



*South East Area Transit*

***Federal Transit Administration  
Title VI Program***

**South East Area Transit**

**Adopted Date:**

**August 10, 2022**

Agency: South East Area Transit  
Address: 375 Fairbanks Zanesville, Oh 43701

Civil Rights Contact: Howard Stewart, Jr.  
Contact Title: Transit Director  
Contact Phone: 740-454-8574  
Contact Email: [director@seatbus.org](mailto:director@seatbus.org)

## **Title VI Plan Table of Contents**

The South East Area Transit Title VI plan includes the following elements:

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**Section 1: Title VI Plan Approval**

Title VI Plan  
Adopted on: August 10, 2022

Adopted by: South East Area Transit Board of Trustees

Signature(s): 

**Title VI Plan Revision Log**

<b>Date</b> Month/day/year	<b>Section Revised</b>	<b>Summary of Revisions</b>
09/09/2015	Entire Plan Revised	Revised Entire Plan
09/18/2019	Entire Plan Updated	Names, Addresses and Contact numbers
08/10/2022	Entire Plan Revised and Updated	New Template Entire Plan

## **Section 2: Title VI Policy Statement**

### **Policy Statement**

South East Area Transit, operating as a fixed-route and demand response transit provider, and as a recipient of Federal Transit Administration (FTA) grant dollars either directly from FTA or through the Ohio Department of Transportation (ODOT), will comply with the Title VI of the Civil Rights Act of 1964 (42 U.S.C. 2000d), the U.S. Department of Transportation implementing regulations, FTA Circular 4702.1B, and ODOT Public Transportation requirements as specified in Master Grant Agreement, and State Management Plan. South East Area Transit operates its programs and services without regard to race, color, and national origin in accordance with Title VI of the Civil Rights Act.

### Section 3: Notice to the Public

#### Title VI Notice to the Public

The South East Area Transit's Notice to the Public is as follows:

### Notifying the Public of Rights Under Title VI

## South East Area Transit

- The South East Area Transit operates its programs and services without regard to race, color, and 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 South East Area Transit.
- For more information on the South East Area Transit's civil rights program, the procedures to file a complaint, or to file a complaint, please contact Howard Stewart, Jr, Transit Director at 740-454-8574, X 103, (TTY 800-750-0750); email Director@Seatbus.org; or visit our administrative office at 375 Fairbanks St, Zanesville Ohio 43701. For more information, visit [www.seatbus.org](http://www.seatbus.org)
- For transportation-related Title VI matters, a complaint may also be filed directly with the Ohio Department of Transportation, Attn: Office of Equal Opportunity, 1980 West Broad Street, Mailstop 3270, Columbus, OH 43223; or the Federal Transit Administration, Office of Civil Rights, Attention: Complaint Team, East Building, 5<sup>th</sup> Floor-TCR, 1200 New Jersey Ave., SE Washington, DC, 20590.
- If information is needed in another language, contact (740) 454-8574.

South East Area Transit Notice to the Public is posted in the public areas of the office and inside the transit vehicles.

1. 375 Fairbanks, Zanesville Ohio 43701
2. 224 Main Street, Zanesville Ohio 43701
3. 61322 Southgate Rd, Cambridge Ohio 43725
4. 300 E Church St, Barnesville, OH 43713

**Notificación al público de derechos bajo el Título VI**

## South East Area Transit

- El South East Area Transit opera sus programas y servicios sin distinción de raza, color y origen nacional, según el Título VI de la Ley de Derechos Civiles. Cualquier persona que cree o que ha sido perjudicada por una práctica discriminatoria ilegal bajo el Título VI puede presentar una queja con el South East Area Transit.
- Para obtener más información sobre el programa de derechos civiles de South East Area Transit, o para obtener más información sobre los procedimientos para presentar una queja, por favor llame a Howard Stewart, Jr, Transit Director, 740-454-8574, X 103, (TTY 800-750-0750), Director@Seatbus.org o visite nuestra oficina administrativa en 375 Fairbanks St, Zanesville Ohio 43701.
- Undemandante puede presentar una queja directamente a la el Departamento de Transporte del estado de Ohio, Attn: Office of Equal Opportunity, 1980 West Broad Street, Mailstop 3270, Columbus, OH 43223.
- Undemandante puede presentar una queja directamente a la Administración Federal de tránsito, Office of Civil Rights, Atención: Complaint Team, East Building, 5<sup>th</sup> Floor-TCR, 1200 New Jersey Ave., SE Washington, DC, 20590.
- Si se necesita información en otro idioma, comuníquese con (740) 454-8574 (TTY 800-750-0750).

El Aviso de Tránsito para el Área Sudeste para el Público está publicado en las áreas públicas de la oficina y dentro de los vehículos de tránsito.

1. 375 Fairbanks, Zanesville Ohio 43701
2. 224 Calle Principal, Zanesville Ohio 43701
3. 61322 Southgate Rd, Cambridge Ohio 43725
4. 300 E Church St, Barnesville, OH 43713

## Benachrichtigung der Öffentlichkeit über Rechte gemäß Titel VI

### South East Area Transit

- The South East Area Transit führt seine Programme und Dienstleistungen ohne Rücksicht auf Rasse, Hautfarbe und nationale Herkunft gemäß Titel VI des Civil Rights Act durch. Jede Person, die glaubt, dass sie oder er durch eine rechtswidrige diskriminierende Praxis gemäß Titel VI benachteiligt wurde, kann eine Beschwerde beim South East Area Transit einreichen.
- Für weitere Informationen über das Bürgerrechtsprogramm des South East Area Transit, die Verfahren zum Einreichen einer Beschwerde oder zum Einreichen einer Beschwerde wenden Sie sich bitte an Howard Stewart, Jr., Transit Director, unter 740-454-8574, (TTY 800-750- 0750); E-Mail an [director@seatbus.org](mailto:director@seatbus.org); oder besuchen Sie unser Verwaltungsbüro in 375 Fairbanks Zanesville, Oh 43701. Weitere Informationen finden Sie unter [www.seatbus.org](http://www.seatbus.org)
- Für transportbezogene Titel-VI-Angelegenheiten kann eine Beschwerde auch direkt beim Ohio Department of Transportation, Attn: Office of Equal Opportunity, 1980 West Broad Street, Mailstop 3270, Columbus, OH 43223, eingereicht werden; oder die Federal Transit Administration, Office of Civil Rights, Attention: Complaint Team, East Building, 5th Floor-TCR, 1200 New Jersey Ave., SE Washington, DC, 20590.
- Wenn Informationen in einer anderen Sprache benötigt werden, wenden Sie sich an (740) 454-8574.

Öffentlich bekannt gemachte Transitmitteilungen für den Bereich South East werden in den öffentlichen Bereichen des Büros und in den Transitfahrzeugen ausgehängt.

1. 375 Fairbanks, Zanesville Ohio 43701
2. Hauptstraße 224, Zanesville Ohio 43701
3. 61322 Southgate Road, Cambridge Ohio 43725
4. 300 E Church Street, Barnesville, OH 43713

#### Section 4: Title VI Complaint Procedure

The South East Area Transit's Title VI Complaint Procedure is made available in the following locations:

- Agency website: [www.seatbus.org](http://www.seatbus.org)

- Hard copy in the central office
  - Agency Title VI Plan
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Any individual, group of individuals, or entity that believes they have been discriminated against on the basis of race, color, or national origin by the South East Area Transit may file a Title VI complaint by completing and submitting the agency's Title VI Complaint Form.

Any individual having filed a complaint or participated in the investigation of a complaint shall not be subjected to any form of intimidation or retaliation. Individuals who have cause to think that they have been subjected to intimidation or retaliation can file a complaint of retaliation following the same procedure for filing a discrimination complaint.

A complaint must be filed with the South East Area Transit no later than 180 days after the following:

1. The date of the alleged act of discrimination; or
2. The date when the person(s) became aware of the alleged discrimination; or
3. Where there has been a continuing course of conduct, the date on which that conduct was discontinued of the latest instance of the conduct.

Once the complaint is received, the South East Area Transit will review it to determine if our office has jurisdiction. A copy of each Title VI complaint received will be forwarded to the Ohio Department of Transportation within ten (10) calendar days of receipt. The complainant will receive an acknowledgment letter informing her/him whether the complaint will be investigated by our office.

The South East Area Transit has 45 days to investigate the complaint. If more information is needed to resolve the case, the South East Area Transit may contact the complainant requesting further information. The complainant has 15 business days from the date of the letter to send the 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 15 business days, the South East Area Transit can administratively close the case.

After the investigator reviews the complaint, she/he will issue one of two (2) 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.
- ✓ A letter of finding (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 15 days after the date of the closure letter or the letter of finding to do so. The appeal process information will be included in the letter.

A person may also file a complaint directly with the: Ohio Department of Transportation, Attn: Office of Equal Opportunity, 1980 West Broad Street, Mailstop 3270, Columbus, OH 43223; or Federal Transit Administration, Office of Civil Rights, Attention: Complaint Team, East Building, 5<sup>th</sup> Floor-TCR, 1200 New Jersey Ave., SE Washington, DC, 20590.

If information is needed in another language, then contact (740) 454-8574. (TTY 800-750-0750)

### Section 5: Title VI Complaint Form

<b>Section I:</b>
<b>Name:</b>



<b>Address:</b>				
<b>Telephone (Home):</b>			<b>Telephone (Work):</b>	
Email Address:				
Accessible Requirements?	Format	Large Print		Audio Tape
		TDD		Other
<b>Section II:</b>				
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
<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. Include the name and contact information of the person(s) who discriminated against you (if known) as well as names and contact information of any witnesses. If more space is needed, please use the back of this form.				
_____				
_____				
_____				
<b>Section IV</b>				
Have you previously filed a Title VI complaint with this agency?			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

\_\_\_\_\_  
Signature

\_\_\_\_\_  
Date

If information is needed in another language, contact 740-454-8574, Option #1.

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

**South East Area Transit**

**Transit Director  
South East Area Transit  
375 Fairbanks Street  
Zanesville, Ohio 43701**

**Section 6: List of Transit Related Title VI Investigations, Complaints and Lawsuits**

The South East Area Transit maintains a list or log of all Title VI investigations, complaints, and lawsuits, pertaining to its transit-related activities.

**Check One:**

There have been no investigations, complaints and/or lawsuits filed against us since the last plan submission.

There have been investigations, complaints and/or lawsuits filed against us. *See list below. Attach additional information as needed.*

	<b>Date</b> (Month, Day, Year)	<b>Summary</b> (include basis of complaint: race, color, or national origin)	<b>Status</b>	<b>Action(s) Taken</b>
<b>Investigations</b>				
1.				
2.				
<b>Lawsuits</b>				
1.				
2.				
<b>Complaints</b>				
1.				
2.				

## Section 7: Public Participation Plan

### Strategies and Desired Outcomes

To promote inclusive public participation, the South East Area Transit will employ the following strategies, as appropriate (make these determinations based on a demographic analysis of the population(s) affected, type of plan, program and/or service under consideration, and the resources available):

- ✓ Provide for early, frequent and continuous engagement by the public.
- ✓ Select accessible and varied meeting locations and times
- ✓ Employ different meeting sizes and formats
- ✓ Use social media in addition to other resources as a way to gain public involvement
- ✓ Use radio, television or newspaper ads on stations and in publications that serve LEP populations. Outreach to LEP populations may also include audio programming available on podcasts.
- ✓ Expand traditional outreach methods by visiting ethnic stores/markets and restaurants, community centers, libraries, faith-based institutions, local festivals, etc.

### Public Outreach Activities

The public outreach and involvement activities conducted by the South East Area Transit since the last Title VI Program submission are summarized in the table below.

Event Date	South East Area Transit Staffer(s)	Activity	Communication Method (Public Notice, Posters, Social Media)	Notes
9-22-21	Marketing and Mobility Management Staff	Car Free Day/GC Pass out Flyer/SEAT Information & Mobility Management	Social Media	Community Presentation & United Way Kick-Off Downtown Cambridge
10-8-2021	Marketing and Mobility Management Staff	Customer Appreciation Day	Social Media	Public Awareness of SEAT and services provided

## Section 8: Limited English Proficient Plan

### Plan Components

As a recipient of federal US DOT funding, the South East Area Transit is required to take reasonable steps to ensure meaningful access to our programs and activities by limited-English proficient (LEP) persons.

Limited English Proficient (LEP) refers 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.

The South East Area Transit's Limited English Proficiency Plan includes the following elements:

- ☒ The results of the *Four Factor Analysis*, including a description of the LEP population(s), served.
- ☒ A description of how Limited English Proficiency services are provided by language.
- ☒ A description of how LEP persons are informed of the availability of Limited English Proficiency service.
- ☒ A description of how the Limited English Proficiency plan is monitored and updated.
- ☒ A description of how employees are trained to provide Limited English Proficiency to LEP persons.

### Four Factor Analysis Methodology

To determine if an individual is entitled to Limited English Proficiency and what specific services are appropriate, the South East Area Transit has conducted a *Four Factor Analysis* of the following areas: 1) LEP Demography, 2) Contact Frequency, 3) Importance of Service, and 4) Resources and Costs.

**Factor 1: The number or proportion of LEP persons eligible to be served or likely to be encountered by the program or recipient.**

- **SEAT's service area is Muskingum County population 86,410, Guernsey County population 38,483, Noble County population 14,115, and Specialized Transportation in Belmont County population 66,497. The total population of SEAT's service area is 205,460.**

In addition to the number or proportion of LEP persons served, the **South East Area Transit** will identify:

- (a) How LEP persons interact with the recipient's agency;
  - The LEP population in SEAT's service area of Muskingum, Guernsey, Noble, and Belmont Counties is considered small LEP population counties. SEAT rarely comes into contact with non-English speaking passengers but are prepared in the event we do.
- (b) Identification of LEP communities, and assessing the number or proportion of LEP persons from each language group to determine the appropriate language services for each language;
  - Upon researching the language types and population at <https://data.census.gov/cedsci/>, using table C16001, it was determined that the total population for our service counties was 205,460 with the total population of residents 5 years of age or older, who speak a language other than English was 4,938 or 2.5%, thus confirming our small LEP population status.
- (c) Since the requests for translations are minimal (no requests for translation in the past ten years), SEAT will continue to provide translation services, even though there is no projected interaction.

**Factor 2: The frequency with which LEP persons come into contact with the program.** Identifies and assesses the frequency South East Area Transit’s staff comes into contact with LEP persons. Examples of contact could include:

- (a) Use of bus service;
- (b) Purchase of tickets through satellite offices, websites, and over the phone;
- (c) Participation in public meetings;
- (d) Customer service interactions;
- (e) Ridership surveys;
- (f) Operator surveys.

**Factor 3: The nature and importance of the program, activity, or service provided by the program to people’s lives.**

*SEAT provides public transportation to the service area already mentioned in Factor 1. Persons accessing public transportation through SEAT utilize the services for employment, medical, educational, and social purposes. Many riders do not have any other means of transportation, and are truly transit dependent. As there have been so few encounters with LEP persons to date, it is only assumed that those individuals that are identified as LEP persons would most likely have similar reasons for using public transit. Public outreach providing information about the transportation services available with the community is ongoing. SEAT has developed an “On-the-Go” program to assist new riders with any education or logistical they may need in order to utilize our services. Working with our local social service agencies and organization, we continue to work to identify LEP populations and how we may better serve those areas/individuals through outreach efforts and accessibility.*

**Factor 4: The resources available to the recipient for LEP outreach, as well as the costs associated with that outreach.**

Although it is not likely that there will be very many more encounters with LEP persons in the foreseeable future, it is desirable to make every effort to remove any barriers that are presented to LEP persons to keep them from accessing SEAT services. SEAT is located in Zanesville and Cambridge, OH where there is a local branch of Ohio University which provides ASL interpreters that we may contact if necessary. We are able to use teachers in our local school district for languages such as Spanish, Latin, German or French. In addition, we contract for translation/interpretation services with Certified Language International (CLI) this service offers 121 different language translation/interpretation at touch of a phone 24 hour a day. In addition, our staff each carries a one-page language identification card for any individual with limited English to request the appropriate language in which they would like an interpreter.

Item #1 – Results of the Four Factor Analysis (including a description of the LEP population(s) served)

**Factor 1: The number or proportion of LEP persons eligible to be served or likely to be encountered.**

Of the 205,460 residents in the South East Area Transit service area, 4938 residents describe themselves as speaking English less than “very well”. Due to a high Amish and Mennonite population in our service, people of German descent are the primary LEP persons likely to utilize South East Area Transit services. Of the 2,278 individuals in this category, only 31% of them state that they speak English “less than very well”. For the South East Area Transit service area, the latest U.S. Census Bureau data shows that among the area’s population 2.5% speak English “less than very well”. **For these groups** who speak English “less than very well”, 0.3% speak German.

Belmont, Guernsey, Muskingum and Noble Counties – Languages Spoke at Home

	Total Number	Percent of Population	Total Population of Counties
Speak Language other than English	4938	2.4%	205,460
Speak English Less than Very Well	1405	0.6%	205,460
German	703	0.3%	205,460
Spanish	281	0.1%	205,460
Other	341	0.1%	205,460

**Factor 2: The frequency with which LEP persons come into contact with the program.**

South East Area Transit assessed the frequency with which staff and drivers have, or could have, contact with LEP persons. South East Area Transit provides approximately 120,000 passenger trips per year. If an individual has speech limitations, the dispatcher or driver will work with the Transit staff and ODOT, if needed, to ensure the individual receives access to the transit services.

**Factor 3: The nature and importance of the program, activity, or service provided by the program to people's lives.**

All of South East Area Transit's programs are important; however, those related to safety, public transit, nondiscrimination and public involvement are among the most important. The South East Area Transit is committed to providing meaningful access and will provide written translation for any of its documents, when reasonable, effective and with the available resources. In other cases, the South East Area Transit will strive to provide alternative but meaningful accessibility. Moreover, the South East Area Transit continually evaluates its programs, services, and activities to ensure that persons who may be LEP are always provided with meaningful access.

**Factor 4: The resources available for LEP outreach, as well as the costs associated with that outreach.**

The South East Area Transit makes every effort to make its programs, services, and activities, accessible to LEP individuals. The South East Area Transit will use available resources, both internal and external to accommodate reasonable requests for translations.

**Item # 2 – Description of how Limited English Proficiency Services are Provided, by Language**

The South East Area Transit has identified, developed, and uses the following:

- a) Individuals who have contact with the public are provided with "I Speak" language cards to identify language needs in order to match them with available services. Language cards verified and distributed by the SEAT Staff as needed.
- b) The South East Area Transit has developed partnerships with local agencies, organizations, law enforcement, colleges/universities, local school districts and social service agencies that are available to assist with it LEP responsibilities.
- c) A web-based translation service is available if requested, as needed.

**Item # 3 - Description of how LEP Persons are Informed of the Availability of Limited English Proficiency Service**

In order to ensure that LEP individuals are aware of South East Area Transit's Limited English Proficiency measures, South East Area Transit provides the following:

- Title VI Program including the Limited English Plan is made available on website, if applicable, and hard copy in central office.
- Drivers and dispatchers are provided "I Speak" language cards to identify language needs in order to match them with available services.

**Item # 4 – Description of how the Limited English Plan is Monitored and Updated**

South East Area Transit will continue to update the LEP plan as required by U.S. DOT. At a minimum, the plan will continue to be reviewed and updated every three (3) years in conjunction with the Title VI submission, or when data from a new U.S. Census is available, or when it is clear that the concentrations of LEP individuals are present in the South East Area Transit service area.



Updates will continue to include the following:

- The number of documented LEP person contacts encountered annually.
- How the needs of LEP persons have been addressed.
- Determination of the current LEP population in the service area.
- Determine whether South East Area Transit's financial resources are sufficient to fund Limited English Proficiency resources needed.
- Determine whether complaints have been received concerning South East Area Transit's failure to meet the needs of LEP individuals

Item # 5 - Description of how Employees are Trained to Provide Limited English Proficiency to LEP Persons
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The following training will continue to be provided to South East Area Transit staff as specified in the Limited English Proficiency Program Procedure:

- Information on the South East Area Transit Title VI Procedures and LEP responsibilities.
- Description of Limited English Proficiency services offered to the public.
- Use of "I Speak" language cards (used to identify language preference).
- Documentation of Limited English Proficiency requests.
- Use of web-based interpreter services (over the phone interpretation provider).
- How to handle a potential Title VI/LEP complaint.



## **LEP Policy**

**South East Area Transit** shall provide for communication for limited English proficient riders to ensure them equal opportunity to benefit from services. Family members or friends of limited English proficient riders will not be used as translators unless specifically requested by that individual. Arrangements have been made with Certified Language International and local colleges and high schools to obtain translators. The agency will also utilize web-based translator programs if available.

**If you need help with English, please call 740-454-8574.**

**Si usted necesita ayuda con el inglés, por favor llame 740-454-8574.**



**Section 9: Minority Representation Information**

Recipients that have transit-related, non-elected planning boards, advisory councils or committees, or similar committees, the membership of which is selected by the recipient, must provide a table depicting the racial breakdown of the membership of those committees, and a description of efforts made to encourage the participation of minorities on such committees.

**Guidance:** Elected transit-related board, committee, or council, do not need to complete the table below, and write in section B that there are no non-elected transit-related boards, committees, or councils.

**A. Minority Representation Table**

**Table Depicting Membership of Board, Committees, Councils, Broken Down by Race**

Body	Caucasian	Hispanic	African American	Asian American	Native American	Two or More Races
Population						
[Insert Name of Committee/Board]						

**B. Efforts to Encourage Minority Participation**

The South East Area Transit Board of Trustees By-Laws specify that Board members are appointed by local government officials.

**Section 10: Providing Assistance to and Monitoring Subrecipients**

1. Does agency provide funding to subrecipients?

No, the agency does not have subrecipients.

Yes. If yes, list the subrecipient names here: Click or tap here to enter text.

South East Area Transit monitors subrecipients using the following process:

1. South East Area Transit uses the following process for ensuring all subrecipients are complying with the general reporting requirements of FTA Circular 4702.1B by doing the following: Click or tap here to enter text.
2. South East Area Transit collects Title VI programs from the subrecipients listed above and reviews programs for compliance by doing the following: Click or tap here to enter text.

**Section 11: Title VI Equity Analysis**

1. Has the agency built a facility? (check a response below)

No, the agency has not built a facility.

Yes, the agency has built a facility and completed a Title VI equity analysis to compare the equity impacts of various siting alternatives, and the analysis must occur before the selection of the preferred site.

**Section 12: Requirements for Metropolitan Planning Organizations (MPOs)**

N/A

All MPOs must meet the following requirements if the agency is included in the MPO constituency.

MPO Requirements (Ref: FTA Circular 4702.1B Chapter VI)	Status
1) Does the plan contain a demographic profile of the metropolitan area that includes identification of the locations of minority populations in the aggregate?	<input type="checkbox"/> Y <input type="checkbox"/> N
2) A description of the procedures by which the mobility needs of minority populations are identified and considered within the planning process?	<input type="checkbox"/> Y <input type="checkbox"/> N
3) Demographic maps that overlay the percent minority and non-minority populations as identified by Census or American Community Survey (ACS) data, at the Census tract or block group level, and charts that analyze the impacts of the distribution of State and Federal funds in the aggregate for public transportation purposes, including federal funds managed by the MPO as a designated recipient?	<input type="checkbox"/> Y <input type="checkbox"/> N
4) Analysis of disparate impacts on the basis of race, color, or national origin, and, if so, determines whether there is a substantial legitimate justification for the policy that resulted in the disparate impacts, and if there are alternatives that could be employed that would have a less discriminatory impact.	<input type="checkbox"/> Y <input type="checkbox"/> N
Comments:	