

TITLE VI IMPLEMENTATION PLAN

Central Shenandoah Planning District Commission

Approved: April 20, 2026



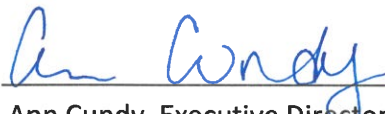
Title VI Policy

The Central Shenandoah Planning District Commission (CSPDC) will effectuate the provisions of Title VI of the Civil Rights Act of 1964, 49 Code of Federal Regulations (CFR) Part 21, 23 CFR Part 200, and other applicable directives. These authorities provide that no person in the United States shall, on the grounds of race, color, or national origin be excluded from participation in, be denied the benefits of, or be otherwise subjected to discrimination under any program or activity for which CSPDC receives federal assistance.

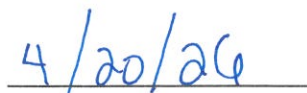
Further, as a recipient of federal-aid funding, CSPDC strives to achieve nondiscrimination in all its programs and activities whether or not those programs and activities are federally funded. CSPDC will ensure that every employee, contractor, and sub-recipient of federal-aid funds administered by the CSPDC or through any of its programs, is aware of and applies the intent and spirit of Title VI of the Civil Rights Act of 1964 and other nondiscrimination authorities in performing assigned duties.

The Executive Director has been designated as the CSPDC's Title VI Coordinator and is responsible for ensuring that all matters relating to nondiscrimination are administered effectively. Individuals with questions, problems, or complaints regarding this statement, and the implementation of the stated provisions, should contact the Title VI Coordinator:

Ann Cundy, Executive Director
Central Shenandoah Planning District Commission
112 MacTanly Place
Staunton, VA 24401
(540) 885-5714
ann@cspdc.org



Ann Cundy, Executive Director



Date

Title VI Implementation Plan

The Title VI Implementation Plan describes the measures the Central Shenandoah Planning District Commission (CSPDC) adopts to ensure compliance with Title VI of the Civil Rights Act of 1964 which prohibit discrimination on the basis of race, color, or national origin. Any agency that receives federal financial assistance must comply with Title VI. CSPDC and the organizations and programs it staffs or funds are subject to the Title VI Implementation Plan. This includes the Harrisonburg-Rockingham-Metropolitan Planning Organization (HRMPO) and the Staunton-Augusta-Waynesboro Metropolitan Planning Organization (SAWMPO).

The BRITE Transit Program is treated as a separate entity and is not included in this implementation plan. BRITE is governed by its own Title VI plan that can be accessed via the BRITE Transit website at www.britebus.org.

Approval and Adoption of Plan

This plan was developed by the CSPDC in coordination with the HRMPO and SAWMPO, and in compliance with guidance set forth by the appropriate state and federal agencies. In accordance with the Public Participation Plans for the HRMPO and SAWMPO, the plan was released for a public comment period of a minimum of 14-days. During this time, the MPOs received no public comment and the plan was approved by each MPO as indicated by the signatures herein.

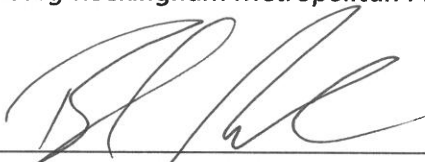


Dennis Driver, Policy Board Chair

Harrisonburg-Rockingham Metropolitan Planning Organization



Date



Brad Arrowood, Policy Board Chair

Staunton-Augusta-Waynesboro Metropolitan Planning Organization



Date

The Board of Commissioners, as the agency's governing body, is responsible for the final approval and adoption of the CSPDC's Title VI Policy and Implementation Plan.



RESOLUTION

Approving and Adopting the Title VI Plan

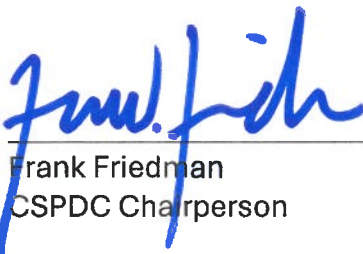
WHEREAS, Title VI of the Civil Rights Act of 1964 (U.S.C. 200D) provides that no person shall, on the grounds of race, color, or national origin, be excluded from participation in, be denied the benefits of, or be subject to discrimination under any program or activity receiving Federal financial assistance; and

WHEREAS, the Federal Highway Administration requires that any organization that is the recipient of Federal financial assistance shall have an adopted Title VI Plan and Policy; and

WHEREAS, the Central Shenandoah Planning District Commission is the recipient of Federal Highway Administration funding for the administration of the Harrisonburg-Rockingham Metropolitan Planning Organization, the Staunton-Augusta-Waynesboro Metropolitan Planning Organization, and the Rural Transportation Program.

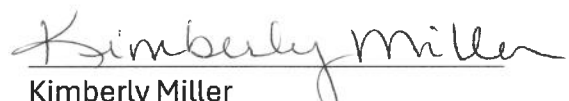
NOW THEREFORE, BE IT RESOLVED, that the Central Shenandoah Planning District Commission does hereby approve and adopt the Title VI Plan dated April 16, 2026.

Adopted by the CSPDC this 20th day of April 2026.



Frank Friedman
CSPDC Chairperson

ATTEST:



Kimberly Miller
Clerk of the Commission

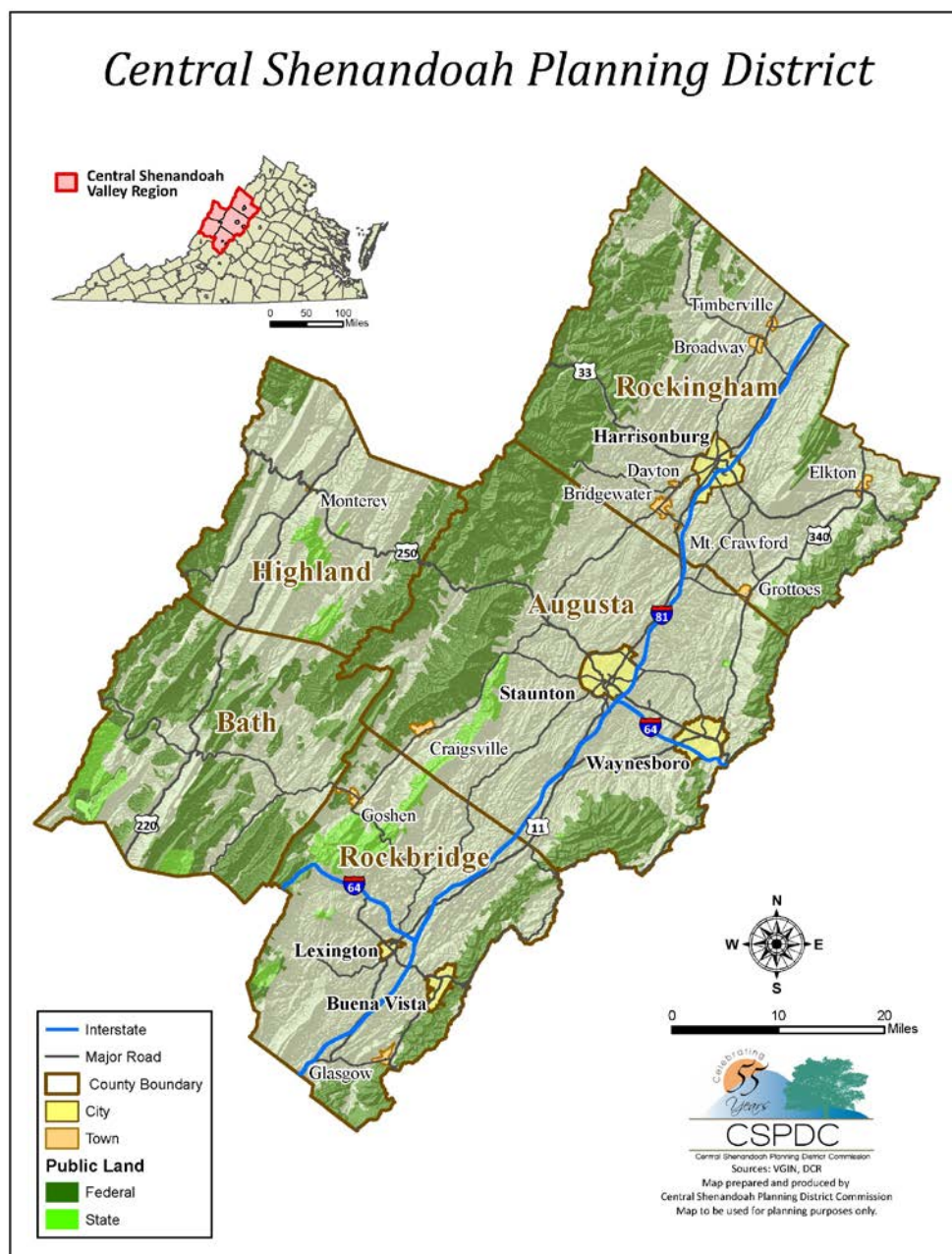
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1. Overview

Title VI of the Civil Rights Act of 1964 prohibits discrimination on the basis of race, color, or national origin by agencies that receive federal financial assistance. As a recipient of federal financial assistance, the Central Shenandoah Planning District Commission (CSPDC) and its programs do not discriminate on the basis of race, color, or national origin.

The CSPDC is a regional planning organization serving five counties (Augusta, Bath, Highland, Rockbridge, and Rockingham), five cities (Buena Vista, Harrisonburg, Lexington, Staunton, and Waynesboro), and eleven towns in the Central Shenandoah Valley of Virginia.



The CSPDC operates multiple programs and serves as the administrative and staffing agency for two Metropolitan Planning Organizations. An organizational chart is provided in Appendix I.

The Title VI Program describes how the CSPDC ensures nondiscrimination in communication and public participation, planning and programming, consultant contracts, and education and training. The required components of the program are covered in four sections – the Title VI program, the CSPDC staff responsible for oversight of the program, the CSPDC’s approach to ensuring nondiscrimination for individuals with language access barriers, and procedures and forms related to discrimination complaints.

This Title VI Implementation Plan describes how all federally-funded programs and projects administered and staffed by the CSPDC will comply with Title VI of the Civil Rights Act of 1964. The CSPDC is the contractual administrator of the Harrisonburg-Rockingham Metropolitan Planning Organization (HRMPO) and the Staunton-Augusta-Waynesboro Metropolitan Planning Organization (SAWMPO), and has other grant-funded program areas that may receive federal financial assistance. This plan applies to any applicable planning activities under the umbrella of the Economic Development Administration (EDA), the Southeast Crescent Regional Commission (SCRC), and the Appalachian Regional Commission (ARC) as well as the following programs:

- Harrisonburg-Rockingham Metropolitan Planning Organization (HRMPO)
- Staunton-Augusta-Waynesboro Metropolitan Planning Organization (SAWMPO)
- Rural Transportation Program
- Chesapeake Bay Watershed Implementation Plan (WIP)
- Homeownership Down Payment Assistance Program
- Hazard Mitigation Plan
- Virginia Telecommunication Initiative (VATI)

Ann Cundy, CSPDC Executive Director, also serves as the Secretary/Administrator for the HRMPO and SAWMPO, and serves as the Title VI Coordinator for each of those organizations and all of the CSPDC programs listed above.

The Executive Director will work with the CSPDC’s program directors and staff to ensure that CSPDC programs and projects are Title VI compliant through staff training, policy maintenance, and regular program reviews. All staff will have an introduction to Title VI training relevant to their program area and ongoing training as necessary. Staff will be made aware of this Title VI Implementation Plan and its requirements and resources.

2. Title VI Program

To ensure Title VI compliance, CSPDC staff and the decision-makers of its organizations and programs will not discriminate on the basis of race, color, or national origin. CSPDC staff evaluate and monitor compliance with nondiscrimination authorities in:

- Communications and Public Participation
- Planning and Programming
- Consultant Contracts
- Education and Training

To comply with Title VI, the CSPDC:

- Maintains current Title VI Assurances
- Promptly corrects any deficiency identified
- Conducts regular reviews of program areas and contractors
- Reviews sub-recipients' Title VI procedures on a regular basis
- Documents and prepares reports of Title VI efforts on a regular basis
- Designates a Title VI Coordinator

2.1 Communications and Public Participation

The CSPDC endeavors to communicate with and provide opportunities for minority, low-income, and disabled persons to participate in all programs. Both the HRMPO and SAWMPO maintain Public Participation Plans that describe processes for communicating and engaging with interested and affected individuals, organizations, agencies, and government entities.

To ensure Title VI compliance in communications and public participation, CSPDC staff will:

- Include contact information for people needing accommodations in all public notices
- Post the Title VI Policy on the CSPDC, HRMPO, and SAWMPO websites
- Include the following statement in all public notices:

"The CSPDC fully complies with Title VI of the Civil Rights Act of 1964 in all programs and activities. The CSPDC provides reasonable accommodations for persons who require special assistance to participate in public involvement opportunities. For more information, or to obtain a Discrimination Complaint Form, contact (540) 885-5174 or visit www.cspdc.org."

- Provide reasonable accommodations for persons who require special assistance to participate in public involvement opportunities
- Collect and monitor demographic data during public input opportunities, and conduct additional targeted outreach if data shows deficiencies in public input from particular groups
- Recruit diverse applicants, including minorities, low-income persons, and persons with disabilities, for public participation opportunities and committee service
- Make meeting materials available in alternative formats upon request

2.2 Planning and Programming

To ensure compliance in planning and programming processes, CSPDC staff will:

- Prepare and update publicly available demographic profiles of the region using the most current and appropriate statistical information
- Maintain separate demographic analyses for the HRMPO and SAWMPO planning areas
- Consider benefits and burdens of transportation projects on minority and low-income populations using maps and geographic demographic data
- Review project selection criteria in Transportation Improvement Programs to ensure they do not have discriminatory impacts
- Analyze proposed transportation projects for potential disproportionate impacts on minority and low-income populations
- Ensure that transportation planning for both MPOs and the rural transportation program considers the needs of all residents, including those without personal vehicles
- Review directives to determine Title VI implications across all program areas

2.3 Consultant and Subrecipient Contracts

The CSPDC is responsible for selection, negotiation, and administration of consultant and subrecipient contracts for PDC programs, HRMPO, and SAWMPO. The CSPDC complies with all relevant federal and state laws in contract selection and evaluates consultant contracts for compliance with nondiscrimination authorities.

CSPDC staff will:

- Ensure inclusion of nondiscrimination language in all contracts and Requests for Proposals

- Require all consultants to verify their compliance with nondiscrimination authorities, procedures, and requirements
- Work with any consultant found to be not in compliance to resolve deficiency status and develop remedial action if necessary
- Review outreach activities to ensure small, disadvantaged, minority, women-owned, and disabled veteran businesses are not excluded from opportunities to compete for consulting contracts
- Document consultant selection processes to demonstrate fair and equitable practices

2.4 Disadvantaged Business Enterprises

Disadvantaged Business Enterprises are for-profit small businesses where socially and economically disadvantaged individuals own at least a 51% interest and control management and daily business operations. Consistent with DOT's Interim Final Rule issued October 3, 2025, race- and sex-based presumptions of social and economic disadvantage have been removed from the DBE program. All individuals seeking DBE certification must now demonstrate eligibility on a case-by-case basis through a personal narrative establishing disadvantage by a preponderance of the evidence, as described in 49 CFR § 26.67, including documentation of specific instances of economic hardship, systemic barriers, and denied opportunities in education, employment, or business. Existing DBE certifications are subject to reevaluation under these new standards.

The CSPDC supports the objectives of the DBE Program:

- To ensure nondiscrimination in the award and administration of FHWA-assisted contracts
- To create a level playing field on which DBEs can compete fairly
- To ensure the DBE Program is narrowly tailored in accordance with applicable law
- To ensure that only firms meeting 49 CFR Part 26 eligibility standards participate as DBEs
- To help remove barriers to DBE participation in federally assisted contracts

2.5 Education and Training

To ensure compliance through education and training, the CSPDC Title VI Coordinator will:

- Distribute information to staff, board and committee members, and stakeholders on Title VI training programs and related nondiscrimination authorities
- Train staff in Title VI nondiscrimination and implementation annually and during new employee orientation
- Track Title VI training of staff, board members, and committee members

3. Individuals with Language Access Barriers

Individuals and who have a limited ability to read, speak, write, or understand English are classified as those with language access barriers. The CSPDC will take reasonable steps to ensure these individuals have meaningful access to programs, activities, services, and information related to planning processes by providing accommodations when and wherever possible to remove language barriers. Failure to ensure these individuals can meaningfully and effectively participate in federally assisted programs and activities, particularly when an individual's primary language is not English, may violate the prohibition against national origin discrimination under Title VI of the Civil Rights Act of 1964.

3.1 Implementation

To ensure meaningful access and participation in planning processes for individuals with language access barriers, CSPDC staff will:

- Provide language interpreter services upon request for in person meetings, and translation of virtual or physical resources directly related to in person meetings held by the CSPDC
- Translate documents and materials based upon the needs of the project and impacted populations, or upon request within reason
- Ensure public notices include statements about reasonable accommodations including the right to free language assistance in the most commonly encountered languages
- Maintain and update a language assistance resource list
- Train staff on:
 - Rights of those with language access barriers to free language assistance
 - How to use language assistance resources
 - How to alert the public of accommodation services when available

3.2 Monitoring and Updating

The CSPDC monitors Language Access Barrier policies using a four-factor analysis:

1. **Demography** - Number and proportion of persons served with Language Access Barriers and languages spoken in the service area
2. **Frequency** - Rate of contact with services or programs
3. **Importance** - Nature and importance of programs/services to people's lives
4. **Resources** - Available resources, including language assistance services

The Title VI Coordinator will:

- Review demographic data and conduct a four-factor analysis on a regular basis and update as necessary
- Proactively modify guidelines if language access barriers are present in >5% of the population in any service area
- Collect and maintain demographic statistics for individuals with language access barriers affected by projects
- Solicit feedback from social service departments and community organizations on language assistance needed

The results of the most recent four-factor analysis are incorporated in this document in Appendix F.

4. Title VI Coordinators and Organization

Title VI Leadership

The Title VI Coordinator serves the CSPDC, HRMPO, and SAWMPO, and has direct access to the highest level of administration over the agency. The Executive Director is the Title VI Coordinator, and they report directly to the Board of Commissioners.

Title VI Coordinator: Ann Cundy

- Email: ann@cspdc.org
- Phone: (540) 885-5174
- Overall responsibility for Title VI compliance
- Coordinates Title VI implementation across all program areas
- Coordinates Title VI reviews and training

- Processes discrimination complaints
- Maintains Title VI documentation

Additional CSPDC staff responsible for implementing the Title VI Program are the program level directors – the Director of Transportation and the Director of Planning. These positions report to the Executive Director. Their contact information is provided below:

Director of Transportation:

Paula Melester

paula@cspdc.org

Director of Planning:

Jeremy Crute

jeremy@cspdc.org

5. Program Areas Covered

5.1 PDC General Programs

The CSPDC provides regional planning and development services to member localities. Title VI applies to all PDC activities that receive federal financial assistance including environmental and resilience, economic and community development, housing, and rural transportation planning programs. Active projects within these PDC planning areas change from year to year and funds are administered through a variety of federal and state agencies.

The CSPDC's Rural Transportation Program, Harrisonburg-Rockingham Metropolitan Planning Organization, and Staunton-Augusta-Waynesboro Metropolitan Planning Organization receive federal financial assistance annually. Unless otherwise specified by program, the Title VI compliance requirements outlined in the CSPDC's Title VI Program and Plan comply with the requirements set forth by the Federal Highway Administration under *23 CFR Part 200 (§ 200.9) and 49 CFR Part 21*.

5.2 Economic Development Programs

EDA Economic Development District Planning and Administration

The CSPDC is designated as an Economic Development District (EDD) by the U.S. Department of Commerce's Economic Development Administration, serving the Counties of Augusta, Bath,

Highland, Rockbridge, and Rockingham, and the Cities of Buena Vista, Harrisonburg, Lexington, Staunton, and Waynesboro.

Through the administration of annual EDA Economic Development District funding, the CSPDC conducts the following economic development planning activities:

- Develops and maintains the region's Comprehensive Economic Development Strategy (CEDS)
- Provides technical assistance to member localities, businesses, and community stakeholders on economic development planning and project development
- Collects, maintains, and analyzes regional economic data to inform planning and investment decisions
- Coordinates with Federal, State, and local partners to align regional priorities with broader economic development goals
- Identifies and supports the development of EDA grant applications on behalf of member localities and regional partners

The EDA Economic Development District program is administered and staffed by the Central Shenandoah Planning District Commission. All programs and activities supported by this funding are subject to the nondiscrimination requirements of Title VI of the Civil Rights Act of 1964. The CSPDC ensures that no person shall, on the grounds of race, color, or national origin, be excluded from participation in, denied the benefits of, or subjected to discrimination under any EDA-funded program or activity administered by the agency. The agency's Title VI obligations under this program are monitored through EDA's standard grant compliance and reporting requirements.

ARC Local Development District Planning and Administration

The CSPDC is designated as a Local Development District (LDD) by the Appalachian Regional Commission (ARC), serving the Counties of Bath, Highland, and Rockbridge, and the Cities of Buena Vista and Lexington within the Appalachian Regional Commission's defined service area.

Through the administration of annual ARC Local Development District funding, the CSPDC conducts the following planning and technical assistance activities:

- Provides technical assistance to member localities, businesses, and community organizations on grant identification, application development, and project implementation

- Assists member localities in accessing ARC area development funding and coordinating ARC-funded projects within the district
- Coordinates with Federal, State, and local partners to advance ARC's strategic investment priorities in the region
- Supports workforce development, infrastructure, and community capacity building initiatives consistent with ARC's investment programs

The ARC Local Development District program is administered and staffed by the Central Shenandoah Planning District Commission. All programs and activities supported by this funding are subject to the nondiscrimination requirements of Title VI of the Civil Rights Act of 1964. The CSPDC ensures that no person shall, on the grounds of race, color, or national origin, be excluded from participation in, denied the benefits of, or subjected to discrimination under any ARC-funded program or activity administered by the agency. The agency's Title VI obligations under this program are monitored through ARC's standard grant compliance and reporting requirements.

SCRC Local Development District Planning and Administration

The CSPDC is designated as a Local Development District (LDD) by the Southeast Crescent Regional Commission (SCRC), serving the Counties of Augusta and Rockingham, and the Cities of Harrisonburg, Staunton, and Waynesboro within the Southeast Crescent Regional Commission's defined service area.

Through the administration of annual SCRC Local Development District funding, the CSPDC conducts the following planning and technical assistance activities:

- Provides technical assistance to member localities, businesses, and community organizations on grant identification, application development, and project implementation
- Assists member localities in accessing SCRC area development funding and coordinating SCRC-funded projects within the district
- Coordinates with Federal, State, and local partners to advance SCRC's strategic investment priorities in the region
- Supports workforce development, infrastructure, and community capacity building initiatives consistent with SCRC's program priorities and investment goals

The SCRC Local Development District program is administered and staffed by the Central Shenandoah Planning District Commission. All programs and activities supported by this funding are subject to the nondiscrimination requirements of Title VI of the Civil Rights Act of 1964. The

CSPDC ensures that no person shall, on the grounds of race, color, or national origin, be excluded from participation in, denied the benefits of, or subjected to discrimination under any SCRC-funded program or activity administered by the agency. The agency's Title VI obligations under this program are monitored through SCRC's standard grant compliance and reporting requirements.

5.3 Transportation Planning Programs

HRMPO

The Harrisonburg-Rockingham Metropolitan Planning Organization (HRMPO) serves the City of Harrisonburg, urbanized portion of Rockingham County, and the Towns of Bridgewater, Dayton, and Mount Crawford.

Through the development of an Annual Unified Planning Work Program (UPWP), the HRMPO conducts the following planning activities:

- Develops and maintains the region's Long-Range Transportation Plan
- Executes and coordinates short-range regional planning studies
- Develops and maintains the HRMPO region's Transportation Improvement Program (TIP)
- Coordinates with Federal, State, and local agencies regarding bicycle and pedestrian planning
- Coordinates with Federal, State, and local agencies regarding freight planning
- Provides regional planning support to the public transit agencies in the HRMPO region

The HRMPO is administered and staffed by the Central Shenandoah Planning District Commission. The HRMPO is supported by a Technical Advisory Committee (TAC) and is governed by a Policy Board. The TAC and Policy Board are comprised of representatives from the five member jurisdictions, representatives from Federal and State agencies, and may also have representatives from other relevant stakeholder groups as determined appropriate by the Board.

Title VI Requirements for HRMPO:

- Conducting a benefits and burdens analysis as part of the development of long-range transportation plans
- The development and maintenance of a Public Participation Plan that outlines the organizations standards for public engagement and inclusion in planning processes
- Assurance of Title VI compliance in all planning studies and projects
- Conducting demographic analysis for project prioritization

- Review of the TIP for equitable distribution of projects

SAWMPO

The Staunton-Augusta-Waynesboro Metropolitan Planning Organization (SAWMPO) serves the Cities of Staunton and Waynesboro, and the urbanized portion of Augusta County.

Through the development of an Annual Unified Planning Work Program (UPWP), the SAWMPO conducts the following planning activities:

- Develops and maintains the region's Long-Range Transportation Plan
- Executes and coordinates short-range regional planning studies
- Develops and maintains the SAWMPO region's Transportation Improvement Program (TIP)
- Coordinates with Federal, State, and local agencies regarding bicycle and pedestrian planning
- Coordinates with Federal, State, and local agencies regarding freight planning
- Provides regional planning support to the public transit agencies in the SAWMPO region

The SAWMPO is administered and staffed by the Central Shenandoah Planning District Commission. The SAWMPO is supported by a Technical Advisory Committee (TAC) and is governed by a Policy Board. The TAC and Policy Board are comprised of representatives from the three member jurisdictions, representatives from Federal and State agencies, and may also have representatives from other relevant stakeholder groups as determined appropriate by the Board.

Title VI Requirements for SAWMPO:

- Conducting a benefits and burdens analysis as part of the development of long-range transportation plans
- The development and maintenance of a Public Participation Plan that outlines the organizations standards for public engagement and inclusion in planning processes
- Assurance of Title VI compliance in all planning studies and projects
- Conducting demographic analysis for project prioritization
- Review of the TIP for equitable distribution of projects

Rural Transportation Program

The Rural Transportation Program serves the non-urbanized portion of Augusta and Rockingham Counties, all of Bath, Highland, and Rockbridge Counties, the Cities of Buena Vista and Lexington, and all of the Towns in the non-urbanized portion of the region.

Through the development of an annual Rural Work Program, the CSPDC conducts the following planning activities:

- Develops and maintains long range plans
- Executes and coordinates short-range regional planning studies
- Coordinates with Federal, State, and local agencies regarding bicycle and pedestrian planning
- Coordinates with Federal, State, and local agencies regarding freight planning
- Provides regional planning support to the public transit agencies in the CSPDC region

The Rural Transportation Program is administered and staffed by the Central Shenandoah Planning District Commission. The Rural Transportation Program is supported by a Technical Advisory Committee (RTAC) comprised of representatives from the member jurisdictions, representatives from Federal and State agencies, and may also have representatives from other relevant stakeholder groups as determined appropriate.

Title VI Requirements for the Rural Transportation Program:

- Conducting a benefits and burdens analysis as part of the development of long-range transportation plans
- Assurance of Title VI compliance in all planning studies and projects
- Conducting demographic analysis for project prioritization

6. Discrimination Complaint Procedures

Any person who believes the CSPDC, HRMPO, or SAWMPO has unlawfully discriminated against them may file a complaint. The following steps/procedures are written for CSPDC staff to follow. A person who believes there has been discrimination may use the information below and forms in Appendix D to file a complaint.

6.1 Eligibility

Any person who believes they—or a specific class of persons—were subjected to discrimination on the basis of race, color, or national origin in CSPDC programs and activities may file a Title VI complaint.

6.2 Filing a Complaint

Forms Available:

- Title VI Discrimination Complaint Form (English)
- Title VI Discrimination Complaint Form (Spanish)
- Additional languages available upon request

How to File:

- Online: Available on CSPDC, HRMPO, and SAWMPO websites
- By mail: 112 MacTanly Place, Staunton, VA 24401
- In person: CSPDC office during business hours
- By phone: (540) 885-5174 (assistance available)
- By email: ann@cspdc.org

Timeline: Complaints must be filed within 180 days of the alleged discrimination, unless the time for filing is extended by the processing agency.

6.3 Complaint Processing

The CSPDC logs all complaints received and forwards complaints through the appropriate federal oversight authority. For Federal Highway Administration (FHWA) funded programs, the CSPDC, HRMPO, or SAWMPO will forward the complaint to the Virginia Department of Transportation (VDOT), which should forward the complaint to Virginia's FHWA Division Office, which should forward the complaint to the FHWA Office of Civil Rights (OCR).

OCR will decide whether to accept, dismiss, or transfer the complaint and will notify the Complainant, the FHWA Division Office, the Virginia Department of Transportation, and the CSPDC/HRMPO/SAWMPO. The CSPDC, HRMPO, and SAWMPO are committed to full cooperation with all oversight authorities in the investigation of any filed complaints and will maintain records of all complaints received, actions taken, outcomes, and corrective actions implemented.

7. Appendices

Appendix A: Title VI of the Civil Rights Act of 1964

Appendix B: Non-Discrimination Statement

Appendix C: Certificate of Assurance

Appendix D: Title VI Complaint Form

Appendix E: Public Notification

Appendix F: Language Access Barriers Four-Factor Analysis

Appendix G: Review Procedures

Appendix H: HRMPO and SAWMPO Public Participation Plans

Appendix I: Organizational Charts

Appendix J: List of Commission Members

Appendix A: Title VI of the Civil Rights Act of 1964

The eleven titles of the Civil Rights Act of 1964 are:

- I. Voting Rights
- II. Public Accommodation
- III. Desegregation of Public Facilities
- IV. Desegregation of Public Education
- V. Commission on Civil Rights
- VI. Nondiscrimination in Federally Assisted Programs and Activities
- VII. Equal Employment Opportunity
- VIII. Registration and Voting Statistics
- IX. Intervention and Procedure after Removal in Civil Rights Cases
- X. Establishment of Community Relations Service
- XI. Miscellaneous

Title VI of the Civil Rights Act of 1964 addresses nondiscrimination in federally assisted programs and activities. Title VI declares it to be the policy of the United States that discrimination on the grounds of race, color, or national origin shall not occur in connection with programs and activities receiving federal financial assistance and authorizes and directs the appropriate federal departments and agencies to take action to carry out this policy. Subsequent nondiscrimination laws expanded the range and scope of Title VI coverage and applicability. Executive orders and federal agency orders and memos clarify implementation of nondiscrimination policy.

Appendix B: Non-Discrimination Statement

The Central Shenandoah Planning District Commission (CSPDC) gives public notice of its policy to assure full compliance with Title VI of the Civil Rights Act of 1964, the Civil Rights Restoration Act of 1987 (PL 100.259), and all related statutes. CSPDC is committed to ensuring that no person in the United States of America shall, on the grounds of race, color, or national origin, be excluded from the participation in, be denied the benefits of, or be otherwise subjected to discrimination under any program or activity for which CSPDC receives Federal financial assistance as required by Title VI.

In addition to Title VI, the following federal statutes and regulations also prohibit discrimination:

- **Section 162(a) of the Federal-Aid Highway Act of 1973** (23 U.S.C. § 324) - Prohibits discrimination based on sex
- **Section 504 of the Rehabilitation Act of 1973 (29 U.S.C. § 794)** - Prohibits discrimination based on disability
- **The Age Discrimination Act of 1975** (42 U.S.C. § 6101) - Prohibits discrimination based on age
- **The Americans with Disabilities Act of 1990** (42 U.S.C. § 12101 et seq.) - Prohibits discrimination based on disability
- **Title IX of the Education Amendments of 1972** – Prohibits discrimination based on sex in education programs
- **Civil Rights Restoration Act of 1987** (P.L. 100-259) - Broadens scope of Title VI coverage

Any person who believes that he or she has, individually, or as a member of any specific class of persons, been excluded from the participation in, been denied the benefits of, or been otherwise subjected to discrimination under any program or activity for which CSPDC provides assistance, and believes the discrimination is based upon race, color, or national origin has the right to file a formal complaint.

The CSPDC Executive Director is responsible for initiating and monitoring Title VI activities, preparing required reports, and other responsibilities as required by Title 23 Code of Federal Regulations (CFR) Part 200, and Title 49 CFR Part 21.

To submit a formal complaint (Appendix D) or to request additional information on Title VI obligations, contact Ann Cundy, CSPDC Title VI Coordinator, 112 MacTanly Place, Staunton VA, 24401; phone (540) 885-5174; email ann@cspdc.org. For complainants who may be unable to file a written complaint, verbal information will be accepted by CSPDC by phone or in person.

Appendix C: Certificate of Assurance

CSPDC Title VI/Nondiscrimination Assurance (DOT Order No. 1050.2A) inclusive of Appendices A through E.

CENTRAL SHENANDOAH PLANNING DISTRICT COMMISSION
TITLE VI / NONDISCRIMINATION ASSURANCE
(DOT Order No.1050.2A)

The Central Shenandoah Planning District Commission, administrator of the Harrisonburg Rockingham Metropolitan Planning Organization (HRMPO) and the Staunton Augusta Waynesboro Metropolitan Planning Organization (SAWMPO), (herein referred to as the "Recipient"), HEREBY AGREES THAT, as a condition to receiving any Federal financial assistance from the U.S. Department of Transportation (DOT), through the **Federal Highway Administration (FHWA)**, is subject to and will comply with the following:

Statutory/Regulatory Authorities

- Title VI of the Civil Rights Act of 1964 (42 U.S.C. § 2000d *et seq.*, 78 stat. 252), (prohibits discrimination on the basis of race, color, national origin);
- 49 C.F.R. Part 21 (entitled *Nondiscrimination In Federally-Assisted Programs Of The Department Of Transportation – Effectuation Of Title VI Of The Civil Rights Act Of 1964*);
- 28 C.F.R. section 50.3 (U.S. Department of Justice Guidelines for Enforcement of Title VI of the Civil Rights Act of 1964);

The preceding statutory and regulatory cites hereinafter are referred to as the "Acts" and "Regulations," respectively.

General Assurance

In accordance with the Acts, the Regulations, and other pertinent directives, circulars, policy, memoranda, and/or guidance, the Recipient hereby gives assurance that it will promptly take any measures necessary to ensure that:

"No person in the United States shall, on the ground of race, color, or national origin, be excluded from participation in, be denied the benefits of, or be otherwise subjected to discrimination under any program or activity," for which the Recipient receives Federal financial assistance from DOT, including the Federal Highway Administration.

The Civil Rights Restoration Act of 1987 clarified the original intent of Congress, with respect to Title VI and other Nondiscrimination requirements (The Age Discrimination Act of 1975, and Section 504 of the Rehabilitation Act of 1973), by restoring the broad, institutional-wide scope and coverage of these nondiscrimination statutes and requirements to include all programs and activities of the Recipient, so long as any portion of the program is Federally assisted.

Specific Assurances

More specifically, and without limiting the above general Assurance, the Recipient agrees with and gives the following Assurances with respect to its federally assisted Highway Program:

1. The Recipient agrees that each "activity," "facility," or "program," as defined in §§ 21.23 (b) and 21.23 (e) of 49 C.F.R. § 21 will be (with regard to an "activity") facilitated, or

will be (with regard to a "facility") operated, or will be (with regard to a "program") conducted in compliance with all requirements imposed by, or pursuant to the Acts and the Regulations.

2. The Recipient will insert the following notification in all solicitations for bids, Requests For Proposals for work, or material subject to the Acts and the Regulations made in connection with all Federal-Aid Highway Program and, in adapted form, in all proposals for negotiated agreements regardless of funding source:

*"The **Central Shenandoah Planning District Commission** in accordance with the provisions of Title VI of the Civil Rights Act of 1964 (78 Stat. 252, 42 U.S.C. §§ 2000d to 2000d-4) and the Regulations, hereby notifies all bidders that it will affirmatively ensure that any contract entered into pursuant to this advertisement, disadvantaged business enterprises will be afforded full and fair opportunity to submit bids in response to this invitation and will not be discriminated against on the grounds of race, color, or national origin in consideration for an award."*

3. The Recipient will insert the clauses of Appendix A and E of this Assurance in every contract or agreement subject to the Acts and the Regulations.
4. The Recipient will insert the clauses of Appendix B of this Assurance, as a covenant running with the land, in any deed from the United States effecting or recording a transfer of real property, structures, use, or improvements thereon or interest therein to a Recipient.
5. That where the Recipient receives Federal financial assistance to construct a facility, or part of a facility, the Assurance will extend to the entire facility and facilities operated in connection therewith.
6. That where the Recipient receives Federal financial assistance in the form, or for the acquisition of real property or an interest in real property, the Assurance will extend to rights to space on, over, or under such property.
7. That the Recipient will include the clauses set forth in Appendix C and Appendix D of this Assurance, as a covenant running with the land, in any future deeds, leases, licenses, permits, or similar instruments entered into by the Recipient with other parties:
 - a. for the subsequent transfer of real property acquired or improved under the applicable activity, project, or program; and
 - b. for the construction or use of, or access to, space on, over, or under real property acquired or improved under the applicable activity, project, or program.
8. That this Assurance obligates the Recipient for the period during which Federal financial assistance is extended to the program(s), except where the Federal financial assistance is to provide, or is in the form of, personal property, or real property, or interest therein, or structures or improvements thereon, in which case the Assurance obligates the Recipient, or any transferee for the longer of the following periods:
 - a. the period during which the property is used for a purpose for which the Federal financial assistance is extended, or for another purpose involving the provision of similar services or benefits; or

- b. the period during which the Recipient retains ownership or possession of the property.
9. The Recipient will provide for such methods of administration for the program(s) as are found by the Secretary of Transportation or the official to whom he/she delegates specific authority to give reasonable guarantee that it, other recipients, sub-recipients, sub-grantees, contractors, subcontractors, consultants, transferees, successors in interest, and other participants of Federal financial assistance under such program(s) will comply with all requirements imposed or pursuant to the Acts, the Regulations, and this Assurance.
10. The Recipient agrees that the United States has a right to seek judicial enforcement with regard to any matter arising under the Acts, the Regulations, and this Assurance.

By signing this ASSURANCE, the **Central Shenandoah Planning District Commission** also agrees to comply (and require any sub-recipients, sub-grantees, contractors, successors, transferees, and/or assignees to comply) with all applicable provisions governing the **FHWA or the Virginia Department of Transportation (VDOT)** access to records, accounts, documents, information, facilities, and staff. You also recognize that you must comply with any program or compliance reviews, and/or complaint investigations conducted by **FHWA or VDOT**. You must keep records, reports, and submit the material for review upon request to **FHWA or VDOT**, or its designee in a timely, complete, and accurate way. Additionally, you must comply with all other reporting, data collection, and evaluation requirements, as prescribed by law or detailed in program guidance.

The **Central Shenandoah Planning District Commission** gives this ASSURANCE in consideration of and for obtaining any Federal grants, loans, contracts, agreements, property, and/or discounts, or other Federal-aid and Federal financial assistance extended after the date hereof to the recipients by the U.S. Department of Transportation under the **Federal-Aid Highway Program**. This ASSURANCE is binding on the **Commonwealth of Virginia**, other recipients, sub-recipients, sub-grantees, contractors, subcontractors and their subcontractors, transferees, successors in interest, and any other participants in the **Federal-Aid Highway Program**.

Central Shenandoah Planning District Commission

by Ann W. Cundy
Ann W. Cundy, Executive Director

DATED 03/23/26

APPENDIX A
Contractor/ Consultant/Supplier Agreement: U.S. DOT 1050.2A -- Appendix A

During the performance of this contract, the contractor, for itself, its assignees, and successors in interest (hereinafter referred to as the "contractor") agrees as follows:

1. Compliance with Regulations: The contractor (hereinafter includes consultants) will comply with the Acts and the Regulations relative to Nondiscrimination in Federally-assisted programs of the U.S. Department of Transportation, the Federal Highway Administration, as they may be amended from time to time, which are herein incorporated by reference and made a part of this contract.
2. Nondiscrimination: The contractor, with regard to the work performed by it during the contract, will not discriminate on the grounds of race, color, or national origin in the selection and retention of subcontractors, including procurements of materials and leases of equipment. The contractor will not participate directly or indirectly in the discrimination prohibited by the Acts and the Regulations, including employment practices when the contract covers any activity, project, or program set forth in Appendix B of 49 CFR Part 21.
3. Solicitations for Subcontracts, Including Procurements of Materials and Equipment: In all solicitations, either by competitive bidding, or negotiation made by the contractor for work to be performed under a subcontract, including procurements of materials, or leases of equipment, each potential subcontractor or supplier will be notified by the contractor of the contractor's obligations under this contract and the Acts and the Regulations relative to Nondiscrimination on the grounds of race, color, or national origin.
4. Information and Reports: The contractor will provide all information and reports required by the Acts, the Regulations, and directives issued pursuant thereto and will permit access to its books, records, accounts, other sources of information, and its facilities as may be determined by the Recipient or the Federal Highway Administration to be pertinent to ascertain compliance with such Acts, Regulations, and instructions. Where any information required of a contractor is in the exclusive possession of another who fails or refuses to furnish the information, the contractor will so certify to the Recipient or the Federal Highway Administration, as appropriate, and will set forth what efforts it has made to obtain the information.
5. Sanctions for Noncompliance: In the event of a contractor's noncompliance with the Non-discrimination provisions of this contract, the Recipient will impose such contract sanctions as it or the Federal Highway Administration may determine to be appropriate, including, but not limited to:
 - a. withholding payments to the contractor under the contract until the contractor complies; and/or
 - b. cancelling, terminating, or suspending a contract, in whole or in part.

6. Incorporation of Provisions: The contractor will include the provisions of paragraphs one through six in every subcontract, including procurements of materials and leases of equipment, unless exempt by the Acts, the Regulations and directives issued pursuant thereto. The contractor will take action with respect to any subcontract or procurement as the Recipient or the Federal Highway Administration may direct as a means of enforcing such provisions including sanctions for noncompliance. Provided, that if the contractor becomes involved in, or is threatened with litigation by a subcontractor, or supplier because of such direction, the contractor may request the Recipient to enter into any litigation to protect the interests of the Recipient. In addition, the contractor may request the United States to enter into the litigation to protect the interests of the United States.

APPENDIX B
CLAUSES FOR DEEDS TRANSFERRING UNITED STATES PROPERTY

The following clauses will be included in deeds effecting or recording the transfer of real property, structures, or improvements thereon, or granting interest therein from the United States pursuant to the provisions of Assurance 4:

NOW, THEREFORE, the U.S. Department of Transportation as authorized by law and upon the condition that the **Central Shenandoah Planning District Commission, as the administrator of the Harrisonburg-Rockingham Metropolitan Planning Organization and the Staunton-Augusta-Waynesboro Metropolitan Planning Organization**, will accept title to the lands and maintain the project constructed thereon in accordance with the Virginia General Assembly, the Regulations for the Administration of the Federal-Aid Highway Program and the policies and procedures prescribed by the **Federal Highway Administration** of the U.S. Department of Transportation in accordance and in compliance with all requirements imposed by Title 49, Code of Federal Regulations, U.S. Department of Transportation, Subtitle A, Office of the Secretary, Part 21, Nondiscrimination in Federally-assisted programs of the U.S. Department of Transportation pertaining to and effectuating the provisions of Title VI of the Civil Rights Act of 1964 (78 Stat. 252; 42 U.S.C. § 2000d to 2000d-4), does hereby remise, release, quitclaim and convey unto the **Central Shenandoah Planning District Commission** all the right, title and interest of the U.S. Department of Transportation in and to said lands described in Exhibit A attached hereto and made a part hereof.

(HABENDUM CLAUSE)

TO HAVE AND TO HOLD said lands and interests therein unto the **Central Shenandoah Planning District Commission** and its successors forever, subject, however, to the covenants, conditions, restrictions and reservations herein contained as follows, which will remain in effect for the period during which the real property or structures are used for a purpose for which Federal financial assistance is extended or for another purpose involving the provision of similar services or benefits and will be binding on the **Central Shenandoah Planning District Commission**, its successors and assigns.

The **Central Shenandoah Planning District Commission**, in consideration of the conveyance of said lands and interests in lands, does hereby covenant and agree as a covenant running with the land for itself, its successors and assigns, that (1) no person will on the grounds of race, color, or national origin, be excluded from participation in, be denied the benefits of, or be otherwise subjected to discrimination with regard to any facility located wholly or in part on, over, or under such lands hereby conveyed [,] [and]* (2) that the **Central Shenandoah Planning District Commission** will use the lands and interests in lands and interests in lands so conveyed, in compliance with all requirements imposed by or pursuant to Title 49, Code of Federal Regulations, U.S. Department of Transportation, Subtitle A, Office of the Secretary, Part 21, Nondiscrimination in Federally-assisted programs of the U.S. Department of Transportation, Effectuation of Title VI of the Civil Rights Act of 1964, and as said Regulations and Acts may be amended[, and (3) that in the event of breach of any of the above-mentioned non-discrimination conditions, the Department will have a right to enter or re-enter said lands and facilities on said land, and that above described land and facilities will thereon revert to and vest in and become the absolute property of the U.S. Department of Transportation and its assigns as such interest existed prior to this instruction].*

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

APPENDIX C
CLAUSES FOR TRANSFER OF REAL PROPERTY ACQUIRED OR IMPROVED UNDER
THE ACTIVITY, FACILITY, OR PROGRAM

The following clauses will be included in deeds, licenses, leases, permits, or similar instruments entered into by the **Central Shenandoah Planning District Commission, as the administrator of the Harrisonburg-Rockingham Metropolitan Planning Organization, and the Staunton-Augusta-Waynesboro Metropolitan Planning Organization,** pursuant to the provisions of Assurance 7(a):

- A. The (grantee, lessee, permittee, etc. as appropriate) for himself/herself, his/her heirs, personal representatives, successors in interest, and assigns, as a part of the consideration hereof, does hereby covenant and agree [in the case of deeds and leases add "as a covenant running with the land"] that:
 - 1. In the event facilities are constructed, maintained, or otherwise operated on the property described in this (deed, license, lease, permit, etc.) for a purpose for which a U.S. Department of Transportation activity, facility, or program is extended or for another purpose involving the provision of similar services or benefits, the (grantee, licensee, lessee, permittee, etc.) will maintain and operate such facilities and services in compliance with all requirements imposed by the Acts and Regulations (as may be amended) such that no person on the grounds of race, color, or national origin, will be excluded from participation in, denied the benefits of, or be otherwise subjected to discrimination in the use of said facilities.
- B. With respect to licenses, leases, permits, etc., in the event of breach of any of the above Nondiscrimination covenants, the **Central Shenandoah Planning District Commission** will have the right to terminate the (lease, license, permit, etc.) and to enter, re-enter, and repossess said lands and facilities thereon, and hold the same as if the (lease, license, permit, etc.) had never been made or issued.*
- C. With respect to a deed, in the event of breach of any of the above Nondiscrimination covenants, the **Central Shenandoah Planning District Commission** will have the right to enter or re-enter the lands and facilities thereon, and the above-described lands and facilities will there upon revert to and vest in and become the absolute property of the **Central Shenandoah Planning District Commission** and its assigns. *

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

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

The following clauses will be included in deeds, licenses, permits, or similar instruments/agreements entered into by the **Central Shenandoah Planning District Commission, as the administrator of the Harrisonburg-Rockingham Metropolitan Planning Organization, and the Staunton-Augusta-Waynesboro Metropolitan Planning Organization** pursuant to the provisions of Assurance 7(b):

- A. The (grantee, licensee, permittee, etc., as appropriate) for himself/herself, his/her heirs, personal representatives, successors in interest, and assigns, as a part of the consideration hereof, does hereby covenant and agree (in the case of deeds and leases add, "as a covenant running with the land") that (1) no person on the ground of race, color, or national origin, will be excluded from participation in, denied the benefits of, or be otherwise subjected to discrimination in the use of said facilities, (2) that in the construction of any improvements on, over, or under such land, and the furnishing of services thereon, no person on the ground of race, color, or national origin, will be excluded from participation in, denied the benefits of, or otherwise be subjected to discrimination, (3) that the (grantee, licensee, lessee, permittee, etc.) will use the premises in compliance with all other requirements imposed by or pursuant to the Acts and Regulations, as amended, set forth in this Assurance.
- B. With respect to (licenses, leases, permits, etc.), in the event of breach of any of the above Nondiscrimination covenants, the **Central Shenandoah Planning District Commission** will have the right to terminate the (license, permit, etc., as appropriate) and to enter or re-enter and repossess said land and the facilities thereon, and hold the same as if said (license, permit, etc., as appropriate) had never been made or issued.*
- C. With respect to deeds, in the event of breach of any of the above Non-discrimination covenants, the **Central Shenandoah Planning District Commission** will there upon revert to and vest in and become the absolute property of the **Central Shenandoah Planning District Commission** and its assigns. *

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

APPENDIX E
Contractor/ Consultant/Supplier Agreements: U.S. DOT 1050.2A -- Appendix E

During the performance of this contract, the contractor, for itself, its assignees, and successors in interest (hereinafter referred to as the “contractor”) agrees to comply with the following non-discrimination statutes and authorities; including but not limited to:

Pertinent Nondiscrimination Authorities:

- Title VI of the Civil Rights Act of 1964 (42 U.S.C. § 2000d *et seq.*, 78 stat. 252), (prohibits discrimination on the basis of race, color, national origin); and 49 CFR Part 21;
- The Uniform Relocation Assistance and Real Property Acquisition Policies Act of 1970, (42 U.S.C. § 4601), (prohibits unfair treatment of persons displaced or whose property has been acquired because of Federal or Federal-aid programs and projects);
- Federal-Aid Highway Act of 1973, (23 U.S.C. § 324 *et seq.*), (prohibits discrimination on the basis of sex);
- Section 504 of the Rehabilitation Act of 1973, (29 U.S.C. § 794 *et seq.*), as amended, (prohibits discrimination on the basis of disability); and 49 CFR Part 27;
- The Age Discrimination Act of 1975, as amended, (42 U.S.C. § 6101 *et seq.*), (prohibits discrimination on the basis of age);
- Airport and Airway Improvement Act of 1982, (49 USC § 471, Section 47123), as amended, (prohibits discrimination based on race, creed, color, national origin, or sex);
- The Civil Rights Restoration Act of 1987, (PL 100-209), (Broadened the scope, coverage and applicability of Title VI of the Civil Rights Act of 1964, The Age Discrimination Act of 1975 and Section 504 of the Rehabilitation Act of 1973, by expanding the definition of the terms “programs or activities” to include all of the programs or activities of the Federal-aid recipients, sub-recipients and contractors, whether such programs or activities are Federally funded or not);
- Titles II and III of the Americans with Disabilities Act, which prohibit discrimination on the basis of disability in the operation of public entities, public and private transportation systems, places of public accommodation, and certain testing entities (42 U.S.C. §§ 12131 -- 12189) as implemented by Department of Transportation regulations at 49 C.F.R. parts 37 and 38;
- The Federal Aviation Administration’s Non-discrimination statute (49 U.S.C. § 47123) (prohibits discrimination on the basis of race, color, national origin, and sex);
- Title IX of the Education Amendments of 1972, as amended, which prohibits you from discriminating because of sex in education programs or activities (20 U.S.C. 1681 *et seq.*).

Appendix D: Title VI Complaint Form and Log of Complaints

The following Title VI Discrimination Complaint Form may be used for any of the CSPDC administered programs, including the Harrisonburg-Rockingham Metropolitan Planning Organization and the Staunton-Augusta-Waynesboro Metropolitan Planning Organization.

The discrimination complaint form is available on the following page, and online at the following websites:

CSPDC – www.cspdc.org

HRMPO – www.hrvampo.org/public-participation-title-vi

SAWMPO – www.sawmpo.org/public-participation-title-vi

The complaint form can be submitted by email, by mail, or in person at 112 MacTanly Place, Staunton, VA 24401. The Title VI Coordinator can assist the person in filing a complaint if needed. You can reach our office Monday – Friday from 8:30 a.m. to 5:00 p.m. at (540) 885-5174, or by email at cspdc@cspdc.org.

List of Investigations, Lawsuits, and Complaints:

In the last 5 years related to Title VI investigations, lawsuits, and complaints:

Year	Complaints	Investigations	Lawsuits	Total
FY22: July 1, 2021 – June 30, 2022	0	0	0	0
FY23: July 1, 2022 – June 30, 2023	0	0	0	0
FY24: July 1, 2023 – June 30, 2024	0	0	0	0
FY25: July 1, 2024 – June 30, 2025	0	0	0	0
FY26: July 1, 2025 – June 30, 2026	0	0	0	0



Title VI Discrimination Complaint Form

Section 1	
Name:	
Address:	
Telephone (Home/Cell):	
Email Address:	
Accessible Requirement Needed:	☐ Large Print Format ☐ TDD ☐ Audio Tape ☐ Other
If other, please describe:	
Section 2	
Are you filing this complaint on your own behalf? ☐ Yes ☐ No	
* If you answered "yes" to this question, go to Section 3	
If not, please supply the name and relationship of the person for whom you are filing a complaint:	
Please explain why you have filed on behalf of a third party:	
Please confirm that you have obtained the permission of the aggrieved party if you are filing on their behalf:	
☐ Yes, ☐ No	

Section 3

I believe the discrimination I experienced was based on (check all that apply):

☐ Race ☐ Color ☐ National Origin

Date of Alleged Discrimination
(Month, Day, Year):

Explain as clearly as possible what happened and why you believe you were discriminated against. Describe all persons who were involved. Include the name and contact information of the person(s) who discriminated against you (if known) as well as the names and contact information of any witnesses. If more space is needed, please use the back of this form:

Section 4

Have you previously filed a Title VI complaint with the CSPDC, HRMPO, or SAWMPO?

☐ Yes ☐ No

Section 5

Have you filed this complaint with any other Federal, State, or local agency, or with any Federal or State court?

☐ Yes ☐ No

If you selected yes, check all that apply:

☐ Federal Agency _____

☐ Federal Court _____

☐ State Agency _____

☐ State Court _____

☐ Local Agency _____

Please provide information about a contact person at the agency/court where the complaint was filed:	
Name:	
Title:	
Agency:	
Address:	
Telephone:	
Section 6	
Name of the agency or organization the complaint is against:	
Contact person:	
Title:	
Telephone:	

You may attach written materials or other information that you think is relevant to your complaint.

Signature and date required below:

Signature

Date

Please submit this form in person at the address below, or mail this form to:

Ann Cundy, Title VI Manager

112 MacTanly Place, Staunton, VA 24401

Phone: 540-885-5174; Email ann@cspdc.org



Formulario de Queja Título VI Discriminación

Sección 1	
Nombre:	
Dirección:	
Teléfono (Casa):	
Dirección de Correo Electrónico:	
Requisitos formato accesible:	☐ Letra Grance ☐ TDD ☐ Audio Tape ☐ Otros
Si es otro, por favor descríballo:	
Sección 2	
¿Está presentando esta queja en su propio nombre?? ☐ Si ☐ No	
* Si su respuesta es "sí" a esta pregunta, vaya a la Sección 3	
Si no es así, sírvase proporcionar el nombre y la relación de la persona para quien se queja:	
Por favor, explique por qué usted ha presentado para un tercero:	
Por favor, confirma que ha obtenido el permiso de la parte perjudicada, si usted está presentando en nombre de un tercero.	
☐ Si ☐ No	

Sección 3

Creo que la discriminación que experimenté fue basado en (marque todo lo que corresponda):

☐ Carrera ☐ Color ☐ Origen Nacional

Fecha de la Discriminación
Presunta (mes, día, año):

Explique lo más claramente posible lo que pasó y por qué cree que fue discriminado. Describir todas las personas que estuvieron involucradas. Incluya el nombre y la información de contacto de la persona (s) que lo discriminó (si se conoce), así como los nombres y la información de los testigos en contacto. Si se necesita más espacio, por favor use la parte de atrás de este formulario.

Sección 4

¿Ha presentado previamente una queja del Título VI con esta agencia?

☐ Si ☐ No

Sección 5

¿Ha presentado previamente una queja del Título VI con esta agencia?

☐ Si ☐ No

En caso afirmativo, marque todo lo que corresponda:

☐ Agencia Federal _____

☐ Tribunal Federal _____

☐ Agencia Estatal _____

☐ Tribunal Estatal _____

☐ Agencia Local _____

Sírvanse proporcionar información sobre una persona de contacto en la agencia / tribunal donde se presentó la denuncia.	
Nombre:	
Título:	
Agencia:	
Dirección:	
Teléfono:	
Sección 6	
Nombre de la agencia de queja es en contra:	
Persona de contacto:	
Título:	
Teléfono:	

Puede adjuntar cualquier material escrito o cualquier otra información que usted piensa que es relevante para su queja. Firma y fecha requerida a continuación

Firma

Fecha

Por favor, envíe este formulario en persona en la dirección indicada más abajo, o envíe este formulario a:

Ann Cundy, Título VI Oficial de Cumplimiento
 112 MacTanly Place, Staunton, Virginia 24401
 Teléfono: 540-885-5174; Dirección de Correo Electrónico: ann@cspdc.org

Appendix E: Public Notification

The CSPDC Title VI Notices are posted on the following locations:

- CSPDC Offices (112 MacTanly Place, Staunton, VA 24401)
- On our websites: www.cspdc.org, www.hrvampo.org, and www.sawmpo.org

Appendix F: Data Collection and Regional Demographics

The Central Shenandoah Planning District Commission (CSPDC) collects and analyzes demographic data on an ongoing basis to ensure the agency is meeting Title VI obligations. Analysis of demographic trends within the planning area allows the CSPDC to evaluate the implications of past and present transportation investments – including whether those investments have supported the efficient movement of people and goods, expanded economic opportunity, and improved safety for all members of the traveling public – and to inform future decision-making accordingly.

Demographic data collection and analysis are conducted in furtherance of the following nondiscrimination obligations under Title VI of the Civil Rights Act of 1964 and applicable federal regulations:

- To ensure the level and quality of transportation services and benefits are provided without regard to race, color, or national origin
- To identify and avoid disproportionately high and adverse human health and environmental effects on low-income and minority populations
- To ensure full and fair participation by all potentially affected communities in the planning process
- To prevent the denial of, reduction in, or significant delay in receipt of benefits by low-income and minority populations; and
- To ensure meaningful access to the CSPDC's programs, activities, and services by persons with language access barriers.

The following demographic analysis was completed using the 2020-2024 American Community Survey (ACS) 5-Year Estimates – the most recent data available at the time the plan was last updated. Disadvantaged groups in the CSPDC region include individuals experiencing poverty, disabled populations, zero-car households, minority populations, and elderly populations, and individuals experiencing language access barriers.

Poverty

The CSPDC seeks to identify and address the needs of low-income populations with regards to transportation investments and services. Individuals and households living below the federal poverty level frequently face compounding barriers to transportation access, including limited vehicle ownership, reduced mobility, and geographic isolation from employment, healthcare, and essential services.

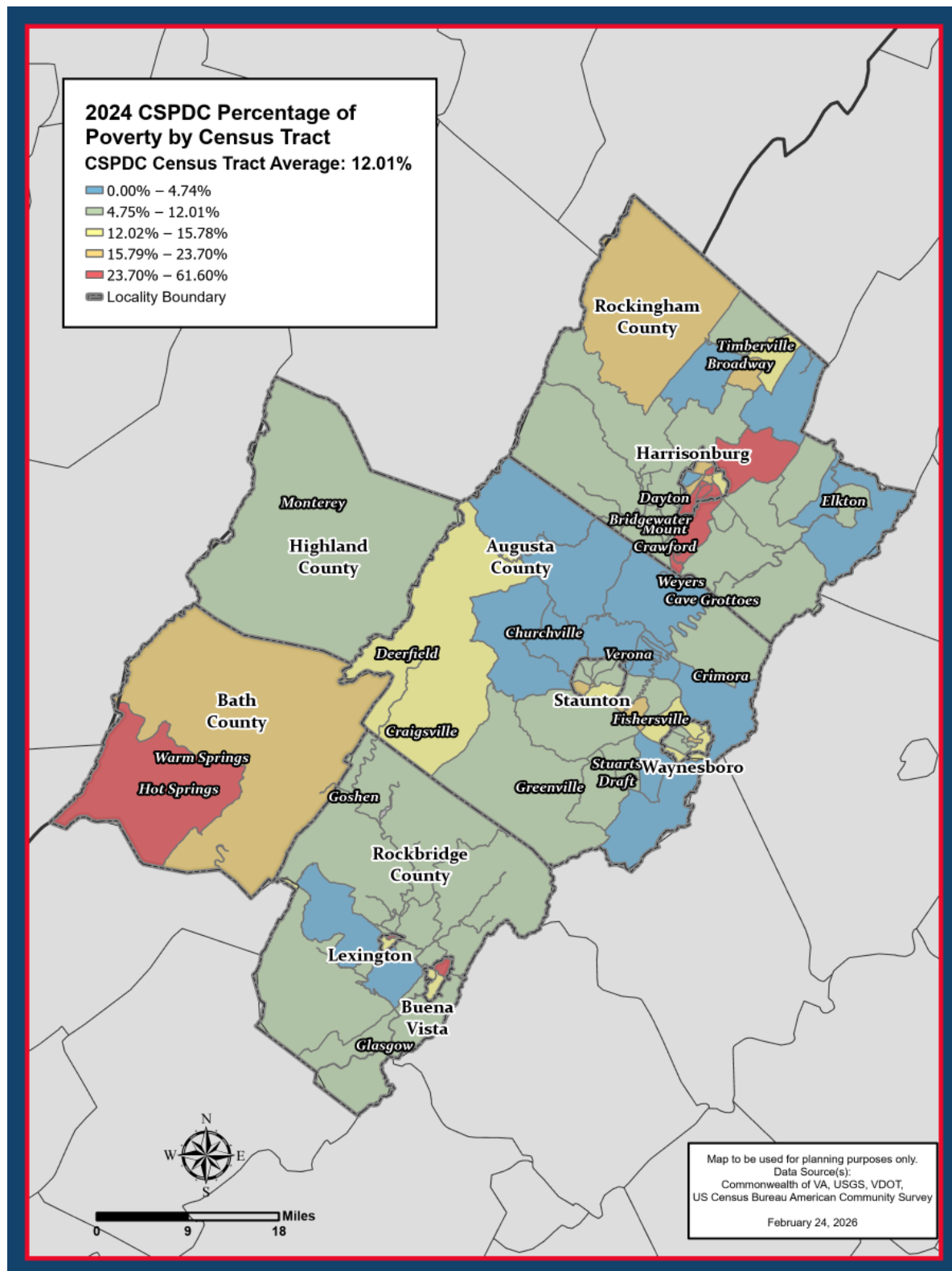
Approximately 34,619 residents, or 12.01% of the CSPDC region’s population for whom poverty status is determined had incomes below the federal poverty level. The regional average of 12.01% reflects significant variation across jurisdictions. **Table 1** provides the percentage of poverty compared to the total population for each CSPDC city and county, and the map in **Figure 1** illustrates the concentration of the population living below the federal poverty level by census tract.

Table 1. Population Below Poverty Level Jurisdiction, CSPDC Region (2020-2024 ACS 5-Year Estimates)

Jurisdiction*	Total Population	Population Below Poverty	Percentage
Augusta County	75,204	4,993	6.61%
Bath County	3,966	943	23.80%
Highland County	2,296	219	9.51%
Rockbridge County	21,932	1,646	7.54%
Rockingham County	83,217	8,142	9.84%
City of Staunton	24,234	3,007	12.37%
City of Waynesboro	22,611	2,538	11.18%
City of Harrisonburg	44,259	11,377	25.02%
City of Lexington	4,315	606	14.04%
City of Buena Vista	6,092	1,148	18.83%
CSPDC Region Total	288,126	34,619	12.01%

Source: U.S. Census Bureau, 2020–2024 American Community Survey 5-Year Estimates, Table S1701.
*The independent and unincorporated towns within the region are accounted for within the population data of each corresponding county.

Figure 1. 2024 Poverty by Census Tract



Disabled Populations

The Americans with Disabilities Act (ADA) of 1990 and Section 504 of the Rehabilitation Act of 1973 prohibit discrimination against individuals with disabilities in transportation programs and services receiving federal financial assistance. For Title VI planning purposes, understanding where concentrations of individuals with disabilities exist within the CSPDC region is essential to ensuring that planning with regards to transportation investments, infrastructure improvements, and public participation processes are accessible.

Approximately 44,000 individuals, or 14.76% of the CSPDC region's noninstitutionalized population reported living with a disability. **Table 2** provides the percentage of persons with a reported disability compared to the total population for each city and county in the CSPDC region. The map in **Figure 2** illustrates the concentration of the population with a disability by census tract.

This regional average of 14.76% is notably higher than the statewide Virginia average. Buena Vista recorded the highest share of disabled population at 20.9%.

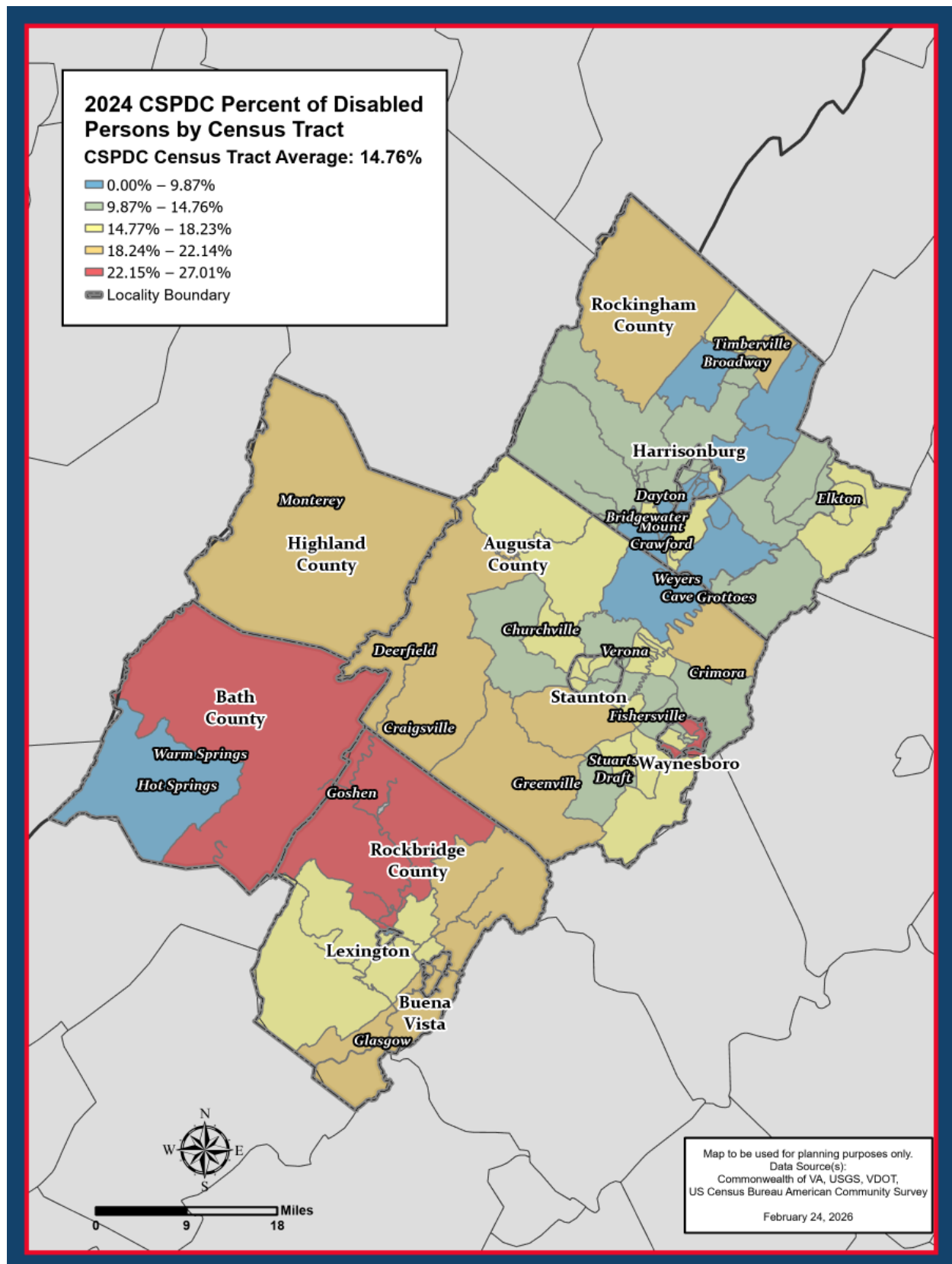
Table 2. Disabled Population by Jurisdiction, CSPDC Region (2020–2024 ACS 5-Year Estimates)

Jurisdiction*	Total Population	Persons with a Disability	Percentage
Augusta County	75,306	11,778	15.61%
Bath County	3,984	630	15.83%
Highland County	2,296	447	19.48%
Rockbridge County	22,252	4,330	19.54%
Rockingham County	85,110	11,269	13.21%
City of Staunton	25,031	3,805	15.24%
City of Waynesboro	22,606	4,484	19.81%
City of Harrisonburg	50,750	5,285	10.40%
City of Lexington	7,457	1,005	13.52%
City of Buena Vista	6,546	1,367	20.90%
CSPDC Region Total	301,338	44,400	14.76%

Source: U.S. Census Bureau, 2020–2024 American Community Survey 5-Year Estimates, Table S1810.

*The independent and unincorporated towns within the region are accounted for within the population data of each corresponding county.

Figure 2. 2024 Disability by Census Tract



Zero Car Households

Around 6,508 of the total 119,397 households in the CSPDC region are considered by the U.S. Census as “Zero-Car Households”, which means that the no one in the household has access to a vehicle. Zero-car households represent a regional average of 5.57% of all households. **Table 3** provides the percentage of zero-car households compared to the total population for each city and county in the CSPDC region. The map in **Figure 3** illustrates the concentration of zero-car households by census tract. Households without vehicle access are concentrated in urban core areas and are more likely to include individuals who are also cost-burdened or living below the poverty level.

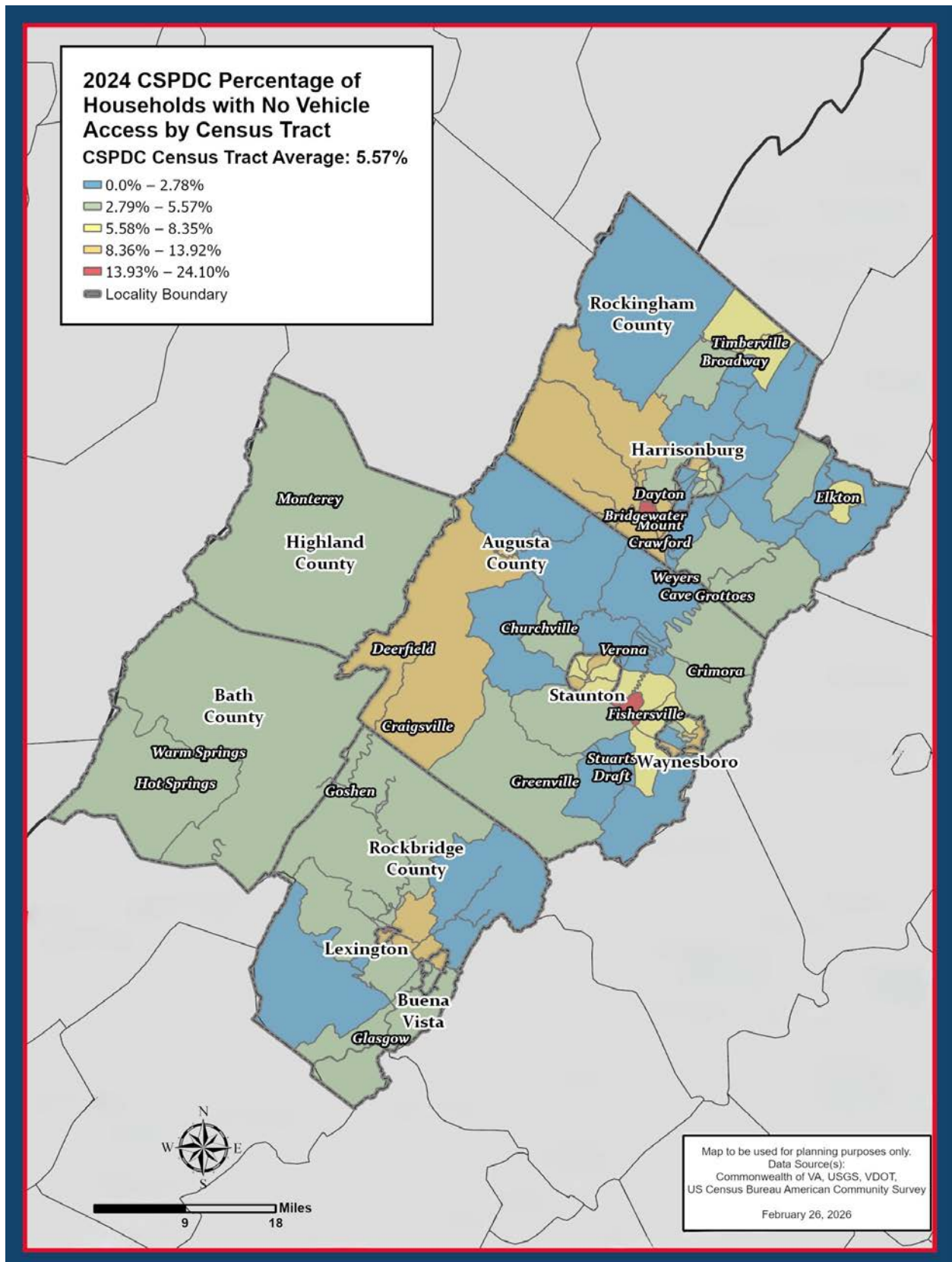
Table 3. Zero-Car Households by Jurisdiction, CSPDC Region (2020–2024 ACS 5-Year Estimates)

Jurisdiction*	Total Households ¹	Zero-Car Households	Percentage of Zero-Car Households
Augusta County	31,083	1,332	4.32%
Bath County	1,822	75	4.11%
Highland County	1,003	51	5.08%
Rockbridge County	9,552	364	3.76%
Rockingham County	32,686	1,583	4.81%
City of Staunton	11,309	911	8.06%
City of Waynesboro	9,841	568	5.75%
City of Harrisonburg	17,360	1,132	6.52%
City of Lexington	2,187	276	12.61%
City of Buena Vista	2,554	216	8.54%
CSPDC Region Total	119,397	6,508	5.57%

¹ Total occupied housing units for whom vehicle availability is determined. Source: U.S. Census Bureau, 2020–2024 American Community Survey 5-Year Estimates, Table DP04

*The independent and unincorporated towns within the region are accounted for within the population data of each corresponding county.

Figure 3. 2024 Zero-Car Households by Census Tract



Minority Population

Minority populations include all people who have not identified themselves as White (Non-Hispanic or Latino and Single Race Alone) in U.S. Census race and ethnicity questions. The overall percentage of the minority population within the CSPDC region is 18.63%, with a total minority population of 60,489. Cities have the largest minority populations, with Harrisonburg, Waynesboro, Lexington, and Staunton all exceeding the regional average. **Table 4** provides the minority population percentages compared to the total population for each city and county in the CSPDC region. The map in **Figure 4** illustrates the concentration of minority population by census tract.

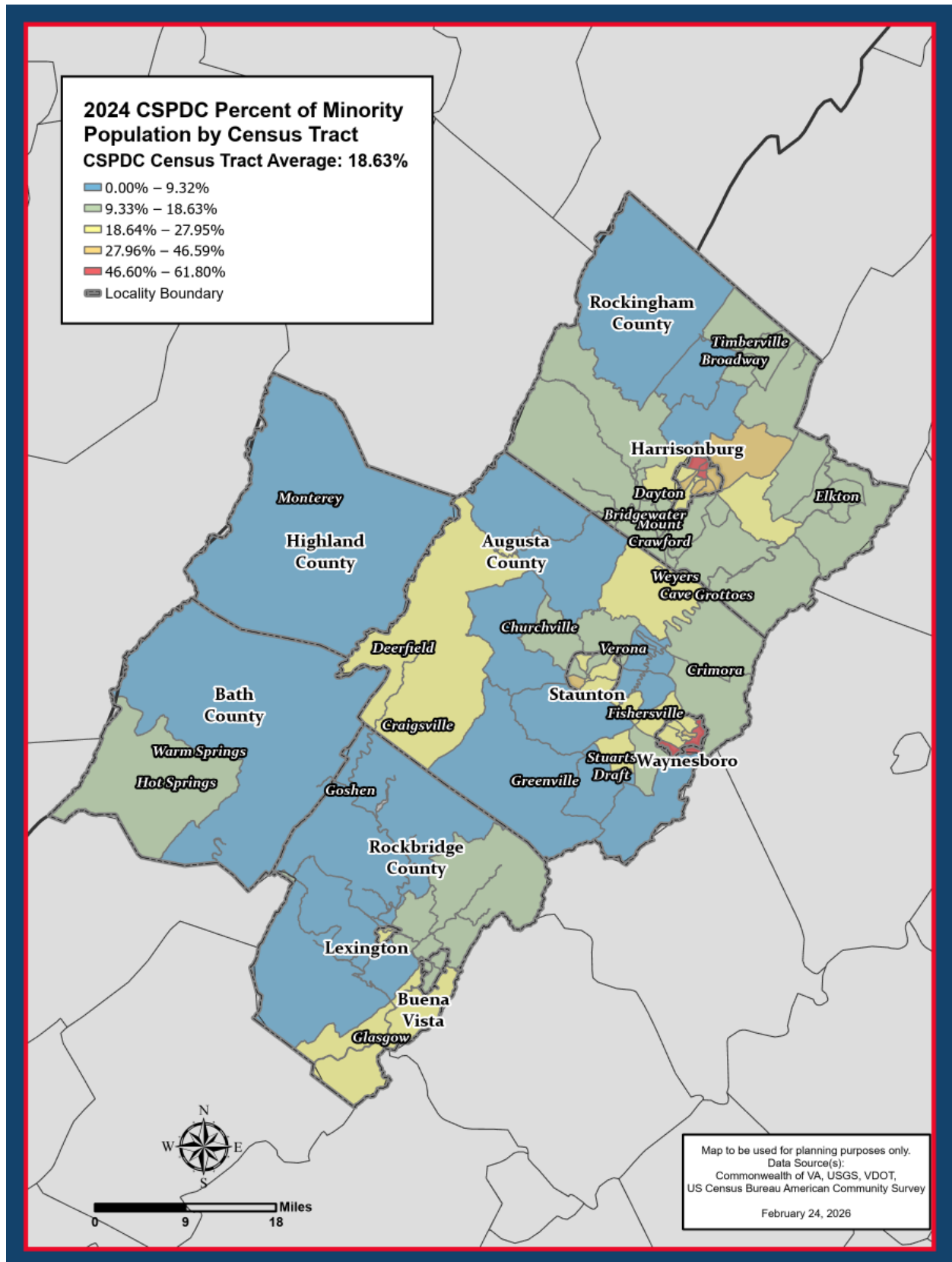
Table 4. Minority Population by Jurisdiction, CSPDC Region (2020–2024 ACS 5-Year Estimates)

Jurisdiction*	Total Population	Minority Population	Percentage of Minority Population
Augusta County	78,033	9,380	12.02%
Bath County	4,100	334	8.12%
Highland County	2,296	117	5.07%
Rockbridge County	22,531	2,395	10.23%
Rockingham County	85,600	13,361	15.59%
City of Staunton	25,948	5,618	21.71%
City of Waynesboro	22,841	6,490	28.38%
City of Harrisonburg	51,392	20,146	39.22%
City of Lexington	7,525	1,638	21.78%
City of Buena Vista	6,593	1,010	15.20%
CSPDC Region Total	306,859	60,489	18.63%

Source: U.S. Census Bureau, 2020–2024 American Community Survey 5-Year Estimates, Table DP05.

*The independent and unincorporated towns within the region are accounted for within the population data of each corresponding county.

Figure 4. 2024 Minority Population by Census Tract



Elderly Population

The elderly population, which is defined as those aged 65 years and older, in the CSPDC region is 60,438, which represents 19.74% of the total regional population. Highland County has the highest percentage of elderly population at 34.8% with Bath and Rockbridge Counties close behind. These concentrations often overlap with other social planning factors, such as individuals with disabilities. Conversely, the localities with the lowest population of elderly residents are among the cities, with Harrisonburg having the lowest elderly population in the region at only 10.5%. This is an example of how demographic divides exist between our rural areas and the more urban cores. **Table 5** provides the elderly population percentages compared to the total population for each city and county in the CSPDC region. The map in **Figure 5** illustrates the concentration of elderly population by census tract.

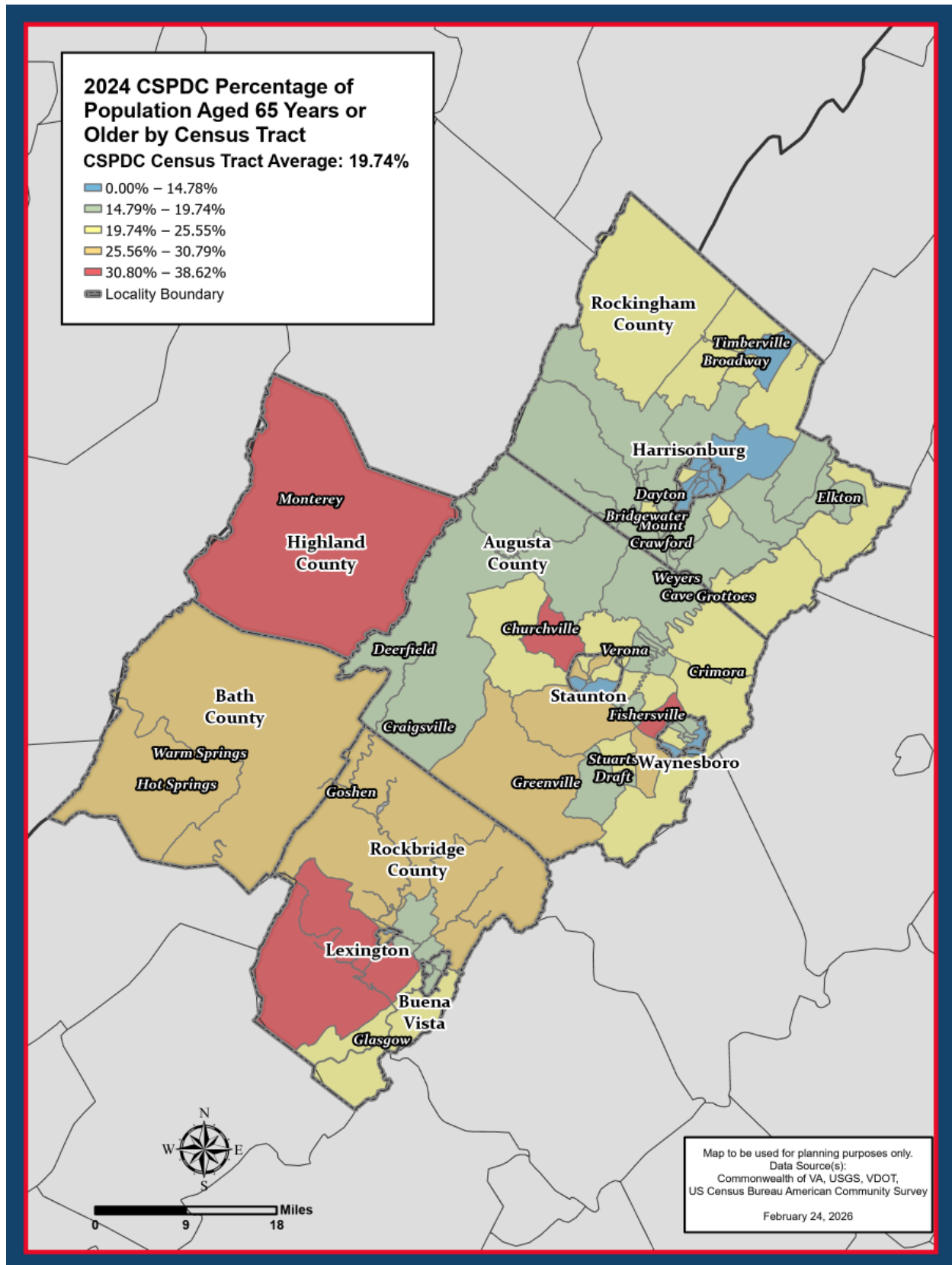
Table 5. Elderly Population by Jurisdiction, CSPDC Region (2020–2024 ACS 5-Year Estimates)

Jurisdiction*	Total Population	Total Population Age 65+	Percentage of Elderly Population
Augusta County	78,033	17,626	22.62%
Bath County	4,100	1,117	27.21%
Highland County	2,296	798	34.83%
Rockbridge County	22,531	6,183	27.44%
Rockingham County	85,600	17,185	20.15%
City of Staunton	25,948	5,524	21.34%
City of Waynesboro	22,841	4,081	17.93%
City of Harrisonburg	51,392	5,411	10.52%
City of Lexington	7,525	1,273	16.89%
City of Buena Vista	6,593	1,240	18.75%
CSPDC Region Total	306,859	60,438	19.74%

Source: U.S. Census Bureau, 2020–2024 American Community Survey 5-Year Estimates, Table S0101

*The independent and unincorporated towns within the region are accounted for within the population data of each corresponding county.

Figure 5. 2024 Elderly Population by Census Tract



Language Access Barriers Four-Factor Analysis

To ensure meaningful access for all residents and stakeholders, the CSPDC regularly examines the need for services for individuals who experience language access barriers to participation in the planning process. This may include individuals for whom English is not their primary language, individuals who are vision impaired, and those who are deaf or hard of hearing. This is done by completing a four-factor analysis that assesses the demographics of the region, the frequency in which the CSPDC encounters an individual in need of accommodations, the importance of the planning work to specific populations, and the resources the CSPDC is able to provide to reduce or remove barriers to access.

Factor 1 – Demographics

Language

Federal Title VI regulations require recipients of federal financial assistance to take reasonable steps to ensure meaningful access to programs and services for individuals with language access barriers. To assess the need for language assistance services, CSPDC analyzed language use and English-speaking ability data from the U.S. Census Bureau's 2020–2024 American Community Survey (ACS) 5-Year Estimates for all jurisdictions within the CSPDC region.

The Title VI Safe Harbor threshold for determining whether language assistance is required is the greater of 1,000 persons or 5% of the service area population that speaks a language other than English and speaks English less than "very well." Under this standard, four jurisdictions in the CSPDC region meet or exceed the threshold for language assistance obligations.

The City of Harrisonburg has the highest concentration of individuals with language access barriers in the region, with 6,312 persons (14.85% of the adult population). Spanish is the predominant language, representing 11.61% of the adult population, followed by Other languages (1.19%), Other Indo-European languages (1.14%), and Asian and Pacific Island languages (0.91%).

Rockingham County also exceeds the 1,000-person numeric threshold, with 2,919 individuals with language access barriers (4.38% of the adult population). Spanish is again the dominant language at 3.01%, with Other Indo-European languages representing an additional 1.01%. The City of Waynesboro and the City of Lexington each fall below the 1,000-person numeric threshold but exceed the 5% population threshold, with language access barrier populations of 5.64% and 5.40%, respectively.

All remaining jurisdictions in the CSPDC region fall below both safe harbor thresholds. Across the region as a whole, 11,780 individuals — representing 4.76% of the total adult population — have

language access barriers, with Spanish being the most prevalent language at 3.45% of the regional adult population.

Based on this analysis, CSPDC's language assistance efforts should prioritize Spanish-language access across the region, with particular focus on Harrisonburg and Rockingham County. Secondary languages including Other Indo-European languages and Asian and Pacific Island languages should also be considered in jurisdictions where those populations are concentrated.

Table 6 displays the language access barrier population percentages compared to the total population for each city and county in the CSPDC region. The map in **Figure 6** illustrates the concentration of those with language access barriers in the CSPDC region by census tract.

Table 6. Language Use & English-Speaking Ability by Jurisdiction, CSPDC Region (2020–2024 ACS 5-Year Estimates)

Jurisdiction****	Population 18+	Total Language Access Barrier Population	% Language Access Barrier	Spanish	Other Indo-European*	Asian & Pacific Island**	Other Languages**
Augusta County	63,693	658	1.03%	0.69%	0.15%	0.03%	0.16%
Bath County	3,390	0	0.00%	0.00%	0.00%	0.00%	0.00%
Highland County	1,962	2	0.10%	0.00%	0.00%	0.10%	0.00%
Rockbridge County	18,692	155	0.83%	0.54%	0.00%	0.29%	0.00%
Rockingham County	66,674	2,919	4.38%	3.01%	1.01%	0.20%	0.16%
City of Staunton	20,931	346	1.65%	1.01%	0.42%	0.13%	0.09%
City of Waynesboro	17,734	1,001	5.64%	3.55%	0.00%	2.09%	0.00%
City of Harrisonburg	42,503	6,312	14.85%	11.61%	1.14%	0.91%	1.19%
City of Lexington	6,977	377	5.40%	3.22%	0.85%	1.33%	0.00%
City of Buena Vista	5,141	10	0.19%	0.00%	0.00%	0.19%	0.00%
CSPDC Region Total	247,697	11,780	4.76%	3.45%	0.57%	0.44%	0.30%

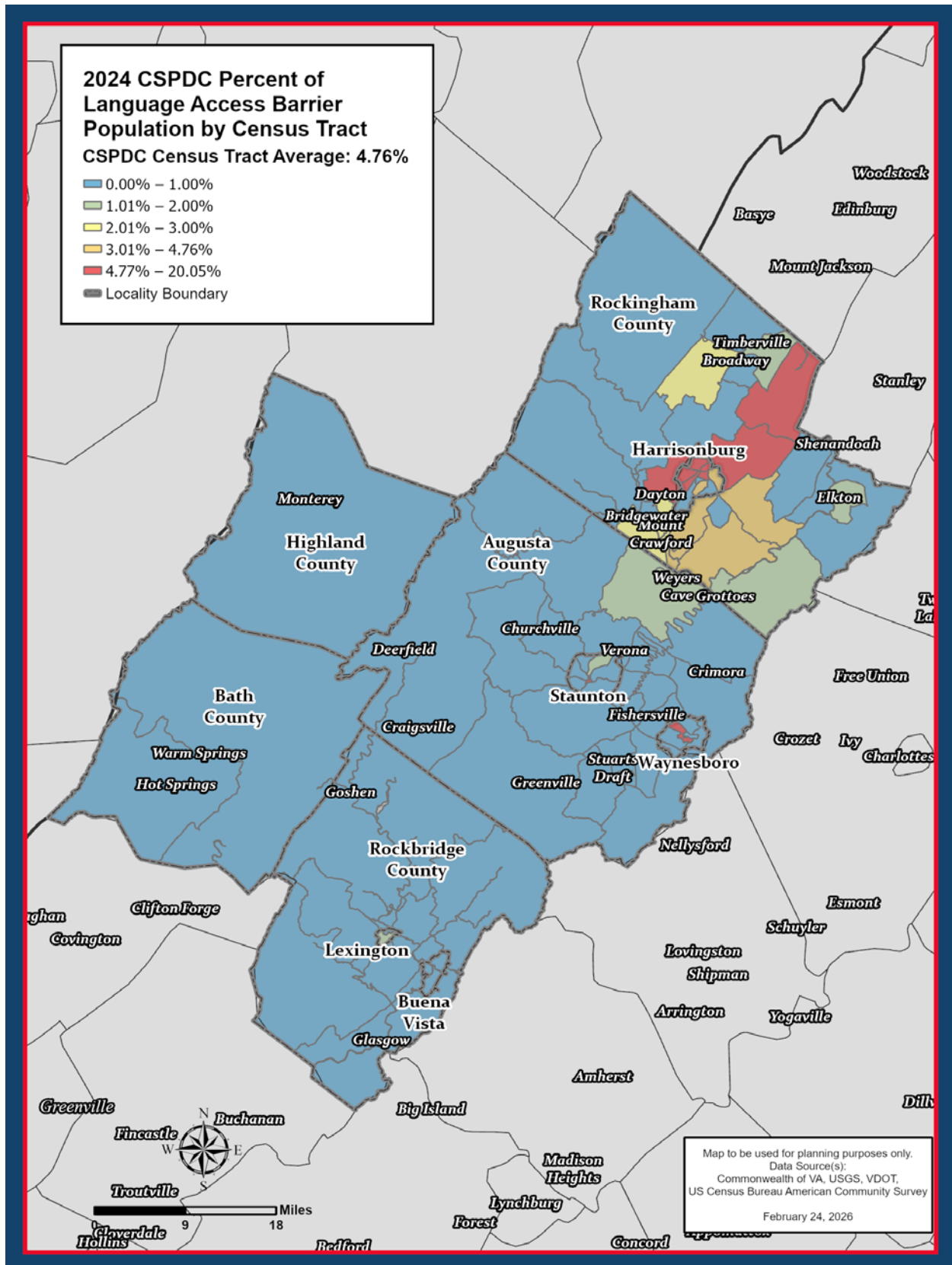
Source: U.S. Census Bureau, 2020–2024 American Community Survey 5-Year Estimates, Table S1601.

* Other Indo-European includes: French, Haitian, or Cajun; German or other West Germanic languages; Russian, Polish, or other Slavic languages; and Other Indo-European languages (which itself covers languages like Hindi, Portuguese, Italian, Greek, Persian, etc.)

** Asian & Pacific Island includes: Korean; Chinese (incl. Mandarin, Cantonese); Vietnamese; Tagalog; and Other Asian and Pacific Island languages*** Other languages constitutes Arabic along with other unspecified languages

****The independent and unincorporated towns within the region are accounted for within the population data of each corresponding county.

Figure 6. 2024 Language Access Barrier Population by Census Tract



Sensory Disabilities

Beyond spoken language barriers, the CSPDC also recognizes that populations with sensory disabilities face unique communication access challenges that require specific planning consideration.

Populations with sensory disabilities, including hearing and vision difficulties, face unique language access barriers that require specific communication strategies. Within the CSPDC region, approximately 6.6% of the population (19,799 persons) faces at least one sensory disability. Highland County has the highest regional concentration of sensory disabilities at 14.7%, while Rockbridge County and the Cities of Buena Vista, Waynesboro, Lexington, and Staunton also exceed the regional average. These populations often require multimodal engagement tools, such as deaf-specific telecommunication services, screen-reader-accessible documents, and American Sign Language (ASL) interpretation, to ensure full participation in the planning process. **Table 7** displays the percentages of individuals with sensory disabilities compared to the total population for each city and county in the CSPDC region. The map in **Figure 7** illustrates the distribution of sensory disabilities across the region, identifying areas where auditory or visual barriers to information are most prevalent.

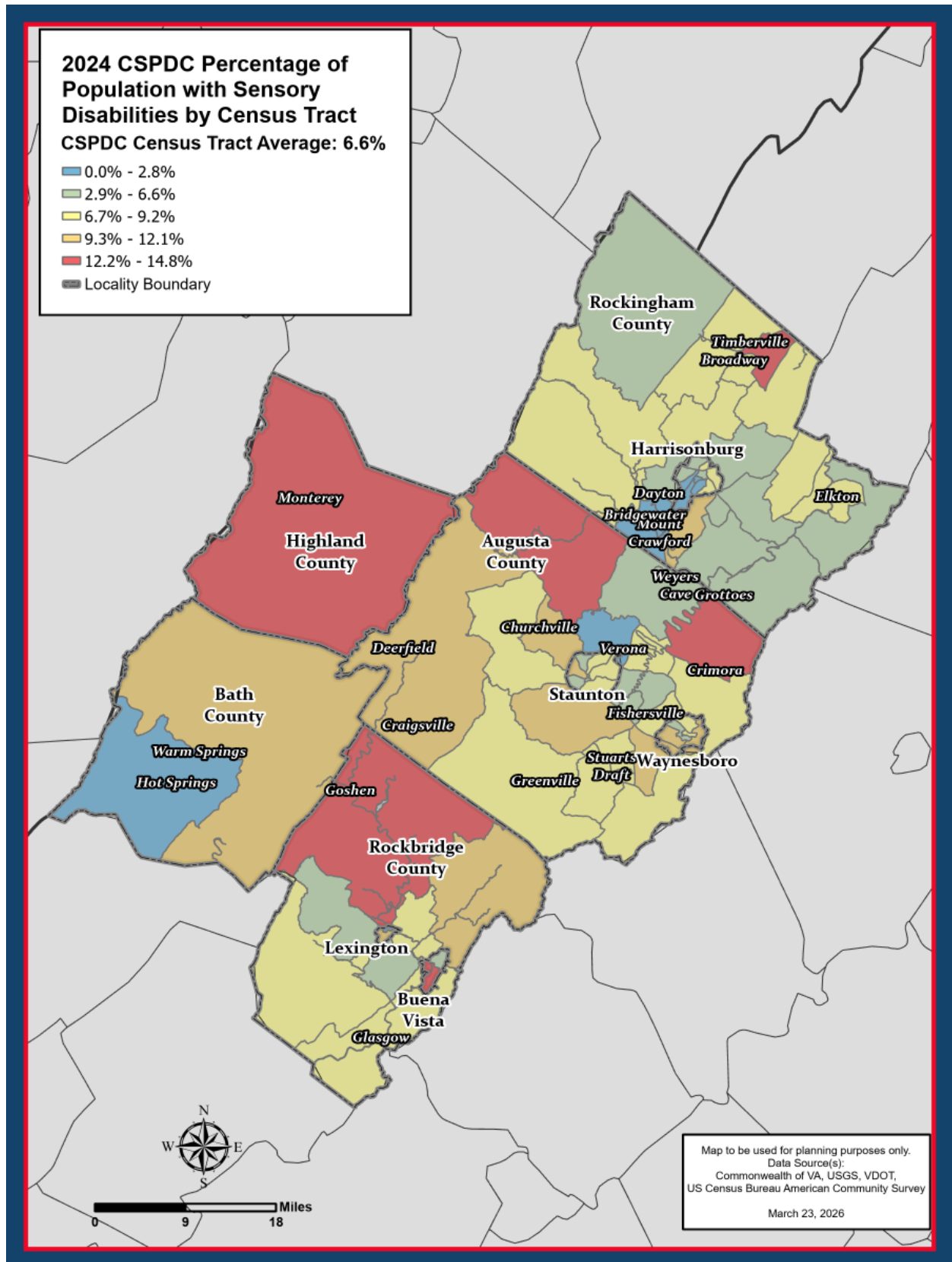
Table 7. Population with Sensory Disabilities by Jurisdiction, CSPDC Region (2020–2024 ACS 5-Year Estimates)

Jurisdiction*	Total Population	Hearing Difficulty	Vision Difficulty	Percent Sensory Disabilities
Augusta County	75,306	3,998	1,679	7.5%
Bath County	3,984	154	92	6.2%
Highland County	2,296	198	139	14.7%
Rockbridge County	22,252	1,151	851	9.0%
Rockingham County	85,110	3,226	1,667	5.7%
City of Staunton	25,031	1,027	611	6.6%
City of Waynesboro	22,606	1,044	769	8.0%
City of Harrisonburg	50,750	1,200	804	3.9%
City of Lexington	7,457	331	183	6.9%
City of Buena Vista	6,546	330	345	10.3%
CSPDC Region Total	301,338	12,659	7,140	6.6%

Source: U.S. Census Bureau, 2020–2024 American Community Survey 5-Year Estimates, Table S1810.

*The independent and unincorporated towns within the region are accounted for within the population data of each corresponding county.

Figure 7. 2024 Sensory Disabilities by Census Tract



Factor 2 – Frequency

The CSPDC regularly reviews the benefits, services, and information it provides and determines the extent to which individuals with language access barriers may come into contact with the organization and its program through the following channels:

- Calls to the CSPDC Offices
- Visits to the CSPDC Offices
- Access to the CSPDC, HRMPO, or SAWMPO websites
- Attendance at community meetings or public hearings hosted by the CSPDC, HRMPO, or SAWMPO
- Public involvement and public engagement meetings/hearings for projects affecting communities or individuals

The CSPDC has not received any requests for language assistance, interpretation services, or document translation in connection with its planning activities within at least the past five years. This may reflect an unawareness of the accommodations available to individuals with language access barriers, or it may reflect the true infrequency in which these populations interact with CSPDC programs and planning activities. The CSPDC aims to proactively provide accommodations whenever relevant and possible, and will monitor requests and will respond promptly should any be received.

When individuals with language access barriers do contact the agency, staff will attempt to identify the appropriate accommodation and deliver accommodations as outlined in our Public Participation Plans.

Factor 3 – Importance

CSPDC serves as a regional planning agency providing cooperative, comprehensive, and continuing planning services across multiple disciplines for the Central Shenandoah region. The CSPDC supports member jurisdictions with planning efforts spanning transportation, economic development, community development, housing, and environmental planning, among other services. The CSPDC also staffs the Harrisonburg-Rockingham and Staunton-Augusta-Waynesboro Metropolitan Planning Organizations.

Core transportation planning activities include development of the regional Transportation Improvement Program (TIP) and Long-Range Transportation Plan (LRTP), assistance to member jurisdictions with local transportation planning documents, and promotion of multi-modal transportation options throughout the region.

The decisions that emerge from CSPDC's planning processes have direct and lasting consequences for all residents of the region, including individuals with language access barriers. Across planning disciplines, CSPDC's work shapes access to employment, housing, healthcare, education, and essential services — areas where individuals with language access barriers may face compounded disadvantage if they are not meaningfully included in planning and decision-making processes. Ensuring equitable access to CSPDC's programs and public engagement opportunities is therefore not limited to any single planning area but extends across the full scope of the agency's work. CSPDC will continue to monitor the geographic distribution of language access barrier populations across the region to ensure that planning priorities and public engagement efforts continue to reach and serve these communities.

Factor 4 – Resources

Public participation opportunities vary across the different planning program areas. For most CSPDC programs, the methods by which public notification and engagement is applied is determined on a project-by-project basis. For transportation planning, the Metropolitan Planning Organizations each maintain their own Public Participation Plan (PPP). The PPP for each MPO is region specific and serves as the primary framework for facilitating engagement with groups with language access barriers ensuring meaningful access to the transportation planning process.

For MPOs, the HRMPO Public Participation Plan is available at www.hrvampo.org/public-participation-title-vi and the SAWMPO Public Participation Plan is available at www.sawmpo.org/public-participation-title-vi.

Language assistance services are available upon request and will be provided at no cost to the individual. When projects are located in areas identified as having high concentrations of Language Access Barrier populations, additional outreach or accommodations may be necessary, including translation of project materials into additional languages and/or oral interpreter services at public meetings.

Appendix G: Review Procedures

Procedures for Conducting Title VI Reviews of CSPDC Program Areas

Reviews will be completed for all projects receiving federal funding on an annual basis. Federal regulations state the following:

All entities that receive federal financial assistance are required to create, establish, and maintain effective internal control over the Federal award that provides reasonable assurance that the entity is managing the award in compliance with Federal statutes, regulations, and the terms and conditions of the Federal award. 2 C.F.R. §200.303(a).

Entities may not directly or through contractual or other arrangements utilize criteria or methods of administration which have the effect of subjecting individuals to discrimination because of their race, color, or national origin, or have the effect of defeating or substantially impairing accomplishments of the objectives of the program as respects individuals of a particular race, color, or national origin. 49 C.F.R. § 21.5(b); 28 C.F.R. §42.104(b).

CSPDC receives direct federal funding to the following programs:

- Economic Development Administration (EDA)
- Appalachian Regional Commission (ARC)
- Southeast Crescent Regional Commission (SCRC)

And indirectly receives federal funding for the following programs:

- Harrisonburg-Rockingham Metropolitan Planning Organization
- Staunton-Augusta-Waynesboro Metropolitan Planning Organization
- Rural Transportation
- Hazard Mitigation Plan
- Virginia Telecommunications Initiative

The CSPDC is committed to ensuring that all people are afforded equal opportunities to participate in all the CSPDC's activities regardless of their race, color, ability, or national origin. Title VI requires non-discrimination based on race, color, or national origin, and the Americans with Disabilities Act requires entities open to the public to reasonably accommodate people with disabilities. This review procedure intends to ensure that all CSPDC programs and projects do not discriminate based on both race and ability. CSPDC will use a Title VI Implementation Plan, accompanying memos and statements, interpreter services, and annual program reviews to ensure that people are not discriminated against based on race, color, ability, or national origin.

CSPDC's programs operate on a fiscal year basis using annual work programs that start on July 1st. The Title VI Coordinator will review CSPDC program workplans at the beginning of each Fiscal Year (July) by meeting with the program managers to identify projects that need a Four Factor Analysis. During the annual program review, the Title VI Coordinator will review the Title VI Implementation Plan, which includes:

- Instructions to ensure nondiscrimination in communications and public participation;
- Instructions to ensure nondiscrimination in planning and programming;
- Instructions to evaluate and monitor consultant contracts for compliance with nondiscrimination authorities and disadvantaged business enterprise goals; and
- Instructions for accommodating a person with language access barriers and language access and accommodation requests.

*The CSPDC currently does not have any subrecipients. If circumstances change, these review procedures will be expanded to include a regular review of subrecipients.

Appendix H: HRMPO and SAWMPO Public Participation Plans

The Harrisonburg-Rockingham Metropolitan Planning Organization (HRMPO) and the Staunton-Augusta-Waynesboro Metropolitan Planning Organization (SAWMPO) each maintain their own Public Participation Plans (PPPs) governing public engagement activities related to the metropolitan transportation planning process. These plans establish procedures and strategies for providing citizens, affected public agencies, representatives of public transportation employees, freight shippers, providers of freight transportation services, private providers of transportation, representatives of users of public transportation, representatives of users of pedestrian walkways and bicycle transportation facilities, representatives of the disabled, and other interested parties with reasonable opportunities to be involved in the metropolitan planning process, consistent with the requirements of 23 CFR 450.316.

Each MPO's PPP reflects the unique demographic composition, geographic context, and transportation needs of its respective planning area, and is developed and updated in coordination with member jurisdictions and the public.

The Public Participation Plans for each MPO are available in print upon request at the CSPDC offices (112 MacTanly Place, Staunton, VA 24401) or on the MPO websites at the links below:

Harrisonburg-Rockingham Metropolitan Planning Organization

www.hrvampo.org/public-participation-title-vi

Staunton-Augusta-Waynesboro Metropolitan Planning Organization

www.sawmpo.org/public-participation-title-vi

Appendix I: Organizational Charts

CSPDC ORGANIZATION CHART



Ann Cundy

Executive Director

Responsible for the overall administration and direction of the Commission which serves a regional area of five counties, five cities and 11 towns.
Hired 4/2013



Jeremy Crute
Director of Planning

Responsible for all planning projects and coordination of services in the areas of community development, economic development, housing, emergency management and environmental. Hired 2/2022



Kimberly Miller
Office Manager

Responsible for Human Resources administration, and oversees building and office management functions. Hired 8/2012



Donnie Kern
Finance Director

Responsible for the development of the budget, accounting, financial management and reporting systems for the organization. Hired 1/2024



Paula Melester
Director of Transportation

Responsible for regional transportation programs, including metropolitan and rural planning, transit, transportation demand management, bike and pedestrian planning, and the interface of land use and transportation. Hired 12/2021



Philippe Bone
Regional Planner

Provides planning services for local governments in the areas of community and economic development, housing, and recreation. Hired 4/2024



Elizabeth Goodloe
Regional Planner

Provides planning services for local governments in the areas of community and economic development. Hired 10/2024



Rachel Kinzer
Regional Planner

Provides planning services for local governments in the areas of environmental and emergency management. Hired 6/2024



Carrie Sensabaugh
Administrative Assistant

Provides routine and non-routine administrative support to the organization, ensuring operations of the Commission are carried out in an efficient and timely manner. Hired 11/2024



Richard Sagui
Accountant

Assists the Finance Director in all areas of the Commission's accounting system, and is responsible for Accounts Payable and Receivables. Hired 8/2024



Zach Beard
Transportation Manager

Responsible for all Transportation programs SAWMPO, HRMPO and Rural Transportation programs and planning for Environmental programs. Hired 1/2019



Devon Thompson
Transit Manager

Responsible for management and oversight of the region's public transit system (BRITE) and coordinating public transportation planning. Hired 1/2013



Garreth Bartholomew
Transportation Planner

Provides planning services for localities related to transportation; supports the Staunton-Augusta-Waynesboro and Harrisonburg-Rockingham MPOs. Hired 4/2024



Danielle Gannon
Transit Planner

Responsible for the public relations as well as support and coordination of the Transit and Rideshare Programs. Hired 8/2024

Appendix J: List of Committee Members

Central Shenandoah Planning District Commission: Board of Commissioners (2026)

Augusta County	Carolyn Bragg, Board of Supervisors Julia Hensley – Non-Elected Representative Vacant
Bath County	Lynn Ellen Black, Board of Supervisors
Buena Vista	Jesse Lineberry, City Council
Harrisonburg	Nasser Alsaadun, City Council Laura Dent, City Council Adam Fletcher, Non-Elected Representative
Highland County	Henry Budzinski, Board of Supervisors
Lexington	Frank Friedman (Chairperson), City Council
Rockbridge County	Jay Lewis, Board of Supervisors Chris Slaydon, Non-Elected Representative
Rockingham County	Joel Henlsey, Board of Supervisors Sallie Wolfe-Garrison, Board of Supervisors Rachel Salatin, Non-Elected Representative Kim Sandum, Non-Elected Representative
Staunton	Brad Arrowood, City Council Sharon Angle, Non-Elected Representative
Waynesboro	Terry Short, City Council Leslie Tate, Non-Elected Representative

Contact Information:

Central Shenandoah Planning District Commission 112 MacTanly Place Staunton, VA 24401
Phone: (540) 885-5174 Website: www.cspdc.org

Document Control:

- **Last Updated:** March 25, 2026
- **Next Review:** *Pending Board Approval*
- **Approved by:** CSPDC Board of Commissioners, HRMPO Policy Board, SAWMPO Policy Board
- **Effective Date:** *Pending Board Approval*

Harrisonburg-Rockingham Metropolitan Planning Organization Membership (2026)

Policy Board Voting Members		Alternates and Non-Voting Members
Dennis Driver, Chairperson Town of Mount Crawford	Laura Dent, Vice Chairperson City of Harrisonburg	<i>Vacant</i> , Harrisonburg Dylan Nicely, Rockingham County Alex Wilmer, Bridgewater Gary Corder, Dayton Robert Taylor Jr., Mt. Crawford Libby Clark, Mt. Crawford Matt Dana, VDOT Jeff Lineberry, VDOT Adam Campbell, VDOT Don Komara, VDOT Jeremy Mason, VDOT Burgess Lindsey, VDOT <i>Vacant</i> , Dept. of Aviation Grace Stankus, Dept. of Rail and Public Transportation <i>Vacant</i> , FHWA Laura Keely, FTA Bill Yates, JMU Valerie Kramer, JMU Ann Cundy, CSPDC
Sallie Wolfe-Garrison Rockingham County	Casey Armstrong Rockingham County	
Rachel Salatin Rockingham County	Dany Fleming City of Harrisonburg	
Nasser Alsaadun City of Harrisonburg	Ande Banks City of Harrisonburg	
Gerald Gatobu City of Harrisonburg	Brian Borne Town of Dayton	
Jay Litten Town of Bridgewater	Joel DeNunzio VDOT	

Technical Advisory Committee Voting Members		Alternates and Non-Voting Members
Tom Hartman, Chairperson City of Harrisonburg	Dylan Nicely, Vice Chairperson Rockingham County	Gerald Gatobu, Harrisonburg Eliott Menge, Harrisonburg James Polhamus, Harrisonburg Julia Cottrell, Rockingham County Rachel Salatin, Rockingham County Kayla Yankey, Rockingham County Megan Byler, Bridgewater Libby Clark, Mt. Crawford Brian Borne, Dayton Jermey Mason, VDOT Jeff Lineberry, VDOT Brad Reed, VDOT Vacant, Dept. of Aviation Vacant, FHWA Laura Keely, FTA Bill Yates, JMU Valerie Kramer, JMU
Thanh Dang City of Harrisonburg	Vacant City of Harrisonburg	
Kyle Lawrence City of Harrisonburg	Jakob zumFelde City of Harrisonburg	
Casey Armstrong Rockingham County	Alex Wilmer Town of Bridgewater	
Gary Corder Town Of Dayton	Robert Taylor, Jr. Town of Mount Crawford	
Adam Campbell VDOT	Don Komara VDOT	
Grace Stankus Department of Rail and Public Transportation		

Contact Information:

Harrisonburg-Rockingham Metropolitan Planning Organization: 112 MacTanly Place Staunton, VA 24401 Phone: (540) 885-5174 Website: www.hrvampo.org

Staunton-Augusta-Waynesboro Metropolitan Planning Organization Membership (2026)

Policy Board Voting Members		Alternates and Non-Voting Members
Brad Arrowood, Chairperson City of Staunton	Jim Wood, Vice Chairperson City of Waynesboro	Rodney Rhodes, Staunton Michael Hamp, Waynesboro Vacant, Augusta County Don Komara, VDOT Brad Reed, VDOT Matt Dana, VDOT Laura Keely, FTA Vacant, FHWA Grace Stankus, Dept. of Rail and Public Transportation Phil Thompson, Virginia Regional Transit Steve Wilson, Virginia Regional Transit Vacant, Dept. of Aviation Ann Cundy, CSPDC
Leslie Beauregard City of Staunton	Tim Fitzgerald Augusta County	
Todd Wood City of Waynesboro	Carolyn Bragg Augusta County	
Joel DeNunzio VDOT		

Technical Advisory Committee Voting Members		Alternates and Non-Voting Members
Rodney Rhodes, Chairperson City of Staunton	Doug Wolfe, Vice Chairperson Augusta County	Lyle Hartt, Staunton Meggie Taylor, Staunton Garret Shultz, Augusta County Scott Kesecker, Waynesboro Jeff Oswald, Waynesboro Cody Huffman, VDOT Shane McCabe, VDOT Brad Reed, VDOT Laura Keely, FTA Vacant, FHWA Steve Wilson, Virginia Regional Transit Phil Thompson, Virginia Regional Transit Vacant, Dept. of Aviation
Susan Wilson City of Staunton	Leslie Tate City of Waynesboro	
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