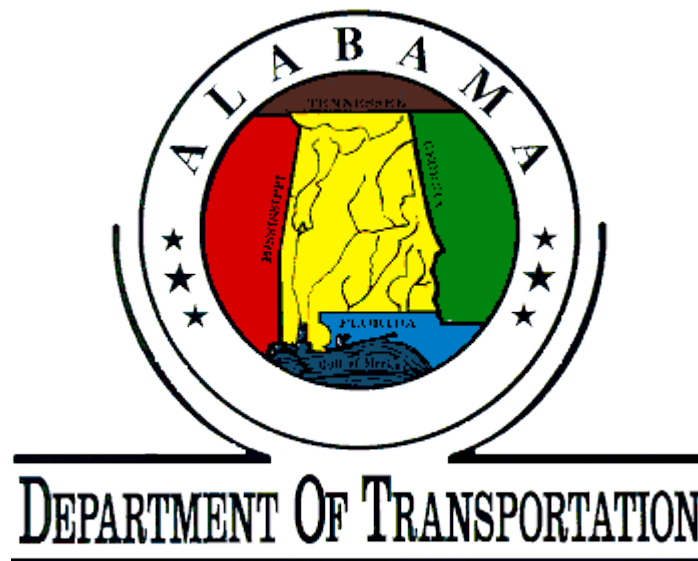


# ALABAMA DEPARTMENT OF TRANSPORTATION

## LOCAL TRANSPORTATION BUREAU

### Transit Section

#### TITLE VI PROGRAM



September 2025

## **ACCESSIBLE FORMATS**

This document is available in accessible formats upon request. Paper copies of this document as well as information regarding accessible formats may be obtained by contacting the Alabama Department of Transportation:

Alabama Department of Transportation  
1409 Coliseum Boulevard  
Montgomery, Alabama 36130-3050  
Phone: (334) 242-6764

This document was prepared in accordance with the FTA Circular 4702.1B, dated October 1, 2012.

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# **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.

### **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 Policy Guidance Concerning Recipients' Responsibilities to Limited English Proficient (LEP) Persons (70 FR 74087, December 14, 2005).

Further Title VI guidance can be found on the Federal Transit Administration (FTA) website at <https://www.transit.dot.gov/title6>. This site contains Title VI training materials, information on filing complaints with FTA, and links to the regulations detailing the Title VI requirements.

This program 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.

It should be noted that 49 CFR 21.9(b) requires recipients to 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 without regard to race, color, or national origin.
- 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**

#### **1. 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 Recipients". 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 for 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 subrecipient 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 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.

## **2. 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. Reviewers will perform the following tasks:

- Inspect all materials pertaining to implementation of Title VI and verify 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 possible solutions.
- 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 (MPOs), 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 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 requirements consistent with the FTA Circular, 4702.1B, dated October 1, 2012. Consequently, this updated Title VI Program 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 information 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.
- 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 subrecipient 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 subrecipient facilities, office spaces, and vehicles.

ALDOT complies with Title VI and shall make its nondiscrimination statement/notice available to participants, beneficiaries, and other interested persons. ALDOT's nondiscrimination statement can be found in Section I of this document. ALDOT will make the Title VI complaint

procedures available to the public upon request. Also, the Title VI Program will be available at <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 due to 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 Appendix C.

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

A Title VI complaint may be filed by any individual who believes he or she has been discriminated against on the basis of race, color, or national origin. The complaint may be submitted 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. Appendix A includes a copy of the Complaint Form. The complaint should be submitted to:

**Sundae Ragland  
Transit Program Manager  
Alabama Department of Transportation  
Local Transportation Bureau  
1409 Coliseum Boulevard  
Montgomery, Alabama 36130-3050  
Phone: (334) 242-6764  
E-MAIL: [Raglands@dot.state.al.us](mailto:Raglands@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 with 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 the appropriate 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 Transit Program Manager noted

above. Under these circumstances, the complainant will be interviewed, and the ALDOT Local Transportation 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 Transportation 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 Transit Program Manager. 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 contact attempts 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 Transit Program Manager will notify the complainant of the outcome of the investigation by providing a copy of the investigative report forwarded to FTA or other appropriate federal agency. In 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, ALDOT has not received any Title VI complaints for ALDOT or its 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, 5<sup>th</sup> 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 their Title VI Program submissions every three years. ALDOT has had no lawsuits or complaints that allege discrimination on the basis of race, color, or 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 Appendix B.

**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 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 communities 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, and will be a living document meeting the spirit and letter of the requirements.

To more fully integrate the opinions of minority, low-income, and LEP populations into community outreach activities, 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 (news outlets, 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 meetings at times and locations that are convenient and accessible for minority and LEP communities.
- Host meetings 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 members 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, suggestions, 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 2022-2024 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 the 2023 American Community Survey 5-Year Estimates (U.S. Census Bureau), the total population for the State of Alabama is 4,759,836. Of those persons, 112,280 (2.4%) residents report speaking English less than very well. Those persons with limited English proficiency speak the following languages at home: 79,492 speak Spanish, 8,550 speak other Indo-European languages, 20,437 speak Asian and Pacific Island languages, and 3,801 speak other languages. The most popular language spoken at home (other than English) is Spanish.

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 the Title VI Notice, Complaint Procedures, and the Complaint Form on the Alabama Department of Transportation website at <https://www.dot.state.al.us/programs/TitleVI.html> 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 have limited interaction with ALDOT although possible encounters may occur during meetings held by ALDOT or subrecipients. LEP persons interact with the subrecipients by engaging and utilizing subrecipient transportation systems that are contracted with and through ALDOT. ALDOT does not provide or maintain any Fixed Route Transit Service.
  - b. Identification of LEP communities and an assessment of the number or proportion of LEP persons to determine the appropriate language services for each language group will be determined using available U.S. Census data and information on local community and regional demographic maps.
  - c. Information about the literacy skills of LEP populations in their native languages will be obtained from local demographics and population data as well as appropriate Census Bureau information to determine whether translation of documents will be an effective practice.
  - d. ALDOT will determine 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 including 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: ALDOT does not provide any Fixed Route or Rail Service. Since all 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 how frequently LEP persons utilize bus services. 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: Data collection pertaining to methods of purchasing passes or tickets will be

maintained and submitted to ALDOT by subrecipients. ALDOT will use this information to assess how LEP persons are purchasing rides and ensure that there are no adverse or disproportionate impacts to these riders.

- c. Participation in public meetings: LEP persons will be notified of public meetings and encouraged to participate. This notification will occur through postings in all public ALDOT and/or subrecipient facilities, to include but not limited to fliers, news media, and other methods deemed appropriate. ALDOT will evaluate how often LEP persons participate in public meetings.
  - d. Customer services interactions: ALDOT will require all subrecipients to initiate customer service interaction surveys and assessments to determine how often LEP persons interact with customer service. ALDOT will review and analyze this information to determine if the needs of LEP persons are being addressed.
  - e. Ridership surveys: ALDOT will require all subrecipients to conduct rider surveys and provide ALDOT with results and conclusions to determine any perceived or real disparities for LEP persons. ALDOT will utilize and analyze all feedback provided from subrecipients to address any disparities.
  - f. Operator surveys: ALDOT will require all subrecipients to conduct and submit operator surveys to determine how often vehicle operators encounter LEP persons. Surveys will be submitted to ALDOT for review and analysis.
- **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 transit program is significantly important. The more frequently that the program interacts with Alabama residents, the more likely that language services will be desired and needed. The provision of public transportation is especially vital for people without access to personal vehicles, and public transportation can enhance and improve the user's quality of life. 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 subrecipients shall coordinate with LEP community stakeholders to ensure that appropriate resources are expressly consistent with and allocated for local, regional, and statewide demographic needs. 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 corresponding cost 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 and written translation. At a minimum, ALDOT recommends that summaries of important documents be translated upon request

and that qualified community volunteers be utilized when oral translation is needed. Web-based translation services may also be used.

**Limited English Proficiency Plan (LEP):** ALDOT shall develop, implement, and execute an LEP Plan as shown below. Subrecipients will develop their individual LEP Plans with guidance from ALDOT. These plans will be based on current census data, local and statewide demographics, and population(s) served. Language assistance will be provided through a series of methods including but not limited to translation services and distribution of translated materials. Translation shall pertain to all transportation services and schedules for the areas where LEP populations reside and are utilizing the designated transportation services. The availability of language assistance shall include a variety of methods including dissemination of translated printed materials, distribution of hand-outs to advocacy groups and LEP populations that are utilizing transportation services, articles in local newspapers that target LEP populations, and all other means deemed appropriate to heighten the LEP population's awareness of available transportation assistance. ALDOT will monitor and require all subrecipients to periodically evaluate and update the LEP Plan based on several factors, including but not limited to, Census and demographic changes, feedback from LEP populations, and increase and/or decrease of the LEP population's utilization of available transportation services. ALDOT will ensure that appropriate staff personnel are expertly and properly trained to train local subrecipient personnel so that LEP populations receive timely and reasonable assistance 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 services to the LEP population served by ALDOT's subrecipients must be continually monitored due to the growing population of LEP persons served throughout the respective service areas. Throughout ALDOT's area of jurisdiction, the State of Alabama, the 2023 American Community Survey 5-Year Estimates (U.S. Census Bureau) revealed that 2.4% of the LEP population speak English less than very well. ALDOT has determined that the current initiatives are adequate to address the LEP population transportation needs. ALDOT is currently using Flash Cards, posting LEP information on the website, using web-based translation services, and providing 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 considered when adjusting and modifying the LEP plan to ensure that the LEP population's transportation needs are being met consistent with the Title VI requirements.

ALDOT will provide language assistance services by language based on the demographics of the populations served, specific feedback from LEP groups, feedback from subrecipient bus operators and bus surveys, and feedback from subrecipients that provide the actual transportation services to the LEP populations.

The provision and notification of transportation services to LEP groups are provided utilizing the following: focus groups, community town-hall meetings, and notifications advertised in LEP media as well as television, radio, and newspapers specific to LEP populations.



ALDOT is the Transportation Designated and Primary Recipient. Therefore, monitoring, evaluation, and updating the Limited English Proficiency Plan will be done according to ALDOT's overall assessment of feedback provided by the subrecipients. Information will also be obtained from 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 Management 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. ALDOT as the designated recipient does not meet the 5% threshold. Nevertheless, there are counties throughout the ALDOT's area of jurisdiction that do 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 have 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 ensure that it provides assistance to the subrecipients and enforces reporting requirements that are consistent with Title 49 CFR Section 21.9(b) which states that if "a primary recipient extends Federal financial assistance to any other recipient, such other recipient shall also submit such compliance reports to the primary recipient as may be necessary to enable the primary recipient to carry out its obligations". The following information has 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 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 also given 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's Title VI regulation requirements. As a Primary Designated/Recipient, ALDOT fully understands that if a subrecipient is found to be non-compliant, then ALDOT is also considered non-compliant. 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 subrecipients based on the type of entity and the number of fixed route vehicles it operates in peak service.
- b. Collect Title VI programs from subrecipients, review these programs for compliance, and store the programs appropriately.
- c. Upon request from the FTA, respond to any complaints of discrimination. ALDOT will require subrecipients to verify, validate, and confirm their level of quality and quantity of service provided. These requirements will be consistent with FTA Circular 4702.1b, dated October 1, 2012.

## **13. Determination of Site or Location of Facilities**

ALDOT did not select a site or locate any facilities during the period from 2022 through 2024, and ALDOT currently has no plans 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) and will not select a site or location for 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 requirements 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 understands that for this requirement, "facilities" does not include bus shelters, which are transit amenities and are covered in Chapter IV of the Circular, nor does it include transit stations, power substations, etc., which are evaluated during project development and the NEPA process.

#### **14. Requirement to Provide Additional Information upon Request**

ALDOT shall comply with all requests 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 demonstrate compliance with the Title VI regulations. ALDOT will establish, maintain, and provide "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 as shown in the attached documentation. 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 demographic maps (Appendix D) that show the total transit usage by language group in the State of Alabama. Additional maps show the percentage of minority populations and the percentage of the population who speak English "less than very well". All maps are based on the 2023 American Survey 5-Year Estimates (U.S. Census data).
- d. ALDOT's analysis of possible impacts on the basis of race, color, or national origin identified by reviewing the maps in Appendix D did not identify any significant impacts. If significant impacts arise or are perceived, ALDOT will swiftly develop and implement alternatives to mitigate the impacts.
- e. 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. This information is also integrated into the statewide planning activities. The ALDOT statewide transportation planning process includes outreach, public involvement and participation, and meetings that are accessible to LEP and minority populations.
- f. The procedure utilized by ALDOT to pass through FTA financial assistance includes 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 funding availability, individual requests from subrecipients, and an individual evaluation and assessment of need based on ridership and population served. ALDOT also selects a cross population representative of the community that will receive the funding to eliminate any perceived or real bias or discrimination in the selection process.

- g. The procedures used by ALDOT to assist potential subrecipients in applying for funding include assisting applicants that serve the minority populations and 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 understands and will comply with the requirement to collect Title VI Programs from MPOs. Title VI Programs shall be collected electronically. ALDOT will work with the MPOs to monitor the programs 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 has completed the following:

- a. Analyzed regional demographic data to identify minority populations within the non-urbanized areas of the state.
- b. When necessary, provided 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 opportunities to engage in the Statewide Transportation Planning Process. These actions will strive to reduce language, mobility, temporal, and other obstacles to allow minority and LEP population to participate fully in the Planning Process.
- d. Monitor all subrecipient activities to ensure 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 ensure that minority populations are not denied the benefits of or excluded from participation in the programs. ALDOT shall also prepare and maintain the information shown below but will not report it to FTA until requested. The following information will be provided to FTA upon request:

- a. A record of funding requests received from private non-profit organizations, state or

local governmental authorities, and Indian tribes. The record shall identify applicants that would use grant program funds to provide assistance to predominantly minority populations. 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 distribution of funds to subrecipients that serve predominantly minority populations, including Native Americans tribes, where present. This distribution can be achieved by engaging in outreach to diverse stakeholders regarding the availability of funds and ensuring that 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.

When a subrecipient is also a direct recipient of FTA funding, meaning that they have applied for funds directly from FTA in addition to receiving funds from the state, the subrecipient/direct recipient reports directly to FTA. The state, as designated recipient, is not responsible for monitoring compliance of that subrecipient/direct recipient. 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 want to file a Title VI complaint. The complaint form will also be available to customers on ALDOT's website. All customers will be advised that Title VI complaints will be limited to allegations of discrimination based **ONLY** on **Race**, **Color** and **National Origin**.

<b>Section I:</b>				
Name:				
Address:				
Telephone (Home):			Telephone (Work):	
Electronic Mail Address:				
Accessible Format Requirements?	Large Print		Audio Tape	
	TDD		Other	
<b>Section II:</b>				
Are you filing this complaint on your own behalf? Circle			Yes	No
*If you answered "yes" to this question, go to <b>Section III</b> .				
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
<b>Section III:</b>				
I believe the discrimination I experienced was based on (check all that apply):				
<input type="checkbox"/> Race <input type="checkbox"/> Color <input type="checkbox"/> 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. <u>Include the name and contact information</u> 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.				

<b>Section IV</b>		
Have you previously filed a Title VI complaint with this agency? Circle	Yes	No
<b>Section V</b>		
Have you filed this complaint with any other Federal, State, or local agency, or with any Federal or State court? <input type="checkbox"/> Yes <input type="checkbox"/> No If yes, check all that apply: <input type="checkbox"/> Federal Agency: _____ <input type="checkbox"/> Federal Court _____ <input type="checkbox"/> State Agency _____ <input type="checkbox"/> State Court _____ <input type="checkbox"/> Local Agency _____		
Please provide information about a contact person at the agency/court where the complaint was filed.		
<b>Name:</b>		
<b>Title:</b>		
<b>Agency:</b>		
<b>Address:</b>		
<b>Telephone:</b>		
<b>Section VI</b>		
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:

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Signature

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Date

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

**Sundae Ragland**  
**Transit Program Manager**  
**Alabama Department of Transportation**  
**Local Transportation Bureau**  
**1409 Coliseum Boulevard**  
**Montgomery, Alabama 36130-3050**  
**Phone: (334) 242-6764**  
**E-MAIL: [Raglands@dot.state.al.us](mailto:Raglands@dot.state.al.us)**

**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
<b>Investigations</b>	None in the Past 3 yrs			
<b>1</b>				
<b>2</b>				
<b>Lawsuits</b>	None in the Past 3 yrs.			
<b>1</b>				
<b>2</b>				
<b>Complaints</b>	None in the Past 3 yrs.			
<b>1</b>				
<b>2</b>				

**APPENDIX C**  
**TITLE VI NOTICE TO THE PUBLIC**

**NOTIFY THE PUBLIC OF RIGHTS UNDER TITLE VI**

**ALABAMA DEPARTMENT OF TRANSPORTATION (ALDOT)**

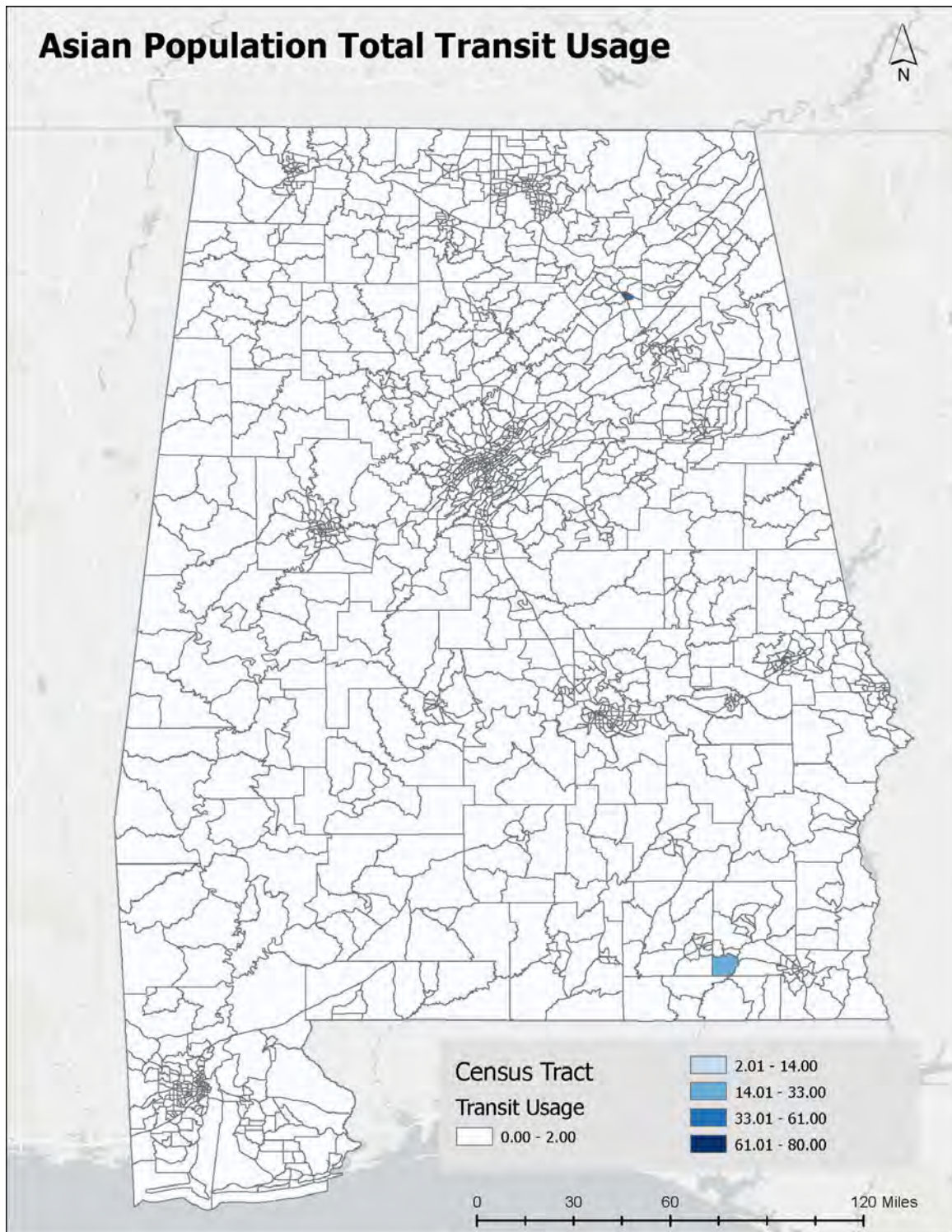
The Alabama Department of Transportation operates its transit programs without regards to race, color, and national origin in accordance with Title VI of the Civil Rights Act. Any person who believes she/he has been aggrieved by any unlawful discriminatory practice under Title VI may file a complaint 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 Ms. Sundae Ragland at 334-242-6764, email [Raglands@dot.state.al.us](mailto:Raglands@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 with the Office of Civil Rights, Attention: Title VI Program Coordinator, East Building, 5<sup>th</sup> floor-TCR, 1200 New Jersey Avenue, SE, Washington, DC 20590.

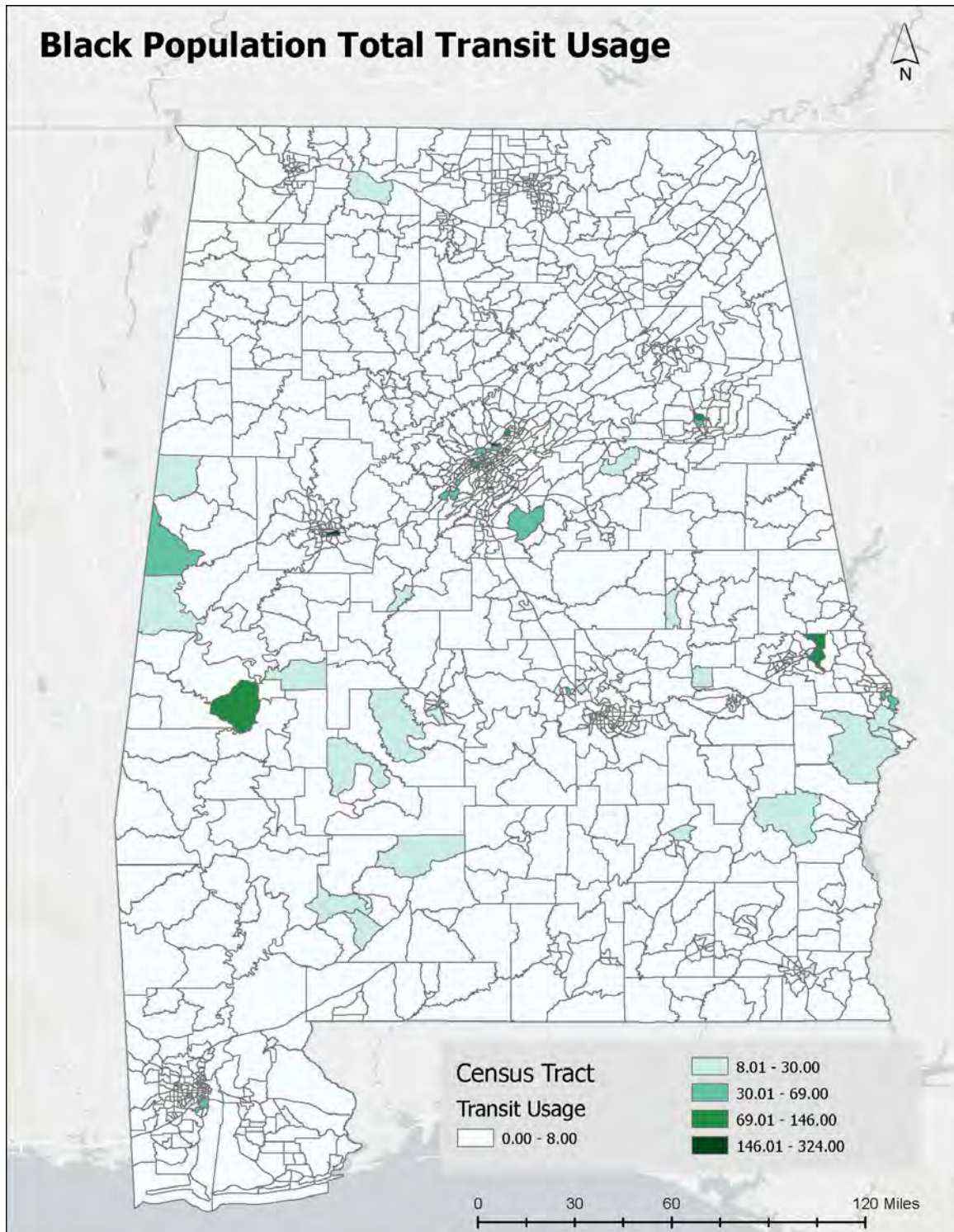
If information is needed in another language, contact (334) 242-6764.

**APPENDIX D**  
**DEMOGRAPHIC MAPS**

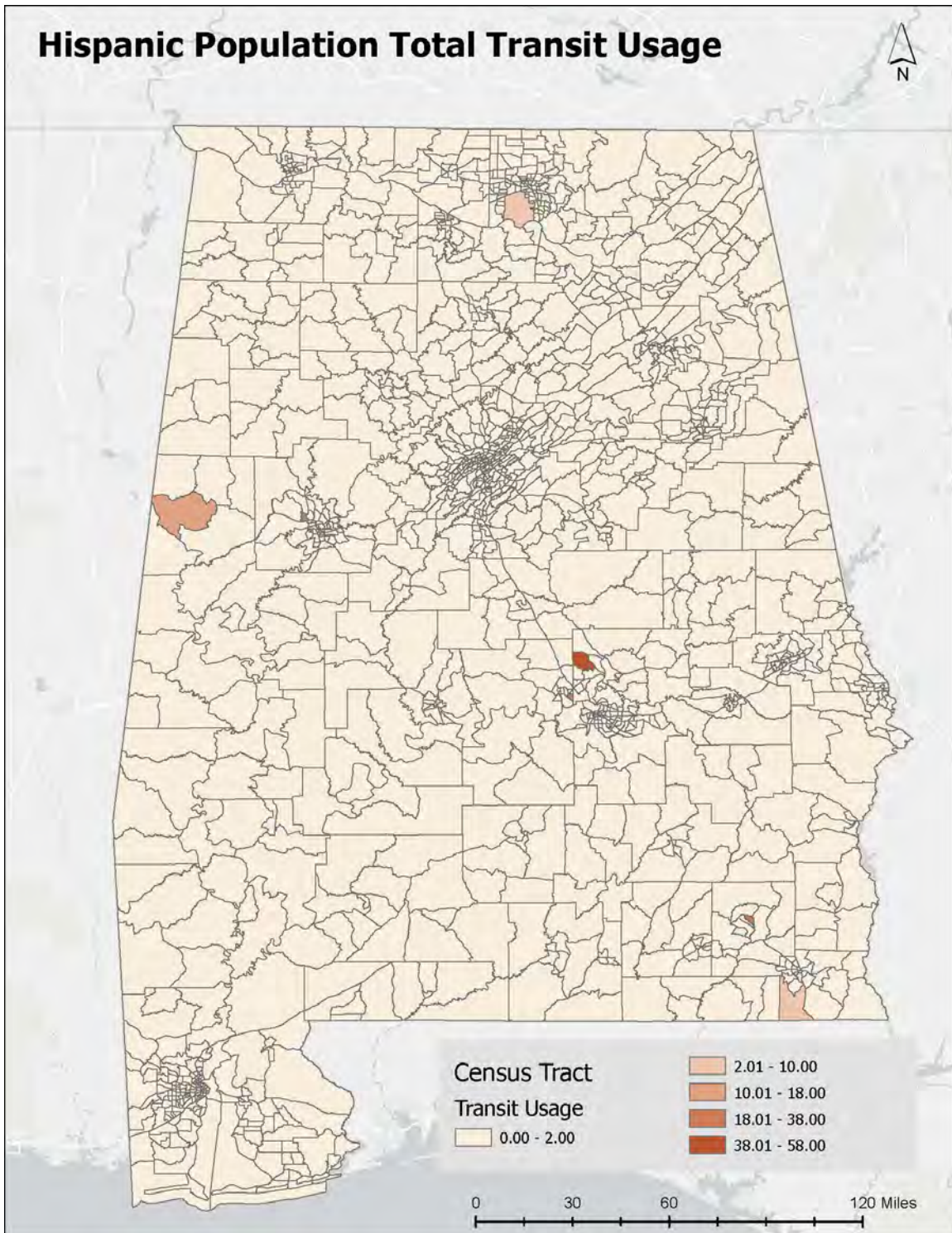


Source: 2023 American Community Survey 5-Year Estimates (U.S. Census Bureau)



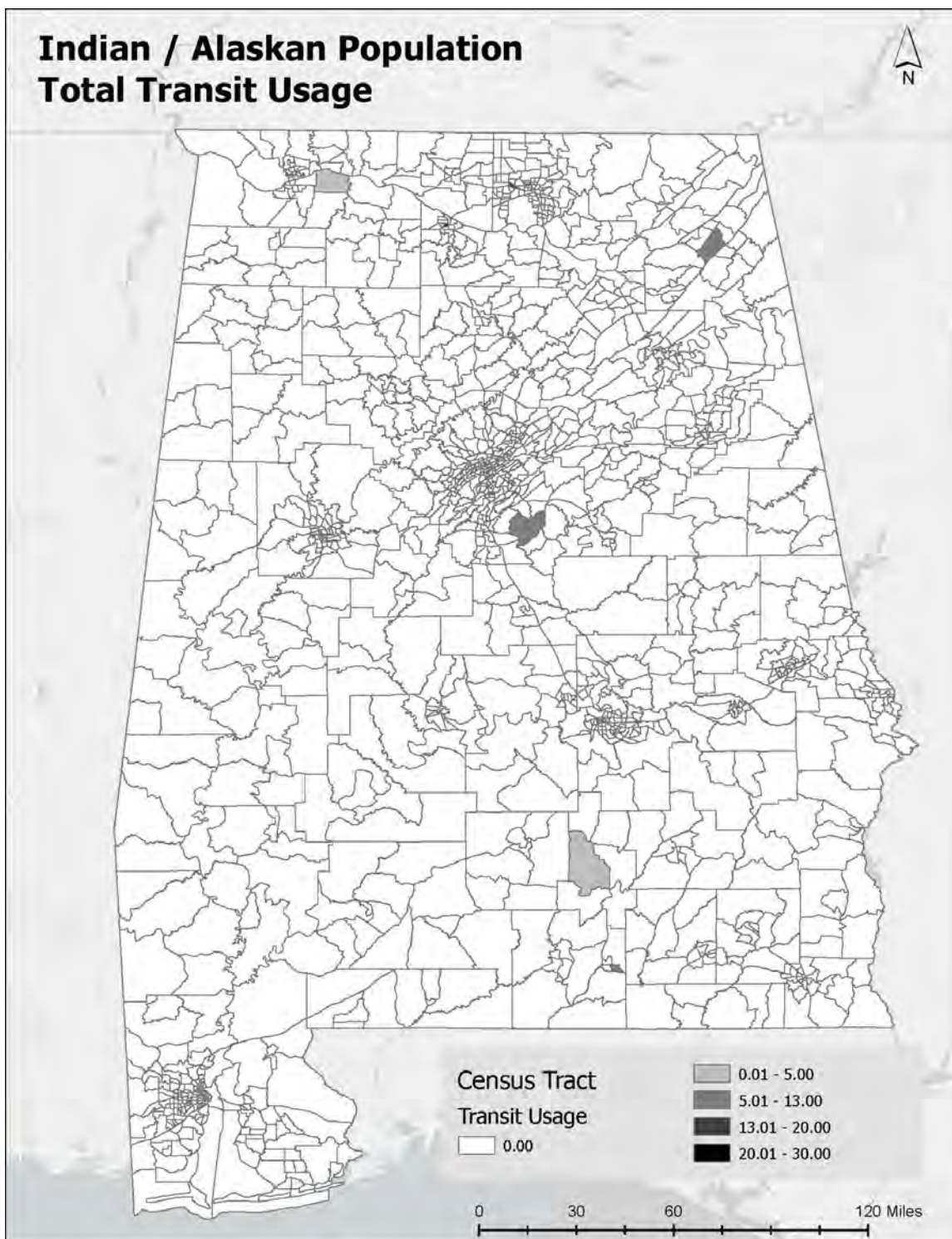


Source: 2023 American Community Survey 5-Year Estimates (U.S. Census Bureau)



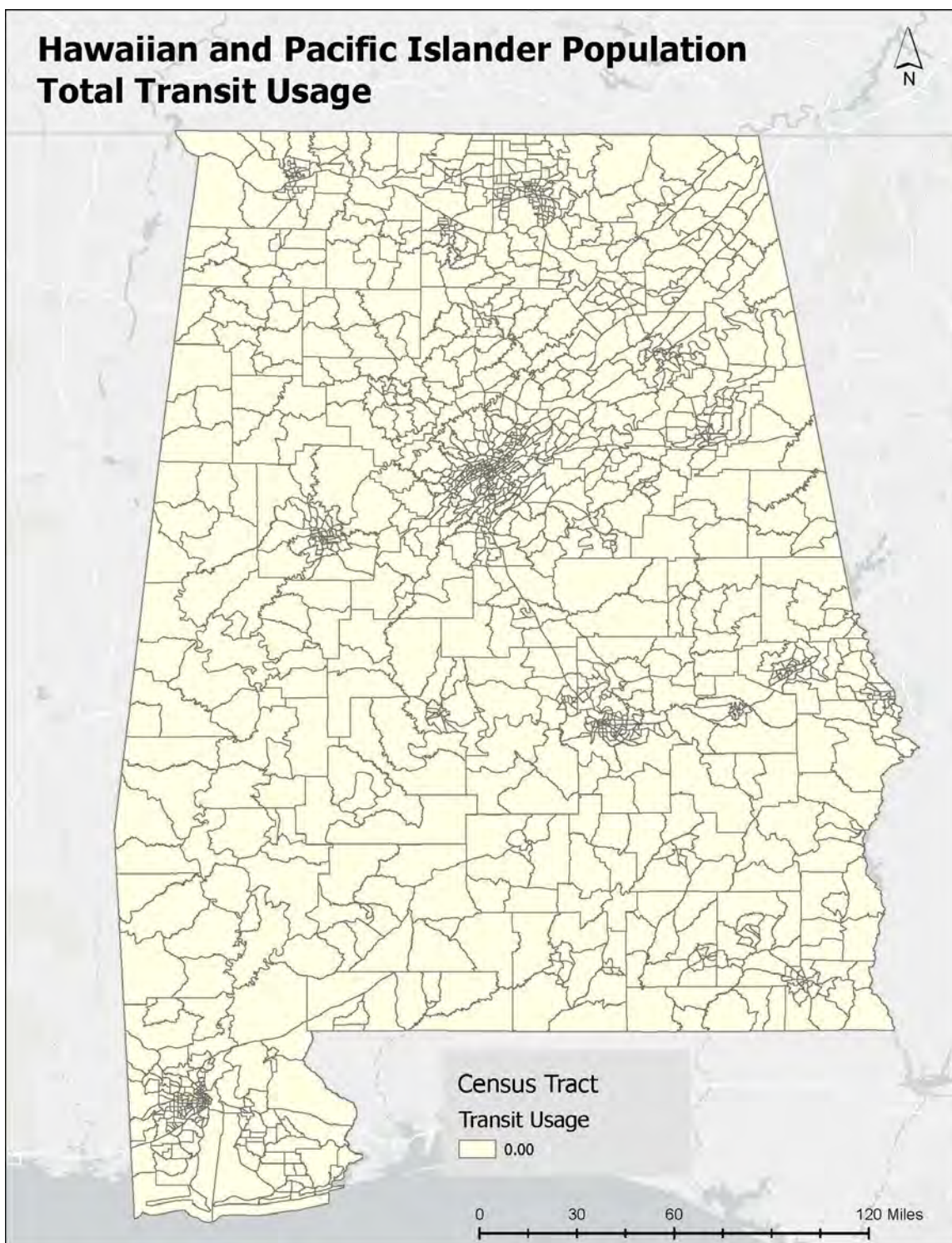
Source: 2023 American Community Survey 5-Year Estimates (U.S. Census Bureau)



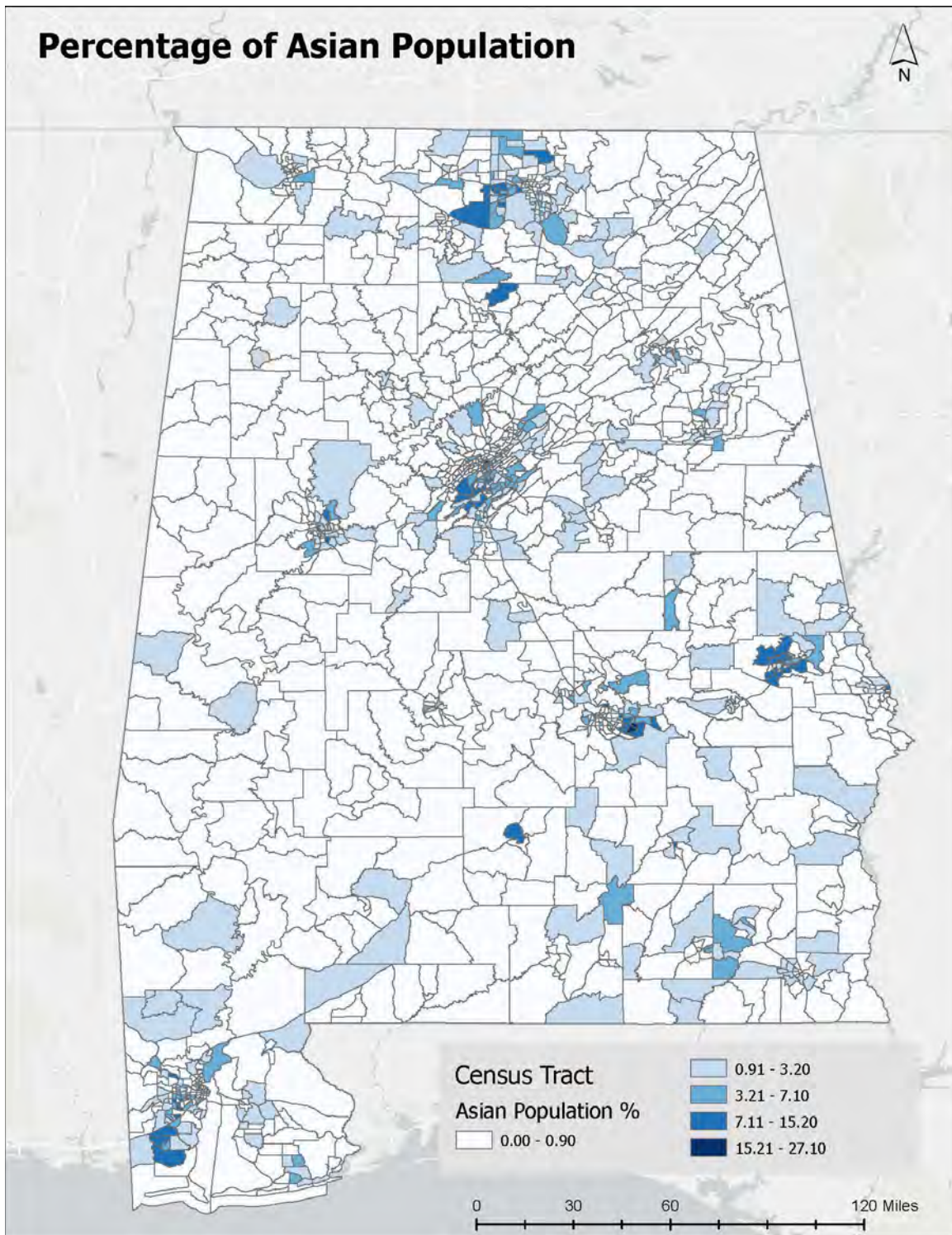


Source: 2023 American Community Survey 5-Year Estimates (U.S. Census Bureau)



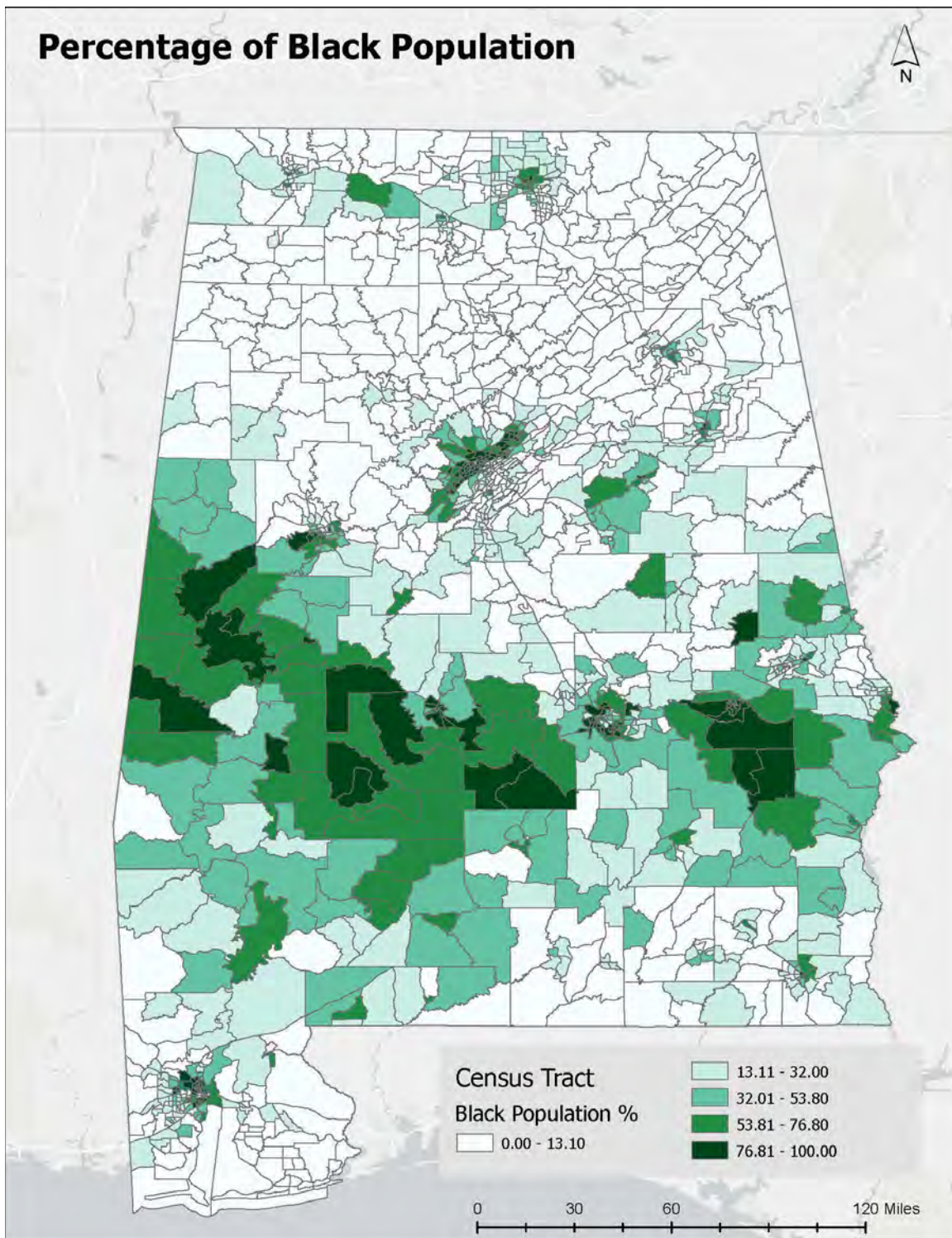


Source: 2023 American Community Survey 5-Year Estimates (U.S. Census Bureau)

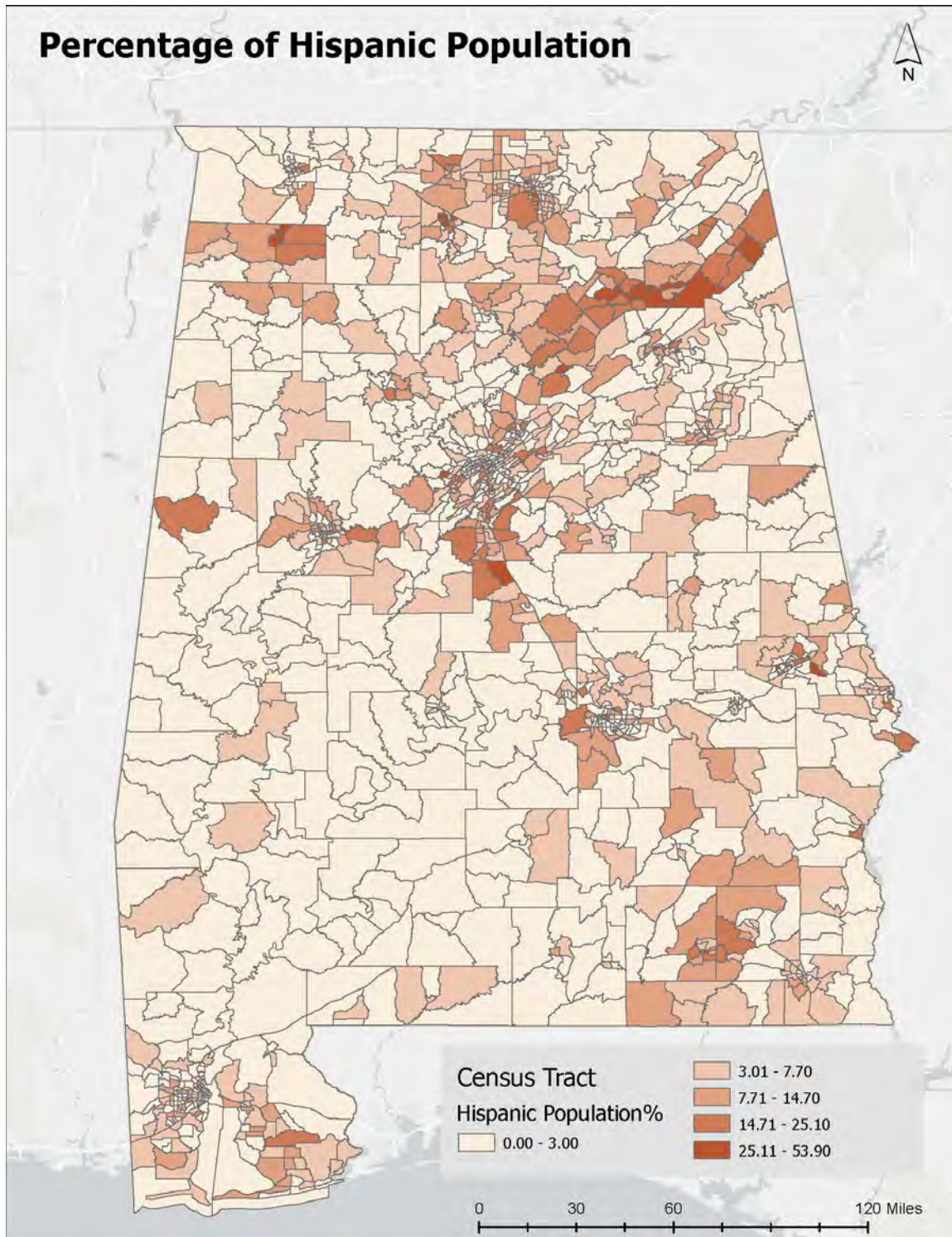


Source: 2023 American Community Survey 5-Year Estimates (U.S. Census Bureau)



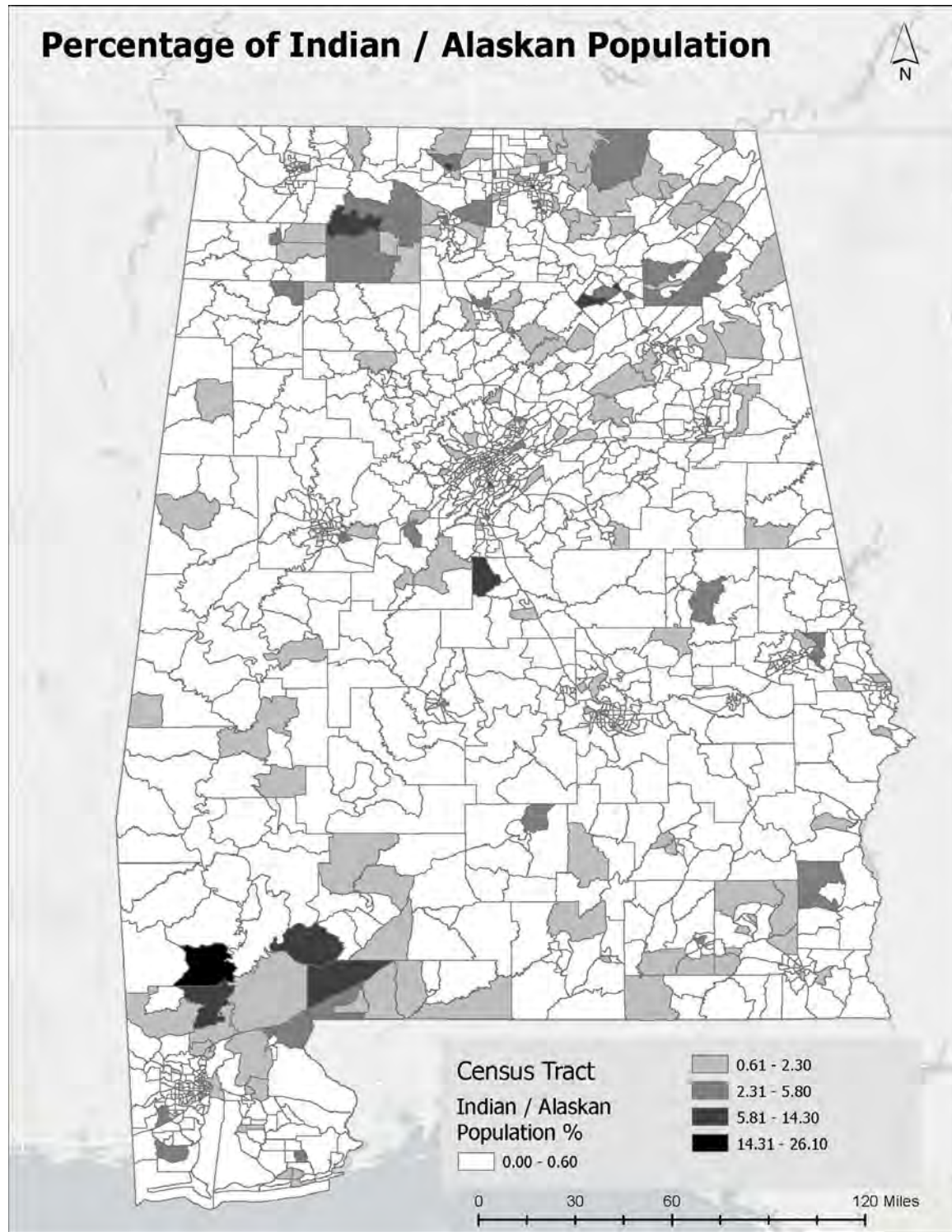


Source: 2023 American Community Survey 5-Year Estimates (U.S. Census Bureau)



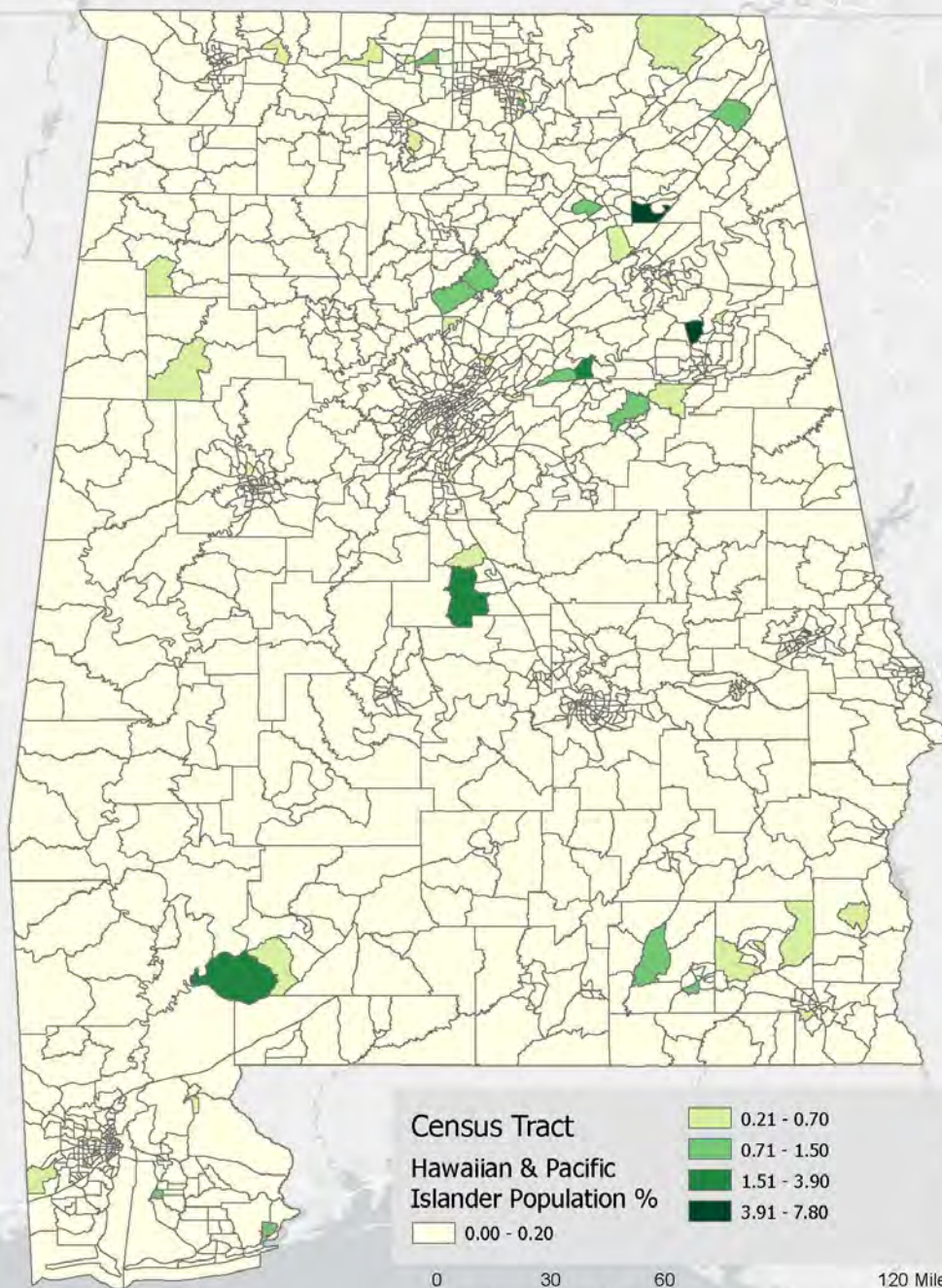
Source: 2023 American Community Survey 5-Year Estimates (U.S. Census Bureau)





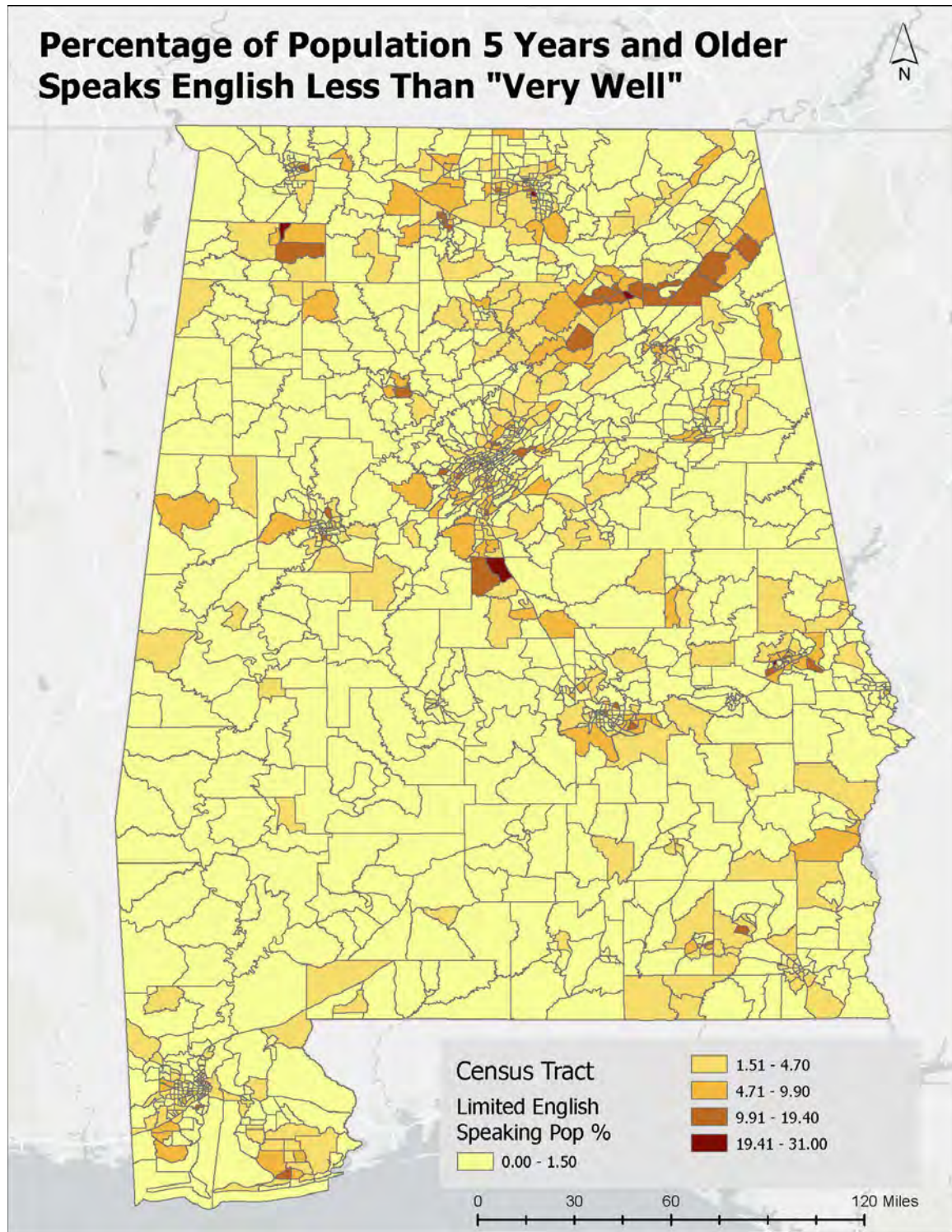
Source: 2023 American Community Survey 5-Year Estimates (U.S. Census Bureau)

## Percentage of Hawaiian and Pacific Islander Population



Source: 2023 American Community Survey 5-Year Estimates (U.S. Census Bureau)





*Source: 2023 American Community Survey 5-Year Estimates (U.S. Census Bureau)*

## **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
  - o Vehicle load for each mode
  - o Vehicle headway for each mode
  - o On time performance for each mode
  - o Service availability for each mode
- ☐ Service policies
  - o Transit Amenities for each mode
  - o 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.