

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

Allen County Council on Aging

May 3, 2022

(Plan expires 3 years from date approved by the board)

Ohio Department of Transportation Division of Opportunity, Diversity & Inclusion
Office of Civil Rights Compliance
Mail Stop:3270
1980 West Broad Street Columbus, Ohio 43223

Complaint Filing Process at Office of Civil Rights Compliance Phone Numbers:
614-466-3264 or 877-845-5058 Ohio Relay Service 800-750-0750

Title VI Contact: Michael Hensley, Executive Director
Phone Number: 419-228-5135
Email: mhensley@accoa.org

TTY Number: 1-800-750-0750

Address: 700 N. Main Street Lima, Ohio 45801

Web Address: www.accoa.accoa.org

Para Informacion en Espanol: Gerry Burton or Pam Fitzgerald 419-228-5135

Title VI Plan Table of Contents

The Allen County Council on Aging Title VI plan includes the following elements:

1. Plan Approval and Revision Log
2. Policy Statement
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5. Complaint Form
6. List of transit related Title VI Investigations, Complaints and Lawsuits
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Allen County Council on Aging, Inc.

TITLE VI PLAN

ALLEN COUNTY COUNCIL on AGING, INC.
BOARD OF DIRECTORS

RESOLUTION

WHEREAS, Allen County Council on Aging, Inc. as a requirement of the Ohio Department of Transportation (ODOT) 5310 vehicle grant application and process has revised/updated the agency's TITLE VI PLAN that includes:

- TITLE VI Non Discrimination Notice To The Public
- TITLE VI Limited English Proficiency Plan
- TITLE VI Public Participation Plan
- TITLE VI Discrimination Complaint Procedure
- TITLE VI Discrimination Complaint Form

WHEREAS, Allen County Council on Aging, Inc. Governing Board of Directors has reviewed and approved said TITLE VI PLAN on 5-3-2022

THEREFORE, IT IS RESOLVED that THE TITLE VI PLAN is reviewed and approved as the TITLE VI PROGRAM/PLAN of Allen County Council on Aging, Inc.

Sue Grusenmeyer 5-3-2022
 Sue Grusenmeyer Date
 Board Corporate Secretary
 Allen County Council on Aging, Inc.

Michael K Hensley 5-3-2022
 Michael K. Hensley, MPA Date
 Executive Director
 Allen County Council on Aging, Inc.

Pamela Jennings 5/3/2022
 Pamela Jennings Date
 Board President
 Allen County Council on Aging, Inc.



Section 1: Title VI Plan Approval

Title VI Plan
 Adopted on: 5-3-2022

Adopted by: Allen County Council on Aging Board of Directors

Signature(s): Michael K. Hensley, MPA, Ex. Director Michael K. Hensley 5/3/2022

Include documentation to show approval (i.e., minutes, resolutions, ordinance, etc.)

Title VI Plan Revision Log

Date Month/day/year	Section Revised	Summary of Revisions

Section 2: Title VI Policy Statement

Policy Statement

The **Allen County Council on Aging**, operating demand response transit provider, 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. The **Allen County Council on Aging** 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 Allen County Council on Aging's Notice to the Public is as follows:

Notifying the Public of Rights Under Title VI

THE ALLEN COUNTY COUNCIL ON AGING

- The **Allen County Council on Aging** 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 **Allen County Council on Aging**.
- For more information on the **Allen County Council on Aging's** civil rights program, the procedures to file a complaint, or to file a complaint, please contact Michael Hensley, Executive Director at 419-228-5135 (TTY 1-800-750-0750); email mhensley@accoa.org or visit our administrative office at 700 N. Main Street Lima, Ohio 45801 for more information, visit accoa.accoa.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

Federal Transit Administration, Office of Civil Rights, Attention: Complaint Team, East Building, 5th Floor-TCR, 1200 New Jersey Ave., SE Washington, DC, 20590.

- If information is needed in another language, contact 419-228-5135
FYI: This statement should be stated in English and in any other language(s) spoken by LEP populations that meet the Safe Harbor threshold

The **Allen County Council on Aging** Notice to the Public is posted in the public areas of the office and inside the transit vehicles.

1. Agency Lobby
2. In the front of all vehicles

Sample Title VI Notice to the Public in Spanish

Note: The translation of vital documents must be verified for accuracy. You cannot assume that what is written in this template accurately conveys the rights included in your Title VI notice. You also cannot rely on Google Translate without additional verification.

Notificación al público de derechos bajo el Título VI

- El Allen County Council on Aging 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 Allen County Council on Aging
- Para obtener más información sobre el programa de derechos civiles de Allen County Council on Aging, o para obtener más información sobre los procedimientos para presentar una queja, por favor llame a Michael Hensley, Executive Director 419-228-5135, (TTY 1-800-750-0750), mhensley@accoa.org o visite nuestra oficina administrativa en 700 N. Main Street Lima, Ohio 45801
- Un demandante 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.
- Un demandante puede presentar una queja directamente a la Administración Federal de tránsito, Office of Civil Rights, Atención: Complaint Team, East Building, 5th Floor-TCR, 1200 New Jersey Ave., SE Washington, DC, 20590.
- Si se necesita información en otro idioma, comuníquese con 419-228-5135.

Section 4: Title VI Complaint Procedure

The **Allen County Council on Aging** Title VI Complaint Procedure is made available in the following locations:

- Agency website, if available: accoa.accoa.org
 - Hard copy in the central office
 - Agency Title VI Plan
-

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 **Allen County Council on Aging** 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 **Allen County Council on Aging** 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 **Allen County Council on Aging** 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 acknowledgement letter informing her/him whether the complaint will be investigated by our office.

The **Allen County Council on Aging** has 45 days to investigate the complaint. If more information is needed to resolve the case, the **Allen County Council on Aging** may contact the complainant requesting further information. The complainant has 30 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 30 business days, the **Allen County Council on Aging** 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 30 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, 5th Floor-TCR, 1200 New Jersey Ave., SE Washington, DC, 20590.

If information is needed in another language, then contact (419)-228-5135

Section 5: Title VI Complaint Form

The **Allen County Council on Aging** Title VI Complaint Procedure is made available in the following locations:

- Agency website, if available: accoa.accoa.org
- Hard copy in the central office
- Agency Title VI Plan

Section I:			
Name:			
Address:			
Telephone (Home):		Telephone (Work):	
Email Address:			
Accessible Requirements?	Format	Large Print TDD	Audio Tape 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 persons who were involved. Include the name and contact information of the person(s) who discriminated against you (if known) as well as names and contact information of any witnesses. If more space is needed, please use the back of this form.			

Section IV			

Have you previously filed a Title VI complaint with this agency?	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: <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.		
Name:		
Title:		
Agency:		
Address:		
Telephone:		
Section VI		
Name of agency complaint is against:		
Contact person:		
Title:		
Telephone number:		

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

Signature and date required below

Signature

Date

If information is needed in another language, contact 419-228-5135.

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

Allen County Council on Aging, 700 North Main Street, Lima, Ohio 45801

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

The **Allen County Council on Aging** maintains a list or log of all Title VI investigations, complaints and lawsuits, pertaining to its transit-related activities.

Check One:

 X There have been no investigations, complaint 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.*

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

Section 7: Public Participation Plan

Strategies and Desired Outcomes

To promote inclusive public participation, the **Allen County Council on Aging** 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 **Allen County Council on Aging** since the last Title VI Program submission are summarized in the table below.

Enter specific Public Participation activities in the table below.

Event Date	Allen County Council on Aging Staffer(s)	Activity	Communication Method (Public Notice, Posters, Social Media)	Notes
6-17-2020	Gerry Burton	Allen County Fair	In person booth at fair	
6-16-2019	Gerry Burton	Allen County Fair	In person booth at fair	
Monthly	Pam Fitzgerald	West Central Ohio Community Action Partnership	In Person Board Member	

Section 8: Language Assistance Plan

Plan Components

As a recipient of federal US DOT funding, the **Allen County Council on Aging** 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 **Allen County Council on Aging** Language Assistance Plan includes the following elements:

Item #1: The results of the *Four Factor Analysis*, including a description of the LEP population(s), served.

Item #2: A description of how language assistance services are provided by language

Item #3: A description of how LEP persons are informed of the availability of language assistance service

Item #4: A description of how the language assistance plan is monitored and updated

Item #5: A description of how employees are trained to provide language assistance to LEP persons

Four Factor Analysis Methodology

To determine if an individual is entitled to language assistance and what specific services are appropriate, the **Allen County Council on Aging** 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. In addition to the number or proportion of LEP persons served, the **Allen County Council on Aging** will identify:

- (a) How LEP persons interact with the recipient's agency;
- (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;
- (c) The literacy skills of LEP populations in their native languages, in order to determine whether translation of documents will be an effective practice; and
- (d) Whether LEP persons are underserved by the recipient due to language barriers.

Factor 2: The frequency with which LEP persons come into contact with the program. Identifies and assesses the frequency **Allen County Council on Aging** staff comes into contact with LEP persons. Examples of contact could include:

- (a) Use of bus and rail service;

- (b) Purchase of tickets through vending machines, outlets, 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. Generally speaking, the more important the program, the more frequent the contact and the likelihood that language services will be needed.

This section discusses how the **Allen County Council on Aging** program and services impact the lives of people within the community. The **Allen County Council on Aging** will specify the community organizations that serve LEP persons, if available.

Factor 4: The resources available to the recipient for LEP outreach, as well as the costs associated with that outreach. Resource and cost issues can often be reduced by technological advances, reasonable business practices, and the sharing of language assistance materials and services among and between recipients, advocacy groups, LEP populations and Federal agencies. Large entities and those entities serving a significant number of LEP persons should ensure that their resource limitations are well substantiated before using this factor as a reason to limit language assistance.

The summary below discusses the low-cost methods the **Allen County Council on Aging** uses to provide outreach to LEP persons as well as train staff (and transit provider/lessee, if applicable) on Title VI and LEP principles.

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 residents in the Allen County Council on Aging service area, 810 residents describe themselves as speaking English less than “very well”. People of Spanish descent are the primary LEP persons likely to utilize Allen County Council on Aging services. For the Allen County Council on Aging service area, the latest U.S. Census Bureau data shows that among the area’s population .8% speak English “less than very well”. **For these groups** who speak English “less than very well”, 1.3% speak Spanish.

Allen County – Languages Spoke at Home⁴⁵

	Total Number	Percent of Population	Total Population of County
Speak Language other than English	1892	2.4%	96546
Speak English Less than Very Well	810	.8%	96546
Spanish	1267	1.3%	96546
Other Indo-European	917	.9%	96546

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

Allen County Council on Aging assessed the frequency with which staff and drivers have, or could have, contact with LEP persons. Allen County Council on Aging provides approximately 20,000 passenger trips per year. If an individual has speech limitations, the dispatcher or driver will work with the Transit Manager 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 Allen County Council on Aging’s programs are important; however, those related to safety, public transit, nondiscrimination and public involvement are among the most important. The Allen County Council on Aging 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 Allen County Council on Aging will strive to provide alternative but meaningfully accessibility. Moreover, the Allen County Council on Aging continually evaluates its programs, services, and activities to ensure that persons who may be LEP are always provided with meaningful access. The Title VI policy, complaint form, and LEP policy are available in Spanish upon request.

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

The Allen County Council on Aging makes every effort to make its programs, services, and activities, accessible to LEP individuals. The Allen County Council on Aging will use available resources, both internal and external to accommodate reasonable requests for translations.

Item # 2 – Description of how Language Assistance Services are Provided, by Language

The Allen County Council on Aging 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 Director as needed.
- b) The Allen County Council on Aging has developed partnerships with individuals, 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 list of web-based translation services can be provided by contracting the Human Resources Department.

Item # 3 - Description of how LEP Persons are Informed of the Availability of Language Assistance Service

In order to ensure that LEP individuals are aware of Allen County Council on Aging language assistance measures, Allen County Council on Aging provides the following:

- Title VI Program including the Language Assistance 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 Language Assistance Plan is Monitored and Updated

Allen County Council on Aging 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 the 2020 U.S. Census is available, or when it is clear that the concentrations of LEP individuals are present in the Allen County Council on Aging 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.
- Determination as to whether the need for translation services has changed.
- Determine whether local language assistance programs have been effective and sufficient to meet the need.
- Determine whether Allen County Council on Aging financial resources are sufficient to fund language assistance resources needed.
- Determine whether Allen County Council on Aging has fully complied with the goals of this LEP Plan.
- Determine whether complaints have been received concerning Allen County Council on Aging failure to meet the needs of LEP individuals

Item # 5 - Description of how Employees are Trained to Provide Language Assistance to LEP Persons

The following training will continue to be provided to Allen County Council on Aging's staff:

- Information on the Allen County Council on Aging Title VI Procedures and LEP responsibilities.
- Description of language assistance services offered to the public.
- Use of "I Speak" language cards (used to identify language preference).
- Documentation of language assistance requests.
- Use of web-based interpreter services (over the phone interpretation provider).
- How to handle a potential Title VI / LEP complaint.

Limited English Proficient (LEP) Resource Materials:

LEP Policy

Allen County Council on Aging 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 Spanish speaking individuals to obtain translators. The agency will also utilize web-based translator programs if available.

If you need help with English, please call 419-228-5135

Si usted necesita ayuda con el inglés, por favor llame 419-228-5135

“I Speak” Language Identification Card

Mark this Box if you speak...	Language Identification Chart	Language
	Mark this box if you read or speak English	English
	Marque esta casilla si lee o habla español	Spanish
	Kos lub voj no yog koj paub twm thiab hais lus Hmoob	Hmong
	如果说中国在方框内打勾	Chinese
	Xin ñaùnh daáu vaøo oâ naøy neáu quyù vò bieát ñioïc vaø noui ñöôïc Vieät Ngöô.	Vietnamese
	당신이한국어말할경우이 상자를표시	Korean
	Markahan itong kuwadrado kung kayo ay marunong magbasa o magsalita ng Tagalog.	Tagalog
	Kreuzen Sie dieses Kästchen an, wenn Sie Deutsch lesen oder sprechen	German
	Отметить этот флажок, если вы говорите по-русски	Russian
	Означите ову кућицу ако говорите српски	Serbian
	आप हिंदी बोलते हैं तो इस बक्से को चिह्नित करें	Hindi
	پر نشان لگائیں تو اس باکس بولتے ہیں اردو اگر آپ	Urdu

Note: For additional languages visit the US Census Bureau website <http://www.lep.gov/ISpeakCards2004.pdf>

Log of LEP Encounters

Date	Time	Language Spoken By Individual <i>(if available)</i>	Name and Phone Number of Individual <i>(if available)</i>	Service Requested	Follow Up Required	Staff Member Providing Assistance	Notes
None in last 5 years							

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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	8	0	1	0	0	0
[Insert Name of Committee/Board]	ACCOA Board of Directors		ACCOA Board of Directors			

B. Efforts to Encourage Minority Participation

To encourage participation on its boards, committees and councils, the Allen County Council on Aging will make every effort to encourage minority participation on the boards.

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: (list other agency names here)

Allen County Council on Aging monitors subrecipients using the following process:

1. Allen County Council on Aging uses the following process for ensuring all subrecipients are complying with the general reporting requirements of FTA Circular 4702.1B: (document the process here)
2. Allen County Council on Aging collects Title VI programs from the subrecipients listed above and reviews programs for compliance by (list the process here)

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. (Include at the end of the Title VI plan a copy of the Title VI equity analysis.)

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	<input type="checkbox"/> Y <input type="checkbox"/> N

transportation purposes, including federal funds managed by the MPO as a designated recipient?

- 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.

Y N

Comments: