations to the MVRPC Board of Directors (the policy board); and the Board of Directors is made aware of the data as a factor that is weighed prior to making a final decision.

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### **D. Monitoring and Compliance Maintenance Process with Title VI Requirements**

Per ODOT requirements, MVRPC's Title VI monitoring includes preparation of the MPO annual self-certification resolutions. Also, MVRPC completes the ODOT Title VI baseline assessment tool. Finally, MVRPC documents Title VI related outreach and activities for inclusion in ODOT's annual Title VI accomplishments report to FHWA.

As recipients of federal funds, MVRPC and their contractors, subcontractors, material suppliers, vendors, and consultants must:

- Ensure nondiscrimination in all of their programs and activities, whether those programs and activities are federally-funded or not. The factors prohibited from consideration as a basis for discriminatory action or inaction include race, color, national origin, biological sex, sexual orientation and gender identity, disability, age, religion, genetic information, military status, low-income status, or limited English proficiency.
- Provide Equal Employment Opportunity by not discriminating in employment based on race, religion, color, sex, national origin, disability, genetic information, age, sexual orientation, or military status.

MVRPC realizes successful implementation of Title VI is dependent on institutions as well as the agents who are employed by them. MVRPC values – which include integrity, transparency, inclusion, diversity, and innovation – align with Title VI and describe how the regional planning commission conducts business. Employee performance, as well as the policies of MVRPC, must be aligned with these values. MVRPC continuously reviews and checks agency performance including a review of all policies (formal and informal) to ensure that the regional planning commission actively creates a workplace culture where Title VI thrives.

Maintaining compliance includes training. MVRPC is exploring online training options that are accessible and not overly burdensome. MVRPC will strive for all employees to participate in Title VI training during the course of fiscal year 2024. MVRPC is short-listing options, including:

- Overview of FHWA's Civil Rights Program Requirements for Local Public Agencies - <https://www.fhwa.dot.gov/federal-aidessentials/catmod.cfm?category=civilrig>
- FTA's Title VI Training - <https://www.transit.dot.gov/regulations-and-guidance/civil-rights-ada/title-vi-training>

Recently, all MVRPC staff attended Title VI training in August 2021. According to ODOT, the updated Title VI Program Plan is requested every three years. As a result, MVRPC will seek staff training opportunities based on the frequency of three years.

### **E. Identifying and Considering Mobility Needs of Minority Populations**

MVRPC adopted four main approaches during the process of updating the Long Range Transportation Plan (LRTP) to address environmental justice issues. The approaches were informed by the guidelines in Guidance and Best Practices for Incorporating Environmental



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Justice into Ohio Transportation Planning and Environmental Processes. The guidance document presents methods and approaches for ensuring that the interests of minority and low-income populations are considered and the impacts on these populations are identified and addressed within the current transportation decision-making processes. MVRPC's approach includes: defining target populations; identifying target areas; conducting tests for adverse impacts; and taking extra public participation efforts to fully engage diverse population groups.

Also, MVRPC conducted various technical analyses for the LRTP to address environmental justice issues, recognizing that no single measurement can determine whether disproportionate adverse impacts exist or not. MVRPC analyzed: accessibility to selected major facilities; home-based-work travel times; and transit and regional bikeway accessibility. The analyses were conducted to determine if target areas are adversely affected by the LRTP, compared to non-target areas, for various populations.

### **F. Demographic Profile of the Planning Area**

MVRPC's Long Range Transportation Plan (LRTP) and Transportation Improvement Program (TIP) include an assessment of the impacts that planned transportation improvements have on environmental justice and other populations of interest. The approach known as Community Impact Assessment is documented in Chapter 10 of the 2050 Plan. Community Impact Assessment was originally developed for the June 2001 update of the transportation Plan and has subsequently been updated based on 2000 and 2010 Census/ACS data and the most current transportation plan projects. The identification of target areas has been updated based on 2010 Census population and 2008-2012 ACS socio-economic data and is used to analyze the impact of the SFY 2018-2021 TIP.

MVRPC will pursue plans to update our demographic analysis during the course of fiscal year 2024 in conjunction with 2020 Census data releases and the release of the corresponding ACS 2018-2022 data.

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**Socio Demographic Profile - 2000-2010 Target Population Thresholds**

<b>Data Set</b>	<b>County</b>	<b>2000 Total</b>	<b>2010 Total</b>	<b>2010 Universe</b>	<b>2000 Threshold</b>	<b>2010 Threshold</b>	<b>2000-2010 Change %</b>
<b>Minority Population</b>	Gre	15,911	21,903	161,573	10.80%	13.56%	25.56%
	Mia	4,174	5,784	102,506	4.20%	5.64%	34.29%
	Mot	130,978	139,881	535,153	23.40%	26.14%	11.71%
	War	8,464	20,262	212,693	5.30%	9.53%	79.81%
<b>Persons in Poverty</b>	Gre	10,937	20,714	153,075	7.40%	13.53%	82.84%
	Mia	5,912	12,366	101,709	5.98%	12.16%	103.34%
	Mot	54,650	87,503	523,164	9.77%	16.73%	71.24%
	War	5,822	13,096	207,043	3.68%	6.33%	72.01%
<b>Disabled Population*</b>	Gre	20,875	16,647	117,780	17.90%	14.13%	-21.06%
	Mia	15,500	11,897	76,759	20.30%	15.50%	-23.65%
	Mot	102,901	73,416	398,033	23.60%	18.44%	-21.86%
	War	21,939	16,941	148,311	18.40%	11.42%	-37.93%
<b>Elderly Population</b>	Gre	17,492	21,998	161,573	11.80%	13.61%	15.34%
	Mia	13,096	15,731	102,506	13.20%	15.35%	16.29%
	Mot	76,679	81,041	535,153	13.70%	15.14%	10.51%
	War	14,858	22,936	212,693	9.40%	10.78%	14.68%
<b>Hispanic Population</b>	Gre	1,813	3,439	161,573	1.20%	2.12%	76.67%
	Mia	721	1,341	102,506	0.70%	1.31%	87.14%
	Mot	7,096	12,177	535,153	1.30%	2.28%	75.38%
	War	1,633	4,784	212,693	1.00%	2.25%	125.00%
<b>Zero-Car Households</b>	Gre	2,838	3,033	62,770	5.13%	4.83%	-5.85%
	Mia	1,891	2,114	40,917	4.91%	5.17%	5.30%
	Mot	22,257	21,305	223,943	9.71%	9.51%	-2.06%
	War	1,925	2,047	76,424	3.44%	2.68%	-22.09%

Note: \* Because of the changes to the definition, the 2010 ACS disability data should not be compared to the previous 2000 disability data. (see Section C).

Source: 2000, 2010 Census; 2008-2012 American Community Survey

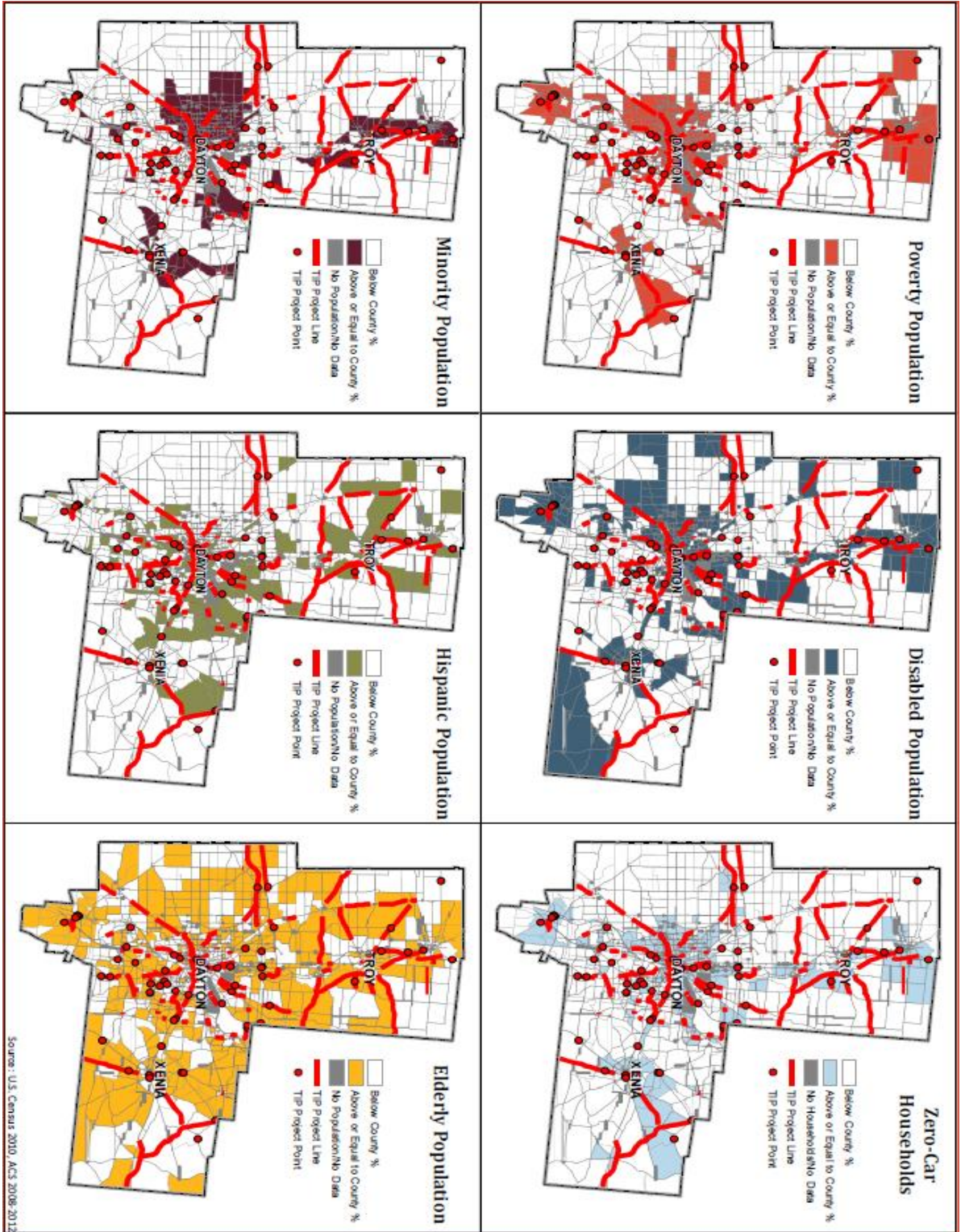
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G. Demographic Maps Implemented for Public Fund Distribution

MVRPC analyzed the distribution of Transportation Improvement Program (TIP) projects with respect to environmental justice populations (low-income and minority) as well as other target populations (such as elderly and disabled) deemed of interest to the transportation planning process using data summarized at the Traffic Analysis Zone (TAZ) level. All TIP projects, with the exception of area-wide programs and projects, slated for construction during SFY 2021-2024, were overlaid on top of the region's six target population maps for analysis. TAZ's with an above or equal to county average population threshold for each target population were identified as focus areas. The analysis was conducted to assure that the focus areas are receiving a proportionate share of TIP project funds relative to the region's general population. Maps displaying the distribution of each environmental justice population and other target populations are included.

MVRPC will pursue plans to update the demographic map in correspondence with the confirmation of the next TIP (SFY 2024-2027).

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### **H. Analysis of MPO Transportation System Investments That Identify and Address Disparate Impacts**

MVRPC's 2050 LRTP includes a community impact assessment. In part, the assessment is conducted to ensure that socially disadvantaged population groups do not bear an unreasonable or inequitable share of the costs associated with planning processes and initiatives.

MVRPC's approach to Community Impact Assessment includes:

- Defining target populations. MVRPC's target population groups include minorities, persons in poverty, disabled, elderly, Hispanic, and zero-car households.
- Identifying target areas. MVRPC defines areas of high concentration at the Traffic Analysis Zone (TAZ) level to utilize the travel demand model in conducting tests for adverse impacts. County average percentages for each selected population are used to determine if a given TAZ falls above or below the county's threshold for each target population.
- Conducting tests for adverse impacts. Using data from the regional travel demand model and the results of step 2 above, MVRPC studied the impact that the proposed plan projects have on work commuting times, accessibility to major facilities, and transit availability for both targeted and non-targeted population groups. When possible the impact of two build scenarios (projects in the TIP only and all projects in the Plan) were compared to existing conditions. According to the findings of the technical analyses, disadvantaged populations were largely unaffected by the 2050 LRTP in comparison to the general population.
- Additional public participation efforts to fully engage diverse population groups.

The TIP also includes an assessment, by funding amount, of the aggregate impact the short-range transportation projects have on the various target populations. According to the SFY2021-2024 Final TIP report published in April 2020, minority target areas will receive the fewest projects and least cost allocation, while elderly target areas receive the greatest number of projects and highest cost allocation. The same report concluded there is no disparate impact on environmental justice and other target populations because "the minority areas are still served by a majority of total projects with a majority of the total costs".

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### **7. Ensuring Non-Discrimination in the Method of Administration**

#### **A. Selection Criteria for Funding Projects**

MVRPC has program policies and procedures for FAST Act funding for Surface Transportation Program funds; Congestion Mitigation and Air Quality funds; and Transportation Alternative funds. MVRPC uses the following requirements for project selection and priority:

- Metropolitan Planning Organizations (MPO) are responsible for developing a Long Range Transportation Plan (LRTP) and a Transportation Improvement Program (TIP). The TIP must be consistent with the LRTP and must include all projects in the metropolitan area that are proposed for federal funding. States are required to develop a State Transportation Improvement Plan (STIP) which is consistent with MPO TIPs.
- MPOs with populations over 200,000 like MVRPC are considered Transportation Management Areas (TMA) which are responsible for project selection of all highway and transit projects in consultation with the state. The exceptions are selected by the state in cooperation with the MPOs.
- TIPs must be prioritized and include a financial plan demonstrating how projects are to be funded. The TIP must demonstrate that full funding can be reasonably anticipated in the time period contemplated for completion of the project.
- MPOs are required to provide a reasonable opportunity for public comment on the LRTP and TIP.
- All project sponsors must know and implement the U.S. Department of Transportation Standard Title VI Assurances and Nondiscrimination Provisions, which states “No person in the United States shall, on the grounds of race, color, national origin, sex, age, disability, low-income status, or limited English proficiency, be excluded from participation in, be denied the benefits of, or be otherwise subjected to discrimination under any program or activity, for which the Recipient receives Federal financial assistance from DOT, including FHWA”.

#### **B. DBE Participation Process**

MPO planning projects that are bid out are evaluated for a DBE goal by ODOT’s Office of Small and Disadvantaged Business Enterprise’s Goal Committee prior to soliciting bids. If a DBE goal is assigned by the committee, bid advertising will include the assigned goal.

MVRPC uses the following means to help increase DBE participation:

- Arranging solicitations and specifications in ways that facilitate DBE and small business participation, including encouraging prime contractors to subcontract

## **Miami Valley Regional Planning Commission Title VI Program Procedures Description**

portions of work that they might otherwise perform with their own forces.

- Providing information about RFPs directly to DBEs and other small businesses via the Ohio DOT RFP Bulletin Board.
- Placing bid notices in and through minority-focused media, journals, and associations, as appropriate and available.
- Providing technical assistance and other services, including assistance in developing acceptable bid packages, addressing cash flow, and scheduling problems, etc.
- Communicating information on specific contracting opportunities (e.g., including DBEs and small businesses on bidder mailing lists)
- Distributing DBE information to potential prime contractors, strongly encouraging them to utilize minority subcontractors when submitting their proposal packages.

### **C. Agency Consultant Contracting**

MVRPC provides assistance for minority contractors as part of the consultant selection process for planning work. Examples are:

- The Agency's contract bid process encourages DBE participation.
- MVRPC utilizes DBE Directories from Ohio DOT.
- Information about RFPs is made available directly to DBEs via the Ohio DOT Bulletin Board.
- Notices for both Bids and RFPs are placed in and through minority owned media, journals, and associations as appropriate and available.
- Both Requests for Bids and RFPs are posted on MVRPC's web site.
- All proposers are strongly encouraged to utilize minority subcontractors when submitting their proposal packages. In addition, award contracts also contain clauses encouraging the use of DBE contractors, vendors, and suppliers. MVRPC has actively awarded contracts that included small and minority business as subcontractors.
- Title VI assurances and provisions are included on all consultant contracts.

MVRPC attempts to assure that all consultants comply with Title VI provisions by incorporating the ODOT-prescribed language requirements for contractors and subcontractors into its contractual agreements. Subcontracts with minority vendors are monitored through contractor invoices to insure that the vendors are being utilized as stated in the contract and also to insure that they are being paid in a timely fashion.

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8. Requirements for Primary Recipients

The Specialized Transportation Program (Section 5310) is a Federal Transportation Administration (FTA) program designed to improve transportation options for the elderly and individuals with disabilities through the coordination and expansion of transportation services. Funds are available each federal fiscal year and are distributed through a competitive application process.

MVRPC receives an annual allocation of funds designed to support the special transportation needs of seniors and individuals with disabilities. When an MPO receives funds directly from FTA and then passes funds through to sub recipients, the MPO becomes a primary recipient under the DOT Title VI regulations and is responsible for monitoring the compliance of its sub recipients with Title VI, unless that sub recipient is also an FTA direct recipient.

MVRPC requests applicants to respond to questions for Title VI general reporting as well as Title VI data collection at the time of application. Also, applicants are required to affirm the truthfulness and accuracy of certifications and assurances made to FTA and MVRPC.

For compliance, MVRPC will require sub recipients to submit an annual memorandum, and the memo will satisfy periodic reporting of Title VI reporting requirements. The memorandum will request sub recipients to provide updates on public outreach activity, non-English communications, any Title VI investigations or complaints received, DBE utilization, the impact of grantee service provision on minority/disabled population and the employment make up of transit system personnel.



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9. Limited English Proficiency (LEP) Analysis

Below is the description of the LEP population that MVRPC serves, the frequency with which LEP individuals come into contact with our programs, the importance of our programs to LEP persons, and the resources we make available to service LEP needs. With the expected fiscal year 2024 update related to 2020 Census data releases and the release of the corresponding ACS 2018-2022 data that will allow the determination of the appropriate level of LEP assistance needed for our regional jurisdictional population, MVRPC will pursue the initiation and completion of a Four-Factor analysis to be included in an Language Assistance Plan.

A. Quantification of LEP in Service Population

As part of an ongoing update process, MVRPC examined the Limited English Proficiency (LEP) populations within its Metropolitan Planning Organization (MPO) boundaries using 2010 American Community Survey: Language Spoken at Home by the Ability to Speak English datasets.

Of the 37,919 individuals who do not speak English as their primary language in the household, approximately 86% speak English well with 14% being Limited English Proficiency individuals, who do not speak English well or do not speak English at all. When comparing LEP individuals to the total general population, less than 1% of the total population 5 years or older in the Miami Valley are not proficient in English.

The largest percentages of individuals who do not speak English as the primary language in the household in the Miami Valley speak Spanish. Approximately 13,800 speak Spanish, comprising 36.4% of all LEP individuals in the Region. Other languages include Other Indo-Euro, Asian/ Pacific Isles, and all Other.

Overall, our region has primarily English (95.2%) and the largest non-English is Spanish (1.75%) that together represent 97% of the region population. As a result, MVRPC provides Spanish translation services and advertising in Spanish.

**Limited English Proficient (LEP) Persons in the Miami Valley**

County	Speaks English "Well"	Percent Speaks English Well	Total LEP: Speaks English "Not Well"	Percent LEP: Speaks English "Not Well"
<b>Greene</b>	7,948	90.8%	805	9.2%
<b>Miami</b>	2,098	84.7%	380	15.3%
<b>Montgomery</b>	21,241	84.1%	4,017	15.9%
<b>Warren*</b>	1,263	88.4%	167	11.6%
<b>Total:</b>	32,550	85.8%	5,369	14.2%

Source: 2006-2010 American Community Survey 5-Year Estimates

\* Warren County includes Census block groups in the vicinity of the cities of Carlisle, Franklin, and Springboro.

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**B. Frequency of LEP Contact within Programs**

MVRPC programs are primarily transportation planning grants and LEP contact is limited to public participation outreach conducted by MVRPC. MVRPC has an ongoing public participation process that engages our region's population. Individuals do not apply for the transportation projects but will have an interest because of potential transportation projects in their community or region.

MVRPC only provides a FTA grant administration service that publicizes availability of funding for FTA grants and MVRPC performs all application reviews and ranking. MVRPC does not provide any FTA program services or equipment purchases or transit operations. MVRPC is not a transit agency.

Individuals do not apply for the FTA grants. Because of the nature of the FTA grant requirements, these grants are typically awarded to transit agencies that operate and provide all transit services.

**C. Programmatic Importance to LEP Persons**

The impact of our programs to LEP persons would be limited to the potential improvement or changes to transportation projects in the next few years or even as far in the future as several decades.

**D. Available LEP Resources**

MVRPC provides a language translation feature for our web site and we advertise in both English and in Spanish for all public involvement using public posters, regional news media, a Spanish community publication, the Latino Community Connection a local Hispanic Community-based outreach organization and East End Community Services a nonprofit organization serving East Dayton communities. As part of periodic public advertising, MVRPC invites all eligible applicants to apply for these grants, review and make comments and provide MVRPC contact information. A translation service is available for all public meetings upon request. MVRPC has a written public participation plan that includes these notices of language services assistance, advertising notices in Spanish, as well as specific methods of communications, participation plan elements and responsibilities for conducting an effective public participation process.

10. Resolution Ensuring Equity, Diversity, and Inclusion in all MVRPC Staff, Committee, and Board of Director Actions & Resolution of Self-Certification of the Metropolitan Planning Process



Regional Planning Commission

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## RESOLUTION

### **Ensuring Equity, Diversity, and Inclusion in all MVRPC Staff, Committee, and Board of Directors Actions**

**WHEREAS**, the Miami Valley Regional Planning Commission is designated as a Voluntary Association of Local Governments by Ohio Revised Code Section 713.21; and

**WHEREAS**, the Miami Valley Regional Planning Commission was formed in 1964 through the cooperation of locally elected officials from Greene, Miami, Preble, and Montgomery Counties and later to include Carlisle, Franklin, Springboro, and Franklin Township in Warren County; and

**WHEREAS**, in addition to units of local government, the MVRPC Board of Directors is made up of other government organizations, business, education, and community regional interests and it serves as the policy and decision making body for the Miami Valley Region through which local governments work cooperatively to guide important regional matters on behalf of the residents and businesses of the Miami Valley Region; and

**WHEREAS**, the Equity Regional Profile published by the Miami Valley Regional Planning Commission in July 2017 found that systemic, institutionalized segregation based upon race was implemented by the Federal Housing Authority from 1910 through 1950 through housing covenants to keep African Americans and immigrants from living in any part of the Miami Valley besides the west side of Dayton; and

**WHEREAS**, this practice of institutional and systemic segregation and racism has harmed certain neighborhoods as better jobs, education, health, food, and housing opportunities have been located in other parts of the Miami Valley and have allowed those who could move to these areas to have increased access to opportunity; and

**WHEREAS**, racism causes persistent discrimination and disparate outcomes in many areas of life including housing, economic opportunity, infant mortality, employment, food access, environmental protection, and criminal justice; and an emerging body of research demonstrates that racism itself is a social determinant of health; and

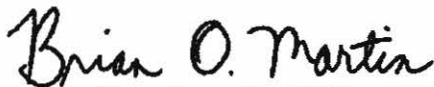
**WHEREAS**, the MVRPC Board of Directors and its partners formed the Institute for Livable and Equitable Communities on September 5, 2019 which dedicated funding for staff, programs, and projects that address racism and other disparities, increase access to opportunity, and improve livability for Older Americans throughout the Miami Valley; and

**WHEREAS**, numerous MVRPC governmental and associate members have adopted or considered adopting diversity, inclusion, equity, and antiracism policies including the City of Dayton, Village of Yellow Springs, Montgomery County, City of Piqua, City of Trotwood, City of Fairborn, City of Oakwood, Greater Dayton Area Chamber of Commerce, Dayton Development Coalition, University of Dayton, Sinclair College, Dayton Metropolitan Library, Greater Dayton Regional Transit Authority, Five Rivers Metroparks, and others.

**NOW THEREFORE BE IT RESOLVED**, that Miami Valley Regional Planning Commission's Board of Directors hereby:

1. Denounces discrimination of any group or in any form based upon race, income, jurisdiction, ability, national origin, age, religion, sexual preference or gender;
2. Directs the Executive Director to work with requesting member organizations to increase equity, diversity, and inclusion in their communities and organizations;
3. Requests that the Executive Director develop proactive policies, training programs, and other strategies that increase the understanding of racism, equity, access to opportunity, and diversity among MVRPC staff, boards, committees, and communities;
4. Encourages all members in their own time to develop letters, statements or resolutions and implement activities that increase equity, diversity, and inclusion in their communities;
5. Encourages all MVRPC member local governments and organizations to utilize any policies or tools developed to this end so that MVRPC through its Institute for Livable and Equitable Communities shares this information with members, tracks national best practices, and develops strategies to assist member local governments and organizations;
6. Advocates and supports the continued active involvement of the Institute for Livable and Equitable Communities as the regional and community entity that works to address racism, increase equity, provide access to opportunity, and increase livability in the communities and organizations of the Miami Valley;
7. Supports the agency's involvement in local, state, and federal purchasing programs that ensure fairness and equal opportunity programs for minority and women owned businesses;
8. Directs the Executive Director to develop a business plan, metrics, and provide annual updates to the Board of Directors on the success of these programs, projects, and policies prepared to address racism and increase diversity, inclusion, and equity throughout the Miami Valley Region.

**BY ACTION OF THE** Miami Valley Regional Planning Commission's Board of Directors.



**Brian O. Martin, AICP**  
Executive Director



**Chris Mucher, Chairperson**  
Board of Directors of the  
Miami Valley Regional Planning  
Commission

10/1/2020

Date



# MIAMI VALLEY

Regional Planning Commission

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## RESOLUTION 23-024

### SELF-CERTIFICATION OF THE METROPOLITAN TRANSPORTATION PLANNING PROCESS

**WHEREAS**, the Miami Valley Regional Planning Commission is designated as the Metropolitan Planning Organization (MPO) for the Dayton Urbanized Area (Greene, Miami and Montgomery Counties and the jurisdictions of Carlisle, Franklin, Springboro and Franklin Township in Warren County) by the Governor of the State of Ohio, acting through the Ohio Department of Transportation, in cooperation with local elected officials for the Urbanized Area, and as evidenced in the Agreement of Cooperation, Number 35896 between ODOT and the MVRPC; and

**WHEREAS**, the federal regulations published as 23 CFR 450.336 requires MVRPC, as the MPO for the Dayton Urbanized area, to self-certify through its Board of Directors (MVRPC's policy board) in conjunction with the Transportation Improvement Program update, that the transportation planning process is addressing the major issues in the metropolitan planning area and is being conducted in accordance with the following applicable requirements:

- (a) 23 U.S.C. 134, 49 U.S.C. 5303, and this subpart;
- (b) In non-attainment and maintenance areas, sections 174 and 176 (c) and (d) of the Clean Air Act, as amended (42 U.S.C. 7504, 7506 (c) and (d)) and 40 CFR part 93;
- (c) Title VI of the Civil Rights Act of 1964, as amended (42 U.S.C. 2000d-1) and 49 CFR part 21;
- (d) 49 U.S.C. 5332, prohibiting discrimination on the basis of race, color, creed, national origin, sex, or age in employment or business opportunity;
- (e) Section 1101(b) of the FAST Act (Pub. L. 114-357) and 49 CFR part 26 regarding the involvement of disadvantaged business enterprises in DOT funded projects;
- (f) 23 CFR part 230, regarding the implementation of an equal employment opportunity program on Federal and Federal-aid highway construction contracts;
- (g) The provisions of the Americans with Disabilities Act of 1990 (42 U.S.C. 12101 et seq.) and 49 CFR parts 27, 37, and 38;
- (h) The Older Americans Act, as amended (42 U.S.C. 6101), prohibiting discrimination on the basis of age in programs or activities receiving Federal financial assistance;
- (i) Section 324 of title 23 U.S.C. regarding the prohibition of discrimination based on gender; and
- (j) Section 504 of the Rehabilitation Act of 1973 (29 U.S.C. 794) and 49 CFR part 27 regarding discrimination against individuals with disabilities.

**NOW THEREFORE BE IT RESOLVED**, that the Board of Directors of the Miami Valley Regional Planning Commission certifies that the Metropolitan Planning Organization's metropolitan transportation planning process complies with the metropolitan planning requirements as set forth above.

**BY ACTION OF THE** Miami Valley Regional Planning Commission's Board of Directors.

**Brian O. Martin, AICP**  
Executive Director

5/4/2023

Date

**Greg Simmons, Chairperson**  
Board of Directors of the

Miami Valley Regional Planning Commission