



**COMPASS**  
COMMUNITY PLANNING ASSOCIATION  
of Southwest Idaho



# Title VI Plan

February 2026

Report No. 02-2026



*Working together to  
plan for the future*



# I. Overview

The Community Planning Association of Southwest Idaho (COMPASS) is the forum for regional collaboration in southwest Idaho that helps maintain a healthy and economically vibrant region, offering people choices in how and where they live, work, play, and travel. COMPASS serves as the metropolitan planning organization (MPO) for Ada and Canyon Counties, Idaho.

As a recipient of federal financial assistance, COMPASS complies with the requirements of the Title VI Program in all its activities, programs and services.

Title VI of the Civil Rights Act of 1964 requires that “no person in the United States shall, on the grounds of race, color, or national origin, be excluded from participation in, be denied the benefits of, or be otherwise subjected to discrimination under any program or activity.”

The Civil Rights Restoration Act of 1987 clarified the original intent of Congress, with respect to Title VI of the 1964 Civil Rights Act and other nondiscrimination requirements (The Age Discrimination Act of 1976 (age) and Section 504 of the Rehabilitation Act of 1973 (disability)) by restoring the broad, institutional-wide coverage of these three nondiscrimination statutes and requirements to include all programs and activities of recipients of federal financial assistance. Additionally, the Federal-Aid Highway Act of 1973 prohibited discrimination based on sex. Executive Orders 12898 (Environmental Justice) and 13166 (Limited English Proficiency) provided additional clarification under Title VI.

COMPASS will comply with the requirements of the Title VI Program in all its activities, programs and services.

## II. Policy Statement

COMPASS is committed to compliance with Title VI of the Civil Rights Act of 1964 and all related regulations and directives. COMPASS assures that no person shall, on the grounds of race, color, national origin, sex, age, disability, low-income or Limited English Proficiency (LEP), be excluded from participation in, be denied the benefits of, or be otherwise subjected to discrimination under any COMPASS service, program, or activity. COMPASS' Title VI Plan in its entirety applies to all of COMPASS's programs and services, regardless of funding source.

To ensure compliance with Title VI of the Civil Rights Act and related authorities, COMPASS commits to:

- 1) Conducting each of its programs, services and activities in compliance with all the requirements of Title VI of the Civil Rights Act and related authorities.
- 2) Requiring its contractors, subcontractors and grantees to comply with Title VI of the Civil Rights Act and related authorities.
- 3) Promptly taking necessary measures to ensure compliance with Title VI of the Civil Rights Act and related authorities.

COMPASS will be proactive in its efforts to prevent discrimination, and will consider and address matters of access, benefits, and participation as they relate to COMPASS programs, services, contracting opportunities, educational opportunities, employment opportunities and any other activities of COMPASS.

Any person believing that COMPASS has violated the provisions of Title VI of the Civil Rights Act and related authorities may file a complaint with COMPASS' Director of Operations.

COMPASS' Director of Operations oversees COMPASS' Title VI plan and overall program compliance. COMPASS' Communication Coordinator oversees Title VI compliance as it relates to communication and public engagement opportunities and compiles and submits required Title VI reports.

Anyone with questions or requiring additional information related to COMPASS' Title VI policy and its implementation should contact the Director of Operations, at [info@compassidaho.org](mailto:info@compassidaho.org), at 208-855-2558, or at 700 NE 2<sup>nd</sup> Street, Meridian, ID 83642.

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Craig Raborn, Executive Director

Date

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Megan Sonnen, Director of Operations

Date

### III. Assurances

**Executive Director** – The Executive Director is the head of COMPASS and is responsible to the COMPASS Board of Directors. The Executive Director provides leadership, guidance, direction, and support for COMPASS’s Title VI programs.

**Director of Operations** – The Director of Operations is responsible for supervising, reviewing, monitoring, and evaluating the effectiveness of equal employment opportunity programs. The Director of Operations is responsible for managing the Title VI, ADA/Section 504, Limited English Proficiency (LEP), and Disadvantaged Business Enterprises programs. The Director of Operations acts as a liaison between COMPASS and federal and state officials regarding Equal Employment Opportunity (EEO issues).

**Supervisors** – COMPASS supervisors are responsible for familiarizing themselves with the requirements of Title VI, E.O. 12898, and E.O. 13166, and for complying with COMPASS' Title VI Program. They are responsible for promptly reporting issues or complaints concerning Title VI and related statutes to the Director of Operations.

### IV. Program Area Review

COMPASS is responsible for the transportation planning process within its planning area. COMPASS develops a short-range capital improvement budget known as the Transportation Improvement Program (TIP), a long-range transportation plan (*Communities in Motion*) and develops and implements an annual Unified Planning Work Program (UPWP).

COMPASS principal planners, the Director of Operations and the Communication Coordinator are responsible for assuring that all transportation planning processes are executed in accordance with Title VI requirements. This process entails deliberation of all possible social, economic, and environmental effects of a proposed plan or program on identified groups to avoid the unintended creation of inappropriate and biased programs.

#### **Compliance Monitoring**

- Monitor overall strategies and goals of the transportation planning process to ensure Title VI compliance
- Monitor the use of demographic information to identify minority and low-income populations and examine the distributions of the benefits/burdens of the transportation plans and activities on these groups
- Monitor the service equities of the planning data collection and analyses for impacts on different socio-economic groups
- Monitor the public involvement processes to improve effectiveness and reduce participation barriers for minority and low-income populations
- Monitor Environmental Justice (E.O. 12898) issues to identify and locate minority and low-income populations that may be impacted by transportation planning programs
- Monitor compliance with E.O. 13166, Limited English Proficiency, to improve access and understanding of transportation planning processes for those in the population confronted with language barriers
- Monitor MPO accomplishments and problem areas

## Annual Review

The Director of Operations and the Communications Coordinator review the information listed below for compliance with Title VI and report it annually.

- Strategies used to ensure that all components of the transportation planning process comply with Title VI
- Whether COMPASS has developed a demographic profile of its planning area that includes identification of minority and low-income populations
- Whether COMPASS has developed a process to seek to identify the needs of minority and low-income populations and to use demographic information to assess the distribution of benefits across these groups
- What process is in place to assess the benefits/burdens of transportation system investments on minority and low-income populations on an analytic basis and whether an appropriate data source and tools are used to support the analysis
- Whether a public involvement strategy for engaging minority and low-income populations in transportation decision-making is in place and what steps are being taken to reduce any participation barriers that have been identified
- Determine if the public involvement process is routinely evaluated and whether there have been efforts made to improve effectiveness, especially with regard to any affected groups
- What efforts have been made to engage minority and low-income populations in the public outreach effort and whether the public outreach effort utilizes media targeted to minority and low-income groups
- What procedure COMPASS has established for using issues/concerns raised by affected populations and individuals in the decision-making process
- Demographic composition of COMPASS's workforce
- The names, race and gender of the individuals on COMPASS's Board of Directors and what criteria has been established for their selection and retention
- Number of consultant agreements awarded and the dollar amount
- Efforts made to ensure an equal opportunity for consulting firms to participate in the consultant selection process
- Number of hearings, the location, and the times of day the hearings were held; the demographics of participants at the hearings
- Number of public information meetings/open houses held and the demographics of the participants
- Efforts made to take Environmental Justice concerns into consideration in the transportation planning process
- Whether there was any training received regarding Title VI and related regulations
- Review of COMPASS internal complaint procedures and policies
- Status of any Title VI complaints received regarding any of the transportation planning and public involvement processes

- Any significant Title VI activities or accomplishments made during the review period
- Any significant Title VI activities or actions planned for the ensuing year

## V. Data Collection

Consistent with federal regulations, COMPASS collects demographic data of participants and beneficiaries of its programs to identify trends and potential barriers to access. This data is reported annually in the Title VI questionnaire.

## VI. Training

COMPASS encourages all staff to incorporate relevant nondiscrimination training into their annual training plans. COMPASS reports all Title VI nondiscrimination training as part of its annual Title VI questionnaire.

## VII. Discrimination Complaints

Any person who believes that he or she, individually, or as a member of any specific class has been subjected to discrimination including but not limited to discrimination prohibited by Title VI of the Civil Rights Act of 1964, the American with Disabilities Act of 1990, Section 504 of the Rehabilitation Act of 1973, Age Discrimination Act of 1975, and the Civil Rights Restoration Act of 1987, as amended, may file a complaint with COMPASS. A complaint may also be filed by a representative on behalf of such a person. All complaints will be referred to COMPASS' Director of Operations for review and action.

## VIII. Complaint Process

To have the complaint considered under this procedure, the complainant must file the complaint no later than 180 days after:

- a) The date of alleged act of discrimination, or
- b) Where there was a continuing course of conduct, the date on which that conduct was discontinued.

In either case, the Director of Operations or his/her designee may extend the time for filing or waive the time limit in the interest of justice, specifying in writing the reason for so doing.

Complaints shall be in writing and shall be signed by the complainant and/or the complainant's representative. Complaints shall set forth as fully as possible the facts and circumstances surrounding the claimed discrimination. If necessary, the Director of Operations will assist the person in reducing the complaint to writing and submit the written version of the complaint to the person for signature. The complaint shall then be handled according to the investigative procedures as outlined below.

Please Note This Exception to the Procedures:

*All complaints regarding accessibility for the disabled must be forwarded directly to the Idaho Transportation Department (ITD) for investigation.*

Within 10 days, the Director of Operations will acknowledge receipt of the allegation, inform the complainant of action taken or proposed action to process the allegation, and advise the complainant of other avenues of redress available, such as with ITD and/or the US Department of Transportation (USDOT).

COMPASS will advise ITD within 10 days of receipt of the allegations. Generally, the following information will be included in every notification to ITD:

- a) Name, address, and phone number of the complainant.
- b) Name(s) and address(es) of alleged discriminating official(s).
- c) Basis of complaint.
- d) Date of alleged discriminatory act(s).
- e) Date of complaint received by COMPASS.
- f) A statement of the complaint.
- g) Other agencies (state, local or federal) where the complaint has been filed.
- h) An explanation of the actions COMPASS has taken or proposed to resolve the issue raised in the complaint.

Within 60 days, the Director of Operations will conduct an investigation of the allegation and based on the information obtained, will render a recommendation for action in a report of findings to COMPASS' authorized representative. The complaint should be resolved by informal means whenever possible. Such informal attempts and their results will be summarized in the report of findings.

Within 90 days of receipt of the complaint COMPASS' authorized representative will notify the complainant in writing of the final decision reached, including the proposed disposition of the matter. The notification will advise the complainant of his/her appeal rights with ITD, or USDOT, if they are dissatisfied with the final decision rendered by COMPASS. The Director of Operations will also provide ITD with a copy of this decision and summary of findings upon completion of the investigation.

Contacts for the different Title VI administrative jurisdictions are as follows:

Megan Sonnen

Director of Operations

COMPASS

700 NE 2<sup>nd</sup> Street, Suite 200

Meridian, ID 83642

208-475-2228

msonnen@compassidaho.org

Idaho Transportation Department  
Office of Civil Rights  
PO Box 7129  
Boise, ID 83707  
208-334-8884  
civilrights@itd.idaho.gov

Federal Highway Administration  
Idaho Division Office  
Carlos Herrera, Acting Deputy Division Administrator  
3050 Lakeharbor Lane, Suite 126  
Boise, ID 83703  
208-334-1844  
carlos.herrera@dot.gov

## IX. Dissemination

The COMPASS Title VI plan is available to all internal users and members of the public, interest groups and organizations via the COMPASS website: <https://compassidaho.org/public-involvement-plans/>

Hard copies or alternative formats of the COMPASS Title VI plan are available to all internal users and members of the public, interest groups and organizations upon request to the Director of Operations.

## X. Language Access Plan

COMPASS maintains the Limited English Proficiency (LEP) Language Access Plan (LAP) and it is available from COMPASS by request from [info@compassidaho.org](mailto:info@compassidaho.org). COMPASS is working to update its LEP/LAP as more current census data becomes available.

# Appendix A

## Authorities

COMPASS' Title VI plan was developed pursuant to the following authorities:

- Title VI of the Civil Rights Act of 1964 (42 USC 2000d) prohibits discrimination in federally funded programs on the basis of race, color, and national origin
- Uniform Relocation Assistance and Real Property Acquisition Policies Act of 1970, as amended (42 USC 4601) prohibits unfair treatment of persons displaced or whose property has been acquired as a result of projects that are undertaken with federal financial assistance.
- Federal-Aid Highway Act of 1973 (23 USC 324), prohibits discrimination on the basis of sex.
- Section 504 of the Rehabilitation Act of 1973, (29 USC 794) as amended: prohibits discrimination on the basis of disability
- Age Discrimination Act of 1975, as amended (42 USC 6101) prohibits discrimination on the basis of age.
- Civil Rights Restoration Act of 1987 (Public Law 100-259 March 1988) amended Title VI of the 1964 Civil Rights Act, the Age Discrimination Act of 1975 and Section 504 of the Rehabilitation Act of 1973 to make clear that discrimination is prohibited throughout all the operations of an agency if any part of the agency receives federal assistance.
- Titles II and III of the Americans with Disabilities Act of 1990, (42 USC 12131-12189) 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.
- Executive Order 12898: Federal Actions to Address Environmental Justice in Minority Populations and Low-Income Populations which protects from 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 Persons with Limited English Proficiency (LEP), and resulting agency guidance, national origin discrimination includes discrimination because of LEP. Compliance with Executive Order 13166 requires agencies to take reasonable steps to ensure that LEP persons have meaningful access to programs. (70 FR 74087)
- Title IX of the Education Amendments of 1972, as amended, prohibits discrimination because of sex in education programs or activities. (20 USC 1681)
- The National Environmental Policy Act of 1969 (42 USC 4321) prohibits disproportionately high and adverse human health or environmental effects of its programs, policies, and activities on minority populations and low-income populations.

- 49 CFR Part 21: Nondiscrimination in Federally-Assisted Programs of the Department of Transportation – Effectuation of Title VI of the Civil Rights Act of 1964.
- 49 CFR Part 27: Nondiscrimination on the Basis of Disability in Programs or Activities Receiving Federal Financial Assistance.
- 49 CFR Part 28: Enforcement of Nondiscrimination on the Basis of Handicap in Programs or Activities Conducted by the Department of Transportation.
- 49 CFR Part 37: Transportation Services for Individuals with Disabilities – Americans with Disabilities Act.
- 28 CFR Part 35: Discrimination on the Basis of Disability in State and Local Government Services
- 28 CFR Part 50.3: Department of Justice Guidelines for Enforcement of Title VI of the Civil Rights Act of 1964.
- FTA Title VI Circular – FTA C 4702.1B
- FTA Americans with Disabilities Act Circular – FTA C 4710.1

# Appendix B

## Contract Assurances

COMPASS requires the inclusion of the following terms in all of its professional contracts:

During the performance of work covered by this Agreement, the CONTRACTOR for itself, its assignees, agents, employees, subcontractors and successors (hereinafter referred to as the "CONTRACTOR") agrees as follows:

1. **Compliance With Regulations.** The CONTRACTOR shall comply with all regulations of the United States Department of Transportation relative to Civil Rights, with specific reference to Title 49 CFR Part 21, Title VI of the Civil Rights Act of 1964 as amended, Title 23 CFR Part 230 and Title 49 CFR Part 26.
2. **Nondiscrimination.** The CONTRACTOR, with regard to the work performed by them during the term of this Agreement, shall not in any way discriminate against any employee or applicant for employment, subcontractor or solicitations for subcontract including procurement of materials and equipment, or any other individual or firm providing or proposing services based on race, color, sex, national origin, age, disability, limited English proficiency or economic status.
3. **Solicitations for Subcontracts, Including Procurement of Materials and Equipment.** In all solicitations, either by bidding or negotiation, made by the CONTRACTOR for work or services performed under subcontract, including procurement of materials and equipment, each potential subcontractor or supplier shall be made aware by the CONTRACTOR of the obligations of this Agreement and to the Civil Rights requirements based on race, color, sex, national origin, age, disability, limited English proficiency or economic status.
4. **Information and Reports.** The CONTRACTOR shall provide all information and reports required by regulations and/or directives and sources of information, and their facilities as may be determined by COMPASS, the State of Idaho, or the appropriate Federal Agency. The CONTRACTOR is required to retain all records for a period of three (3) years after the final payment is made under the Agreement.
5. **Sanctions for Noncompliance.** In the event the CONTRACTOR or a Subcontractor is in noncompliance with the EEO Special Provisions, COMPASS shall impose such sanctions as it or the appropriate Federal Agency may determine to be appropriate, including, but not limited to:
  - Withholding payments to the CONTRACTOR until they have achieved compliance;
  - Suspension of the agreement, in whole or in part, until the CONTRACTOR or Subcontractor is found to be in compliance, with no progress payment being made during this time and no time extension made;
  - Cancellation, termination, or suspension of the Agreement, in whole or in part;
  - Assess against the CONTRACTOR's final payment on this Agreement an administrative remedy by reducing the final payment or future progress payments in an amount equal to 10% of this agreement or \$7,700, whichever is less.

6. Incorporation of Provisions. The CONTRACTOR will include the provisions of paragraphs 1 through 5 above in every subcontract of \$10,000 or more, to include procurement of materials and leases of equipment unless exempt by the Acts, the Regulations, and directives pursuant thereto. The CONTRACTOR shall take such action with respect to any subcontract or procurement as COMPASS or the appropriate Federal Agency 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 with a subcontractor or supplier as a result of such direction, the CONTRACTOR may request COMPASS to enter into any litigation to protect the interest of COMPASS. In addition, the CONTRACTOR may request the United States to enter into the litigation to protect the interests of the United States.

During the performance of this contract, the CONTRACTOR agrees to comply with all non-discrimination statutes and authorities; including but not limited to:

- 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 § 4 71, Section 4 7123), 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);
- Executive Order 12898, Federal Actions to Address Environmental Justice in Minority Populations and Low-Income Populations, which ensures 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 Persons 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 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).