

Limited English Proficiency Plan for the Northern Middlesex Metropolitan Planning Organization

Prepared for the NMMPO by:

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Role of the Northern Middlesex Metropolitan Planning Organization (NMMPO)

The seven member NMMPO board is comprised of the Chairman of the Northern Middlesex Council of Governments (NMCOG), the Chairman of the Lowell Regional Transit Authority (LRTA), the Secretary of MassDOT, and the MassDOT Highway Administrator. In addition, the following are also voting members of the NMMPO: the chief elected official from the City of Lowell elected to serve as the City's representative to NMCOG; a Selectman elected to serve on NMCOG and further elected by the Council to serve as that town's representative to the NMMPO; and an LRTA Advisory Board member representing a community within the NMMPO boundaries other than the City of Lowell, who may also be an elected official. One representative each from the Federal Highway Administration (FHWA) and the Federal Transit Administration (FTA) are ex-officio, non-voting members of the NMMPO.

The NMMPO is directly responsible for ensuring that investments in existing and future transportation projects and programs are based on a continuing, cooperative and comprehensive (3-C) planning process. The mission of the NMMPO is to provide regional transportation planning and policy making for the Northern Middlesex region. The NMMPO provides policy direction and oversight in the development of federally mandated certification documents, and votes to endorse and amend these documents.

The Northern Middlesex MPO meets on an as-needed basis. Typically, meetings are held four to six times per year. Meetings notices are advertised in the *Lowell Sun*, the *Khmer Post* and on the NMCOG website (www.nmcog.org). In addition, the meeting notices are distributed to an extensive list of stakeholders, as outlined in the region's Public Participation Plan. All meetings are considered official public meetings, and as such, meeting notices are posted at the region's city/town clerk offices, in accordance with the Massachusetts Open Meeting Law.

Definition of a Limited English Proficiency (LEP) Individual

A Limited English Proficiency (LEP) individual is a person who does not speak English as his or her primary language, AND who has a limited ability to read, speak, write or understand English.

Background and Intent of the LEP Plan

Title VI of the Civil Rights Act of 1964 - National Origin Discrimination Against Persons with Limited English Proficiency, and Presidential Executive Order 13166 require entities that receive federal funds to provide guidance on how they will address the needs of LEP individuals. The U.S. Department of Transportation (USDOT) has developed a guidance document entitled "*A Policy Guidance Concerning Recipients' Responsibilities to Limited English Proficient Persons*". This guidance was issued to ensure that persons in the United States are not excluded

from participation in DOT-assisted programs and activities simply because they face challenges communicating in English.

The intent of this LEP plan is to ensure that residents of the region who do not speak or read English proficiently have access to the planning process and published information, and that public notification is provided to these individuals. The production of multilingual publications and documents and/or interpretation at meetings/events will be provided upon request to the degree that funding permits, based on current laws and regulations.

Safe Harbor Provisions

Federal law provides a “Safe Harbor” so that a recipient of federal funds, like the NMMPO, can ensure with greater certainty that it is in compliance with its Title VI obligation to provide written translations of its documents to LEP persons. “Safe Harbor” means that if the recipient provides written translations in certain circumstances, then such action will be deemed strong evidence of compliance with the recipient’s written-translation obligations under Title VI.

The failure to provide written translations, however, does not necessarily mean that there is non-compliance. Even if the “Safe Harbor” is not used and if, for example, the written translation of certain documents would be so burdensome as to defeat the legitimate objectives of the program, then written translation will not be required. In such cases, other ways of providing meaningful access, such as effective oral interpretation of certain vital documents, may suffice to meet the requirements of Title VI.

Strong evidence of compliance with Title VI under the “Safe Harbor” provision involves providing written translations of vital documents for each language group of LEP persons that constitutes 5% of the population or 1,000 persons, whichever is less, eligible to be served or likely to be affected or encountered by the recipient. If that 5% is comprised of less than 50 persons, then translation of vital documents can be provided orally. Also, under the “Safe Harbor” provision, oral translation of non-vital documents is deemed sufficient to meet the requirements of Title VI.

The NMMPO is mindful of the fact that the “Safe Harbor” provision applies only to the translation of written documents. It does not affect the requirement to provide meaningful access to LEP persons through competent oral interpreters where oral language services are needed and reasonable to provide on an advance request basis.

Determining the Need

As a recipient of federal funding, the NMMPO takes reasonable steps to ensure meaningful access to information and services. The federal guidance suggests that four factors be

considered in determining the level and extent of language-assistance measures needed to ensure meaningful access to programs, activities and services:

1. The number and percent of LEP persons in the region who are served by the program;
2. The frequency with which LEP persons come in contact with the program;
3. The importance to the LEP person of accessing the particular program or service; and
4. The resources available to the NMMPO and the costs involved.

The USDOT Policy Guidance gives recipients substantial flexibility in determining what language assistance is appropriate based on a local assessment of the four factors listed above. The following is an assessment of language assistance needs in the Northern Middlesex region in relation to the transportation planning process.

1. The number and proportion of LEP persons in the eligible service area

In order to understand the language assistance needs within the region, an analysis of U.S. Census Bureau's 2008-2012 American Community Survey data was performed. Within the Northern Middlesex region, 39,428 individuals five years of age or older speak Spanish, Vietnamese, Portuguese, Chinese or Khmer at home. This represents 14.6% of the region's population age five years and over. Table 1 on the following page displays the five primary languages spoken at home.

The analysis indicates that region-wide, 18,304 individuals age five and over speak English less than "very well". This represents approximately 6.8% of the region's population. Of those residents who speak Spanish at home (16,193), 38.2% or (6,192) speak English less than "very well". Of those who speak Vietnamese at home (2,146), 63.6% or (1,364) speak English less than "very well". For those individuals who speak Portuguese at home (6,934), 45.2% or (3,134) speak English less than "very well", and for those individuals that speak Khmer at home (11,991), 54.6% or (6,545) speak English less than "very well". Of those who speak Chinese at home (2,164), 49.4% or (1,069) speak English less than "very well".

Lowell's population is known for its rich linguistic diversity. Clearly, the greatest need for language assistance is within the City of Lowell where 31,197 individuals, or 31.5% of the population five years of age or older, live in a household where Spanish, Portuguese, Chinese, Vietnamese or Khmer are spoken. Of these individuals, approximately 50% (15,622) report that they speak English less than "very well". Of those residing in a household that speaks Spanish (12,917), 41% or (5,323) speak English less than "very well". For those individuals who speak Portuguese at home (4,742), 53.6% or (2,544) speak English less than "very well". Individuals residing in a household where Khmer is spoken (11,542), 55% or (6,368) report that they speak English less than "very well". Of those individuals residing in a Vietnamese-speaking household

(1,621), 69.2% or (1,122) speak English less than “very well”. For those residing in a household where Chinese is spoken (375), 70.7% or (265) speak English less than “very well”.

Table 1: LEP Individuals Who Speak English Less Than Very Well by the Four Primary Language Groups Spoken in the Region

Community	Total Population 5 years and Older	Spanish				Vietnamese				Portuguese				Khmer				Chinese			
		Spoken at Home		Speaks English Less Than Very Well		Spoken at Home		Speaks English Less Than Very Well		Spoken at Home		Speaks English Less Than Very Well		Spoken at Home		Speaks English Less Than Very Well		Spoken at Home		Speaks English Less Than Very Well	
		Number	%	Number	%	Number	%	Number	%												
Billerica	38,056	606	1.6	218	0.6	131	0.3	67	0.2	1,154	3.0	278	0.7	134	0.4	34	0.1	198	0.5	44	0.1
Chelmsford	31,957	777	2.4	200	0.6	287	0.9	135	0.4	97	0.3	24	0.1	73	0.2	18	0.1	756	2.4	323	1.0
Dracut	27,692	805	2.9	211	0.8	59	0.2	40	0.1	370	1.3	140	0.5	30	0.1	30	0.1	176	0.6	149	0.5
Dunstable	3,056	70	2.3	9	0.3	-	0.0	-	0.0	19	0.6	12	0.4	10	0.3	-	0.0	6	0.2	6	0.2
Lowell	99,029	12,917	13.0	5,323	5.4	1,621	1.6	1,122	1.1	4,742	4.8	2,544	2.6	11,542	11.7	6,368	6.4	375	0.4	265	0.3
Pepperell	11,124	144	1.3	12	0.1	78	0.4	-	0.0	5	0.0	-	0.0	21	0.2	-	0.0	14	0.1	-	0.0
Tewksbury	27,560	395	1.4	97	0.4	-	0.0	-	0.0	454	1.6	105	0.4	95	0.3	46	0.2	50	0.2	-	0.0
Tyngsborough	11,037	109	1.0	33	0.3	-	0.0	-	0.0	15	0.1	-	0.0	86	0.8	49	0.4	8	0.1	-	0.0
Westford	21,091	370	1.8	89	0.4	-	0.0	-	0.0	78	0.4	31	0.1	-	0.0	-	0.0	581	2.8	282	1.3
Region	270,602	16,193	6.0	6,192	2.3	2,146	0.8	1,364	0.5	6,934	2.6	3,134	1.2	11,991	4.4	6,545	2.4	2,164	0.8	1,069	0.4

Source: 2008-2012 American Community Survey

2. The frequency with which LEP persons come in contact with the program

To date, no formal requests have been made to the MPO, by either individuals or groups, for language assistance. However, MPO staff has provided numerous presentations to neighborhood organizations within Lowell and to non-profit organizations where translation services were provided. NMMPO staff has made arrangements with two non-profit organizations within the region for the provision of translation services.

3. The importance of the service provided by the program

It is important to ensure that information routinely provided by the NMMPO is provided in regularly encountered languages other than English. As outlined in federal requirements, it is particularly important to ensure that vital documents are translated into the non-English language of each regularly encountered LEP group eligible to be served or likely to be affected by the program or activity. A document will be considered vital if it contains information that is critical for obtaining the federal services and/or benefits, or is required by law. Vital documents include the following: applications; consent and complaint forms; notices of rights and disciplinary action; notices advising LEP persons of the availability of free language assistance; and written tests that do not assess English language competency, but rather competency for a particular license, job or skill for which English competency is not required; and letters or notices that require a response from the beneficiary or client. Vital documents must be translated when 1,000 people or 5% of the population eligible to be served or likely to be directly affected by the program/activity, needs services or information in a language other than English to communicate effectively. For many larger documents, translation of vital information contained within the document will suffice and the documents need not be translated in their entirety. It may sometimes be difficult to draw a distinction between vital and non-vital documents, particularly when considering outreach or other documents designed to raise awareness of rights or services.

It is impossible from a practical and cost effective perspective to translate every piece of outreach material into every language, and this is not required under Title VI and EO 13166. However, in some circumstances, lack of awareness of the existence of a particular program may effectively deny LEP individuals meaningful access. It is important for recipients to assess the needs of eligible service populations in order to determine whether certain critical outreach materials should be translated into other languages.

The NMMPO utilizes federal funds to operate its planning programs. The NMMPO activities do not include any service or program that requires vital, immediate, or emergency assistance such as medical treatment or services for basic needs (food, housing, education, etc). Furthermore, the NMMPO does not conduct compulsory activities (applications, interviews, or other activities) prior to participation in our programs and/or events. Involvement with the NMMPO is entirely on a voluntary basis.

The NMMPO does provide opportunities for the public to comment on the use of Federal funds in three major areas: the annual Unified Planning Work Program, the four-year Transportation Improvement Program, and a 20-plus year Long-Range Regional Transportation Plan. The impacts of transportation improvements resulting from these actions do have an impact on all residents and efforts are made to encourage an understanding of the process and to provide opportunities to comment. As a result, NMMPO is concerned with input from all stakeholders and every effort is made to make the planning process as inclusive as possible.

As a result of the regional transportation planning process, selected projects receive approval for Federal funding, and advance to project design and construction under the responsibility of local jurisdictions or the state transportation agencies. These state and local organizations have their own policies in place to ensure opportunities for LEP individuals to participate in the process that shapes where, how and when a specific project is implemented.

4. The resources available to the recipient

Given the resources available to the NMMPO, the cost of translating large transportation documents is prohibitive. However, the region is dynamic and continues to attract diverse ethnic and cultural populations. Therefore, upon adoption of this plan, the NMMPO intends to initiate a program to provide Executive Summaries for the federal certification documents (Transportation Improvement Program, Unified Planning Work Program and the Regional Transportation Plan) in Spanish, Portuguese, Khmer, Vietnamese and Chinese. The NMMPO will also partner with local non-profit agencies to provide language translation and interpretation services within the scope of the funding available.

In addition, the NMMPO, through NMCOG, will continue to make the free online translation software, Google Translate, available via the Council's web site. This site contains considerable information on the regional transportation planning process and the Google Translate program will allow visitors to translate any page of text into the NMMPO regions primary languages.

LEP Implementation Plan

Inclusive public participation is a priority in preparing transportation plans, studies and programs. Transportation improvements resulting from these planning activities have an impact on all residents. The NMMPO encourages input from all stakeholders, and every effort is taken to make the planning process as inclusive as possible.

Identifying LEP Individuals Who Need Language Assistance

When encountering an LEP person, NMMPO staff will use *Language Identification Flashcards* to identify that person's primary language. *Language Identification Flashcards*, as developed by the United States Census Bureau, bear the phrase "Mark this box if you read or speak [name of language]" translated into 38 different languages. The *Language Identification Flashcards* may be downloaded at no cost at www.usdoj.gov/crt/cor/Pubs/ISpeakCards2004.pdf. The NMMPO will also make *Language Identification Flashcards* available to the public through its website, so that LEP persons contacting the NMMPO online can communicate their primary language to NMMPO staff. The NMMPO staff can then use that information to provide language assistance to the LEP person. The NMMPO will also make the *Language Identification Flashcards* available at all public meetings. Once a LEP person's primary language is identified using the flashcards, the NMMPO staff will assess the feasibility of providing written translation service and/or oral interpretation assistance for the LEP person.

Language Assistance Measures

Language assistance will be provided for some LEP individuals through the translation of some key materials, as well as through oral language interpretation when necessary and possible. Translation of all NMMPO plans and materials is not possible due to cost restrictions. However, the NMMPO will provide the following translated written materials:

1. NMCOG Web Site - The free service, powered by Google Translate program, allows the NMMPO and NMCOG website to be translated for users into 80 languages including the five NMMPO regional language groups of, Spanish, Portuguese, Khmer, Vietnamese and Chinese.
2. Certification Documents- An Executive Summary for the following key documents will be made available in Spanish, Portuguese Khmer, Vietnamese and Chinese:
 - (a) The Regional Transportation Plan;
 - (b) The Unified Planning Work Program; and
 - (c) The Transportation Improvement Program.
3. Outreach Materials – Spanish, Portuguese Khmer, Vietnamese and Chinese language outreach materials will be utilized whenever possible.
4. Oral translation services - The NMMPO will provide limited oral language services to Spanish, Portuguese Khmer, Vietnamese and Chinese speaking LEP individuals upon request. In order to provide these services, the Language Access Coordinator will do the following:

- Maintain a list of the points of contact where a LEP person interacts with the organization. At this time, it is anticipated that the key points of contact for LEP individuals are the front-desk receptionist and the NMMPO transportation staff performing outreach activities.
- Inventory staff language capabilities.
- Create a list of outside sources that can provide oral language services (include both paid and unpaid services). Outline the cost of these services, and identify budget and personnel limitations.

5. Training - In order to establish meaningful access to information and services for LEP individuals, employees in public contact positions, and those who will serve as translators or interpreters will be properly trained. Such training will be developed to ensure that staff is fully aware of LEP policies and procedures and are effectively able to work in person and/or by telephone with LEP individuals. NMMPO members and staff will be included in this training, even if they do not interact regularly with LEP persons, to ensure that they are fully aware of and understand the plan so they can reinforce its importance and ensure its implementation by staff.

6. Providing Notice of Available Language Service to LEP Persons- The NMMPO has established the following methods to inform Spanish, Portuguese, Khmer, Vietnamese and Chinese speaking LEP individuals, supporting organizations, as well as the general public, of available no-fee LEP services:

- *Posting signs* – A sign, in Spanish, Portuguese, Khmer, Vietnamese and Chinese, will be posted at the front-desk reception area to notify LEP individuals of any available services and how to obtain these services.
- *Outreach documents* – Key NMMPO outreach documents will include a notice that some language assistance services are available. This notice will be listed in English, Spanish, Portuguese, Khmer, Vietnamese and Chinese.
- *Community Organizations* – The NMMPO staff will notify area community-based organizations and other stakeholders of available language assistance services.
- *Public Notices* – The NMMPO will periodically issue notices, in English, Spanish, Portuguese, Khmer, Vietnamese and Chinese about available LEP services. All public meeting notices will contain the following language:

“Individuals requiring special accommodations under the Americans with Disabilities Act or requiring translation services (free of charge) should contact (insert name of designated staff member) at (978) 454-8021 ten work days in advance of the Public Meeting.”

Monitoring and Updating the LEP Plan

NMMPO staff will monitor changing LEP populations as updated census information is released. A review of the LEP plan will coincide with the review of the Public Participation Plan. The Language Access Coordinator will keep a record of any LEP services provided and will make this information available during the review process.

LEP complaint processing

The NMMPO has established the following complaint procedure and process that meets Title VI requirements. Title VI of the Civil Rights Act prohibits discrimination on the basis of race, color or national origin in programs or activities receiving federal financial assistance. Presidential Executive Order 12898 addresses Environmental Justice in minority and low-income populations. Presidential Executive Order 13166 addresses providing equal access to services and benefits to those individuals with Limited English Proficiency (LEP). The rights of women, the elderly and the disabled are protected under related statutes.

**NORTHERN MIDDLESEX METROPOLITAN PLANNING ORGANIZATION
TITLE VI NONDISCRIMINATION COMPLAINT PROCEDURE**

Title VI of the Civil Rights Act prohibits discrimination on the basis of race, color, or national origin in programs and activities receiving federal financial assistance. Two Executive Orders and related statutes further define populations that are protected under the umbrella of Title VI. Executive Order 12898 is concerned with environmental justice for minority and low-income populations. Executive Order 13166 is concerned with providing equal access to services and benefits for those individuals with limited English proficiency (LEP). The rights of women, the elderly, and people with disabilities are protected under related statutes.

Title VI requires that recipients of federal assistance not discriminate against the protected populations whether the aid is received directly or through contractual means. Massachusetts General Law extends these protections to prevent discrimination on the basis of religion, military service, ancestry, sexual orientation or gender identity or expression. In order to comply with 49 CFR Section 21.9(b), the Northern Middlesex Metropolitan Planning Organization (NMMPO) maintains the following procedure for receiving, investigating, addressing, and tracking Title VI complaints.

1. Submittal of Complaints

Any individual who believes that he or she, or any specific class of persons, has been subjected to discrimination or retaliation, as prohibited by Title VI of the Civil Rights Act of 1964, as amended, and related statutes, by the Northern Middlesex Metropolitan Planning Organization (NMMPO) in its role of planning and programming federal funds may file a written complaint. Complaints may be filed for discrimination on the basis of race, color, national origin, language, gender, age, disability, income, religion, military service, ancestry, sexual orientation, or gender identity or expression. Such complaint must be filed no later than 180 calendar days after the date the person believes the discrimination occurred.

Written complaints shall be submitted to:

Mr. Richard A. Davey, Chair
Northern Middlesex Metropolitan Planning Organization
State Transportation Building
10 Park Plaza, Suite 2150
Boston, MA 02116-3968

Complaints shall be in writing and shall be signed by the complainant and/or the complainant's representative. Complaints shall set forth as completely as possible the facts of and

circumstances surrounding the alleged discrimination and shall include the following information:

- Name, address, and phone number of the complainant.
- A written statement of the complaint, including the following details:
 - Basis of alleged discrimination (for example, race, color, national origin, or language).
 - A detailed description of the alleged discriminatory act(s).
- What in the nature of the incident(s) led the complainant to feel discrimination was a factor:
 - The date or dates on which the alleged discriminatory event or events occurred.
 - Name(s) of alleged discriminating individual(s), if applicable.
- Other agencies (state, local, or federal) where the complaint is also being filed.
- Complainant's signature and date.

In the case where a complainant is unable or incapable of providing a written statement and has no designee to do so, a verbal complaint of discrimination may be made through the Executive Director. Verbal complaints may be submitted (either in person, by telephone at (978) 454-8021, or via a recording) to the Executive Director. The Executive Director will convert the verbal allegations to writing and provide the complainant with the written document for confirmation, revision, and a signature before processing. In cases where the Complainant will be assisted in converting an oral complaint into a written complaint, the Complainant is required to sign the written complaint.

Written complaints may also be submitted to:
MassDOT Director of Civil Rights
10 Park Plaza, Suite 4160
Boston, MA 02116

Departmental Office of Civil Rights
U.S. Department of Transportation
1200 New Jersey Ave.
Washington D.C. 20590

2. Review of Complaint

Upon receipt of the complaint, the MPO chair shall appoint the Northern Middlesex Metropolitan Planning Organization (NMMPO) staff Executive Director and other MPO staff to review it. This review may include the collection of additional information from the complainant

and/or the alleged discriminating party(ies). Upon completion of the review, the Northern Middlesex Metropolitan Planning Organization (NMMPO) staff Executive Director shall report to the chair of the MPO. This report may include recommendations for possible action to address the complaint. Recommendations may include:

- Forwarding the complaint to a responsible implementing agency.
- Identifying remedial actions available to provide redress.
- Identifying improvements to the MPO's processes relative to Title VI and environmental justice.

The chair of the MPO shall refer the matter to the full MPO, which shall meet to discuss the complaint and the staff report.

3. Responding to Complaints

The MPO shall develop a proposed response to the complaint, recommending a course of action. The MPO chair shall then respond to the complaint and issue a written response to the complainant. This response shall be issued no later than 60 days after the date on which the chair received the complaint. If more time is required, the chair shall notify the complainant of the estimated time frame for completing the review and response.

If a complaint concerns agencies other than the Northern Middlesex Metropolitan Planning Organization (NMMPO), MPO staff will seek permission from the complainant to forward his/her complaint to appropriate individuals at those agencies.

4. Appeals

The complainant may appeal the chair's response to the complaint. Appeals must be in writing and be submitted to either of the following no later than 30 days after the date of the written response:

MassDOT Director of Civil Rights
10 Park Plaza, Suite 4160
Boston, MA 02116

Departmental Office of Civil Rights
U.S. Department of Transportation
1200 New Jersey Ave.
Washington D.C. 20590

In the case where a complainant is unable or incapable of providing a written appeal and has no designee to do so, a verbal appeal to a complaint of discrimination decision may be made through the Executive Director. Verbal appeals may be submitted (either in person, by telephone at (978) 454-8021, or via a recording) to the Executive Director. The Executive Director will convert the verbal appeal to writing and provide the complainant with the written document for confirmation, revision, and a signature before processing. In cases where the Complainant will be assisted in converting an oral appeal into a written appeal, the Complainant is required to sign the written appeal.

These procedures do not deny the right of the complainant to file formal complaints with other state or federal agencies or to seek private counsel. These procedures are part of an administrative process that does not include punitive damages or compensatory remuneration for the complainant.

MPO staff will forward complaints and responses to those complaints to the Massachusetts Department of Transportation's Office of Civil Rights.

The MPO shall maintain a list of complaints, lawsuits, and investigations alleging discrimination on the basis of race, color, or national origin. The list shall include filing date(s), allegation summaries, the status of the investigation, lawsuit or complaint, and actions taken by the MPO. The list of complaints, investigations and resolutions will be forwarded to MassDOT's Office of Civil Rights. A summary of all civil rights compliance review activities conducted over the latest three-year period shall be maintained.

DISCRIMINATION COMPLAINT AGAINST THE NORTHERN MIDDLESEX METROPOLITAN PLANNING ORGANIZATION (NMMPO)

If you need assistance completing this form, please contact NMMPO at (978) 454-8021.

Complainant Contact Information

Name: _____
Address: _____
City/Town: _____ State: _____ Zip: _____
Home phone: _____ Work phone: _____
E-mail: _____

Complaint

Date of alleged incident: _____

Decision, document, statement, or other act that you believe was discriminatory:

If you believe that one or more MPO employees discriminated against you, name of employee(s), if known: _____

Basis of alleged discrimination:

- | | | |
|--|---|--|
| <input type="checkbox"/> Race | <input type="checkbox"/> Age | <input type="checkbox"/> Ancestry |
| <input type="checkbox"/> Color | <input type="checkbox"/> Disability | <input type="checkbox"/> Sexual orientation |
| <input type="checkbox"/> National origin | <input type="checkbox"/> Income | <input type="checkbox"/> Gender identity or expression |
| <input type="checkbox"/> Language | <input type="checkbox"/> Religion | <input type="checkbox"/> Other: _____ |
| <input type="checkbox"/> Gender | <input type="checkbox"/> Military service | |

Describe the nature of the incident. Explain what happened and the allegedly discriminatory action(s). Indicate who was involved. Include how other people were treated differently, if present, or how you believe others would have been treated differently if they had been present. Attach any written or graphic material or other information pertaining to the complaint.

List names and contact information of anyone who may have knowledge of the alleged discrimination.

Name: _____

Address: _____

City/Town: _____ State: _____ Zip: _____
Home phone: _____ Work phone: _____
E-mail: _____

Name: _____
Address: _____
City/Town: _____ State: _____ Zip: _____
Home phone: _____ Work phone: _____
E-mail: _____

Name: _____
Address: _____
City/Town: _____ State: _____ Zip: _____
Home phone: _____ Work phone: _____
E-mail: _____

How do you think this issue can be resolved?

In the course of conducting a thorough complaint review process, it may become necessary to disclose your name to persons other than those conducting the review. To allow this, sign, date, and submit the consent/release form, enclosed for your convenience.

This discrimination complaint form must also be signed and dated below.

I certify that to the best of my knowledge the information I have provided is accurate and the events and circumstances occurred as I have described them.

Signature: _____ Date: _____

Attachments: Yes No

Please submit complaint form, consent/release form, and any additional information to:

Mr. Richard A. Davey, Chair
Central Massachusetts Metropolitan Planning Organization
State Transportation Building
10 Park Plaza, Suite 2150
Boston, MA 02116-3968