

HANDBOOK



TITLE VI OF THE CIVIL RIGHTS ACT ODOT INTERMODAL CIVIL RIGHTS

This handbook provides technical assistance to public transit providers who receive Federal Transit Administration (FTA) grant dollars either directly from the FTA or through the Oregon Department of Transportation. This handbook specifically addresses public transit providers' responsibilities in complying with Title VI of the Civil Rights Act.

CONTENTS

1. Background	1
2. Title VI Definitions.....	1
3. Recipient Types and Responsibilities	2
4. General Title VI Requirements	3
5. Specific Requirements.....	4
Title VI Program Requirements Checklist.....	4
Title VI Program Details and Examples	5
A. Title VI Notice to the Public	5
B. Title VI Complaint Procedure	5
C. Title VI Complaint Form	6
D. Transit-Related Title VI Investigations, Complaints and Lawsuits List	6
E. Public Participation Plan	7
F. Language Assistance Plan.....	8
G. Minority Representation Table	9
H. Title VI Equity (Facility Location) Analysis.....	9
I. Fixed Route Service Standards	10
J. Fixed Route Service Policies.....	11
Appendix	12
Resources	12
Samples.....	13
Title VI Notice to the Public	13
Title VI Complaint Procedure.....	13
Title VI Complaint Form	15
List of Transit Related Title VI Investigations, Complaints and Lawsuits	17
Minority Representation Table.....	17
Title VI Minority Representation Data Collection Form.....	18
Fixed Route Service Standards and Policies	19

TITLE VI HANDBOOK

1 BACKGROUND

Any entity receiving federal dollars, either directly from the Federal Transit Administration (FTA) or through the Oregon Department of Transportation (ODOT), must not discriminate based on factors which include, but are not limited to, race, ethnicity, national origin, age, disability status or gender.

This handbook specifically addresses discrimination based on Title VI of the 1964 Civil Rights Act, a federal statute (FTA C 4207. 1B). If an agency is found in violation of Title VI, that agency may lose its federal funding.

The exact language prohibiting discrimination in Title VI reads: “No person in the United States shall, on the ground of race, color, or national origin, be excluded from participation in, be denied the benefits of, or be subjected to discrimination under any program or activity receiving federal financial assistance.”

The ODOT Office of Civil Rights (OCR), Intermodal Civil Rights Program (IMCR) ensures compliance with a variety of civil rights laws and executive orders that prohibit discrimination in programs and activities receiving direct or indirect federal financial assistance from the Federal Transit Administration (FTA) and/or the Federal Rail Administration (FRA). ODOT Intermodal Civil Rights staff will review and provide technical assistance to any agency, transit provider, or other recipient of these funds.

In addition to this handbook there are other resources available on the [Office of Civil Rights website](#) or by contacting;

Sherrin Coleman
Intermodal Civil Rights Manger
Sherrin.k.Coleman@odot.state.or.us
503-986-3169.

2 TITLE VI DEFINITIONS

Color: Skin color or complexion

Discrimination: An intentional or unintentional action through which a person, solely because of race, color, national origin, religion, or gender has been subjected to unequal treatment under a program or activity receiving federal financial assistance.

3 RECIPIENT TYPES & RESPONSIBILITIES

National Origin: A person's, or his or her ancestor's, place of birth. May also refer to the physical, cultural or linguistic characteristics associated with ethnicity or ancestry.

Race (as defined by the U.S. Census): A social classification of people which includes, at a minimum, White, Black or African American, American Indian or Alaska Native, Asian, Native Hawaiian or Other Pacific Islander. (Based on the demographics for your area, other races may be included.)

Primary Recipient: means any FTA recipient that extends Federal financial assistance to a subrecipient.

Designated Recipient: An entity designated by the chief executive officer of state, responsible local officials, or publicly owned operators of public transportation to receive and apportion grant funds made available by Congress and FTA.

Direct Recipient: Any public agency authorized to receive program funds directly from FTA.

Subrecipient: An agency receiving grant funds through ODOT or another Designated Recipient.

ODOT Rail and Public Transit Division (RPTD), as a Primary Designated Recipient of FTA funds for the State of Oregon, receives, administers and allocates FTA funds to subrecipients. Responsibilities include monitoring subrecipients' compliance with Title VI, collecting Title VI program documents, and providing Title VI reports directly to FTA. These responsibilities are delegated to the ODOT Office of Civil Rights, Intermodal Civil Rights Program.

Oregon's large urban (over 200,000 population) transit systems, such as TriMet, Lane Transit District, and Salem-Keizer Transit are Designated/ Direct Recipients and report directly to FTA.

Oregon's small urban (50,000 to 200,000 in population) systems, Rogue Valley Transit District, the City of Bend, Albany, Grants Pass, Walla Walla/ Milton Freewater and Corvallis are FTA Direct Recipients and ODOT RPTD Subrecipients.. They will submit a Title VI program directly to FTA and also to ODOT's Office of Civil Rights, Intermodal Civil Rights Program.

Many of RPTD subrecipients receive FTA funds through RPTD or another Designated Recipient. These subrecipients must also submit Title VI reports and program documents to the entity that provided them with FTA funds.

Primary and Designated Recipients' Monitoring of Subrecipient's Title VI Program

It is important to note that if a subrecipient is not in compliance with Title VI then ODOT and RPTD are also not in compliance.

ODOT's, IMCR, is responsible for documenting that the subrecipient is in compliance with Title VI.

To track compliance with Title VI, IMCR will:

- Document that the subrecipient is complying with the general requirements of Title VI and any other specific requirements that apply to that subrecipient.
- Collect and store electronically, subrecipients' Title VI program documents on a schedule set by IMCR. (Program updates are required every three years.)
- Reports on Complaints and Public Outreach activities are due by August 15th of each year, starting in 2016.

4 GENERAL TITLE VI REQUIREMENTS

If any of your programs or activities receives federal funding, then all of your programs and activities must comply with Title VI. Any agency receiving federal dollars either directly from FTA, indirectly through RPTD, or both, must:

- Ensure that the level and quality of public transportation service is provided in a nondiscriminatory manner;
- Promote full and fair participation in public transportation decision-making without regard to race, color or national origin;
- Ensure meaningful access to transit-related programs and activities by persons with limited English proficiency;
- Prepare and submit a Title VI Program.

Timelines

Designated/Direct recipients are required to submit a Title VI Program to FTA every three years. FTA sets staggered due dates for submittal in order to provide for timely processing. Direct recipients that also receive federal funding from ODOT must submit a copy of their Title VI Program to ODOT IMCR.

All ODOT subrecipients of FTA funds are required to submit a Title VI Program to ODOT Intermodal Civil Rights that complies with the reporting requirements of [Circular, 4702.1B](#).

Although a complete Title VI Program is due to ODOT Intermodal Civil Rights every three years, significant changes to the TITLE VI Program, complaints/lawsuits, and outreach activities must be submitted to ODOT IMCR in an annual report. Annual reports are due by August 15th of each year.

5 SPECIFIC REQUIREMENTS

Please see the Appendix for templates and samples of forms, notices and procedures.

Title VI Program Requirements Checklist

- A. **Title VI Notice to the Public** including a list of posting locations (pg. 5).
- B. A posted **Title VI Complaint Procedure** containing instructions for the public on how to file a Title VI discrimination complaint (pg. 5)
- C. A posted **Title VI Complaint Form** (pg. 6)
- D. **Transit-related Title VI Investigations, Complaints and Lawsuits List**
- E. **Public Participation Plan** including information about outreach to minority and Limited English Proficient (LEP) populations and a summary of outreach efforts made since the last **Title VI Program Submission**
- F. **Language Assistance Plan** for providing language assistance to persons with LEP based on U.S. Department of Transportation (DOT) LEP guidance (pg. 8)
- G. Minority Representation Table depicting membership of committees and councils broken down by race, including a description of the process the agency uses to encourage participation of minorities (pg. 9)

For recipients constructing a facility, in addition to items A–G, submit H.

H. **Title VI (Facility Location) Equity Analysis**

For all fixed route transit providers, in addition to items A–G, submit I.

- I. **Fixed Route Service Standards** (pg. 10)
- J. **Fixed Route Service Policies** (pg. 11)

Title VI Program Details and Examples

A. Title VI Notice To The Public:

The subrecipient must inform customers and the public of their rights under Title VI regulations by posting a Title VI Notice (Appendix Pg. 13). The Title VI notice must include:

- A statement that the agency operates programs without regard to race, color or national origin.
- Information on how to request additional information about the agency's Title VI obligations. This includes such items as how to file a complaint, the location of the complaint form, etc.
- Information on how to request Title VI information in another language. (This information should also be provided in other languages per USDOT LEP guidance <https://www.civilrights.dot.gov/civil-rights-awareness-enforcement/language-assistance/dots-lep-guidance>).

At a minimum, the notice must be posted in the following locations:

- On the agency's website
- In public areas of the agency's offices (reception desk, public meeting rooms, etc.). Best practice guidance also suggests posting or printing notices in other areas such as:
 - Inside vehicles (buses, vans, rail, cars)
 - In and around transit shelters and stations
 - In rider guides
 - In bus schedules

***NOTE:** If you have LEP requirements, the Title VI notice must be posted in those other language(s) as well.*

B. Title VI Complaint Procedure:

The subrecipient must have a clear and consistent procedure for responding to customer complaints on Title VI issues (Appendix Pg. 14). The procedure must be made available and accessible to the public. The procedure should include:

- An explanation of what specific issues are covered by the procedure.
- How to file the complaint (including timelines and access to a complaint form).
- To whom to submit the complaint.
- How the agency will respond to the complaint (including timelines).

- If an investigation of the complaint is conducted, how the customer will be informed of the outcome of the investigation.
- A notice that the customer may file a complaint directly with FTA including FTA contact information.
- An internal system or log for tracking Title VI complaints (issue, dates, findings, etc.).
- How language access will be provided (LEP).

At a minimum, the Title VI Complaint Procedure must be posted on the agency website and made available in hard copy in the central office.

The procedure must also be made available in appropriate languages for LEP populations meeting the Safe Harbor threshold.

C. Title VI Complaint Form:

The subrecipient must provide a Title VI Customer Complaint form (Appendix Pg. 15). The form must include fields for:

- The complainant's name and contact information.
- Identification of the Title VI protected class(es) (race, color, national origin) involved in the complaint. (The form may include other protected classes such as age, disability, and gender, and the complainant can choose one or more of these other protected classes as part of the complaint.)
- Date(s) of the alleged discrimination.
- An explanation of the alleged discriminatory act or behavior.

At a minimum, the Title VI Complaint Form must be posted on the agency website and made available in hard copy in the central office. The form must also be made available in appropriate languages for LEP.

D. Transit-Related Title VI Investigations, Complaints and Lawsuits List:

The subrecipient shall maintain a list or log of all Title VI investigations, complaints, and lawsuits pertaining to their transit-related activities (Appendix Pg. 17). The list, updated with all new events filed since the last submission, must be submitted annually by August 1st and with the Title VI Program.

The list or log shall include dates, a summary of allegation(s), status, actions taken by subrecipient in response, and the final outcome (if resolved) for:

- Active investigations by FTA, the agency itself, or any other entity, which are based on race, color, or national origin discrimination allegation(s).

- Lawsuits which are based on race, color, or national origin discrimination allegation(s).
- Complaints naming the subrecipient which are based on race, color, or national origin discrimination allegation(s).

As this information must be submitted to IMCR annually it is best to keep an on-going log of complaints entered as the complaints come in. Information will be more accurate, and the upkeep of the log easier.

E. Public Participation Plan:

The subrecipient must have a written Public Participation Plan which explicitly describes the proactive strategies, procedures, and desired outcomes underpinning their public participation activities. It is imperative to provide opportunities for the public to be involved in proposed transportation decisions.

Annual submission of Public Participation activities is required and due August 1st.

The subrecipient is allowed a great deal of flexibility in determining how, when, and how often specific public participation activities should take place and which specific measures are appropriate. Plans should be based on the subrecipient's demographics; service under consideration, programs affected or proposed, resources available, etc., and should:

- Provide for early, frequent and continuous engagement by the public.
- Promote inclusive participation of low-income, minority, and LEP individuals (per DOT LEP guidance <https://www.civilrights.dot.gov/civil-rights-awareness-enforcement/language-assistance/dots-lep-guidance>) and people with disabilities.
- Comply with the public participation requirements of 49 U.S.C. Sections 5307 (b). FTA requires programs or projects to be developed with public participation and 5307 (c)(1)(I) requires a locally developed process to consider public comment before raising a fare or carrying out a major reduction in transportation service.

Tips for creating and implementing Public Participation Plans

- Think outside the box: go to hair salons, barbershops, street fairs, faith-based institutions, libraries, etc.
- Select accessible and varied meeting locations and times.
- Consider providing childcare and food during meetings.
- Use social media in addition to other resources as a way to gain public involvement.
- Employ different meeting sizes and formats.

An example of a Public Participation Plan is available in RPTD's State Management Plan: <http://www.oregon.gov/ODOT/PT/resources/guidance-library/state-management-plan.pdf>

F. Language Assistance Plan:

The subrecipient must have a written Language Assistance Plan.

The subrecipient shall take reasonable steps to ensure meaningful access to benefits, services, information, and other important portions of its programs and activities for individuals who are limited-English proficient (LEP). Failure to provide this could lead to a claim of national origin discrimination.

Limited English Proficient (LEP): Referring to persons for whom English is not their primary language and who have a limited ability to read, write, speak, or understand English. This includes those who have reported to the U.S. Census that they speak English less than very well, not well, or not at all.

To determine if an individual is entitled to language assistance and what specific services are appropriate, DOT has provided an assessment tool, the Four Factor Analysis. Per USDOT LEP guidance at: <https://www.civilrights.dot.gov/civil-rights-awareness-enforcement/language-assistance/dots-lep-guidance>.

The LEP Four Factor Analysis

- **Demography:** What is the number or proportion of LEP persons served and the languages spoken in the service area? A useful link: <http://factfinder2.census.gov/faces/nav/jsf/pages/searchresults.xhtml?refresh=t>
- **Frequency:** How often do LEP persons come into contact with the service or program (your public transportation services)?
- **Importance:** How does the program, service or activity affect people's lives (transportation)?
- **Resources and Costs:** What funding and other resources are available for LEP outreach?

At a minimum, the Language Assistance Plan shall include:

- The results of the Four Factor Analysis, including a description of the LEP population(s) served.
- A description of how language assistance services are provided, by language.
- A description of how LEP persons are informed of the availability of language assistance services.

- A description of how the language access plan is monitored and updated.
- A description of how employees are trained to provide language assistance to LEP persons.

Tips for implementing LEP plans

- Publish timetables and route maps in languages other than English.
- Provide pictograms and other symbols.
- Strive for a multilingual staff.
- Create and post multi-language announcements, posters, and other information.

LEP Safe Harbor

The LEP Safe Harbor stipulation was created to provide access to vital documents in a written format to non-English users who, because of small numbers, may not meet the threshold for providing more expansive language access services as identified in the Language Assistance Plan.

Safe Harbor requires, at a minimum, a written translation of vital documents (ADA paratransit eligibility forms, Title VI complaint forms, information regarding access to essential services, etc.) for each LEP group that meets the LEP language threshold (5% or 1,000 individuals, whichever is less).

G. Minority Representation Table:

A subrecipient with transit-related, non-elected planning boards, advisory councils, or committees selected by the subrecipient must provide a table depicting the membership of those organizations broken down by race (Appendix Pg. 17). Subrecipients also must include a description of the efforts made to encourage participation of minorities on these boards, councils, and committees. A sample of a form which can be used to collect this data can be found in the Appendix (Appendix Pg. 18).

H. Title VI (Facility Location) Equity Analysis

A subrecipient planning to acquire land to construct certain types of facilities must not discriminate on the basis of race, color, or national origin, against persons who may, as a result of the construction, be displaced from their homes or businesses. “Facilities” in this context does not include transit stations or bus shelters, but instead refers to storage facilities, maintenance facilities, and operation centers.

Prior to the actual construction of a facility there are many steps involved in the planning process. It is during these planning phases that attention needs to be paid to equity and non-discrimination through equity analysis. The analysis must be done before the selection of the preferred site.

NOTE: *Even if facility construction is financed with non-FTA funds, if the subrecipient organization receives any FTA dollars, it must comply with this requirement.*

Key points:

- The subrecipient shall conduct a Title VI Equity Analysis during the planning stage of the project to ensure a location is selected in a non-discriminatory manner.
- When evaluating locations, the subrecipient must investigate other facilities that have been built in the area with similar impact to determine if there are any cumulative adverse impacts.
- If the selected location of the constructed facility results in “disparate treatment” the subrecipient must show both substantial legitimate justification for locating the facility there and evidence that there are no alternative locations.

I. Fixed Route Service Standards

Fixed route: Public transit service (other than by aircraft) provided on a repetitive, fixed-schedule basis along a specific route, with vehicles stopping to pick up passengers.

A subrecipient providing fixed route service, as defined above, must determine frequency of service, age and quality of vehicles assigned to routes, quality of stations serving different routes, or the location of routes in a non-discriminatory manner. The subrecipient must not make service decisions on the basis of race, color, or national origin. (Appendix Pg. 19).

Effective practices to fulfill the Service Standards requirements include:

- Vehicle load for each mode (Appendix Pg. 19)
- Vehicle headway for each mode (Appendix Pg. 19)
- On time performance for each mode (Appendix Pg. 21)
- Service availability for each mode (Appendix Pg. 21)

J. Fixed Route Service Policies

Fixed route: Public transit service (other than by aircraft) provided on a repetitive, fixed-schedule basis along a specific route, with vehicles stopping to pick up passengers.

A subrecipient providing fixed route service, as defined above, must determine the distribution of transit amenities or the vehicle assignments for each mode in a non-discriminatory manner. The subrecipient must develop policies to ensure service is not distributed on the basis of race, color, or national origin. (Appendix Pg. 21).

Effective practices to fulfill the Service Policies requirements include developing written policies covering each of the following service indicators:

- Transit amenities for each mode

Items of comfort, convenience and safety which are available to the general riding public such as seating, shelters, canopies, signs, maps, schedules, escalators, elevators, and waste receptacles. Although there may be different policies for different modes of transportation, amenities policies address how these amenities are distributed within a transit system in a way that ensures all riders have equal access to the amenities (Pg. 21 in the appendix).

- Vehicle assignments for each mode

The process for placing transit vehicles into service in depots and on routes throughout the transit provider's system. Policies may be based on vehicle type and service type (Pg. 21 in the appendix).

APPENDIX

RESOURCES

Please see the web addresses below for more information on federal requirements.

- FTA Circular 4702.1B (October 1, 2012) <http://www.fta.dot.gov/civilrights/12328.html>
- MAP-21, Public Law 112-141 (October 1, 2012) <http://www.fta.dot.gov/map21/>
- Limited English Proficiency (LEP), Presidential Executive Order 13166 (August, 11, 2000) <http://www.justice.gov/crt/about/cor/Pubs/eolep.php>

Other helpful resources:

- ODOT Office of Civil Rights/Intermodal <http://www.oregon.gov/ODOT/CS/CIVILRIGHTS/Pages/index.aspx>
- Title VI Program Due Dates http://www.fta.dot.gov/documents/Title_VI_Program_Due_Dates_4-1-2013.pdf
- DOT LEP Guidance <https://www.civilrights.dot.gov/civil-rights-awareness-enforcement/language-assistance/dots-lep-guidance>
- PTD's State Management Plan <http://www.oregon.gov/ODOT/PT/resources/guidance-library/state-management-plan.pdf>
- American Fact Finder (Demographic Data) <http://factfinder2.census.gov/faces/nav/jsf/pages/searchresults.xhtml?refresh=t>
- ODOT Office of Civil Rights Complaint Form: <http://www.odot.state.or.us/forms/odot/highway734/5008.pdf>

SAMPLES

All samples in this section are provided for guidance purposes only.

TITLE VI NOTICE TO THE PUBLIC

Title VI Notice
THE CITY OF USA

The City of USA operates its programs and services without regard to race, color, or national origin in accordance with Title VI of the Civil Rights Act. Any person who believes she or he has been aggrieved by any unlawful discriminatory practice under Title VI may file a complaint with the City of USA.

For more information on the City of USA's civil rights program, and the obligations and procedures to file a complaint, contact 800-656-1234, (TTY 800-656-4567); email title.VIcomplaint@abc.org; or visit our administrative office at 1234 Center Street, Anywhere, CA, 17970. For more information, visit www.city.usa.ca.us

A complainant may also file a complaint directly with the Federal Transit Administration: Office of Civil Rights, Attn: Title VI Program Coordinator, East Building, 5th Floor-TCR, 1200 New Jersey Ave., SE, Washington, DC 20590.

If information is needed in another language contact, 800-656-1234
Si se necesita información en otro idioma de contacto, 800-656-1234
Если необходима информация на другом языке контакта, 800-656-1234

NOTE: *The final sentence of the posted notice should be included in any language(s) spoken by LEP Populations meeting the Safe Harbor threshold.*

TITLE VI COMPLAINT PROCEDURE

Any person who believes she or he has been discriminated against on the basis of race, color, or national origin by the City of USA Transit Authority (hereinafter referred to as “the Authority”) may file a Title VI complaint by completing and submitting the agency’s Title VI Complaint Form. The City of USA Transit Authority investigates complaints received no more than 180 days after the alleged incident. The Authority will process complaints that are complete.

Once the complaint is received, the Authority will review it to determine if our office has jurisdiction. The complainant will receive an acknowledgment letter informing her/him whether the complaint will be investigated by our office.

The Authority has XX days to investigate the complaint. If more information is needed to resolve the case, the Authority may contact the complainant. The complainant has XX business days from the date of the letter to send requested information to the investigator assigned to the case. If

the investigator is not contacted by the complainant or does not receive the additional information within XX business days, the Authority can administratively close the case. A case can be administratively closed also if the complainant no longer wishes to pursue their case.

After the investigator reviews the complaint, she/he will issue one of two letters to the complainant: a closure letter or a letter of finding (LOF). A closure letter summarizes the allegations and states that there was not a Title VI violation and that the case will be closed. An LOF summarizes the allegations and the interviews regarding the alleged incident, and explains whether any disciplinary action, additional training of the staff member, or other action will occur. If the complainant wishes to appeal the decision, she/he has XX days after the date of the letter or the LOF to do so.

A person may also file a complaint directly with the Federal Transit Administration at:

FTA Office of Civil Rights
1200 New Jersey Avenue SE
Washington, DC 20590
http://www.fta.dot.gov/contact_us.html

TTY: 1-800-877-8339

Voice: 1-866-377-8642

VCO: 1-877-877-6280

TITLE VI COMPLAINT FORM

TITLE VI COMPLAINT FORM SAMPLE:

Section I				
Name:				
Address:				
Telephone (Home):			Telephone (Work):	
E-Mail Address:				
Accessible Format Requirements?	Large Print		Audio Tape	
	TTY		Other	
Section II				
Are you filing this complaint on your own behalf?			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):				
<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 person(s) who were involved, including the name and contact information of the person(s) who discriminated against you (if known). List name(s) and contact information of any witnesses. If more space is needed, please use the back of this form.				
<hr/> <hr/>				
Section IV				
Have you previously filed a Title VI complaint with this agency?			Yes	No
Section V				
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 and enter name of agency or court:				

<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 or court where the complaint was filed.	
Name:	
Title:	
Agency:	
Address:	
Telephone:	
Section VI	
Name of agency complaint is against:	
Contact person:	
Title:	
Telephone:	

Please 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:

City of USA
 Title VI Coordinator
 1234 Center Street
 City of USA, State 11111

LIST OF TRANSIT RELATED TITLE VI INVESTIGATIONS, COMPLAINTS & LAWSUITS

	Date (Month, Day, Year)	Summary (Include complaint basis: race, color, or national origin)	Status	Action(s) Taken
Investigations				
1.				
2.				
Lawsuits				
1.				
2.				
Complaints				
1.				
2.				

MINORITY REPRESENTATION TABLE

Body	Caucasian	Latino	African American	Asian American	Native American
Population	46%	28%	14%	8%	4%
Access Committee	60%	23%	10%	7%	0%
Citizens Advisory Council	40%	25%	20%	10%	5%
Bicycle Pedestrian Committee	45%	30%	15%	5%	5%

TITLE VI MINORITY REPRESENTATION DATA COLLECTION FORM

Name of the board, commission, council, etc.

Date:

Dear Member,

As the City of USA is a recipient of federal funds we are required under Title VI of the Civil Rights statute to ascertain the racial/ethnic make-up of any non-elected boards, commissions, councils, etc.

Data from this section is used for statistical and reporting purposes. The information may be subject to disclosure under federal or state law or rule.

Anti-Discrimination Notice

It is unlawful for the City of USA to fail or refuse to provide services, access to services or activities, or otherwise discriminate against an individual because of an individual's race, color, religion, sex, national origin, disability or veteran status.

As a council under the jurisdiction of the City of USA, we invite council members to voluntarily self-identify their race/ethnicity in order for us to comply with FTA Title VI regulations. This information will be used according to the provisions of applicable federal and state laws, executive orders and regulations, including those requiring the information to be summarized and reported to the federal government for civil rights enforcement purposes.

Race/Ethnicity

If you choose to voluntarily self-identify, please mark the one box describing the race/ethnicity category with which you primarily identify:

___ **Asian or Pacific Islander:** All persons having origins in any of the peoples of the Far East, Southeast Asia, the Indian subcontinent, or the Pacific Islands. This area includes, for example, China, Japan, Korea, the Philippine Islands and Samoa.

___ **Black (not of Hispanic origin):** All persons having origins in any of the Black racial groups of Africa.

___ **Hispanic:** All persons of Mexican, Puerto Rican, Cuban, Central or South American, or other Spanish culture or origin, regardless of race.

___ **American Indian or Alaskan Native:** All persons having origins in any of the original peoples of North America, and who maintain cultural identification through tribal affiliation or community recognition.

___ **White (not of Hispanic origin):** All persons having origins in any of the original peoples of Europe, North Africa or the Middle East.

FIXED ROUTE SERVICE STANDARDS & POLICIES

Service Standards Sample

Vehicle Load Standards

1. *Expressed in writing*

The average of all loads during the peak operating period should not exceed vehicles' achievable capacities, which are 30 passengers for a 15' mini-bus, 51 passengers for low-floor 40-foot buses, 60 passengers for standard 40-foot buses, and 133 passengers on a light rail car.

2. *Expressed in tabular format*

Vehicle Type	Average Passenger Capacities			
	Seated	Standing	Total	Max Load Factor
15' Mini-Bus	28	2	30	1.1
40' Low Floor Bus	39	12	51	1.3
40' Standard Bus	43	17	160	1.4
Light Rail Vehicle	64	69	133	2.1

Vehicle Headway Standards

1. *Expressed in writing*

Service operates on regional trunk lines every 15 minutes or better from early morning to late in the evening, seven days a week. On weekdays, 15 minute or better service should begin no later than 6:00 a.m. and continue until 10:30 p.m. On weekends, 15 minute or better service should begin by 8:00 a.m. and continue until 10:30 p.m.

Scheduling involves the consideration of a number of factors including: ridership productivity, transit/pedestrian friendly streets, density of transit-dependent population and activities, relationship to the Regional Transportation Plan, relationship to major transportation developments, land use connectivity, and transportation demand management.

2. Expressed in tabular format

POLICY HEADWAYS AND PERIODS OF OPERATION				
WEEKDAY	Peak	Base	Evening	Night
Regional Trunk	10	15	15	30
Urban Radial	15	15	30	60
Cross-Town	15	15	30	--
Secondary Radial	30	30	60	--
Feeder	30	30	60	--
Peak Express	--	--	--	--
Employer Feeder	--	--	--	--

* Peak Hours: 7-9 am and 4-6 pm; Base 9am - 4pm; Evening: 6-9:30 pm; Night: 9:30pm-Midnight; "--" means no service is provided during that time period.

SATURDAY	Day	Evening	Night
Regional Trunk	15	30	30
Urban Radial	30	60	--
Cross-Town	15	30	--
Secondary Radial	60	60	--
Feeder	60	60	--
Peak Express	--	--	--
Employer Feeder	--	--	--
SUNDAY	Day	Evening	Night
Regional Trunk	30	60	--
Urban Radial	30	60	--
Cross-Town	30	--	--
Secondary Radial	--	--	--
Feeder	--	--	--
Peak Express	--	--	--
Employer Feeder	--	--	--

* Day 7am - 6pm; Evening: 6-9:30 pm; Night: 9:30pm-Midnight; "--" means no service is provided during that time period.

ON-TIME PERFORMANCE STANDARDS

Expressed in writing

Sample 1

Ninety-five (95) percent of the City of USA's transit vehicles will complete their established runs no more than 5 minutes early or late in comparison to the established schedule/published timetables.

Sample 2

A vehicle is considered on time if it departs a scheduled time point no more than 1 minute early and no more than 5 minutes late. The City of USA's on-time performance objective is 90% or greater. The City of USA continuously monitors on-time performance and system results are published and posted as part of monthly performance reports covering all aspects of operations.

SERVICE AVAILABILITY STANDARDS

Expressed in writing

The City of USA will distribute transit service so that 90% of all residents in the service area are within a ¼-mile walk of bus service or within a ½-mile walk of rail service.

and/or

Local bus stops will be not more than 3 blocks apart. Express bus stops will be one-half to three-quarters of a mile apart.

SERVICE POLICY SAMPLE

Vehicle Assignment Policy

Vehicles will be assigned to the South, North, and East depots such that the average age of the fleet serving each depot does not exceed "x" years. Low-floor buses are deployed on frequent service and other high-ridership lines, so these buses carry a higher share of ridership than their numerical proportion of the overall bus fleet. Low-floor buses are also equipped with air conditioning and automated stop announcement systems.

Bus assignments take into account the operating characteristics of buses of various lengths, which are matched to the operating characteristics of the route. Local routes with lower ridership may be assigned 30-foot buses rather than the 40-foot buses. Some routes requiring tight turns on narrow streets are operated with 30-foot rather than 40-foot buses.

Transit Amenities Policy

Installation of transit amenities along bus routes are based on the number of passenger boardings at the stops along those routes.