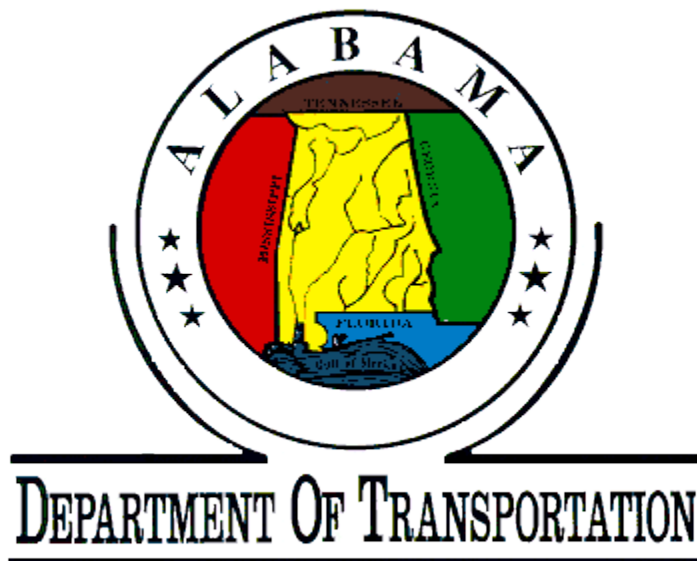


ALABAMA DEPARTMENT OF TRANSPORTATION

LOCAL TRANSPORTATION BUREAU
PUBLIC TRANSPORTATION SECTION

TITLE VI PROGRAM



October 2019

ACCESSIBLE FORMATS

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Alabama Department of Transportation
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Montgomery, Alabama 36130-3050
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This document was prepared in accordance with the FTA Circular 4702.1B, dated
October 1, 2012

TABLE OF CONTENTS

	<u>Page</u>
I. TITLE VI NONDISCRIMINATION STATEMENT.....	4
II. PURPOSE AND OVERVIEW.....	4
III. ROLE OF FTA AND ALDOT.....	5
A. FTA Role.....	5
B. ALDOT Role.....	6
IV. REQUIREMENTS FOR ALL APPLICANTS.....	7
V. GENERAL REQUIREMENTS AND GUIDELINES.....	8
1. Introduction.....	8
2. Requirement to Provide Title VI Assurances.....	8
3. Requirement for First Time Applicants.....	9
4. Requirement to Prepare and Submit a Title VI Program.....	9
5. Requirement to Notify Beneficiaries of Protection under Title VI.....	9
6. Requirement to Develop Title VI Complaint Procedures and Complaint Form.....	9
7. Requirement to Record and Report Transit-Related Title VI Investigations, Complaints, and Lawsuits.....	12
8. Promoting Inclusive Public Participation.....	12
9. Requirement to Provide Meaningful Access to LEP Persons.....	13
10. Minority Representation on Planning and Advisory Bodies.....	17
11. Providing Assistance to Subrecipients.....	18
12. Monitoring Subrecipients.....	18
13. Determination of Site or Location of Facilities.....	18
14. Requirements to Provide Additional Information Upon Request.....	19
VI. REQUIREMENTS FOR STATES.....	19
1. Requirement to Prepare and Submit a Title VI Program.....	19
2. Planning.....	20
3. Requirements for Program Administration.....	20
VII. APPENDICES.....	23
1. APPENDIX A (Complaint Form)	23
2. APPENDIX B (List of Transit-Related Investigations, Lawsuits and Complaints)	26
3. APPENDIX C (Title VI Notice to the Public)	27
4. APPENDIX D (Maps).....	28
5. APPENDIX E (ALDOT Compliance Review Document)	57

ALABAMA DEPARTMENT OF TRANSPORTATION TITLE VI PROGRAM

I. TITLE VI NONDISCRIMINATION STATEMENT

The Alabama Department of Transportation ensures compliance with Title VI of the Civil Rights Act of 1964, 49 CFR, part 21; dated October 1, 2012, and related statutes and regulations to the end that no person shall be excluded from participation in or be denied the benefits of, or be subjected to discrimination under any program or activity receiving federal financial assistance from the U.S. Department of Transportation on the grounds of race, color, or national origin; including the denial of meaning access for Limited English proficient (LEP) persons. Moreover, The Alabama Department of Transportation (ALDOT) complies with all requirements pertaining to Environmental Justice, (EJ) Executive Order 12898 by ensuring that Minority populations and low –Income Populations are not subjected to disproportionately high and adverse environmental impacts and effects.

II. PURPOSE AND OVERVIEW

The purpose of this plan is to enable the Alabama Department of Transportation (ALDOT), Local Transportation Bureau and subrecipients to comply with the guidance and instructions included in FTA Circular 4702.1B that are necessary to carry out the requirements contained in the Title VI regulations issued by the U.S. Department of Justice (DOJ) (28 CFR Part 42, Subpart F) and the U.S. Department of Transportation (DOT) (49 CFR Part 21), and to administer programs, policies, and activities in a manner that is consistent with the DOT Order on Environmental Justice (Order 5610.2) and the DOT Policy Guidance Concerning Recipients' Responsibilities to Limited English Proficient (LEP) Persons (70 FR 74087, December 14, 2005).

Extensive further Title VI guidance can be found on the Federal Transit Administration (FTA) website at [http:// www.transit.dot.gov/regulations-and-guidance/civil-rights-ada/title-vi-civil-rights-act-1964](http://www.transit.dot.gov/regulations-and-guidance/civil-rights-ada/title-vi-civil-rights-act-1964). Here information can be found on filing complaints, ensuring equity in fare and schedule changes, links to other Federal agencies and groups related to this issue, and links to the various regulations affecting the Title VI requirements.

This plan also provides Alabama Public Transportation Systems with an overview of Title VI of the Civil Rights Act of 1964, as amended, as it applies to FTA recipients, through the prescription of requirements and procedures which, if followed, will ensure 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 subjected to discrimination under any program or activity receiving federal financial assistance from the Federal Transit Administration.

Note that 49 CFR 21.9(b) requires that recipients record and retain certain information and submit information to FTA as necessary or required. ALDOT fulfills this requirement by submitting a Title VI Program to FTA once every three years. Subrecipients of FTA funding shall submit Title VI Programs to ALDOT once every three years on a staggered schedule established by ALDOT. All Title VI Programs must be approved by the appropriate governing entity or official prior to submissions.

The objectives of the Alabama DOT Title VI Program are to:

- Ensure that the level and quality of transportation services are provided equitably and without regard to race, color, national origin, or Environmental Justice (EJ), Executive Order 12898.
- Avoid, minimize, or mitigate any disproportionately high and adverse human health and environmental effects, including social and economic effects of programs and activities on minority populations and low-income populations;
- Ensure the full and fair participation of all affected populations in transportation decision making;
- Prevent the denial, reduction, or delay in benefits related to programs and activities that benefit minority populations or low-income populations; and
- Ensure that persons with Limited English Proficiency (LEP) have meaningful access to programs and activities that are administered by recipient and subrecipients.

III. ROLE OF FTA AND ALDOT

A. FTA Role

The FTA Office of Civil Rights conducts periodic discretionary compliance reviews of recipients and subrecipients of FTA funding, including transit providers, state Departments of Transportation, and Metropolitan Planning Organizations to determine their compliance with FTA Circular 4702.1B, "Title VI REQUIREMENTS AND GUIDELINES FOR FEDERAL TRANSIT ADMINISTRATION RECEIPIENTS." Compliance reviews also provide technical assistance and make recommendations regarding corrective actions, as deemed necessary and appropriate. Compliance reviews assess the recipient or subrecipient's efforts to meet the requirements under the "General Reporting" and "Program-Specific Reporting" sections of the Title VI Circular and any additional information that is necessary to decide that the grantee is in compliance with Title VI.

These reviews are conducted separately from the triennial, state management, or planning certification reviews. These reviews are conducted either as a desk audit or during an on-site visit. They may cover all or a portion of the recipient's or subrecipient's compliance with the Title VI requirements. Such reviews are conducted at the discretion of FTA, and their scope is defined on a case-by-case basis. The selection of recipients or subrecipients for compliance reviews is primarily based on the following factors:

- Lawsuits, complaints, or investigations conducted by organizations other than FTA alleging that the recipient or subrecipient is deficient or non-compliant with Title VI;
- Problems brought to the attention of FTA by other federal, state, or local civil rights agencies;
- Incomplete Title VI program submissions that were previously submitted to FTA by a recipient;
- Title VI findings or recommendations on prior triennial, state management, or planning certification reviews that have not been sufficiently resolved or implemented, or repeat findings in any FTA review concerning Title VI; and
- The length of time since the last compliance review.

After reviewing the recipient or subrecipient's efforts to meet the general requirements and guidelines reporting sections of the circular, FTA will issue findings in a draft report of no deficiencies, findings of deficiencies, or advisory comments. The recipient or subrecipient will have the opportunity to review and respond to the draft report. After FTA has received and reviewed the agency's response, it will publish a final report that will be provided to the recipient or subrecipient and will also be subject to requests from the public under the Freedom of Information Act (FOIA). If findings of deficiencies remain in the final report, the recipient or sub-recipient will be required to take corrective action and report on its progress to FTA on a basis deemed appropriate. Once FTA determines that the recipient or subrecipient has satisfactorily responded to the review's findings, it will inform the agency that the review process has ended and release it from further progress reporting in response to the review. Compliance reviews may be followed up with additional reviews as necessary.

In a situation where the recipient or subrecipient fails to take appropriate corrective action in response to the findings of deficiency in the report, FTA may initiate enforcement proceedings that could result in the suspension, termination, refusal to grant or continued federal financial assistance to a recipient or subrecipient or a referral to the Department of Justice with a recommendation that appropriate proceedings be brought to enforce Title VI of the Civil Rights Act of 1964.

B. ALDOT Role

ALDOT is required to ensure that subrecipients are in compliance with Title VI requirements and demonstrate that subrecipients were selected for funding in a nondiscriminatory manner. ALDOT must and will maintain and provide data and other relevant information as required, including all pertinent data obtained from subrecipients. On-site Title VI compliance reviews will be periodically conducted, as determined needed and necessary by the ALDOT Title VI office with review of the following areas:

- Inspection of all materials pertaining to implementation of Title VI and verification that all services are being implemented consistent with the updated Title VI program;
- Review all Title VI complaints and their outcomes. Make comments and advise subrecipient of any needed follow-up action;
- Inquire about any problems involving service delivery to the minority, low-income, and LEP communities and their possible solution; and
- Review other information necessary for compliance with the Title VI program requirements consistent with FTA Circular 4702.1B, dated October 1, 2012.

Upon conclusion of the review, ALDOT will issue a compliance report. This report will contain the subrecipient's state of compliance, including recommendations and corrective actions regarding the Title VI program. Failure to submit requested information might delay consideration of any pending grant or grant application.

In addition to the periodic compliance reviews, ALDOT will:

- Provide direction and technical assistance to ALDOT subrecipients, cities, counties, metropolitan planning organizations (MPO), and contractors to ensure compliance with Title VI;
- Ensure that Title VI requirements are included in program area directives to prevent perceived or real discrimination;
- Attend ALDOT public hearings and monitor for adequate participation of communities affected by ALDOT activities;
- Investigate and resolve filed Title VI complaints;
- Develop and update ALDOT's Title VI Program to reflect organizational policy or implementation changes;
- Submit annual accomplishment report and work plan of Title VI activities to FTA; and
- Develop and periodically deliver Title VI and Environmental Justice Training as needed.

IV. REQUIREMENTS FOR ALL APPLICANTS

All applicants for FTA financial assistance, including those entities that are applying for FTA assistance for the first time, should follow the following procedures to comply with the Title VI regulations. ALDOT has and will comply with all requirements for the submission and implementation of all Title VI Requirement consistent with the FTA Circular, 4702.1B, dated

October 1, 2012; thus, this Updated Circular submission is prepared in accordance with FTA Circular 4702.1B.

- Every application for financial assistance from FTA must be accompanied by an assurance that the applicant will carry out the program in compliance with Title VI of the Civil Rights Act of 1964. This requirement is considered fulfilled when the applicant submits its Annual Certifications and Assurances to ALDOT
- For first time applicants, in addition to the certifications and assurances addressed above, entities applying for FTA funding shall provide information regarding their Title VI compliance history if they have previously received federal funding from another federal agency. This shall include a summary of any Title VI compliance review activities conducted in the last three years. The summary should include:
 - ▶ The purpose or reason for the review;
 - ▶ The name of the agency or organization that performed the review;
 - ▶ A summary of the findings and recommendations of the review; and
 - ▶ A report on the status and/or disposition of such findings and recommendations. This information should be relevant to the organizational entity submitting the application, not necessarily the larger agency or department of which the entity is a part.

ALDOT requires that all applicants address each of the following issues in the submission of their respective grant applications:

- List all active lawsuits or complaints against the transit provider alleging discrimination on the basis of race, color, or national origin with respect to service or other transit benefits.
- Describe all pending applications for financial assistance currently provided by other federal agencies to the applicant.
- Summarize all civil rights compliance reviews conducted by other local, state or federal agencies during the last three years.
- List the date of the most recent signing of the Annual Certification and Assurances.

ALDOT submits its annual Title VI assurances as part of its annual Certification and Assurance Submission to FTA through TrAM.

V. GENERAL REQUIREMENTS AND GUIDELINES

1. **Introduction**: ALDOT complied with the FTA Circular 4702.1B dated October 1, 2012 in the preparation of this Title VI Program.

2. **Requirement to Provide Title VI Assurances**

In accordance with 49 CFR Section 21.7, every application for financial assistance from FTA must be accompanied by an assurance that the applicant will carry out the program in compliance with Title VI of the Civil Rights Act of 1964. ALDOT will fulfill this requirement by submitting the annual certification and assurances to FTA, and subrecipients will submit Title VI Assurances to ALDOT prior to receiving FTA funds. ALDOT will submit the annual Certification and Assurance requirement via TrAM.

3. Requirement for First Time Applicants: ALDOT is not a first-time applicant.

4. Requirement to Prepare and Submit a Title VI program

ALDOT will and has complied with all requirements of Title 49 CFR, section 21.9 (b); as it relates to record keeping and subrecipients submission requirements.

5. Requirement to Notify Beneficiaries of Protection under Title VI

ALDOT and subrecipients of federal transit administration funding will disseminate and provide information to the public regarding their Title VI obligations and apprise the public of the protections against race, color, and national origin discrimination afforded to them by Title VI. This information dissemination will be accomplished through measures that can include but shall not be limited to posting the information on the agency's website; and in public areas of the agency's office(s), including the reception desk and meeting rooms. Each subrecipient will establish and maintain a website to post their Title VI statement. The Title VI information will further be posted in all facilities of the subrecipients establishments; office space, and facilities including buses.

ALDOT shall make available to participants, beneficiaries, and other interested persons this nondiscrimination statement/notice that ALDOT complies with Title VI. ALDOT's nondiscrimination statement can be found in Section I of this document. ALDOT will make the Title VI procedures available to the public upon request. Also, the Title VI Program will be available on the <http://www.dot.state.al.us/programs/TitleVI.html> and disseminated in other suitable formats by ALDOT. The 'call for projects' for FTA funded transportation programs will include a statement of nondiscrimination because of race, color, or national origin.

The Title VI Program will be translated into languages other than English, as needed and consistent with the USDOT LEP Guidance and ALDOT's language assistance plan.

Subrecipients may adopt the Title VI notice developed by ALDOT; however, subrecipients will be responsible for notifying their beneficiaries that they may file discrimination complaints directly with the subrecipient. ALDOT will provide assistance to subrecipients upon request or as ALDOT deems necessary. A copy of the notice can be found in the Appendix.

6. Requirement to Develop Title VI Complaint Procedures and Complaint Form

A Title VI complaint may be filed by any individual or individual who believes he or she has been discriminated against on the basis of race, color, or national origin to ALDOT or the subrecipients.

A formal, signed, written Title VI complaint form must be filed within 180 days of the date of the alleged act of discrimination. See Appendix for a copy of the Complaint Form. The complaint should be submitted to:

Wiley Brooks
Transportation Planner Senior
Alabama Department of Transportation
Local Transportations Bureau
1409 Coliseum Boulevard
Montgomery, Alabama 36130-3050
VOICE: (334) 242-6767
FAX: (334) 353-6451
E-MAIL: brookswi@dot.state.al.us

The complaint must include the following information:

- Name, address, and telephone number of complainant;
- Name and address of the agency, program, organization and/or employee's name that complainant believes discriminated against him/her;
- Description of how, why, and when (include date(s)) complainant believes he/she was discriminated against. Include as much background information as possible about the alleged act(s) of discrimination; and
- Signature of complainant or his/her representative at the bottom of the form.

Once the complaint is received and considered to be complete, and ALDOT has determined Jurisdiction; the complainant will receive an acknowledgement letter informing her/him whether the complaint will be investigated by our office.

In a situation where the complainant is unable or incapable of providing a written complaint, a verbal complaint of discrimination may be made to the ALDOT S Transportation Planner Senior noted above. Under these circumstances, the complainant will be interviewed, and the ALDOT Local Transportations Bureau will assist the complainant in converting the verbal allegations to a formal, written complaint.

ALDOT has developed procedures to address Title VI complaints. It should be noted that these procedures do not deny the right of the complainant to file formal complaints with other state or federal agencies or to seek private counsel for complaints alleging discrimination.

Those complaints filed with ALDOT against contractors, consultants, or other subrecipients will be investigated by ALDOT. Any complaints determined to be outside the jurisdiction of ALDOT will be referred to the appropriate state or federal agency holding such jurisdiction.

When a formal complaint is received, the ALDOT Local Transportations Bureau will provide written acknowledgement to the complainant by registered mail. The complaint will be forwarded to the ALDOT Bureau of Compliance and Business Opportunities – Title VI Program.

For those complaints that are determined to merit further investigation, ALDOT will assign an investigator. A complete investigation will be conducted, and an investigative report will be submitted to the Transportation Planner Senior. ALDOT will strive to complete a Title VI complaint investigation within 180 days of the date that the complaint is received.

ALDOT will strive to obtain early resolution of complaints at the lowest level possible. The option of informal mediation between the complainant and ALDOT may be utilized for resolution of a complaint.

A complaint may be recommended for dismissal for any of the following reasons:

- The complainant requests withdrawal of the complaint;
- The complainant fails to respond to repeated requests for additional information needed to process the complaint; and/or
- The complainant cannot be located after reasonable attempts to contact are made.

- In cases where a subrecipient is being investigated, ALDOT will provide the subrecipient with the opportunity to respond to the allegations in writing. ALDOT's investigative team will be responsible for evaluating the complaint, conducting interviews, collecting and analyzing evidence, and preparing an investigative report.

The Transportation Planner Senior will notify the complainant of the outcome of the investigation, with a copy of the investigative report forwarded to FTA or other appropriate federal agency. In those situations where an investigation is delayed, the investigator will notify the appropriate authorities and an extension will be requested.

Moreover, ALDOT will establish and maintain an internal manual and computerized tracking system for all filed Title VI complaints. Currently, and as of the completion and submission of this plan, the ALDOT has not received any Title VI complaints for ALDOT or subrecipients.

A complainant may file a complaint directly with the following federal office:

**Federal Transit Administration (FTA), Office of Civil Rights
Attn: Title VI Program Coordinator
East Building, 5th Floor-TCR
1200 New Jersey Avenue SE
Washington, D.C. 20590**

In accordance with FTA Circular 4702.1B, and to reduce the administrative burden of the requirements associated with these Title VI complaint procedures, FTA will allow subrecipients to adopt the Title VI complaint investigation and tracking procedures developed by ALDOT.

7. Requirement to Record and Report Transit-Related Title VI Investigations, Complaints, and Lawsuits

All recipients must prepare and maintain a list of any of the following that allege discrimination on the basis of race, color, or national origin: active investigations conducted by entities other than FTA; lawsuits and complaints naming the recipient. The list shall include the date that the investigation, lawsuit, or complaint was filed; a summary of the allegation(s); the status of the investigation, lawsuit, or complaint; and actions taken by the recipient in response, or final findings related to, the investigation, lawsuit, or complaint.

ALDOT and the subrecipients are required to include this list in the Title VI Program submissions every three years. ALDOT has had no lawsuits, or complaints that allege discrimination on the basis of race, color, religion, national origin, since the last submission of the Title VI Program. A copy of the Title VI Investigations, Complaints, and Lawsuit Form that will be used to record any Title VI investigations, complaints, or lawsuits can be found in the Appendix.

8. Promoting Inclusive Public Participation

ALDOT understands and will ensure that inclusive public participation is essential to having a successful and active Title VI program. Effective public involvement provides transportation officials with new and innovative ideas, while also alerting them to potential environmental justice concerns during the project planning phase. Public participation provides a sense of individual and collective ownership in a project among the public, particularly those in the minority, low-income and LEP community that are often at the mercy of their surroundings. ALDOT is committed to a public participation process for its comprehensive constituency and its subrecipients that will provide for early and continuous opportunities for participation by this segment of the population in the transportation decision making process. This Inclusive Public Involvement Process will comply with and exceed all requirements of the, FTA Circular, 4702.1B; in that it shall be a living document meeting the spirit and letter of the requirements.

To more fully integrate into community outreach activities the opinions of minority, low-income and LEP populations, ALDOT's public participation program will:

- Continue to coordinate with the Alabama Association of Regional Councils and other community-based organizations to identify and implement strategies to reach out to members in the affected minority, low-income, and LEP communities.
- Reduce barriers to public participation from this segment of the population.
- Utilize the media (newspaper, radio, television, etc.) to target the minority, low-income and LEP populations in public involvement efforts.
- Provide opportunities for public participation through means other than written communication, such as personal interviews or the use of recording devices to capture oral comments.
- Hold public meetings in locations, facilities, and at meeting times that are convenient and accessible to the minority, low-income, and LEP populations.

- Ensure that the decision-making process adequately considers the issues and concerns raised by the minority, low-income and LEP populations.
- Evaluate the effectiveness of the public participation process.
- Schedule meeting at times and locations that are convenient and accessible for minority and LEP Communities.
- Host meeting in different sizes and formats.
- Coordinate with community-and faith-based organizations, educational institutions, and other organizations to implement public engagement strategies that reach out specifically to member of the affected minority and /or LEP communities.
- Provide opportunities for public participation through written communication, such as personal interviews or use of audio or video recording devices to fully capture all oral comments, suggestion, and recommendations.

ALDOT will continue to reach out and provide improved opportunities for the minority, low-income, and LEP populations to participate in the project planning/decision making process.

ALDOT’s Public Participation Involvement and Outreach for 2017-2019 included:

- Assuring low-income, minorities, and the LEP populations were included in the public participation process by coordinating with the Alabama Association of Regional Councils and social services agencies statewide.
- Purchasing ads in newspapers and other media that serve minority, low-income, and LEP individuals.
- Outreach was made available for the hearing impaired by accessing the TDD system via the Alabama Relay Service.
- Conducting public participation meetings in public libraries, community centers, and other facilities accessible to minorities, low-income, and LEP individuals.

9. Requirement to Provide Meaningful Access to Limited English Proficient (LEP) Persons

According to U.S. Census Bureau 2010 American Community Survey data, approximately 5.0% of residents in the State of Alabama speak a language other than English at home, with Spanish being the most used non-English language. According to the 2010 survey, Spanish was used at home by 3.2% of Alabama residents.

Language barriers often prohibit people who are Limited English Proficient (LEP) from obtaining services and information relating to transportation services and programs. FTA requires recipients to take reasonable steps to ensure meaningful access to the benefits, services, information, and other portions of their programs and activities for individuals who are LEP. To meet this responsibility, ALDOT will post vital documents including Title VI Notice, Complaint

Procedures, and the Complaint Form on the Alabama Department of Transportation website <http://www.dot.state.al.us/Itweb/transit/index.htm> in English and Spanish for FTA funded transportation programs. In addition, ALDOT will provide documents and literature in other languages as needed. ALDOT will utilize bilingual staff and establish a list of qualified interpreters and businesses that can provide translation services on an as needed basis.

ALDOT and subrecipients are required to take appropriate reasonable steps to ensure meaningful access to their programs and activities by LEP persons. Subrecipients shall examine the following factors to determine the type of LEP program it should engage in:

- **Number or proportion of LEP persons eligible to be served or likely to be encountered by a program, activity, or service of the subrecipient;**
 - (a) LEP persons interaction with ALDOT is very limited, possible encounter is during meetings held by ALDOT or subrecipients. LEP persons interact with the subrecipients by engaging and utilizing subrecipient's transportation systems that are contracted with and through ALDOT. ALDOT does not provide and or maintain any Fixed Route Transit Service.
 - (b) Identification of LEP communities and assessing the number or proportion of LEP persons from each language group to determine the appropriate language services for each language group; will be determined by available U.S. Census data, and local community and regional demographic maps information and documentation.
 - (c) The literacy skills of LEP populations in their native languages, to determine whether translation of documents will be an effective practice; this information and documentation will be obtained from local demographics and population data, and appropriate Census Bureau information and researched documentation.
 - (d) Whether LEP persons are underserved by the recipient due to language barriers. The verification and documentation for this requirement will be determined first and foremost by ALDOT from all available research, local, region, and state-wide demographic and census data; secondly, the subrecipient that will be providing the actual transportation service will update, verify, and validate to ALDOT that there are no local underserved LEP persons relative to language barriers on an ongoing and as needed basis based on current demographic ridership information and documentation.
- Frequency with which LEP individuals meet the program, activity, or service;
 - (a) Use of bus and rail services: Since ALDOT does not provide any Fixed Route and or Rail Service; and that such fixed route and demand response services are provided by subrecipients; ALDOT will require subrecipients to submit monthly, quarterly, semi-annual, and annual reports documenting, verifying, and validating LEP person's utilization of bus services as applicable. Currently, ALDOT does not contract with any subrecipients to provide rail services.
 - (b) Purchase of passes and tickets through vending machines, outlets, websites, and over the phone; such data collection pertaining to methods for purchasing travel mode

requirements will be maintained and submitted to ALDOT by subrecipients to assess how LEP persons are purchasing travel medians to ensure that there are no adverse or disproportionate impact for same as applicable.

- (c) Participation in public meetings: Particularly LEP Persons will be encouraged to and advised of all public meetings to the maximum dissemination possible. This dissemination will occur through postings in all public ALDOT and/or subrecipient facilities; to include but not limited to newspapers, and other media means deemed appropriate.
 - (d) Customer services interactions: ALDOT will require all subrecipients to initiate customer service interactions surveys and assessments to determine how LEP persons, evaluate local subrecipient services as applicable. Feedback will be provided to the LEP population who reference their concerns resulting from the surveys.
 - (e) Ridership surveys: ALDOT will require all subrecipients to conduct such surveys; and provide ALDOT with results and conclusions to determine any perceived or real disparities for LEP Persons as necessary. ALDOT will utilize and analyze all feedback provided to subrecipients to assess any disparities.
 - (f) Operator surveys: ALDOT will require all subrecipients to conduct and submit Operator surveys to ensure that there are no real or perceived disparities relative to Customer service from Operators to LEP persons as necessary. Surveys will be submitted to ALDOT for verification and validation as needed and required.
- **The Nature and importance of the program, activity, or service provided by the program to people's lives;** ALDOT and all subrecipients have determined that the program is significantly important, in that the more frequent the contact and the likelihood that the language services will be desired and needed. The provision of public transportation is especially vital for people without access to personal vehicles; thus, with public transportation the user's quality of life can be experientially enhanced and improved. ALDOT and all contracted subrecipients will assess their programs, activities and services to ensure they are providing meaningful access to LEP persons
 - **Resources available to the recipient and costs.** ALDOT and all subrecipient's shall coordinate with all the LEP community stakeholders to ensure that appropriate resources are expressly consistent with and allocated for local, regional, and state-wide demographics needs and requirements as applicable. ALDOT will maximize resource utilization for the LEP Community by sharing language assistance materials and services among and between advocacy groups and LEP Populations as needed.

The level of resources and the cost imposed will likely impact the nature of the effort to provide meaningful access for LEP persons. Smaller subrecipients with more limited budgets are not expected to provide the same level of language services that would be provided by larger entities with more available funds. It is recommended that subrecipients evaluate the most cost-effective means to meet this requirement before limiting services due to resource concerns.

Subrecipients have two primary alternatives to provide language service: oral interpretation either in person or via telephone interaction, or written translation. At a minimum, ALDOT recommends that summaries of important documents be translated upon request and utilize qualified community volunteers when oral translation is needed.

Limited English Proficiency Plan (LEP): ALDOT shall develop, implement, and execute an LEP Plan and provide guidance to subrecipients; subrecipients will develop their individual plans based on current census data, local and state-wide demographics and population(s) served. Language assistance will be provided through a series of methods including but not limited to interpretive and translation services, distribution of translated materials, pertaining to all provision of transportation services and schedules for the areas where LEP populations reside and are utilizing the designated and identified transportation services. The availability of language assistance shall be accomplished through a series of means, including dissemination of translated printed materials, distribution of hand-outs to advocacy groups and LEP populations that are utilizing transportation services, local newspapers that target LEP Populations and all other means to heighten the LEP population awareness level of available transportation assistance. ALDOT will monitor and require all subrecipients to periodically evaluate and update the language access plan based on several factors; including but not necessarily limited to Census and demographic changes, feedback from LEP populations, increase and or decrease of LEP Population utilization of available transportation services. ALDOT will ensure that appropriate staff personnel are expertly and properly trained to train local subrecipient personnel; in order that LEP Populations receive timely and reasonable training on an ongoing basis, particularly those LEP groups that have been identified to need language assistance.

ALDOT LEP PLAN:

The results of the Four Factor Analysis; revealed that the LEP Population served by ALDOT's subrecipients need to continually be sensitized to and periodically monitor the growing population of LEP Person served throughout the respective areas. More specifically, throughout the ALDOT's area of jurisdiction, the State of Alabama, Census 2010 Data and the 2007-2011 American Community Survey data revealed that 2.40% of the LEP population speak English less than very well; thus, ALDOT has determined that the current mentioned initiatives are adequate to address the LEP Population transportation needs. ALDOT is currently using Flash Cards, posting LEP information on the website, web-based translation services, and making available limited staff members that can provide translation services as needed. The number and proportion of LEP persons eligible to be served or likely to be encountered by the program or recipient; the frequency with which LEP persons come in contact with the program; the nature and importance of the program, activity, or service provided by the program to people's lives; and the resources available to the recipient for LEP outreach, as well as the costs associated with the outreach; will always be taken into account and consideration toward adjusting and modifying the LEP plan to ensure that the LEP population's transportation are being met consistent with the Title VI requirements.

ALDOT will provide language assistance services; by language based on population served demographics; specific feedback from LEP Groups, Subrecipient Bus Operators and Bus Surveys, and feedback from subrecipients that provide the actual Transportation Services to the LEP Population.

The provision and notification of transportation services to LEP Groups; are provided utilizing the following: Focus and community town-hall meetings, notifications advertised in LEP Media, television, radio, and newspapers specific to LEP Populations.

ALDOT as the Transportation Designated and Primary Recipient; monitoring, evaluation, and updating the Language Access Plan will be done according to ALDOT's overall insightful assessment of feedback provided by the subrecipients; as well as ALDOT's announced and unannounced visits and monitoring of subrecipients to ensure that the Transportation Services identified and contracted are actually being provided; and that the real active need of the LEP population is being met consistent with the U.S. DOT requirements.

ALDOT will provide training pertaining to LEP requirements to its transit employees and subrecipients at their new hire/transit manager orientation. Additional training will be provided during ALDOT's annual Transit Managements Workshops. Training will include meeting the LEP requirements, accommodating LEP individuals and providing translators/translation resources.

SAFE HARBOR PROVISION: ALDOT will comply with and adopt the requirements of the DOT/ DOJ's Safe Harbor provisions that outlines circumstances that can provide a "safe harbor" for recipients regarding the translation of written material for LEP Populations. Whereas, ALDOT as the designated recipient does not meet the 5% threshold, nevertheless, there are counties throughout the ALDOT's area of jurisdiction that does meet the threshold, therefore, ALDOT will ensure and enforce that subrecipients provide written translation of vital documents for each eligible LEP Language group. ALDOT will periodically evaluate and assess as to whether the translation of the vital documents is the most effective and efficient method in providing language assistance to the LEP Population.

10. MINORITY REPRESENTATION ON PLANNING AND ADVISORY

BODIES: ALDOT is knowledgeable of all requirements found in Title 49 CFR Section 21.5(b) in that ALDOT shall not on the grounds of race, color or national origin, "deny a person the opportunity to participate as a member of a planning, advisory, or similar body which is an integral part of the program." ALDOT does not nor has it established any Transit-Related, Non-Elected Planning Boards, Advisory Councils or Committees. In lieu of a board adoption, ALDOT's Title VI Program will be reviewed and approved by the State of Alabama Transportation Director, prior to being submitted to the FTA.

11. PROVIDING ASSISTANCE TO SUBRECIPIENTS: ALDOT shall comply with and ensure that all reporting requirements and assistance to the subrecipients are consistent with Title 49 CFR Section 21.9(b) states that if' a primary recipient extends Federal financial assistance to any other recipient, it shall also submit such compliance reports to the primary recipient as may be necessary to enable the primary recipient to carry out its obligations under subject requirement. The following information have been disseminated to current subrecipients.

- a. Sample notices to the public informing beneficiaries of their rights under DOT's Title VI regulations, procedures on how to file a Title VI complaint, and the recipient's Title VI complaint form.

- b. Sample procedures for tracking and investigating Title VI Complaints filed with a subrecipient, and when the primary recipient expects the subrecipient to notify the primary recipient of complaints received by the subrecipient.
- c. Demographic information on the race and English proficiency of residents served by the subrecipient. This information will assist the subrecipient in assessing the level and quality of services it provides to communities within its service area and in assessing the need for language assistance.

Potential subrecipients seeking funding are provided the above information. New applicants serving predominantly minority populations receive additional technical assistance, on the Title VI requirements and language assistance.

12. MONITORING SUBRECIPIENTS

ALDOT will monitor subrecipients in accordance with 49 CFR 21.9(b), to ensure that subrecipients are complying with the DOT Title VI regulation requirements. Moreover, as a Primary Designated/Recipient, ALDOT fully understand that if a subrecipient is found to be non-compliant, this will also constitute non-compliance for ALDOT. Moreover, as the Primary Recipient, and to ensure that the subrecipients are compliant, ALDOT shall undertake, implement, and execute the following initiatives (Appendix E):

- a. Document its process for ensuring that all subrecipients are complying with the general requirements and guidelines, Chapter III of the FTA Circular, 4702.1B, dated October 1, 2012; as well as other requirements that apply to the sub--recipients based on the type of and storage of subrecipient Title VI Programs, entity, and the number of fixed route vehicles it operates in peak service if a transit provider.
- b. Collect Title VI programs from subrecipients and review programs for compliance; and maintain appropriate storage.
- c. Upon request from the FTA, respond to any complaints of discrimination deemed necessary by ALDOT. ALDOT will further require subrecipients to verify, validate, and confirm their level of quality and quantity of service provided on an equitable basis. These requirements will be complied and consistent with FTA Circular 4702.1b, dated October 1, 2012.

13. Determination of Site or Location of Facilities: ALDOT did not make a determination of a site or location of facilities during a period from 2017 through 2019. There is no future to construct FTA funded facilities. If future plans include constructing FTA funded facilities, ALDOT shall comply with all requirements of Title 49 CFR section 21.9(b)(3) in determining any site or location of facilities with the purpose or effect of excluding persons from, denying them the benefits of, or subjecting them to discrimination under any program on the grounds of race, color, or national origin; or with the purpose or effect of defeating or substantially impairing the requirement of Title VI, 4702.1B, dated October 1, 2012. Furthermore, the location of projects requiring land acquisition and the displacement of persons from their residences and businesses will not be determined on the basis of race, color, or national origin. ALDOT fully understand that for this requirement, “facilities” does not include bus shelters, as these are transit amenities and are covered in Chapter IV of the Circular, nor does it include transit stations, power substations, etc., as those evaluated during project development

and the NEPA process.

14. REQUIREMENT TO PROVIDE ADDITIONAL INFORMATION

UPON REQUEST: ALDOT shall comply with all request from the FTA for any additional information required by 4702.1B, dated October 1, 2012; to investigate complaints of discriminations or to resolve concerns about possible noncompliance with the DOT's Title VI regulations.

VI. REQUIREMENT FOR STATES

ALDOT receives Federal Financial assistance from the FTA and will implement the general requirements and guidelines outlined in Chapter III of FTA Circular 4702.1B as noted and recorded.

1. REQUIREMENT TO PREPARE AND SUBMIT A TITLE VI PROGRAM

ALDOT will comply with Title 49 CFR Section 21.9(b) by submitting reports to the FTA to ascertain and establish compliance with the DOT Title VI regulation.

Moreover, ALDOT will establish, maintain, and have available "racial and ethnic data showing the extent to which members of minority groups are beneficiaries of programs receiving Federal financial assistance. As a primary/designated recipient, ALDOT will submit this updated Title VI program to the FTA regional civil rights officer every three years. As a State Department of Transportation (DOT), ALDOT's governing entity is the state's Transportation Director, and appropriate attached documentation is included. As a Direct and Primary Recipient, ALDOT will comply with all requirements consistent with FTA Circular 4702.1B in monitoring, reporting, and submission of appropriate Title VI Programs from subrecipients.

- a. ALDOT will comply with all requirements of Chapter III of the Title VI Circular dated October 1, 2012
- b. Since ALDOT is not a transit provider of fixed route public transportation services, Chapter IV is not applicable; however, ALDOT will ensure that fixed route subrecipients comply with these requirements.
- c. ALDOT has developed and will continue to update demographic profiles of all minority populations in aggregate. (note enclosed maps) Appendix D
- d. ALDOT has also developed demographic maps that overlay the percent of minority and non-minority populations that have been identified by the census and American Survey data Census Tract and block group levels. (See enclosed maps and charts). Appendix D
- e. ALDOT's analysis of possible impacts identified in appendix D on the basis of race, color, or national origins are not evidenced; moreover, there is no policy or practice that would justify the same. As such, and even if there were possible significant perceived and or real impacts, ALDOT would swiftly develop and implement alternatives to mitigate the same.
- f. ALDOT's Human Resources – Title VI Program indicated that the Department's Environmental Section maintains the demographic information that the Title VI Program utilizes for certification of Title VI compliance. Such analytical bases

allow for the considerations expressed in the USDOT Order on Environmental Justice to be integrated into the statewide planning activities. The ALDOT Statewide Transportation Plan Update” includes four distinct planning areas with Environmental Justice areas noted for each. Specifically, the statewide transportation planning process include, outreach, public involvement and participation, conducting outreach meetings and sessions to ensure that such sessions are accessible to LEP and Minority Populations.

- g. The procedure utilized by ALDOT to pass through FTA financial assistance include but is not limited to the following: to the maximum extent possible without any regard to race, color, or national origin, pass through of funding is based on first and foremost through funding availability, subrecipient’s individual requests, and an individual evaluation and assessment of need based on ridership and population served. Moreover, ALDOT selects a cross population representative of the community that will receive the funding to ensure equity and elimination of any perceived, real, bias or discrimination in the selection process.
- h. The procedures and assistance used by ALDOT to assist potential subrecipients in applying for funding, includes efforts to assist applicants that would serve the minority population; conducting individual and collective workshops, seminars, and training sessions to ensure that all interested applicants are provided all needed and necessary training and information in a non-discriminatory manner, and that the assistance is provided to whomever makes a request for the same.

2. **Planning:** ALDOT understands and will comply with conducting planning consistent with 49 U.S.C Section 5304, Statewide Transportation Planning, as well as subpart B of 23 CFR part 450, Statewide Transportation Planning and Programming. ALDOT further understand and will comply with the requirement to collect Title VI programs from MPO as appropriately determined. The collection of the Title VI Program shall be collected electronically. Monitoring of the programs shall take place for MPO subrecipients to ensure compliance. ALDOT shall self-certify compliance with all applicable Federal requirements that will be reviewed by the FTA and the Federal Highway Administration (FHWA) in the joint Statewide Planning Review. As part of the planning certification review, FTA/FHWA will review State-developed documentation to determine whether ALDOT have:

- a. Analyzed regional demographic data to identify minority populations within the non-urbanized areas of the state.
- b. When needed and necessary, ALDOT shall provide local service providers and agencies with data to assist them in identifying minority populations in their respective areas.
- c. Consistently ensured that members of minority communities are provided with the full opportunities to engage in the State-Wide Transportation Planning Process. These actions will eliminate language, mobility, temporal, and other obstacles to allow minority and LEP population to participate fully in the Planning Process.

- d. Monitored all activities of subrecipients with regards to ensuring comprehensive Title VI compliance where there are transfers of federal assistance to subrecipients.

3. **Requirements for Program Administration**

In accordance with 49 CFR section 21.5, the general nondiscrimination provision; ALDOT shall document that FTA funds are passed through to subrecipients without regards to race, color, or national origin and will ensure that minority populations are not denied the benefits of or excluded from participation in the programs. Moreover, ALDOT shall prepare and maintain, but will not report to FTA until requested. The following information will be provided FTA:

- a. A record of funding requests received from private non-profit organizations, state or local governmental authorities, and Indian tribes. The record shall identify those applicants that would use grant programs funds to provide assistance to predominantly minority population. The record shall also indicate which applications were rejected and accepted for funding.
- b. A description of how ALDOT develops its competitive selection process or annual program of projects submitted to FTA as part of its grant applications. This description shall emphasize the method used to ensure the equitable distribution of funds to subrecipients that serve predominantly minority populations, including Native Americans tribes, where present. Equitable distribution can be achieved by engaging in outreach to diverse stakeholders regarding the availability of funds, and ensuring the competitive process is not itself a barrier to selection of minority applicants.
- c. A description of the agency's criteria for selecting entities to participate in an FTA grant program.

Moreover, when a subrecipient is also a direct recipient of FTA fund, that is, applies for funds directly from FTA in addition to receiving funds from the state, the subrecipient/direct recipient reports directly to FTA and the state as designated recipient is not responsible for monitoring compliance of that subrecipient/direct recipient. Where there is a supplemental agreement signed by both entities in their roles as designated recipient and direct recipient relieves the State as designated recipient of this oversight responsibility.

APPENDICES

APPENDIX A

TITLE VI COMPLAINT FORM

BACKGROUND

All recipients are required to make the enclosed Title VI complaint form available to customers who are desirous of filing a Title VI complaint.

Furthermore, the complaint form will also be available to customers on ALDOT's web-site.

All customers will be advised that the bases for filing a Title VI complaint will be limited to allegations of discrimination base "**ONLY**" on Race, Color and National Origin.

Section I:				
Name:				
Address:				
Telephone (Home):			Telephone (Work):	
Electronic Mail Address:				
Accessible Format Requirements?	Large Print		Audio Tape	
	TDD		Other	
Section II:				
Are you filing this complaint on your own behalf? Circle			Yes	No
*If you answered "yes" to this question, go to Section III .				
If not, please supply the name and relationship of the person for whom you are complaining:				
Please explain why you have filed for a third party: _____				
Please confirm that you have obtained the permission of the aggrieved party if you are filing on behalf of a third party.			Yes	No
Section III:				
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 names and contact information of any witnesses. If more space is needed, please use the back of this form.				

Section IV

Have you previously filed a Title VI complaint with this agency? Circle	Yes	No
---	-----	----

Section V

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

Yes No

If 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 VI

Name of agency complaint is against:

Contact person:

Title:

Telephone number:

You may attach any 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:

Wiley Brooks
Transportation Planner Senior
Alabama Department of Transportation
Local Transportations Bureau
1409 Coliseum Boulevard
Montgomery, Alabama 36130-3050

APPENDIX B

List of Transit-Related Investigations, Lawsuits and Complaints

	DATE (Month, Day, Year)	Summary (include basis of complaint: race, color, or national origin)	Status Pending or Closed	Action(s) Taken
Investigations	None in the Past 3 yrs			
1				
2				
Lawsuits	None in the Past 3 yrs.			
1				
2				
Complaints	None in the Past 3 yrs.			
1				
2				

APPENDIX C
TITLE VI NOTICE TO THE PUBLIC

NOTIFY THE PUBLIC OF RIGHTS UNDER TITLE VI

ALABAMA DEPARTMENT OF TRANSPORTATION (ALDOT)

The Alabama Department of Transportation operates its transit programs without regard to race, color, and national origin in accordance with Title VI of the Civil Rights Act. Any person who believes she/he has been aggrieved by any unlawful discriminatory practice under Title VI may file a complaint with the Alabama Department of Transportation, Local Transportation Bureau Transit Section.

For more information on the ALDOT's Title VI program and the procedures to file a complaint, contact Mr. Wiley Brooks, 334-242-6767; email brookswi@dot.state.al.us or visit our Administrative office at 1409 Coliseum Boulevard, Montgomery, AL 36110.

A complaint may be filed directly with The Federal Transit Administration by filing a complaint with the Office of Civil Rights, Attention: Title VI Program Coordinator, East Building, 5th floor-TCR, 1200 New Jersey Avenue, SE, Washington, DC 20590.

If information is needed in another language, contact (334) 242-6767.

Si se necesita información en otro idioma, póngase en contacto (334) 242-6767.

Si enfòmasyon ki nesesè nan yon lòt lang, kontakte (334) 242-6767.

Jika informasi yang diperlukan dalam bahasa lain, hubungi (334) 242-6767.

情報が別の言語で必要とされている場合は、3342426767 までお問い合わせください。

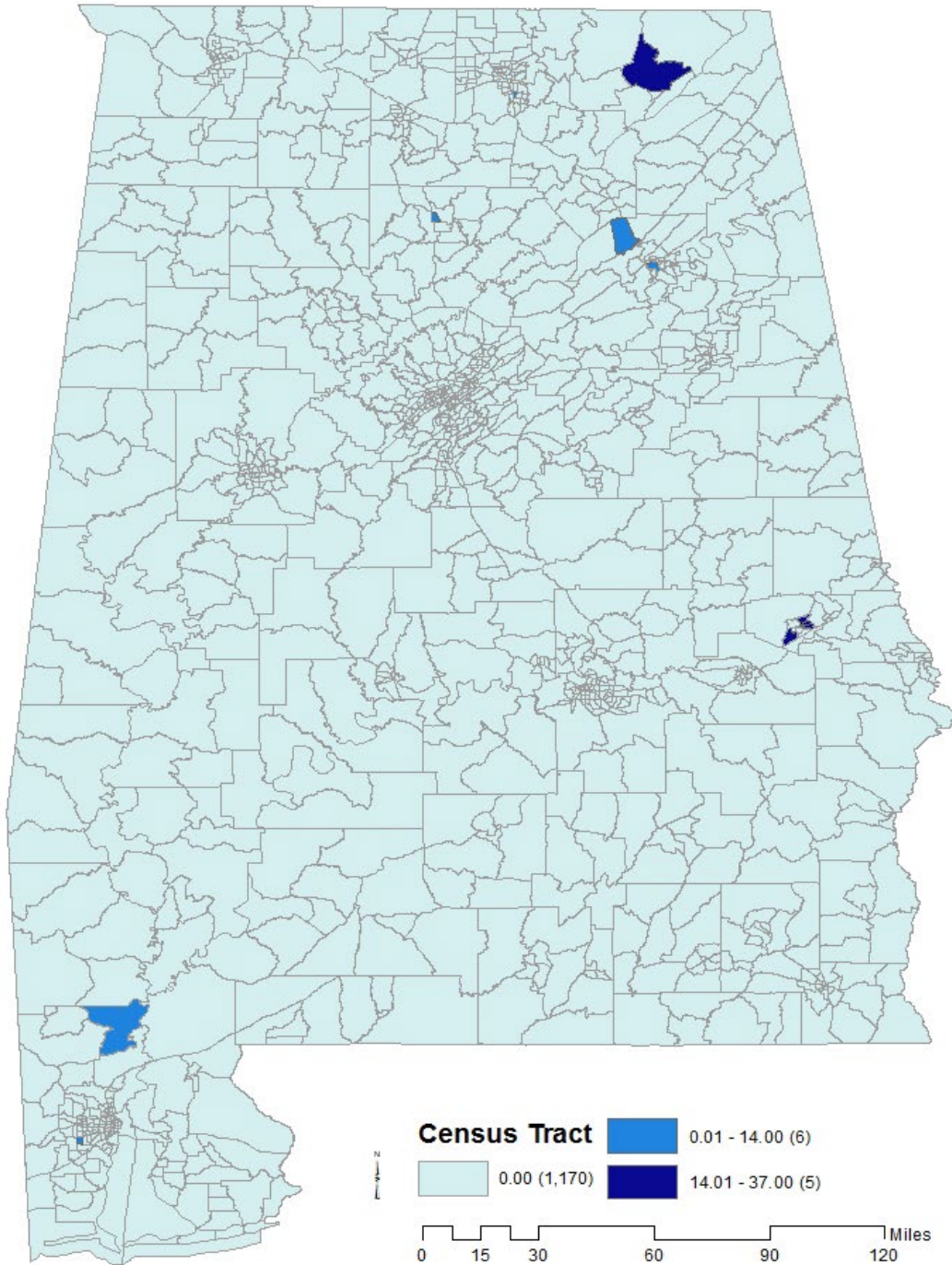
如果需要另一种语言的信息，请联系(334) 242-6767。

如果需要另一種語言的信息，請聯繫(334) 242-6767。

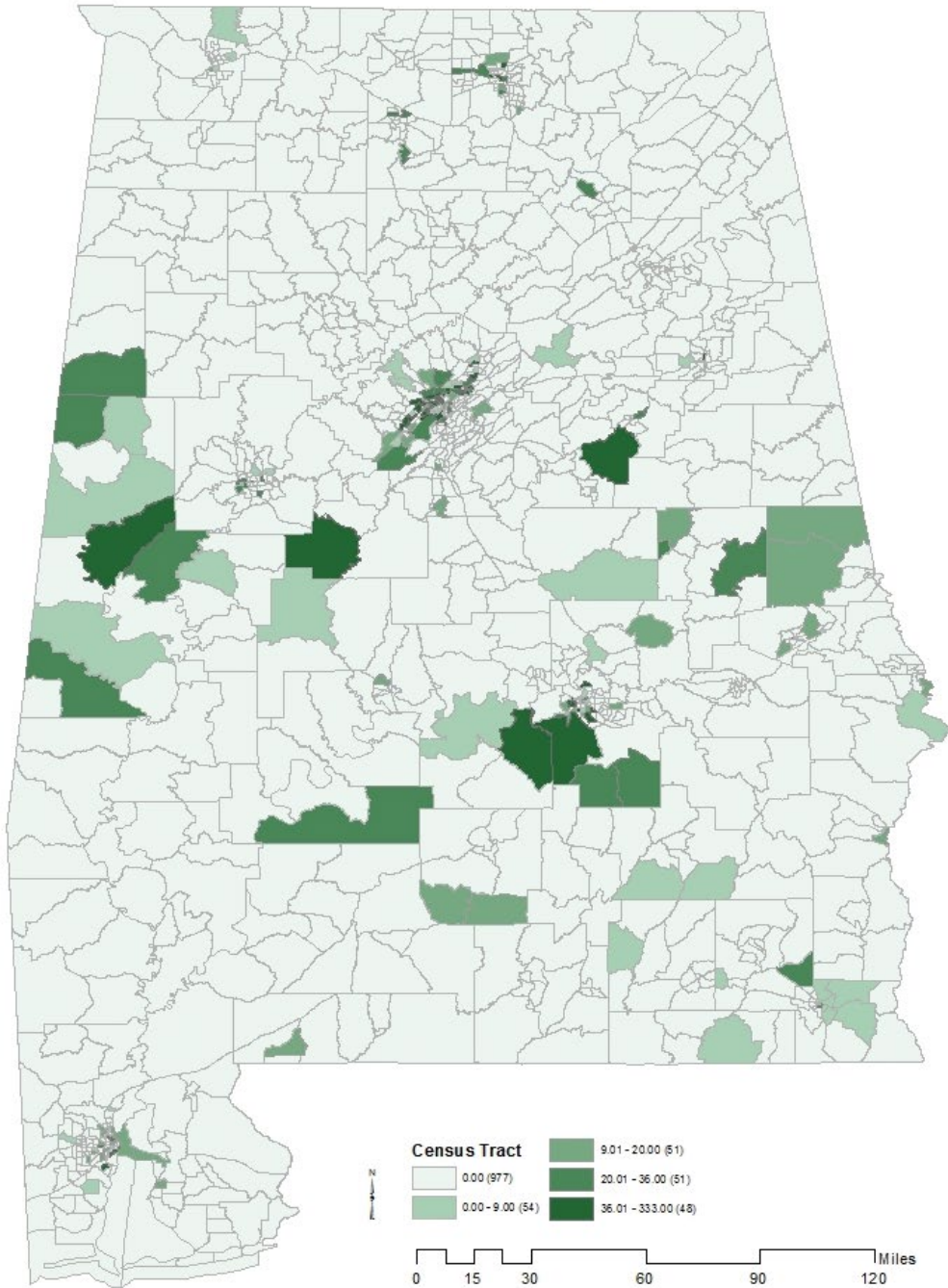
정보가 다른 언어로 필요한 경우, (334) 242-6767 에 문의하십시오.

APPENDIX D
DEMOGRAPHIC MAPS

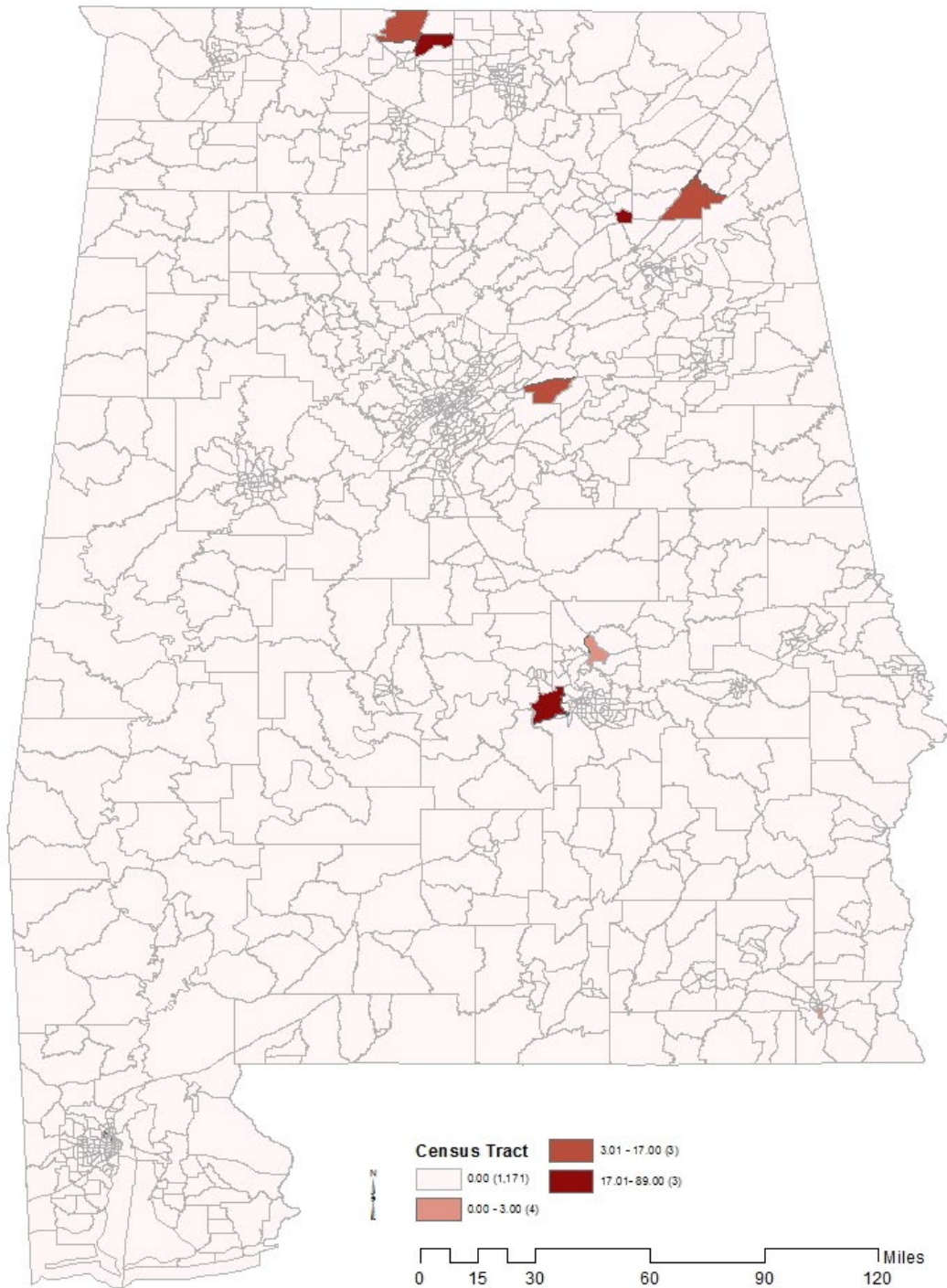
Asian Population Total Transit Usage



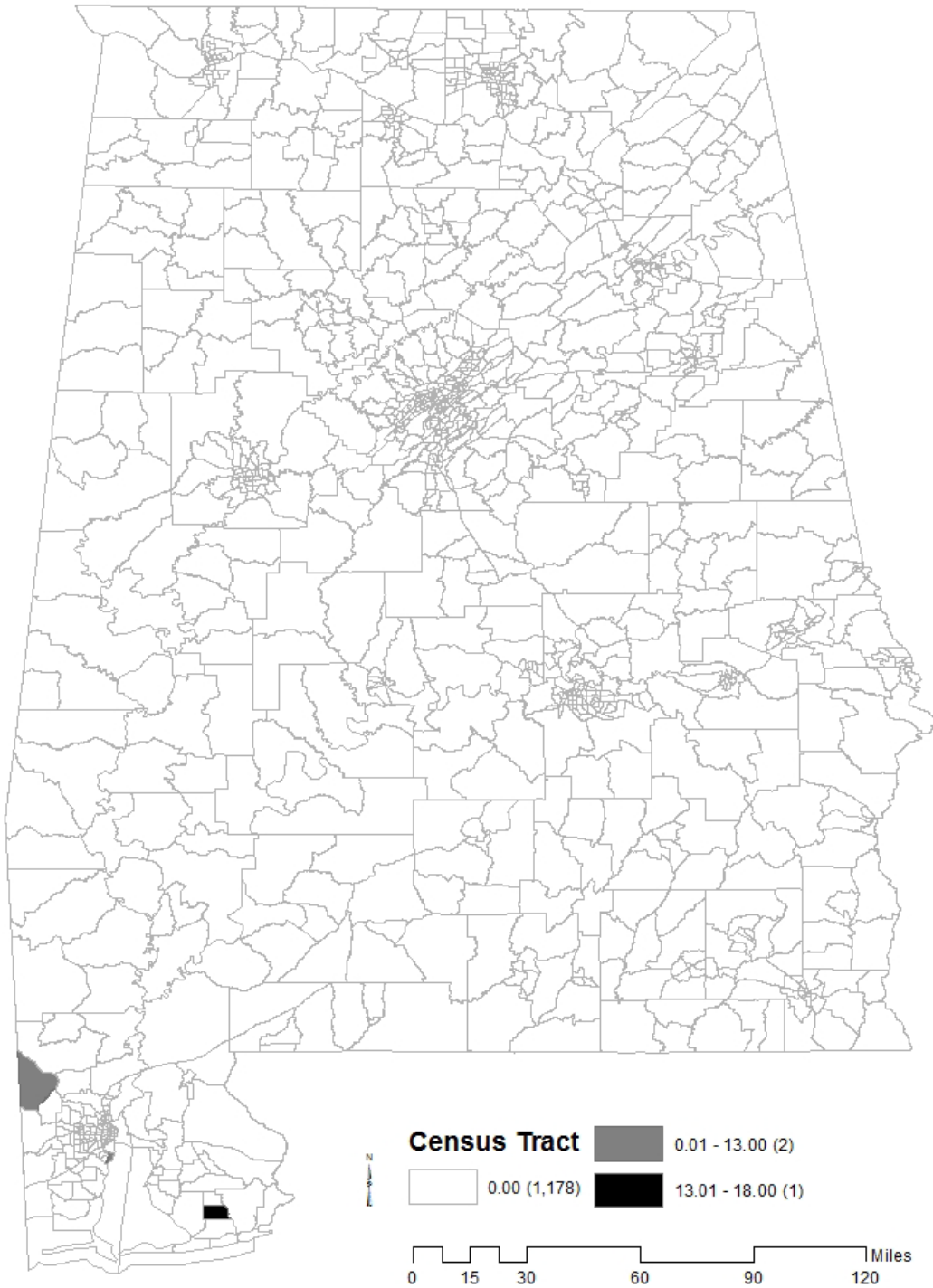
Black Population Total Transit Usage



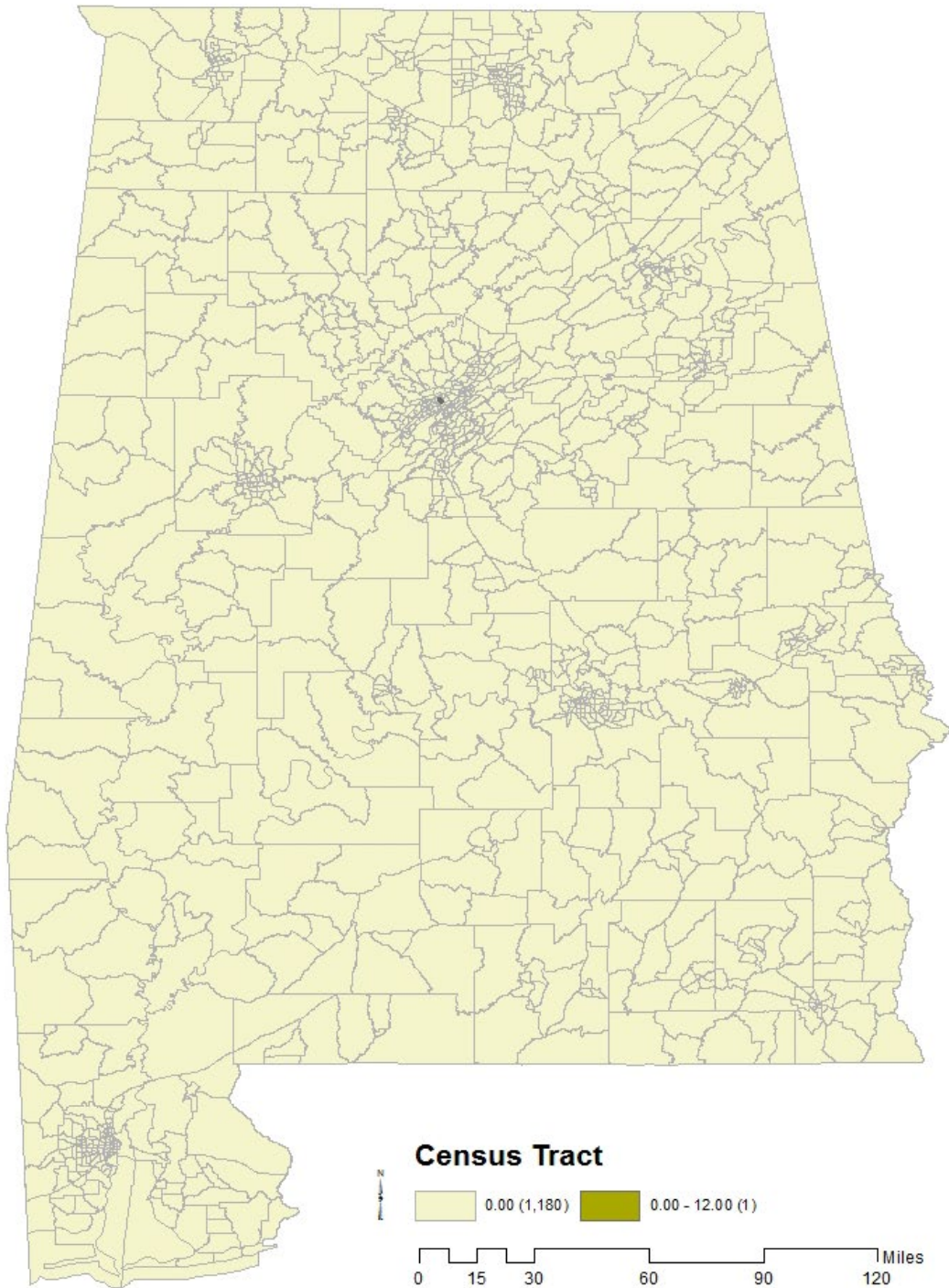
Hispanic Population Total Transit Usage



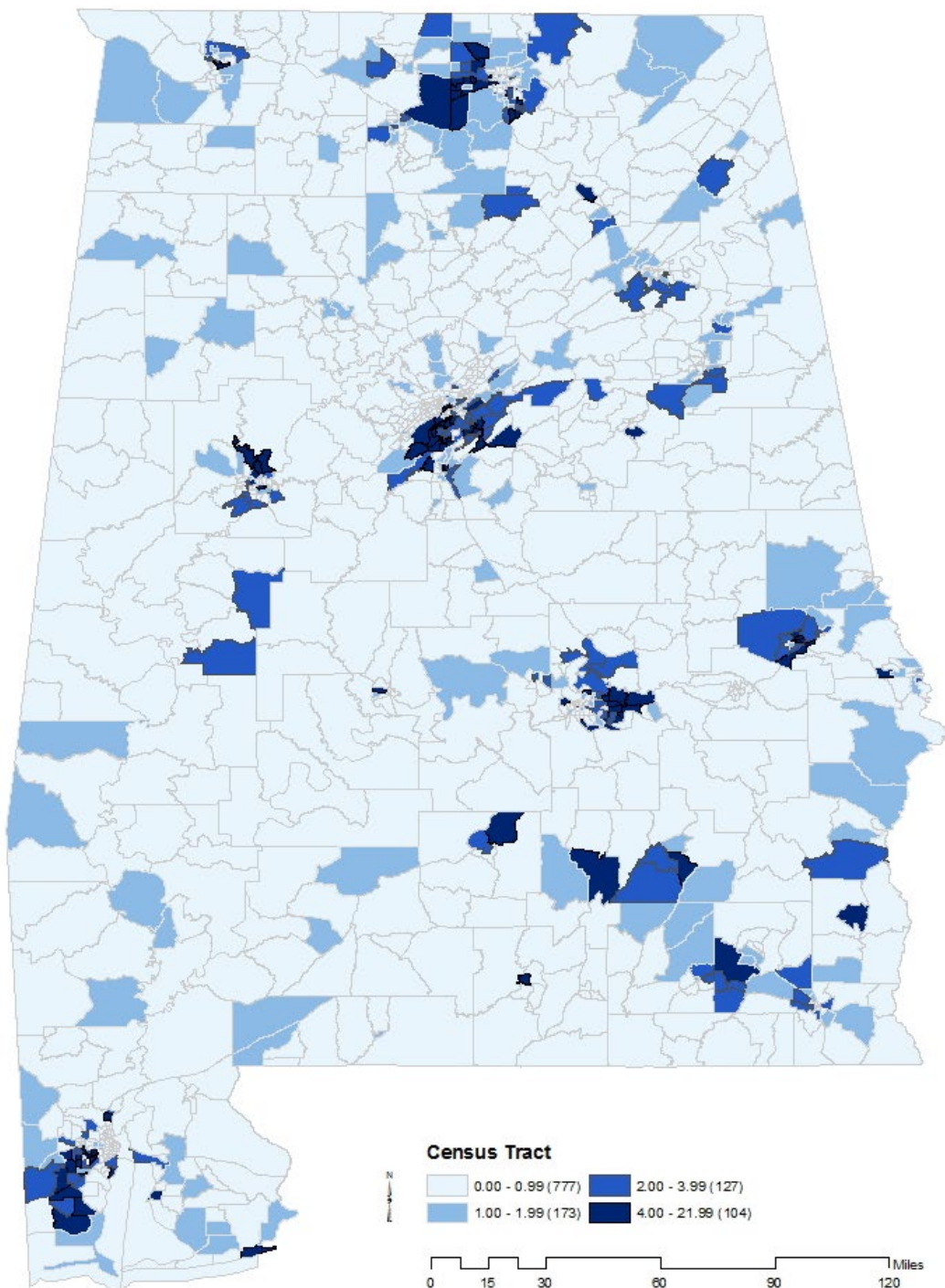
Indian and Alaskan Population Total Transit Usage



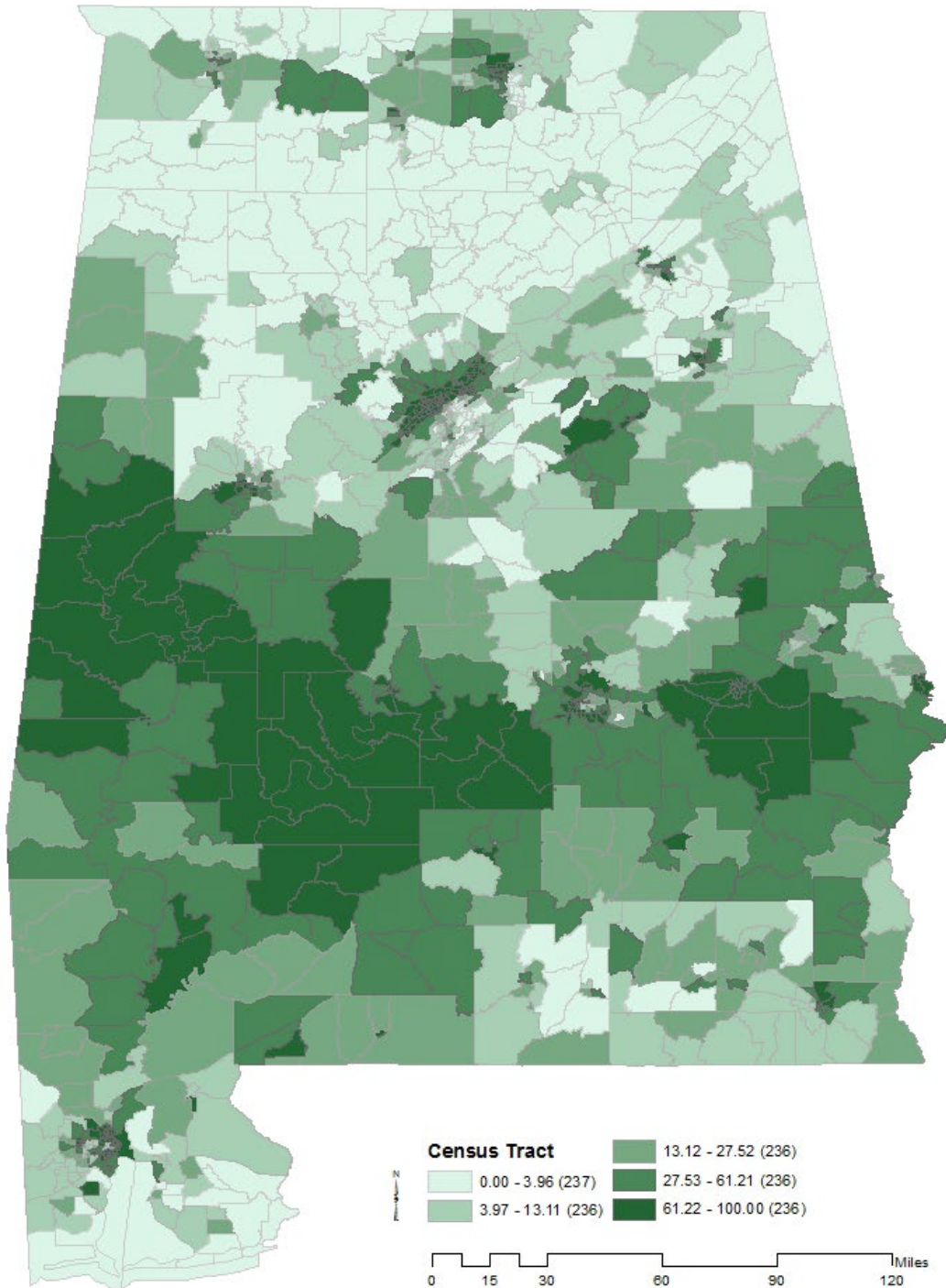
Hawaiian and Pacific Islander Population Total Transit Usage



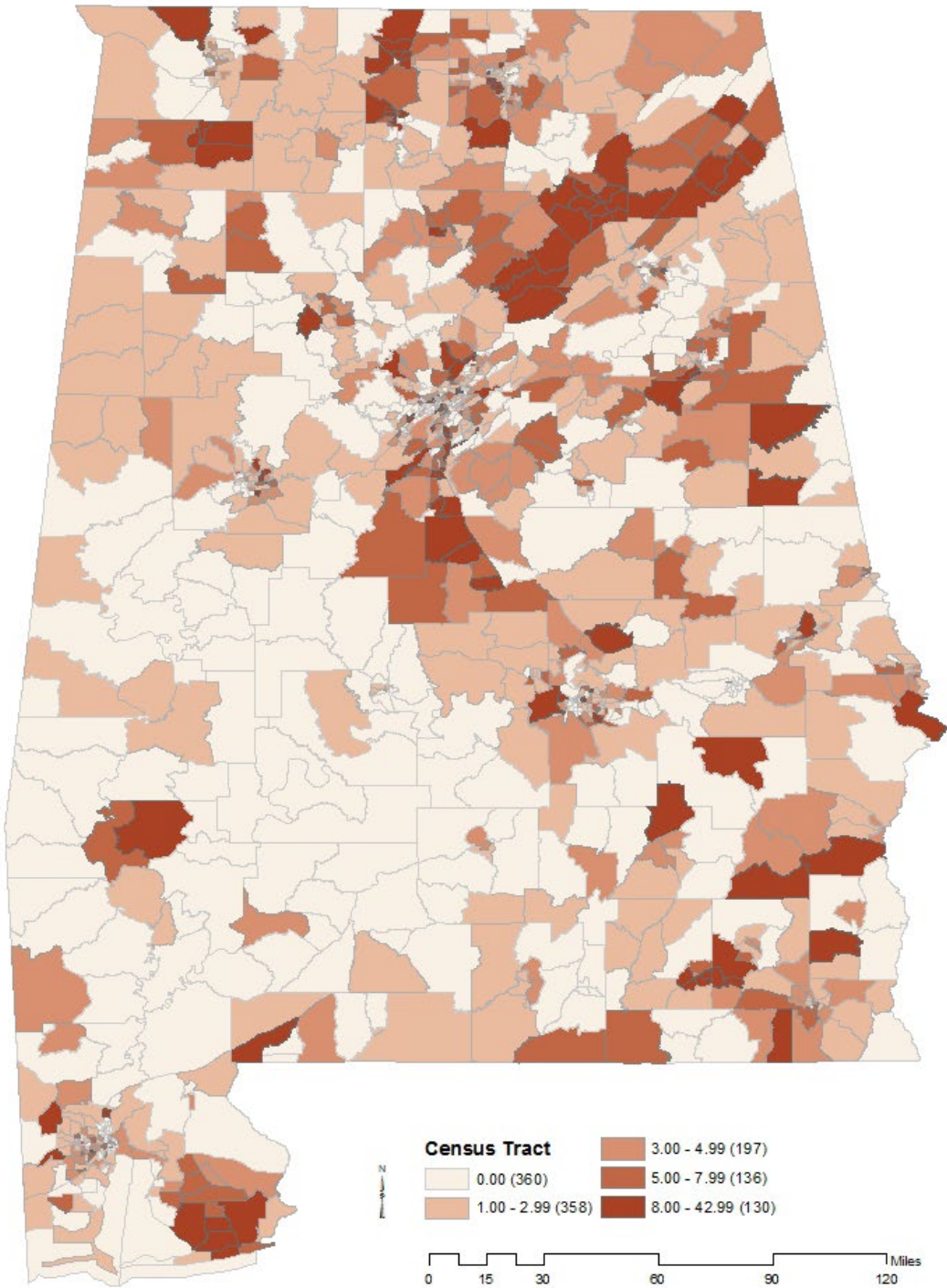
Percentage of Asian Population



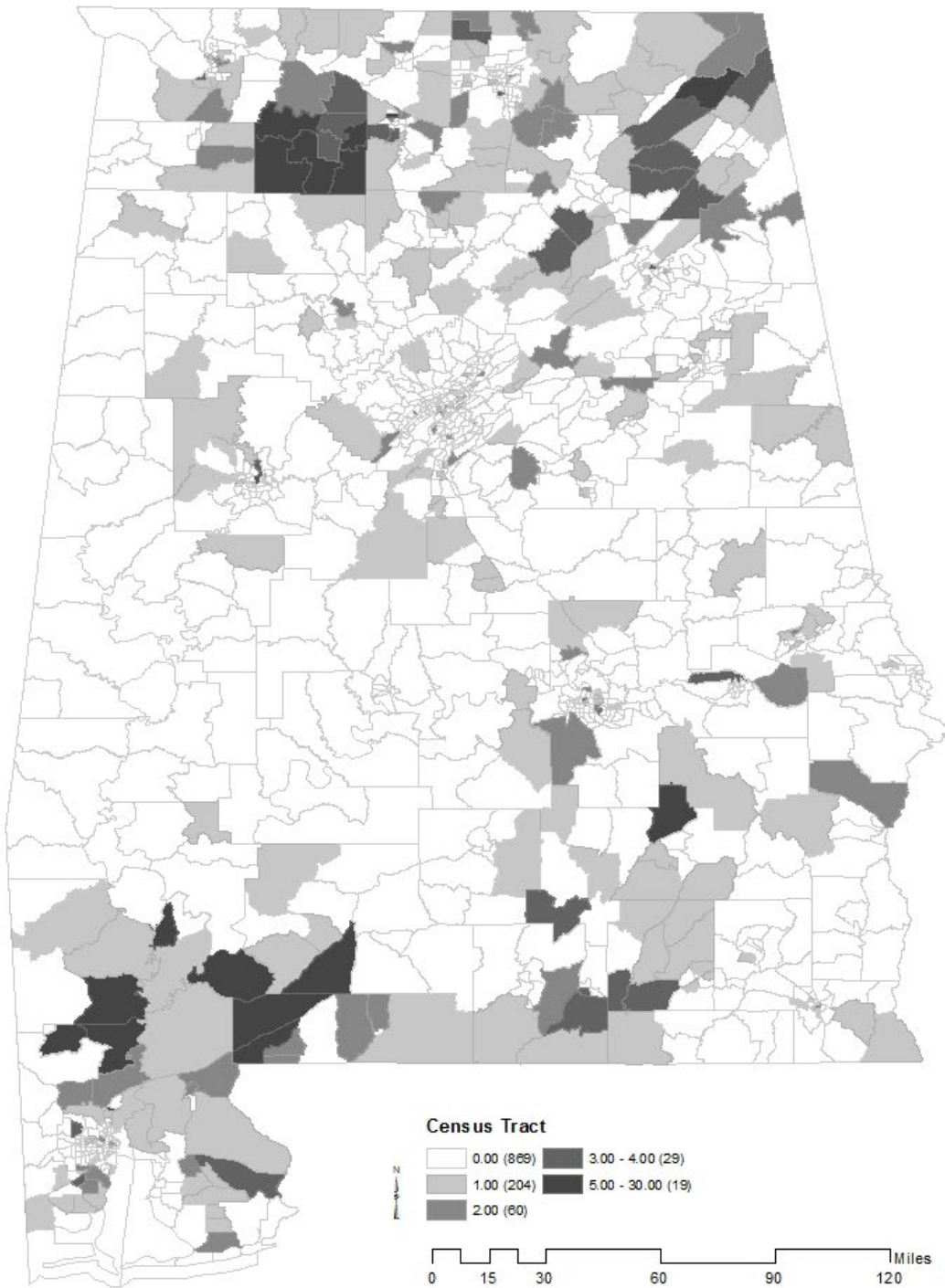
Percentage of Black Population



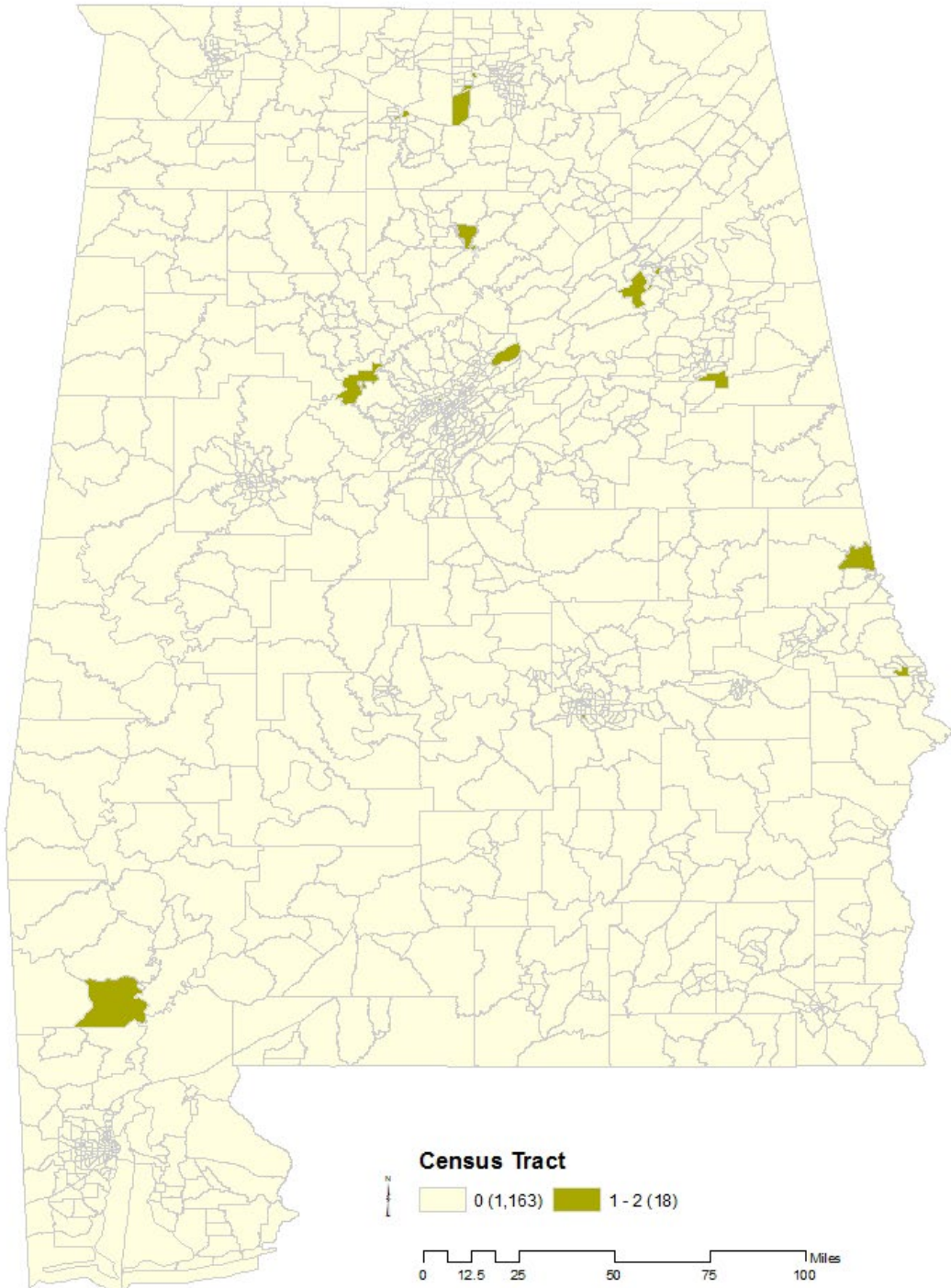
Percentage of Hispanic Population



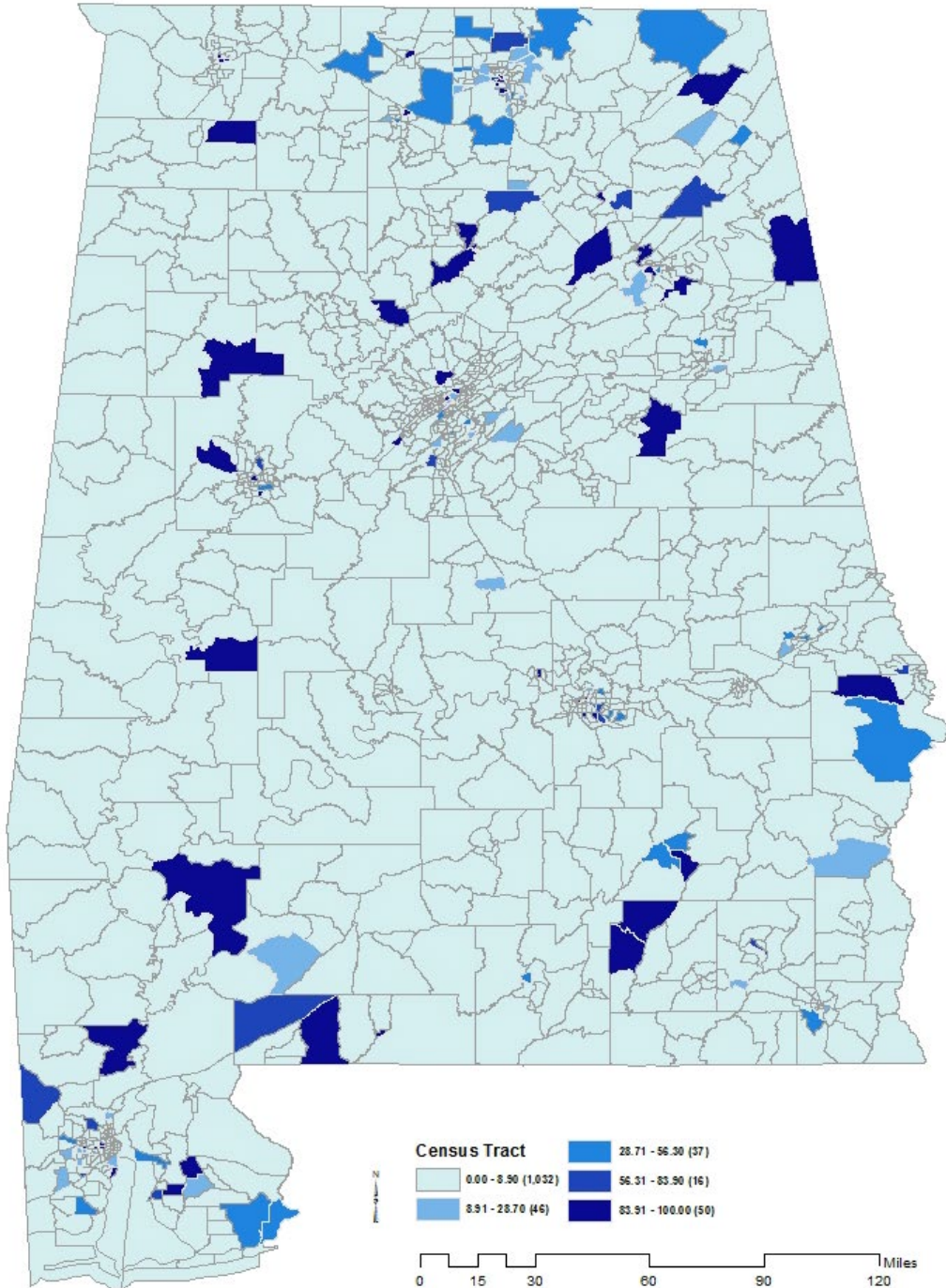
Percentage of Indian / Alaskan Population



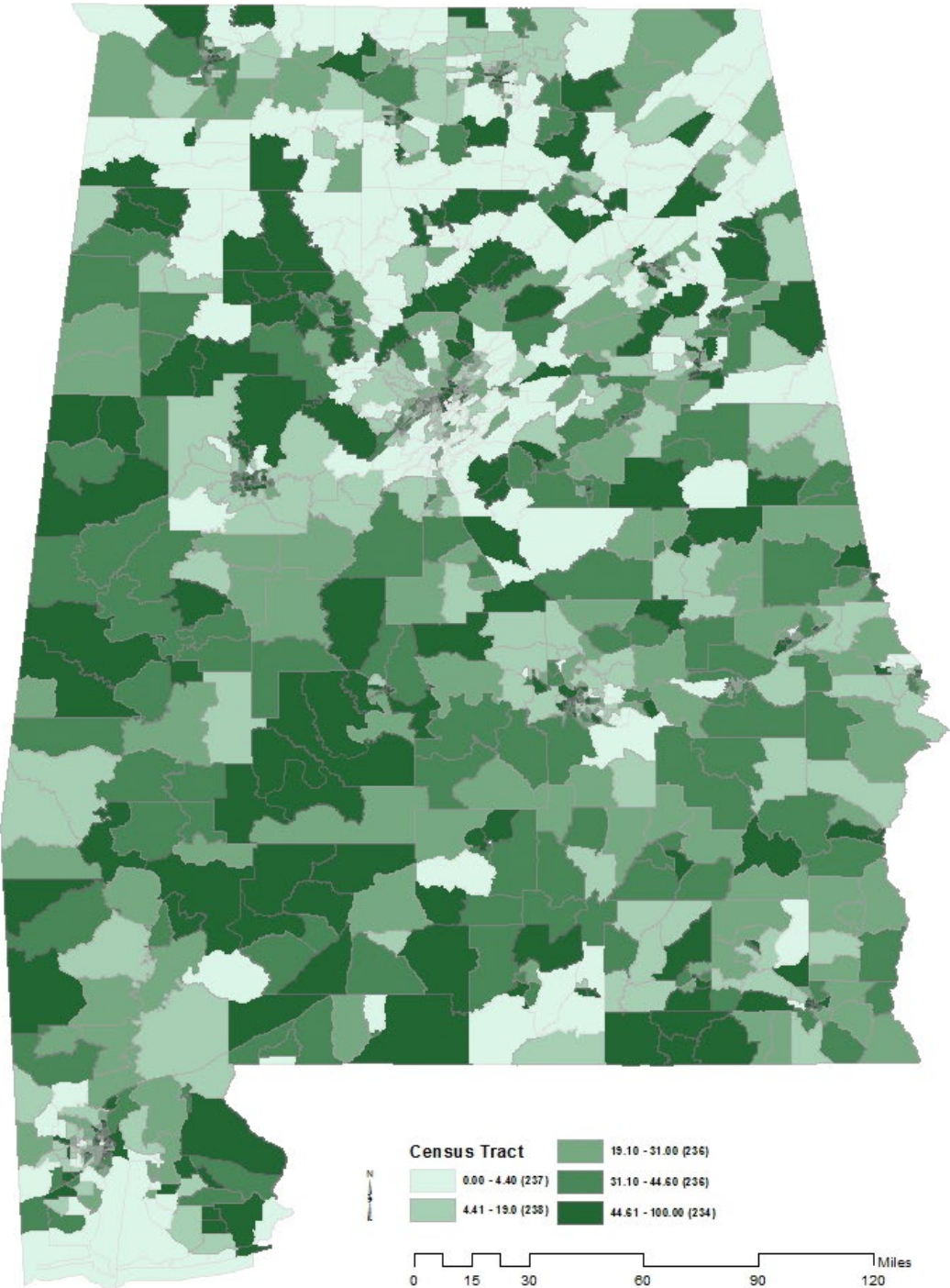
Percentage of Hawaiian and Pacific Islander Population



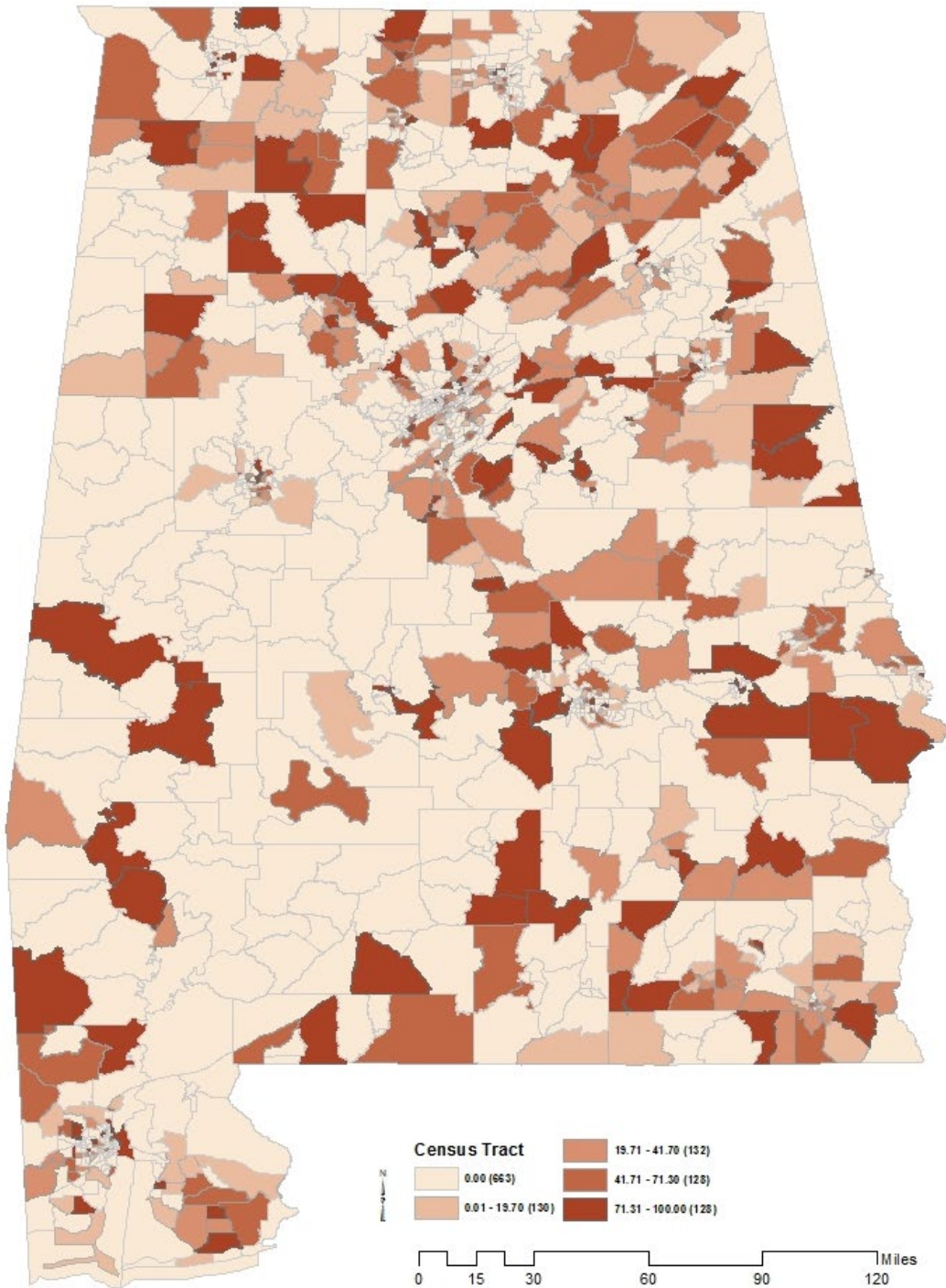
Asian Poverty Population Percentage



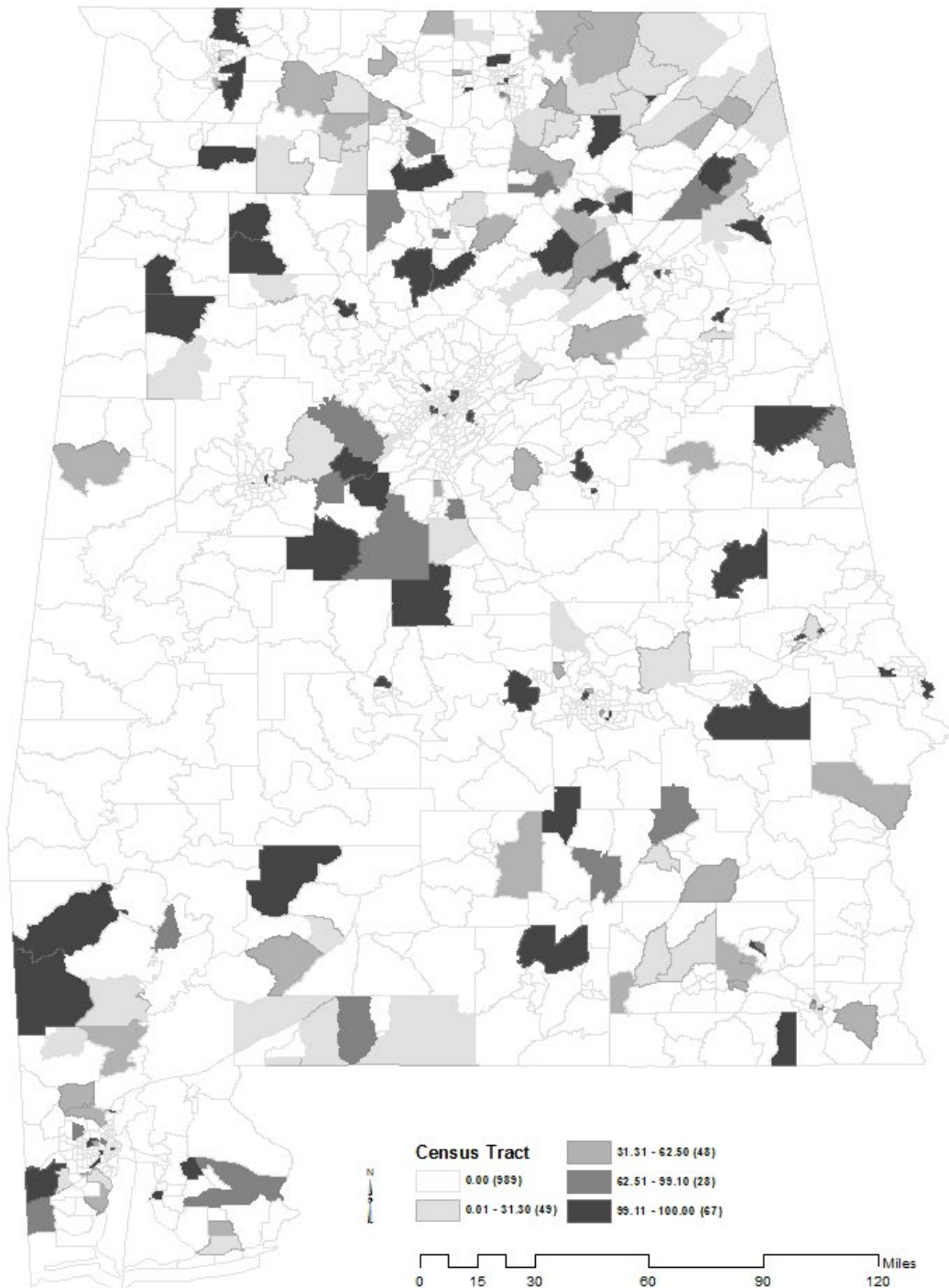
Black Poverty Population Percentage



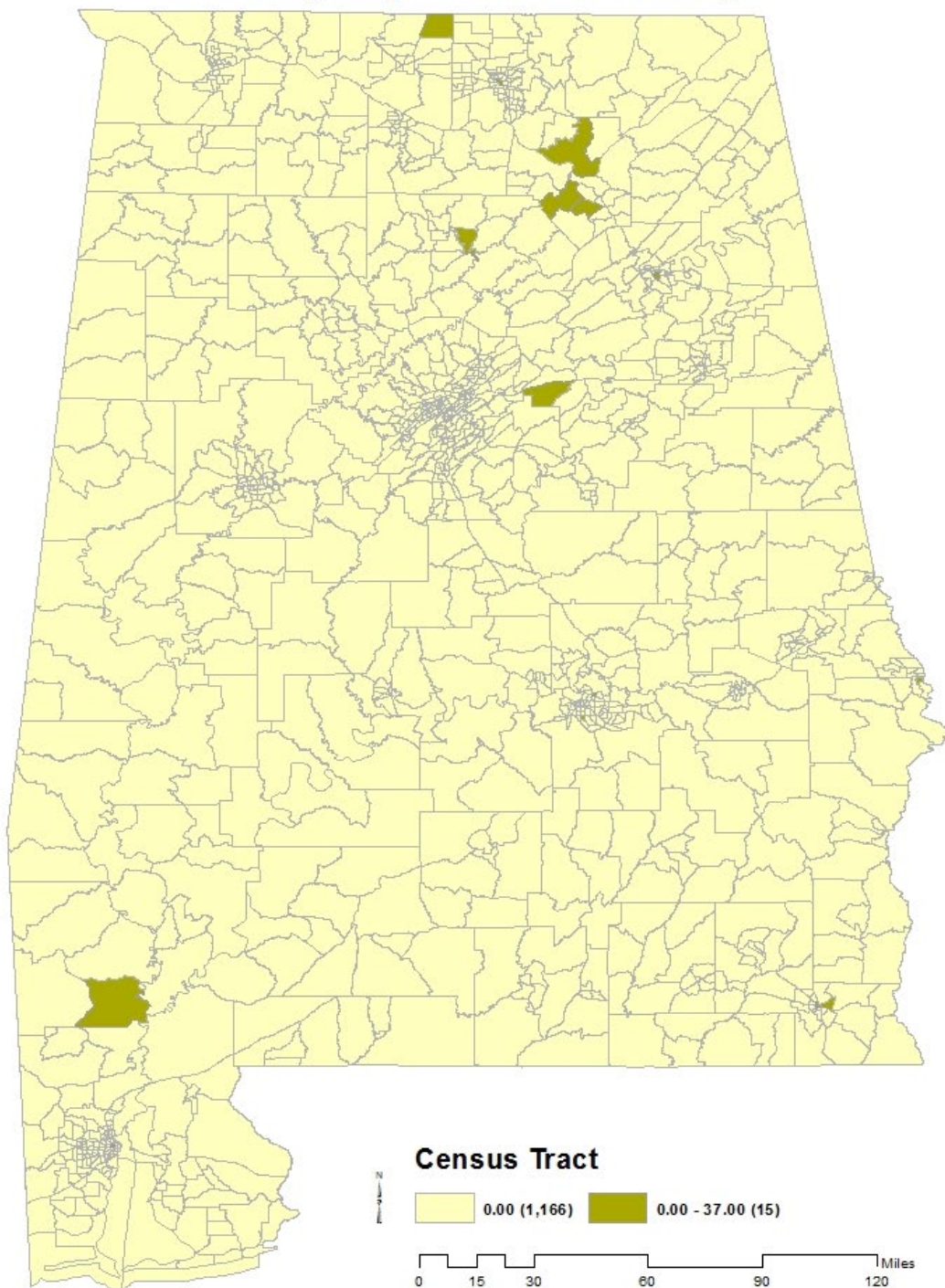
Hispanic Poverty Population Percentage



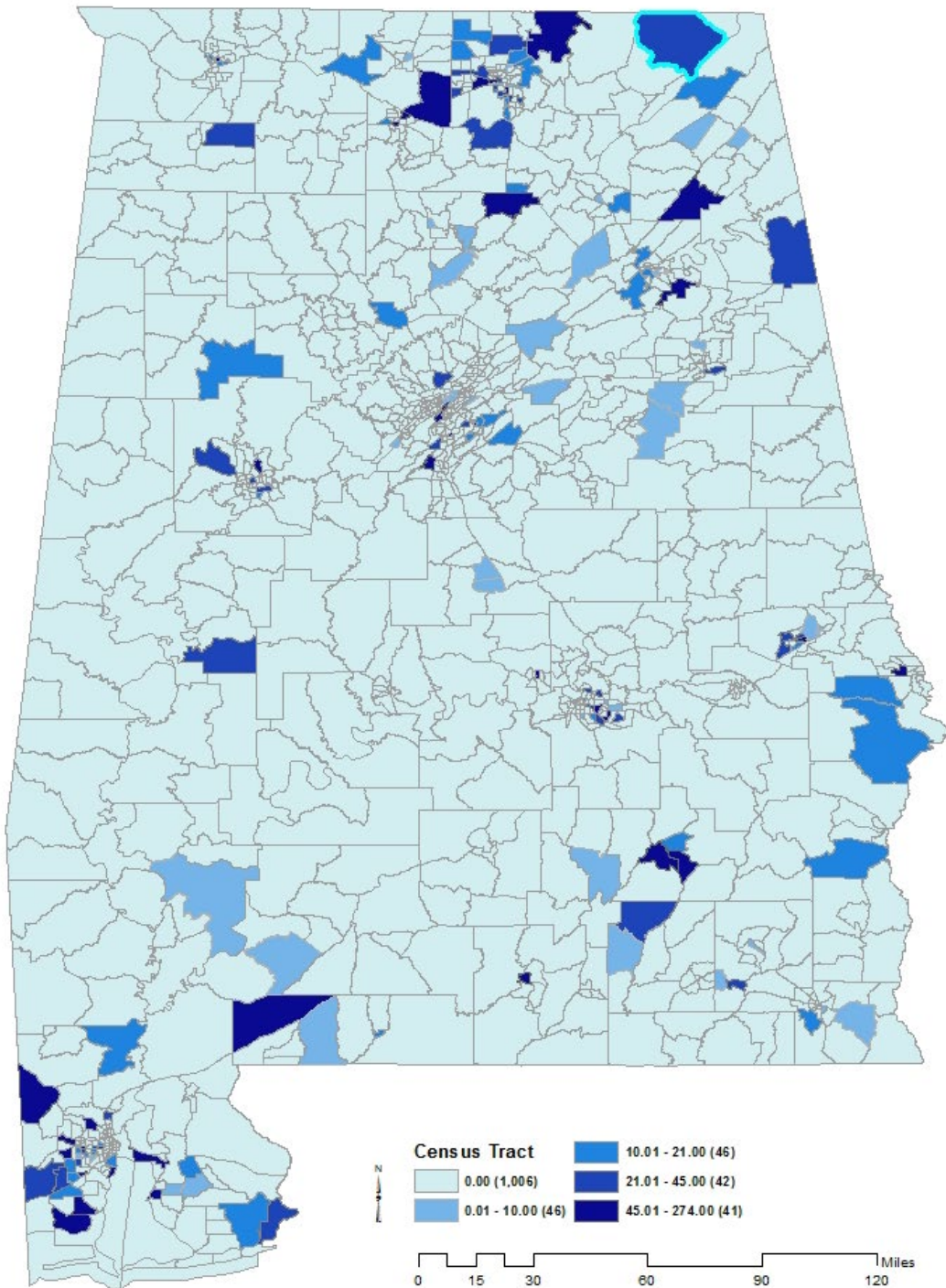
Indian/Alaskan Poverty Population Percentage



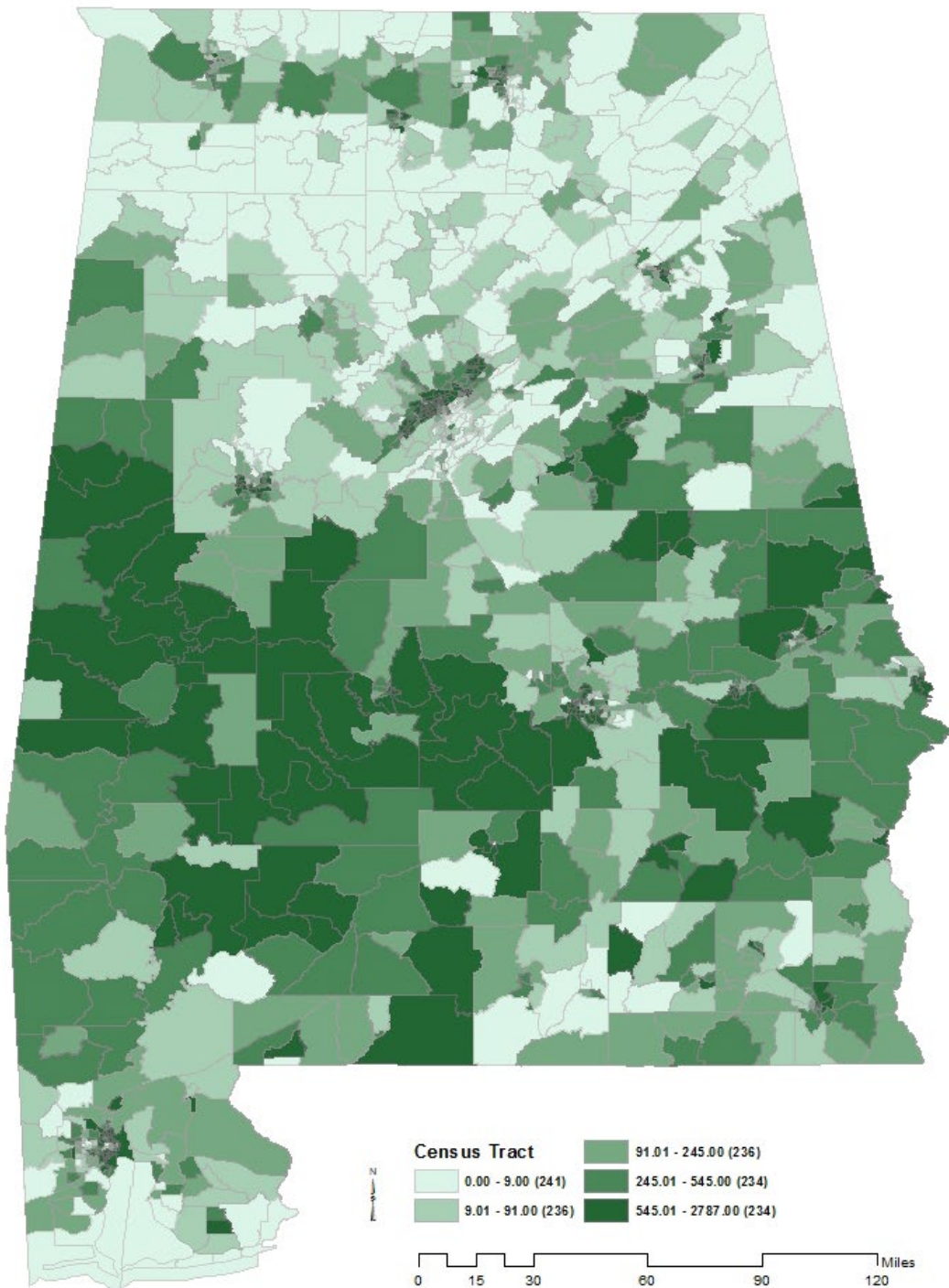
Hawaiian and Pacific Islander Poverty Population Percentage



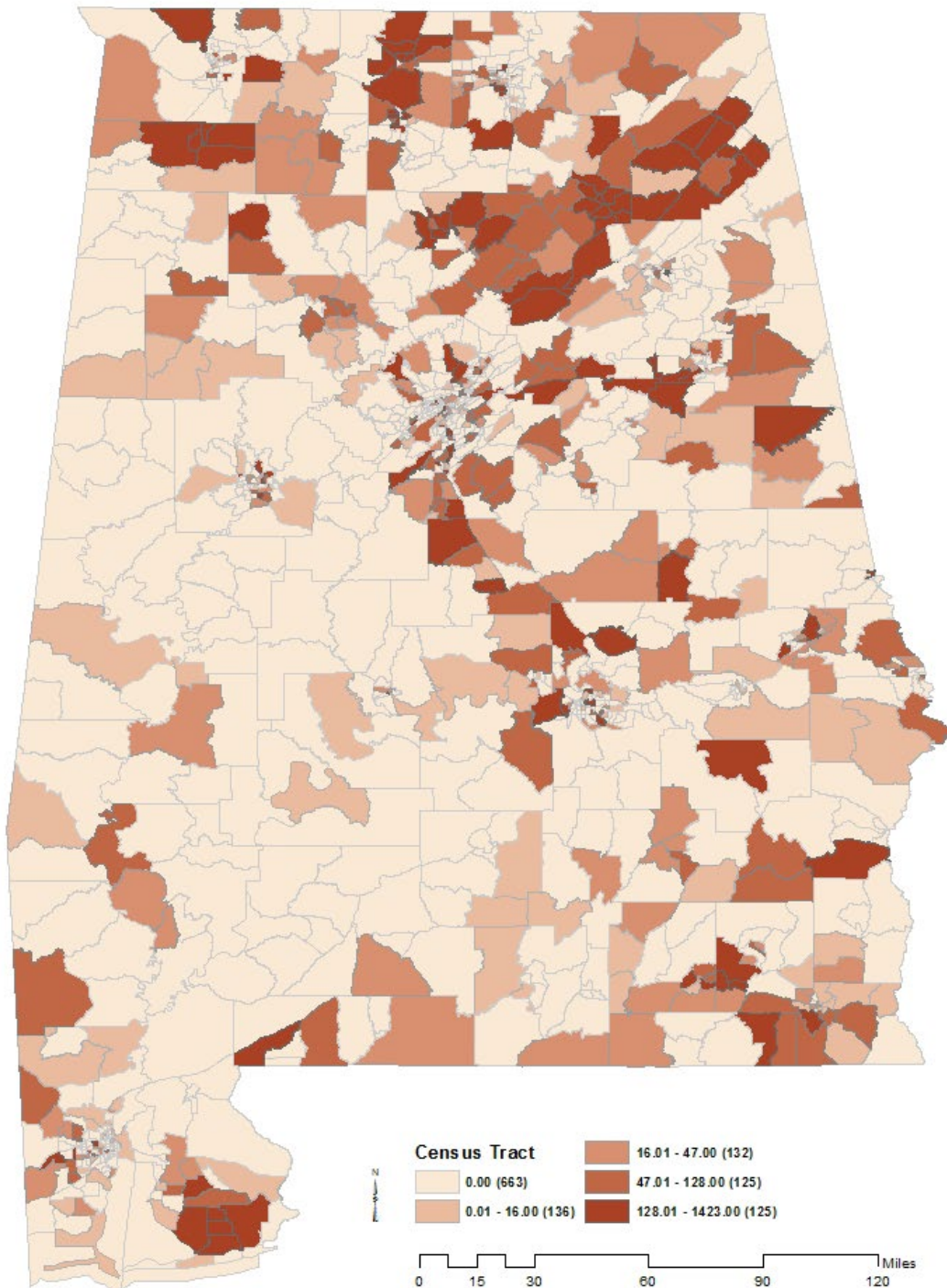
Total Asian Poverty Population



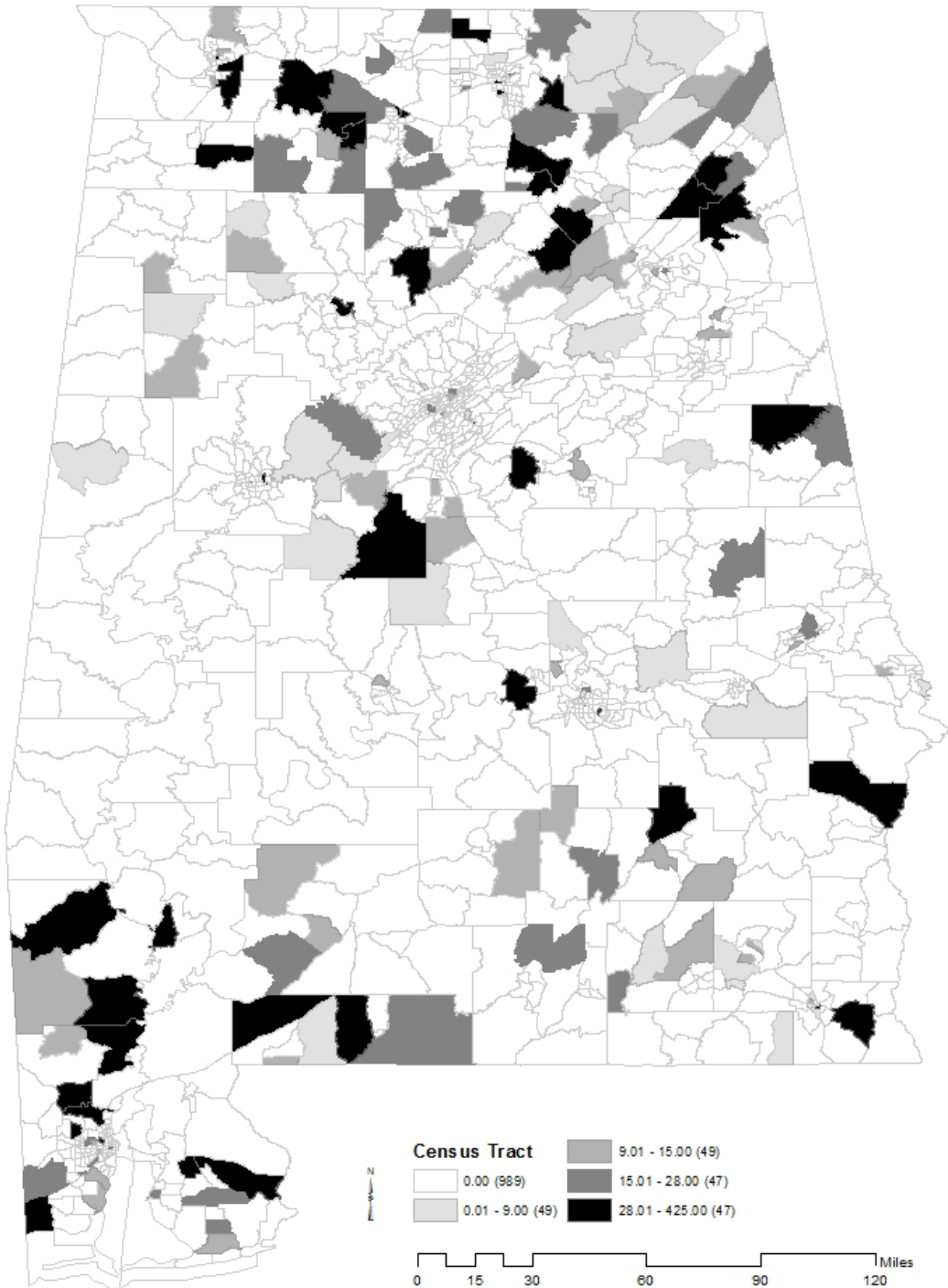
Total Black Poverty Population



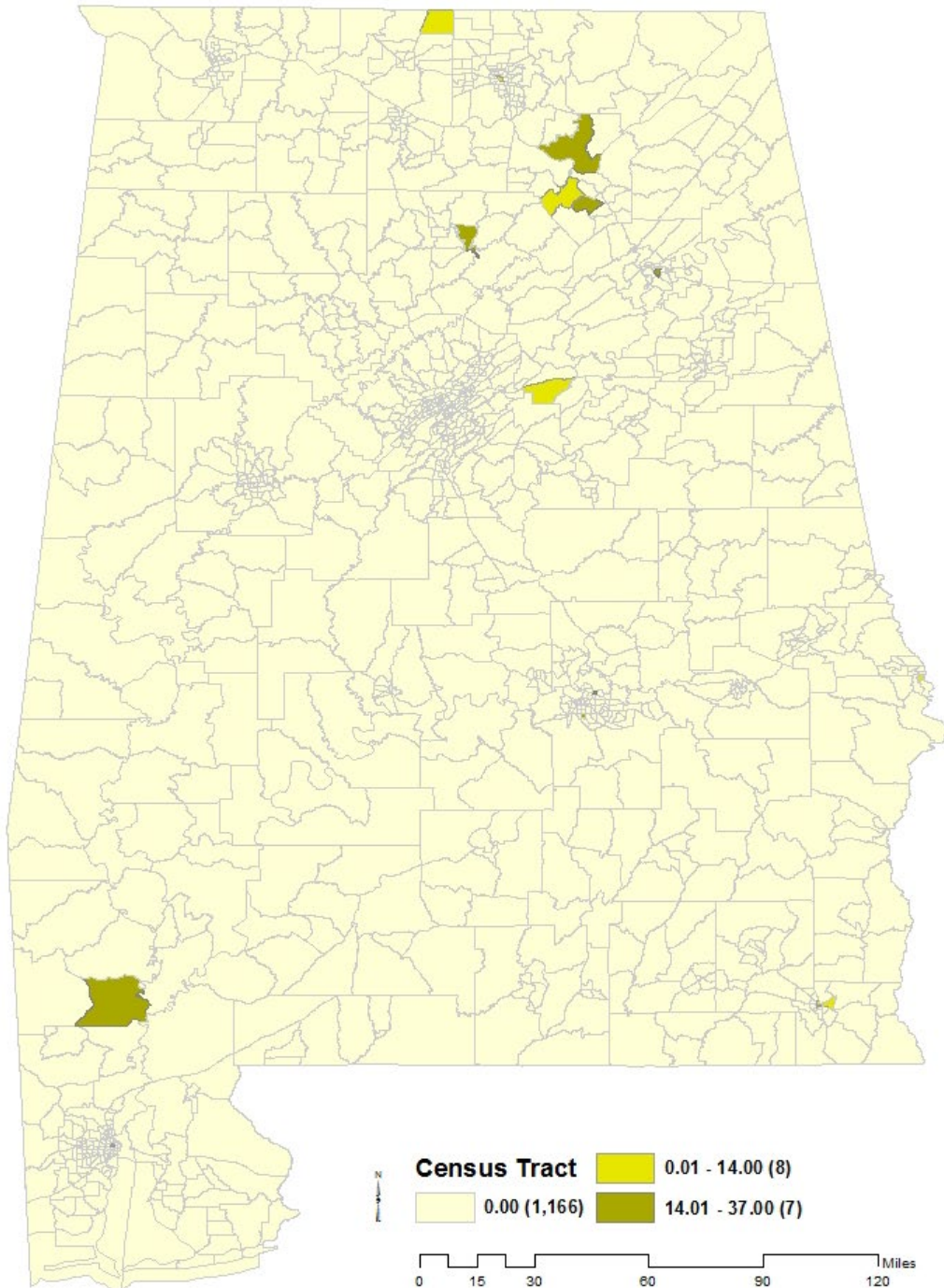
Total Hispanic Poverty Population



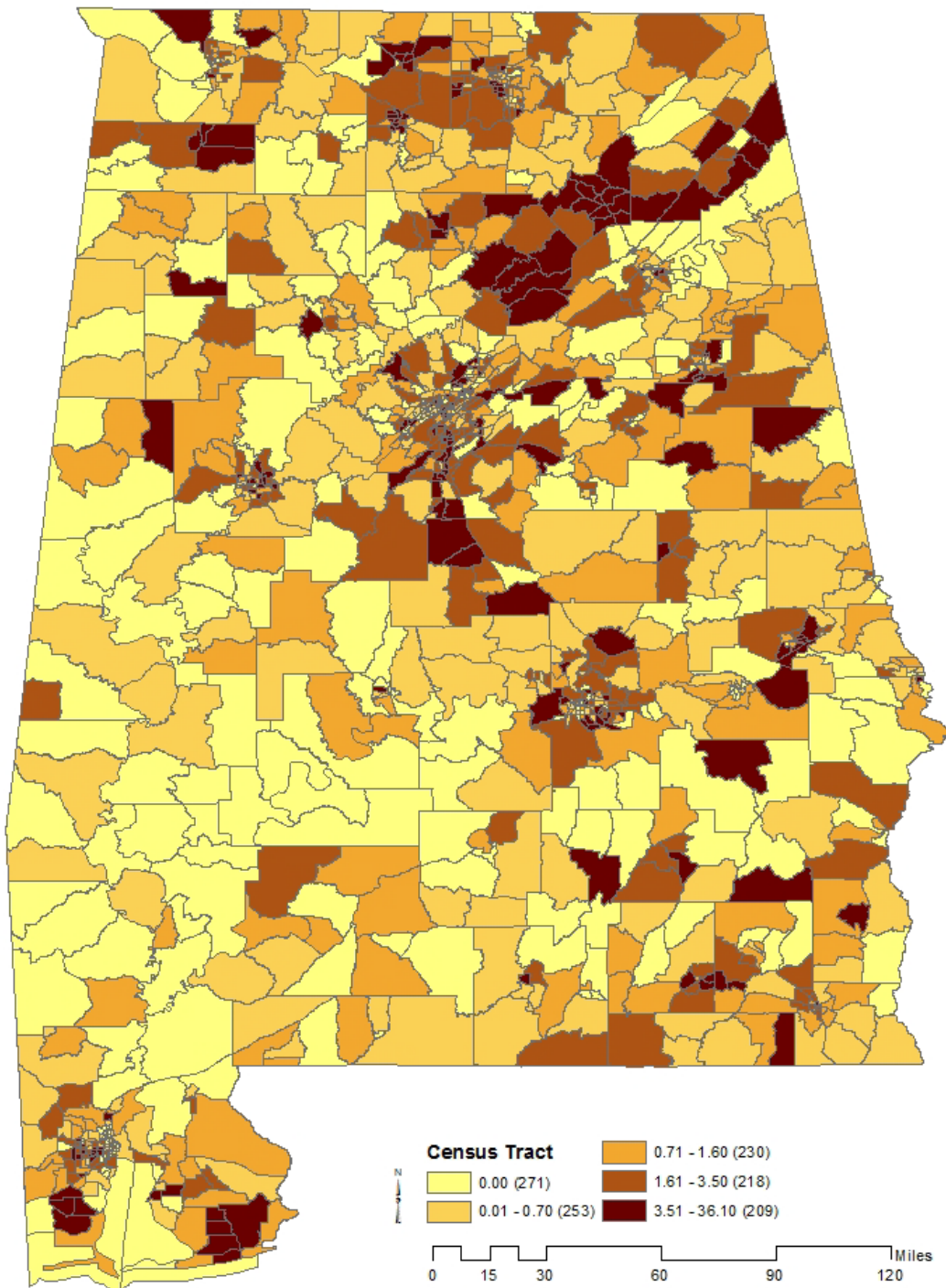
Total Indian / Alaskan Poverty Population



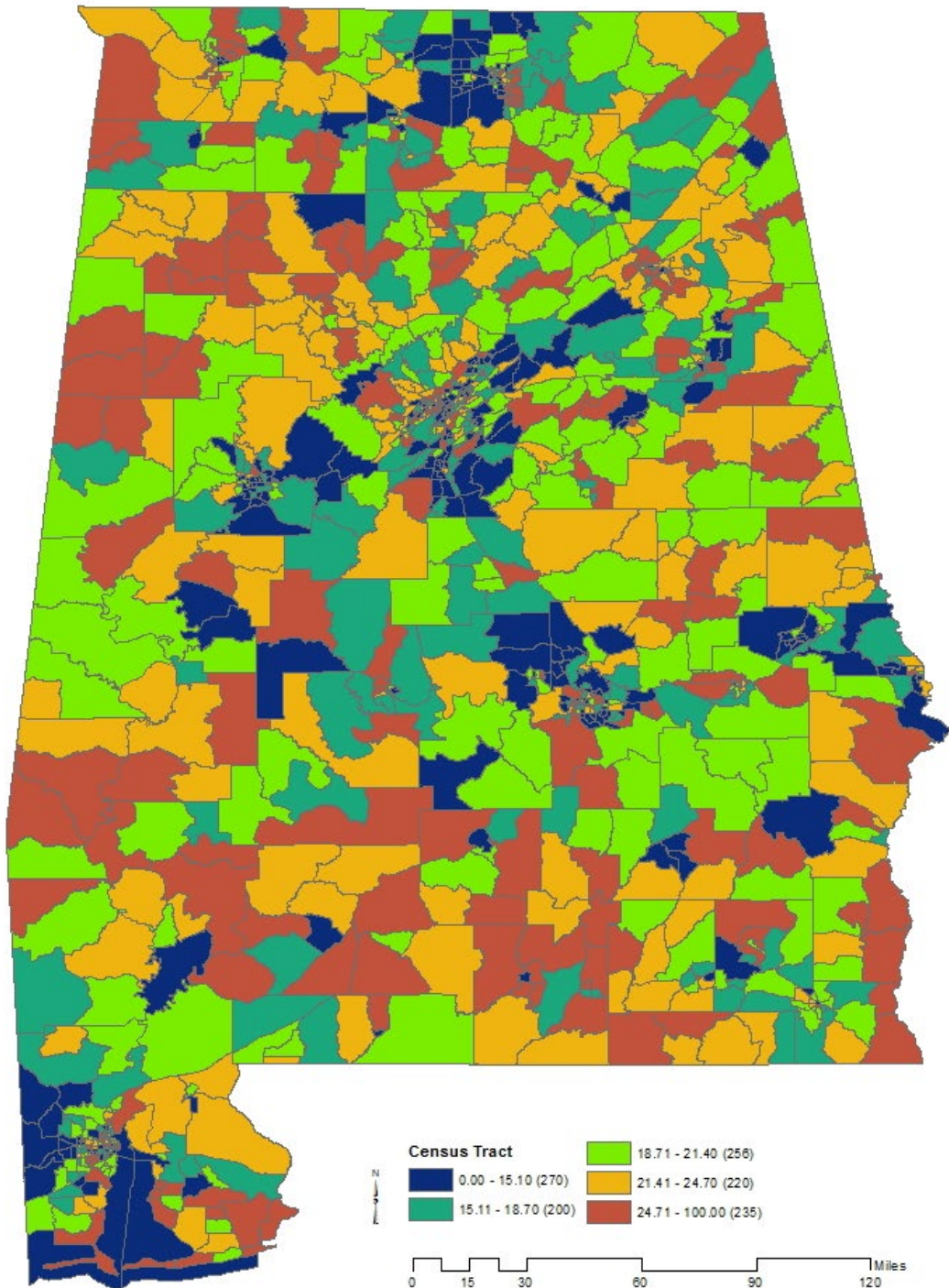
Total Hawaiian and Pacific Islander Poverty Population



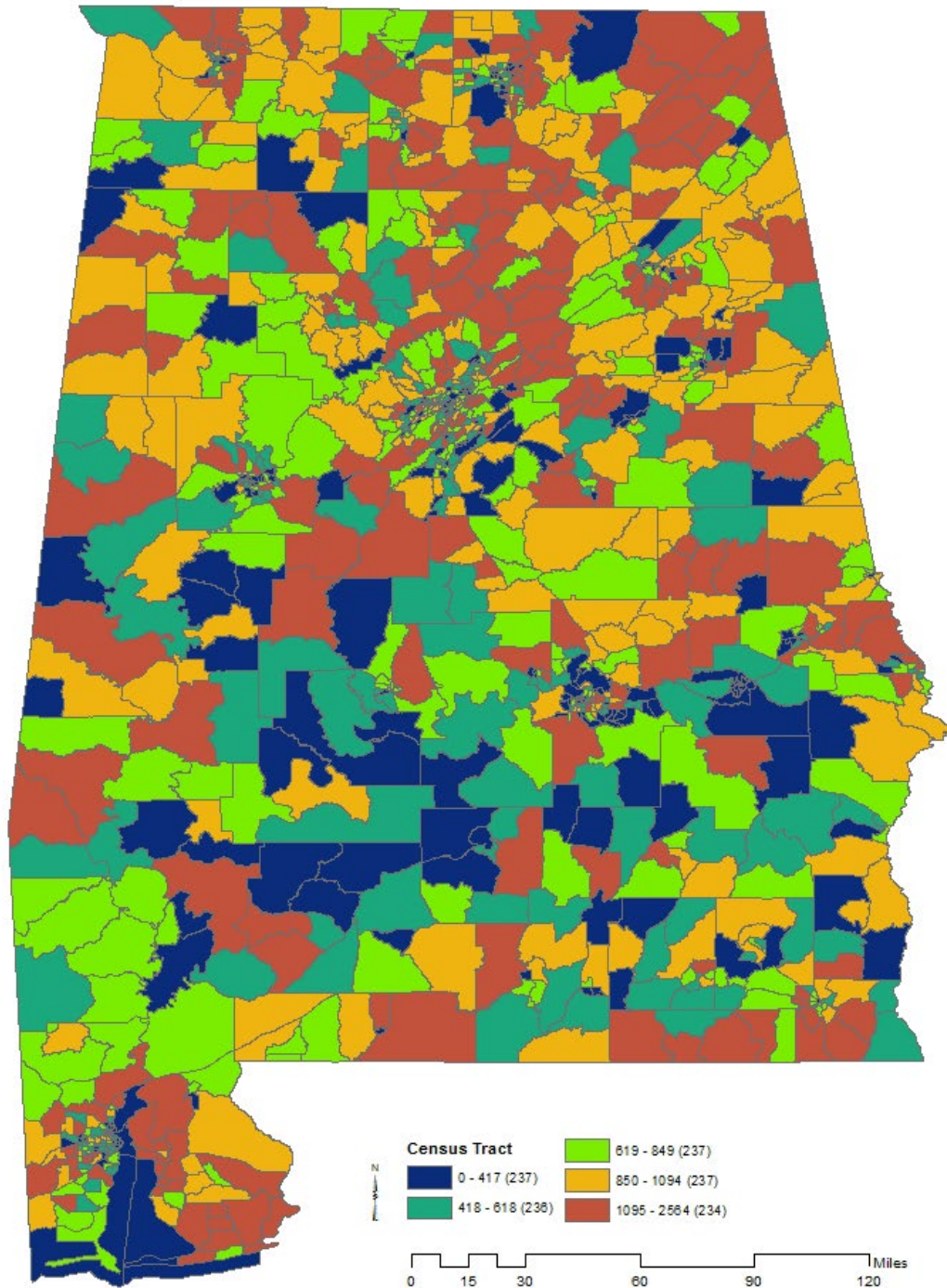
Percentage of Population 5 Years and Older Speaks English Less Than "Very Well"



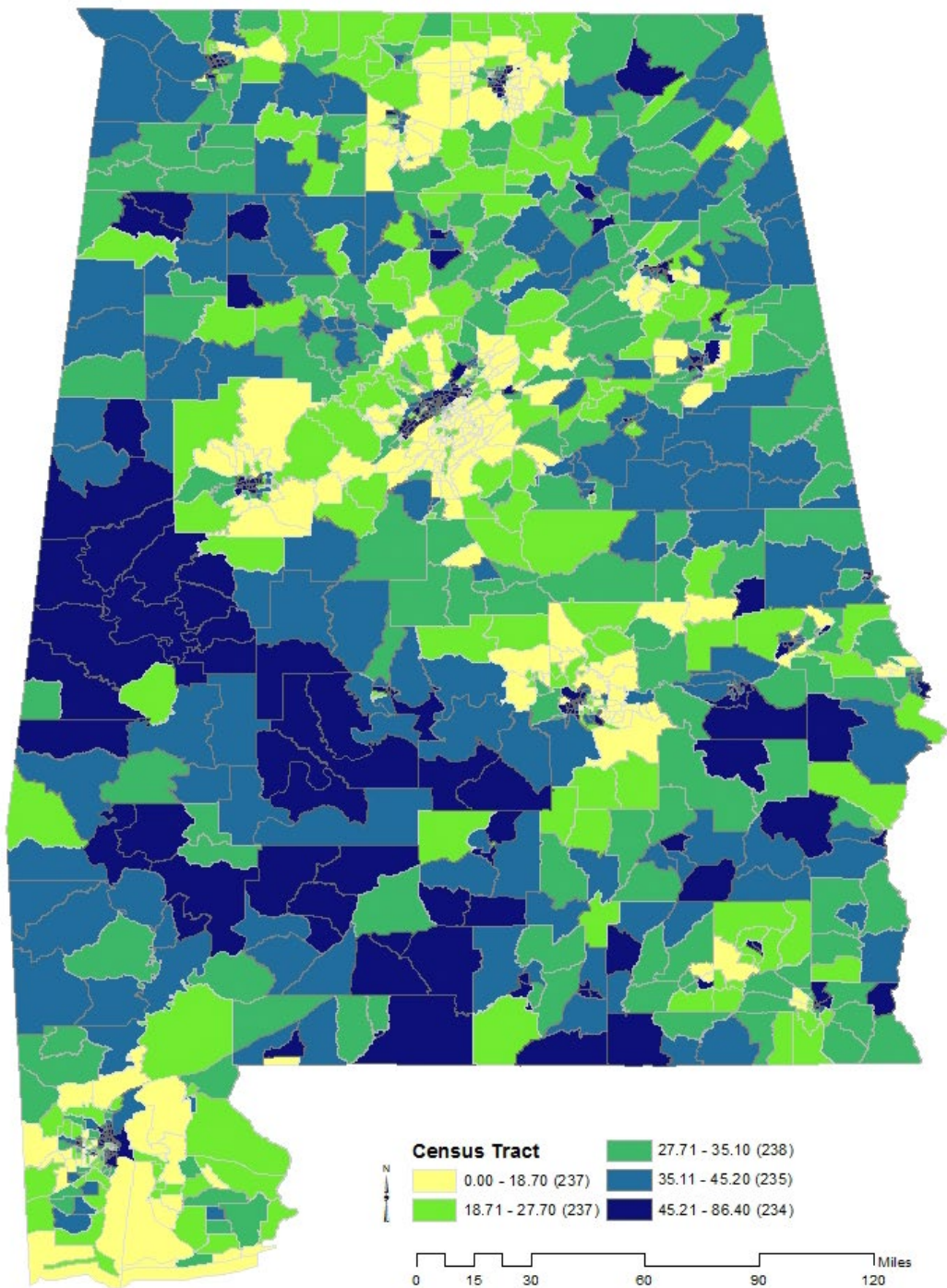
Percentage of Population 60 Years and Older



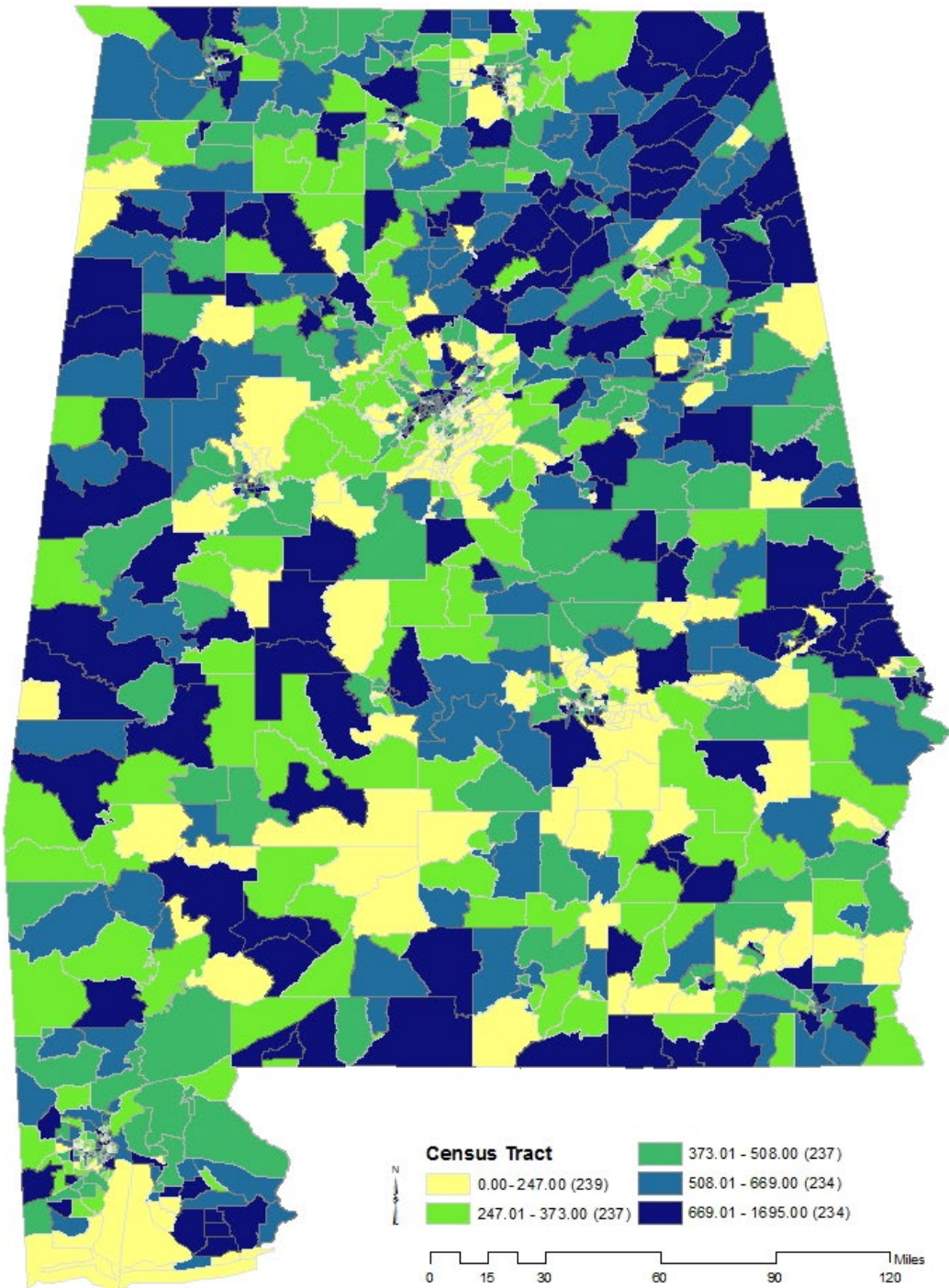
Total Population 60 Years and Older



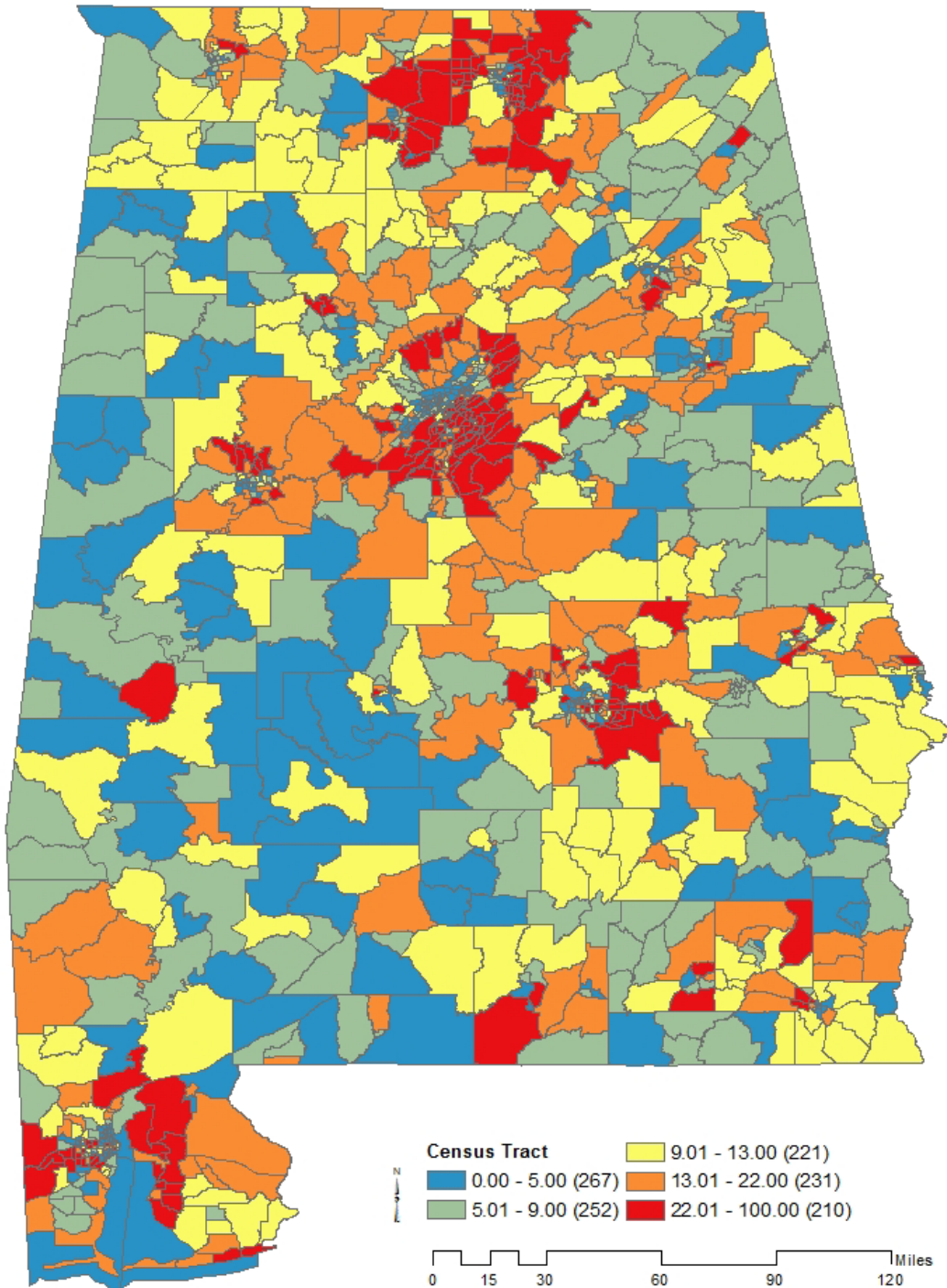
Percentage of Population with Salaries below \$25,000



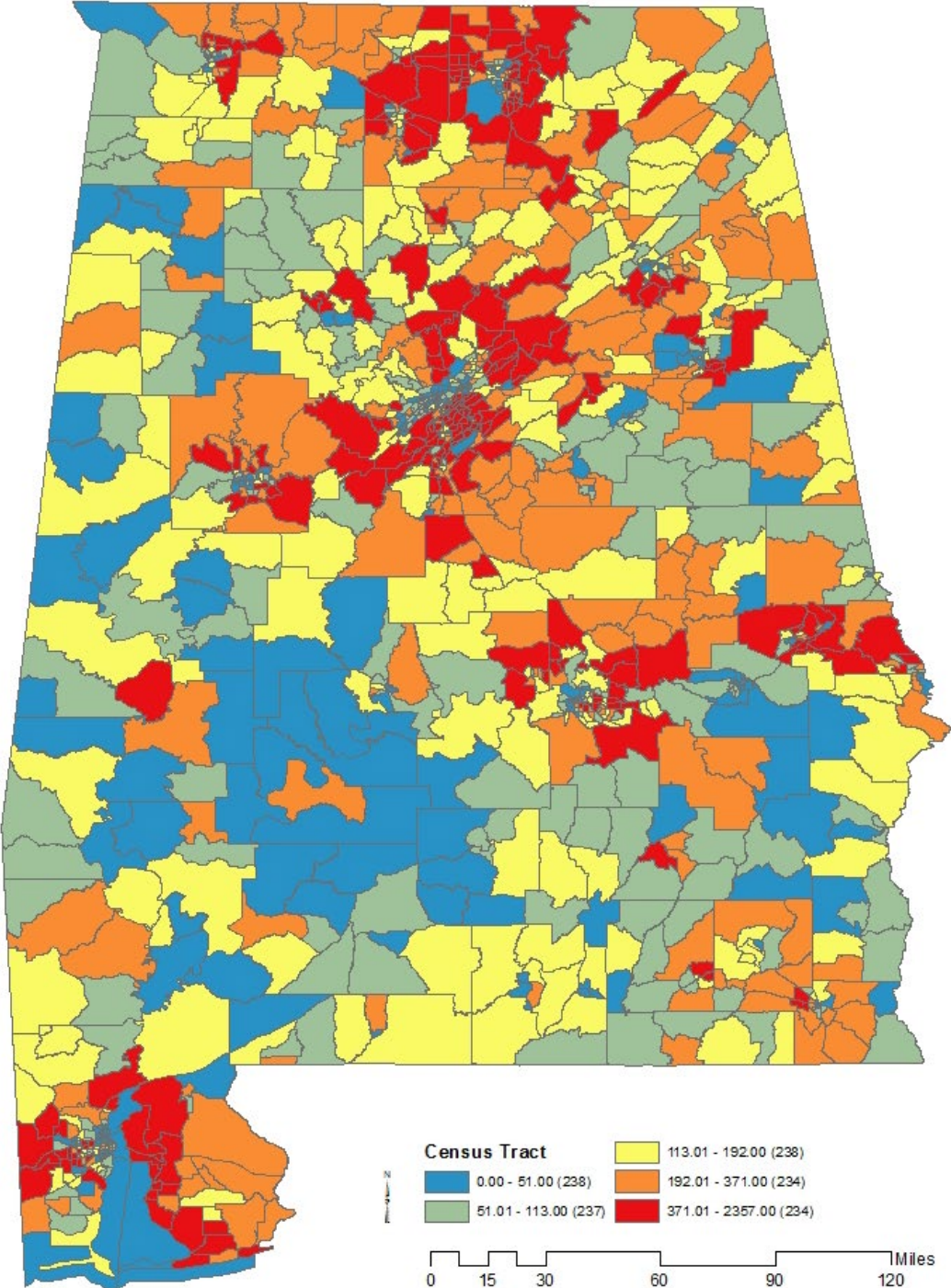
Total Population with Salaries below \$25,000



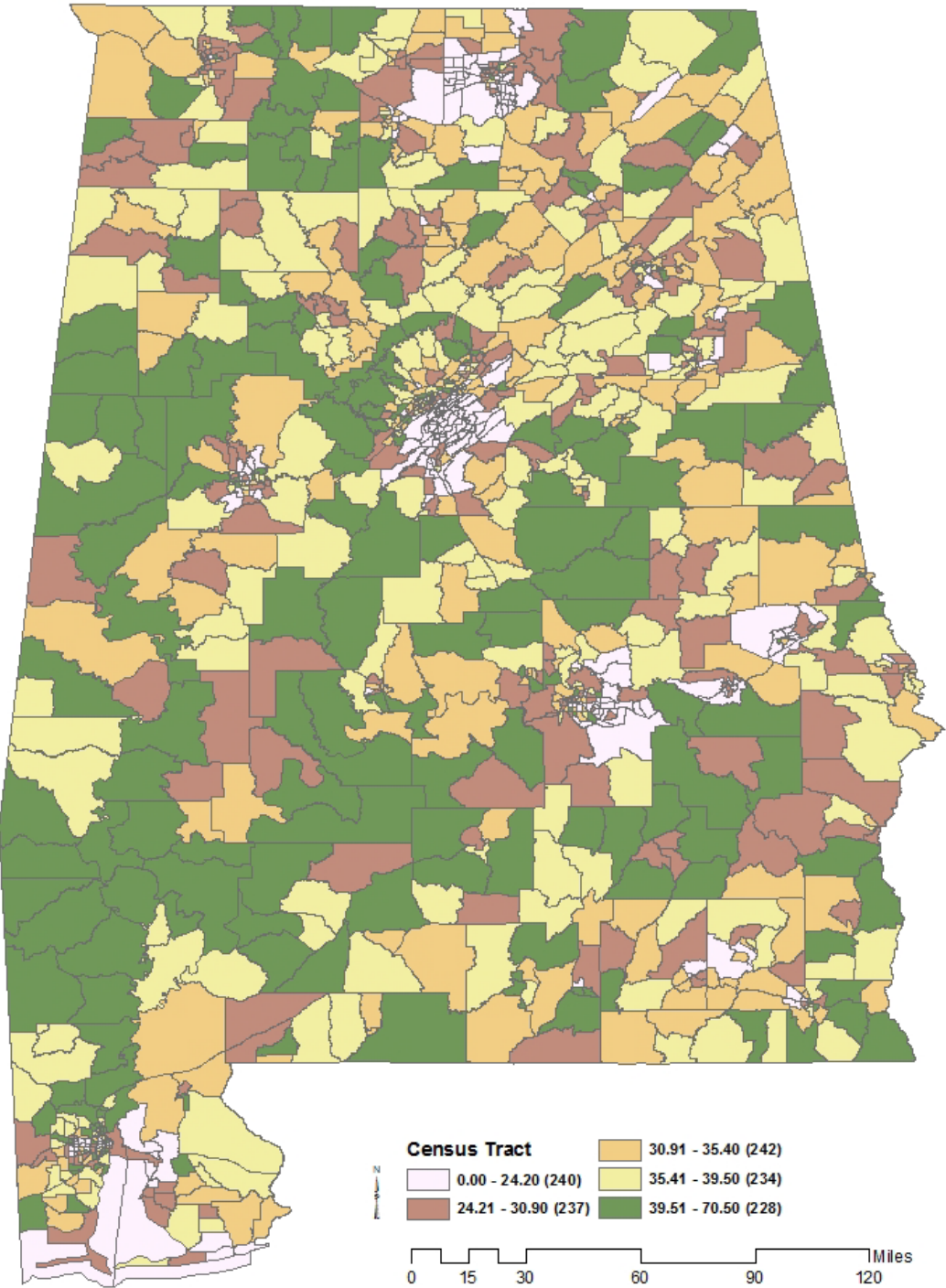
Percentage of Population with Salaries exceeding \$100,000



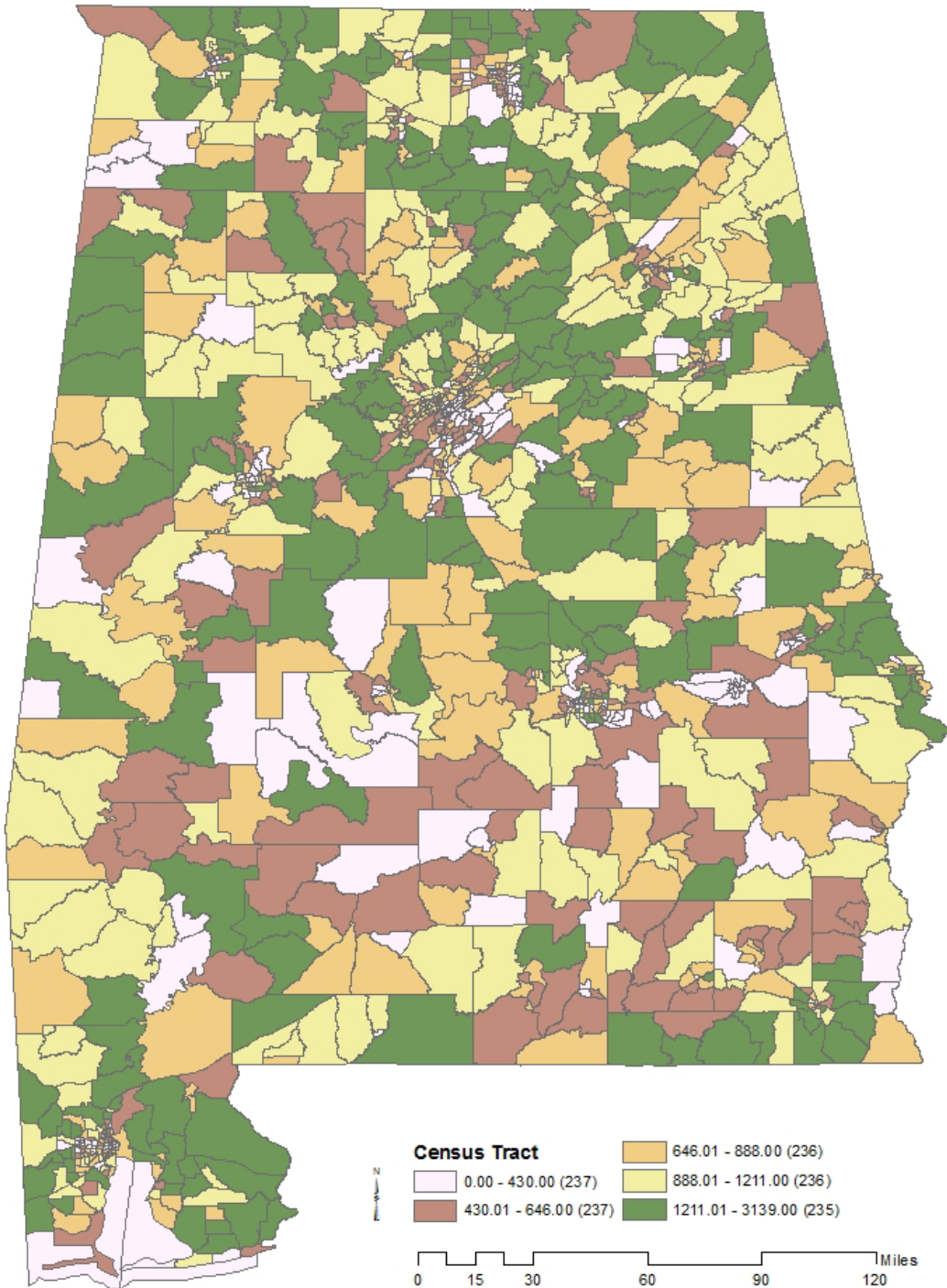
Total Population with Salaries exceeding \$100,000



Percentage Population of High School Graduates



Total Population of High School Graduates



APPENDIX E

Review Questions:

Title VI, Civil Rights

FTA, pursuant to Title VI of the Civil Rights Act of 1964, requires that no person in the United States shall on the grounds of race, color, creed, national origin, sex, age, or disability be excluded from participating in, or denied the benefits of, or be subject to discrimination under any project, program or activity funded in whole or part through financial assistance under 49 U.S.C. Section 5311 (previously the Federal Transit Act). Including the operations of the project and provider.

1. Did the agency prepare and submit a Title VI Program to ALDOT?
2. Does the subrecipient provide meaningful access to LEP persons?
3. Does the subrecipient notify the public of its rights under Title VI?
4. Does the subrecipient implement complaint procedures as described in its Title VI Program?
 - a. Does the subrecipient use the complaint form(s) and instructions for filing complaints identified in its Title VI Program?
 - b. Are the complaint form and instructions available on the subrecipient's website and at other locations described in its Title VI Program?
 - c. Are the complaint form and instructions translated into languages identified in the subrecipient's LAP?
 - d. Is the subrecipient processing complaints as described in its Title VI Program and its complaint instruction forms?
5. Has the subrecipient implemented the public participation plan from its Title VI Program in its public participation activities?
 - a. Does the subrecipient anticipate adding new transit facilities in the next three years? If no, move to the next question.
 - b. Was Title VI equity analysis for the site determination or location of facilities completed prior to selection of the preferred site? If not, when is it anticipated to be completed?
 - c. If an equity analysis was completed, did the subrecipient include required elements?
6. Has the subrecipient evaluated fare and major service changes and monitored transit service?

- a. Does the subrecipient operate 50 or more fixed route vehicles in peak service and is it located in a UZA of 200,000 or more people? If no, move to the next question.
- b. If the subrecipient implemented a fare or major service change since its last Title VI submission, did it conduct an equity analysis in accordance with its Title VI Program?

SUBRECIPIENT TITLE VI PROGRAM CHECKLIST

General Requirements {Chapter III}

Review the following:

- Title VI Notice to the Public, including a list of locations where the notice is posted
- Title VI Complaint Procedures (i.e., instructions to the public regarding how to file a Title VI discrimination complaint)
- Title VI Complaint Form
- List of transit-related Title VI investigations, complaints, and lawsuits
- Public Participation Plan, including information about outreach methods to engage minority and limited English proficient populations (LEP), as well as a summary of outreach efforts made since the last Title VI Program submission
- Language Assistance Plan for providing language assistance to persons with limited English proficiency (LEP), based on the DOT LEP Guidance
- A table depicting the membership of non-elected committees and councils, the membership of which is selected by the recipient, broken down by race, and a description of the process the agency uses to encourage the participation of minorities on such committees
- A Title VI equity analysis if the subrecipient has constructed a facility, such as a vehicle storage facility, maintenance facility, operation center, etc.
- A copy of board meeting minutes, resolution, or other appropriate documentation showing the board of directors or appropriate governing entity or official(s) responsible for policy decisions reviewed and approved the Title VI Program.
- Additional information as specified in chapters IV, V, and VI, for transit providers (see below)

Requirements of Transit Providers {Chapter IV}

For all Fixed Route Transit Providers review the following:

- All requirements set out in Chapter III (General Requirements)
- Service standards
 - Vehicle load for each mode
 - Vehicle headway for each mode
 - On time performance for each mode
 - Service availability for each mode
- Service policies
 - Transit Amenities for each mode
 - Vehicle Assignment for each mode

Transit Providers that operate 50 or more fixed route vehicles in peak service and are located in an Urbanized Area (UZA) of 200,000 or more people must submit:

- Demographic and service profile maps and charts.
- Demographic ridership and travel patterns collected by surveys.
- Results of their monitoring program and report, including evidence that the board or other governing entity or official(s) considered, was aware of the results, and approved the analysis.
- A description of the public engagement process for setting the "major service change policy," disparate impact policy, and disproportionate burden policy.
- Results of service and/or fare equity analyses conducted since the last Title VI Program submission, including evidence that the board or other governing entity or official(s) considered, was aware of, and approved the results of the analysis.