



TITLE VI PROGRAM PLAN

TITLE VI OF THE CIVIL RIGHTS ACT OF 1964

October 2018

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Title VI Policy Statement

It is the policy of the City of Detroit Department of Transportation (DDOT), in accordance with Title VI of the Civil Rights Act of 1964, DDOT's Title VI Compliance and Implementation Plan to assure that "no person in Detroit shall, on the ground of race, color, or national origin, be excluded from participation in, be denied the benefits of, or be subject to discrimination under any program or activity" for which the DDOT receives federal financial assistance (42 U.S.C. Section 2000d). Furthermore, it shall be the policy of the DDOT, as a recipient of federal-aid funding, to ensure nondiscrimination in all of its programs and activities.

Accordingly, to ensure compliance with Title VI of the Civil Rights Act the Detroit Department of Transportation commits to promptly taking any measures necessary to effect compliance with Title VI of the Civil Rights Act.

The DDOT will include Title VI assurances in all written contracts and will monitor for compliance when distributing federal aid funds to other entities. The DDOT's Title VI Program Coordinator in the Office of Compliance is responsible for initiating and monitoring Title VI activities preparing required reports, and other DDOT responsibilities as required by Title 49 CFR Part 21.

Individuals with questions or requiring additional information relating to this policy or the implementation of the DDOT's Title VI Program should contact the Office of Compliance Title VI Coordinator-Alicia Miller, at DDOT Main Office, 1301 East Warren, Detroit, MI 48207; Telephone (313) 833-3658 or DDOTTtitle6@detroitmi.gov . The notice to the public is posted in the lobby of the DDOT Main Office, at the above address.



Approval of 2018 Title VI Program

A Resolution of the Detroit Department of Transportation Adopting the Title VI Program Plan Update 2018 – 2021

WHEREAS, as a recipient of federal funds, DDOT is required to comply with the requirements of Title VI of the Civil Rights Act of 1964 which prohibits discrimination based on race, color and national origin, specifically 42.U.S.C. 2000d, which states that:

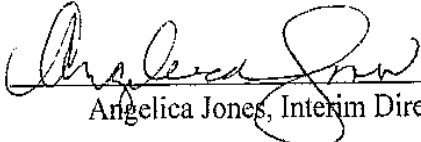
“No person in the United States shall, on the ground of race, color, or national origin, be excluded from participation in, be denied the benefits of, or be subjected to discrimination under any program or activity receiving Federal financial assistance” and

WHEREAS, the Detroit Department of Transportation (DDOT) is required to submit a Title VI Program update once every three years to demonstrate compliance with federal laws and regulation and

WHEREAS, staff has prepared the required submission in accordance with FTA Circular 4702.1B; and

NOW, THEREFORD, BE IT RESOLVED, that the Detroit Department of Transportation Director hereby approves submission of the Title VI Program to the Federal Transit Administration.

Adopted the 5th day of December 2018


Angelica Jones, Interim Director

Definitions

Affirmative Action: a good-faith effort to eliminate past and present discrimination in all federally-assisted programs and to ensure future nondiscriminatory practices.

African American: African Americans, including people whose ancestors were from any of the Black racial groups of Africa.

Applicant: an eligible public entity or organization that submits an application for financial assistance under a program administered on behalf of the State.

Asian-Indian Americans: people whose origins are from India, Pakistan, and Bangladesh.

Asian-Pacific Americans: people whose ancestors were from Japan, China, Taiwan, Korea, Vietnam, Laos, Cambodia, Philippines, Samoa, Guam, United States Trust Territories of the Pacific, and the Northern Marianas.

Beneficiary: any person or group of people (other than states) entitled to receive benefits, directly or indirectly, from any federally-assisted program (*e.g.*, relocatees, impacted citizens, communities, etc.).

Black, not of Hispanic origin: (see *African American* above)

Citizen Participation: an open process in which the rights of the community to be informed; to provide comments to the Government and to receive a response from the Government are met through a full opportunity to be involved and to express needs and goals.

Citizen Participation – An open process in which the rights of the community are informed, to provide comments to the government, and receive a response from the government through a full opportunity to be involved and express needs and goals.

Compliance – That satisfactory condition existing when a recipient has effectively implemented all of the Title VI requirements or can demonstrate that every good faith effort toward achieving this end has been made.

Discrimination refers to any action or inaction, whether intentional or unintentional, in any program or activity of a Federal aid recipient, subrecipient, or contractor that results in disparate treatment, disparate impact, or perpetuating the effects of prior discrimination based on race, color, or national origin.

Federal financial assistance refers to

- (1) grants and loans of Federal funds;
- (2) the grant or donation of Federal property and interests in property;
- (3) the detail of Federal personnel;
- (4) the sale and lease of, and the permission to use (on other than a casual or transient basis), Federal property or any interest in such property without consideration or at a nominal consideration, or at a consideration which is reduced for the purpose of assisting the recipient, or in recognition of the public interest to be served by such sale or lease to the recipient; and
- (5) any Federal agreement, arrangement, or other contract that has as one of its purposes the provision of assistance.

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

Minority persons include the following:

- (1) American Indian and Alaska Native, which refers to people having origins in any of the original peoples of North and South America (including Central America), and who maintain tribal affiliation or community attachment.
- (2) Asian, which refers to people having origins in any of the original peoples of the Far East, Southeast Asia, or the Indian subcontinent, including, for example, Cambodia, China, India, Japan, Korea, Malaysia, Pakistan, the Philippine Islands, Thailand, and Vietnam.
- (3) Black or African American, which refers to people having origins in any of the Black racial groups of Africa.
- (4) Hispanic or Latino, which includes persons of Cuban, Mexican, Puerto Rican, South or Central American, or other Spanish culture or origin, regardless of race.
- (5) Native Hawaiian or Other Pacific Islander, which refers to people having origins in any of the original peoples of Hawaii, Guam, Samoa, or other Pacific Islands.

National origin means the particular nation in which a person was born, or where the person's parents or ancestors were born.

Noncompliance refers to an FTA determination that the recipient is not in compliance with the DOT Title VI regulations, and has engaged in activities that have had the purpose or effect of denying persons the benefits of, excluding from participation in, or subjecting persons to discrimination in the recipient's program or activity on the basis of race, color, or national origin.

Persons – Where designation of person by race, color, or national origin is required, the following designations ordinarily may be used: "White not of Hispanic origin", "Black not of Hispanic origin", "Hispanic", and Asian or Pacific Islander", "American Indian or Alaskan Native."

Additional subcategories based on national origin or primary language spoken may be used, where appropriate, on either a national or a regional basis.

Program – Includes any project, or activity for the provision of services, financial aid, or other benefits to individuals. This includes education or training, work opportunities, health, welfare, rehabilitation, housing, or services, whether provided directly by the recipient of federal financial assistance or provided by others through contracts or other arrangements with recipient.

Recipient as used in this Circular, means any public or private entity that receives Federal financial assistance from FTA, whether directly from FTA or indirectly through a primary recipient. This term includes subrecipients, direct recipients, designated recipients, and primary recipients. The term does not include any ultimate beneficiary under any such assistance program.

Subrecipient means an entity that receives Federal financial assistance from FTA through a primary recipient.

Title VI Coordinator: the person responsible for the Department's Title VI activities under the direction of the Compliance & Quality Assurance Manager.

Title VI Program refers to a document developed by an FTA recipient to demonstrate how the recipient is complying with Title VI requirements. Direct and primary recipients must submit their Title VI Programs to FTA every three years. The Title VI Program must be approved by the recipient's board of directors or appropriate governing entity or official(s) responsible for policy decisions prior to submission to FTA. For State DOTs, the appropriate governing entity is the State's Secretary of Transportation or equivalent.

White, not of Hispanic origin: Caucasian

Triennial Reporting of Title VI Program

Every three years, DDOT's Compliance Manager, will submit the following general requirements to FTA with the Title VI Program submission:

- A complete list of complaints, investigations, and lawsuits received in the prior three years.
- Any updated made to the Public Participation Plan, Title VI Notice to the Public, Limited English Proficiency (LEP) Plan.
- A listing of membership changes for non-elected committees and councils.
- Service standards and policies monitoring results, service and fare change equity analyses and documentation showing DDOT's Directors reviewed and approved the Title VI Program.

This Title VI Program plan expires on November 30, 2020. DDOT's will submit its next triennial Title VI Program to FTA's Regional Civil Rights Officer on or before October 1, 2020 to ensure compliance with Title VI requirement.

Notice to the Public

Title VI information posters shall be prominently and publicly displayed in the DDOT facilities and on their revenue vehicles. The name of the Title VI coordinator is available on the DDOT's website, at www.RideDetroitTransit.com or alternatively, on the City of Detroit website: www.detroitmi.gov. Additional information relating to nondiscrimination obligation can be obtained from the DDOT, Title VI Coordinator.

In order to comply with 49 CFR, Section 21.9(d), DDOT will provide information to the public regarding its obligations under DOT's Title VI regulations and inform the public of the protections against discrimination afforded to them by Title VI.

DDOT will inform members of the public of their Title VI protection rights by posting a bilingual notice in busses, on the DDOT's website, and in public areas of DDOT facilities.

Appendix A includes a copy of the notice and Appendix B list the locations where it is posted. DDOT also provides a bilingual complaint form upon request.

KNOW YOUR RIGHTS





**THE CITY OF DETROIT
DEPARTMENT OF TRANSPORTATION**

- The City of Detroit Department of Transportation operates its programs without regard to race, color, and national origin in accordance with Title VI of the Civil Rights Act. Persons who believe they have been aggrieved by any unlawful discriminatory practice under Title VI may file a complaint with the City of Detroit Department of Transportation.
- For more information on the City of Detroit Department of Transportation's civil rights program, our obligations and procedures for filing a complaint, call 313-933-1300, email DDOTTitle6@detroitmi.gov; visit our administrative office at 1301 East Warren Ave., Detroit, Michigan 48207 or our website at www.RideDetroitTransit.com

For translation assistance, call the DDOT Customer Service Office at (313) 933-1300

Para asistencia de traducción, llame a la Oficina de Servicio al Cliente DDOT al (313) 933 a 1300

للحصول على مساعدة الترجمة، اتصل بمكتب الخدمات في شركه النقل الداخلي التابع لمدينة ديترويت على الرقم: (313)933-1300



List of Locations Where Title VI Notices are Posted

DDOT's Title VI notice to the public is currently posted at the following locations:

Location Name	Address	City
Main Office	1301 East Warren	Detroit
Rosa Park Transit Center	360 Michigan Avenue	Detroit
Gilbert Garage	5600 Wabash	Detroit
Shoemaker Garage	5149 St. Jean	Detroit
Website	www.ridedetroittransit.com	

Title VI Complaint Procedures

The Detroit Department of Transportation is committed to operating its programs in compliance with Title VI of the Civil Rights Act of 1964. Any person who believes he or she has been subjected to discrimination on the basis of race, color, or national origin may file a written complaint in accordance with DDOT's Title VI Complaint Procedures.

Complaint Submission

Any person who believes she or he has been discriminated against on the basis of race, color, or national origin by the City of Detroit Department of Transportation may file a Title VI complaint by completing and submitting DDOT's Title VI Complaint Form. DDOT investigates complaints received no more than 180 days after the alleged incident. DDOT will process complaints that are complete.

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

Investigation of Complaint

DDOT has 60 days to investigate the complaint. If more information is needed to resolve the case, DDOT may contact the complainant. The complainant has 10 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 10 business days, DDOT 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 is unsatisfied with the decision, he/she has 30 days after the date of the DDOT closure letter or the LOF to appeal to DDOT Director.

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.

Title VI Investigation Process

Investigation – An investigation is an official inquiry for the purpose of determining whether there has been a violation of the laws or statutes and includes a determination of appropriate relief where a violation has been found. An investigation requires an objective gathering and analysis of the evidence, which will ensure that the decision is as accurate as possible.

Role of the Investigator- The investigator is a neutral party provided by DDOT to conduct an investigation of the issues raised in a complaint. The Investigator's behavior, demeanor, and attitude reflect DDOT and may affect the degree of cooperation received from the parties. The investigator has an obligation to identify and obtain relevant evidence from all available sources in order to resolve all of the issues under investigation. The investigator is not an advocate for the Complainant or the Respondent. The Investigator is a neutral fact finder.

Responsibilities of the Investigator – The investigator must:

- Never express his/her opinion
- Never tell the parties that the complaint represents a good case or that the complaint is frivolous
- Always remain neutral
- Write the facts, and state what the facts are, based upon the evidence of testimony
- Decide who is to be interviewed, if the complainant or the respondent is adamant about a witness interview, perform the interview.
- Decide when sufficient evidence has been gathered to begin writing the investigative report
- Always remain professional and polite
- Be a good listener

The investigative process includes the following:

- Investigate Report
- Request for information
- Conducting interviews
- On-site visit
- Obtain evidence
- Analyze data
- Writing the Investigative Report

Investigative Report – The Investigative Report is working document intended to define the issues and provide a roadmap to complete the investigation. It is also an internal document for use by the investigator and his/her supervisor to keep the investigation on track and focused on the relevant issues. It is the Investigator's checklist and the following elements should be contained in an Investigative report:

- Complainant(s) name and address
- Attorney for Complainant with name and address
- Respondent(s) name and address
- Attorney for Respondent with name and address
- Applicable Law (e.g. Title VI)
- Basis
- Issue(s)
- Background
- Name of person(s) to be interviewed, including questions for the Complainant, Respondent, and witness(es)
- Evidence to be obtained during the investigation

Conducting Interview – When preparing for the interview, the main objective is to obtain information from witnesses who can provide information that will either support or refute the allegations. A list of major questions will be prepared that address the issues involved in the complaint.

1. Complainant – the purpose of interview is to gain a better understanding of the situation outlined in the complaint of discrimination. The investigator will contact the complainant to ensure that investigator understands the complainant's allegations(s). It is recommended that the investigator interview the complainant prior to preparing the investigation report. If it is not possible, the investigator will make any changes as appropriate to the investigation report form, based upon any new information provided by the complainant. The investigator will always inquire of the complainant and whether he/she desires to resolve the complaint.
2. Respondent – respondents are interviewed to provide an opportunity to respond to the allegations raised by the complainant. Additionally, it provides the investigator with an opportunity to understand the respondent's operation or policies that the complainant cites. As the keeper of the records, the investigator will discuss the investigation with the respondent, and be able to explain the need for requesting any documentation on the investigators list. The investigator will inform the respondent that he/she has the right to submit a formal position statement addressing the complainant's allegations. The investigator will question the respondent regarding possible settlement or remediation opportunities.
3. Witness – The complainant or respondent may request that additional persons be interviewed. The investigator will determine what relevant information, if any, a witness has to provide

prior to conducting an interview with them. The investigator will only interview persons who have information relevant to the allegations raised in the complaint of discrimination.

On-Site Visit – An on-site visit will be conducted when:

- Personal contact with the complainant and the respondent may yield information and clarification that might not otherwise be discovered by only reviewing the written document or telephone contacts.
- It is necessary to review that physical environment.
- More effective communication can be established with representative and witnesses of the complainant and respondent.
- Documentation can only be examined on-site reasons of convenience, cost format or volume.

Obtaining Evidence – evidentiary requests shall be related to the issues cited in the complaint. An evidentiary request may obtain some or all of the following:

- The policies and procedures regarding the practice that the complainant has alleged
- All documents relating to respondent's dealing with complainant in the situation described in the complaint
- Documents which exhibit how others not in the complainant's group were treated under similar circumstances
- Respondent's reason for the action taken
- A formal position statement from respondent addressing complainant allegations

There are various classification of evidence, which include the following:

Circumstantial evidence – includes facts from which may be inferred intent or discriminatory motive and proves intent by using objectively observable data.

- **Comparative Evidence** – A comparative between similarly situated individuals.
- **Direct Evidence** – Related to respondent's motive, it is defined as any statement or action by an official of the respondent that indicates a bias against members of particular party.
- **Documentary Evidence** – Written materials, which is generated during the course of normal business activity.
- **Statistical Evidence** – Statistics, facts or data of a numerical type, which are assembled, classified, and tabulated so as to present significant information about a given subject.
- **Testimonial Evidence** – Evidence that is provided orally.

Analyzing Data – Data will be analyzed to determine whether a violation has occurred. When analyzing data, the investigator will:

- Review what happened to the complainant
- Compare complainant's treatment with the appropriate policies and procedures

- Compare complainant's treatment with others in the same situation
- Review respondent's reason(s) for the treatment afforded the complainant
- Compare respondent's treatment of the complainant with the treatment afforded others.

Writing the investigative report – the investigative report (IR) will contain the following sections:

- Complainant(s) name and address
- Respondent(s) name and address
- Applicable Law
- Basis
- Issues
- Findings for each issue with a corresponding conclusion for each issue
- Recommendations

Title VI Complaint Form

Recipients must create and make available a Title VI Complaint Form for use by customers who wish to file a Title VI complaint. The complaint form shall be available on the recipient's website. A recipient's Title VI Complaint Form shall specify the three classes protected by Title VI—race, color, and national origin—and allow the complainant to select one or more of those protected classes as the basis/bases for discrimination. The Title VI Complaint Form is a vital document. If any of the Limited English Proficient (LEP) populations in your service area meet the Safe Harbor threshold (see Chapter III), then the procedure should be provided in English *and* in any other language(s) spoken by LEP populations that meet the Safe Harbor Threshold.



Detroit Department of Transportation Title VI Complaint Form

Section I:				
1. Name:				
2. Address:				
3. Telephone (Home):			3.2. Secondary Phone (<i>Optional</i>):	
4. Electronic Mail Address:				
5. Accessible Format Requirements?	<input type="checkbox"/> Large Print		<input type="checkbox"/> Audio Tape	
	<input type="checkbox"/> TDD		<input type="checkbox"/> Other	
Section II:				
6. Are you filing this complaint on your own behalf?			Yes*	No
*If you answered "yes" to this question, go to Section III.				
7. If you answered "no" to #6, what is the name and relationship of the person for whom you are filing this complaint?				
Name:		Relationship:		
8. Please explain why you have filed for a third party:				
9. 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:				
10. 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	
11. Date of Alleged Discrimination (mm/dd/yyyy):				
12. 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 back of this form.				
Section IV				

13. Have you previously filed a Title VI complaint with this agency?	Yes	No
Section V		
14. 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 _____		
15. If you answered "yes" to #14, 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 to complete form:

Signature

Date

Please submit this form in person, by mail or send via email to the address below:

Detroit Department of Transportation
1301 East Warren Avenue
Detroit, MI 48207
Attention: Office of Compliance – Title VI
DDOTtitle6@detroitmi.gov

Title VI Training

The City of Detroit's Human Rights/Resources Department will provide Title VI training to all employees during employee orientation training. All employees are required to sign an "Acknowledgement of Title VI Plan Policy" form during the employee orientation process (Appendix B).

List of Complaints, Investigations, Lawsuits

DDOT prepares and maintains a list of any of the following that allege discrimination on the basis of race, color, or national origin:

- Active investigations conducted by FTA and entities other than FTA;
- Lawsuits; and
- Complaints naming the recipient

Type	Case Number	Date	Summary	Status	Action(s) Taken
Lawsuit	DDOT-2017-01	9/8/2017	Discrimination	Pending	On going
Complaints	DDOT-2017-01	3/28/2017	DBE	Closed	No Violation Found
Complaint	DDOT-2017-02	6/22/2017	Discrimination	Closed	No Violation Found

Minority Membership on Committees

DDOT will provide a table depicting the membership of non-elected planning boards, advisory councils or committees, or similar bodies broken down by race, and a description of efforts made to encourage the participation of minorities on such committees.

Name	Caucasian	Black
Advisory Commission	67%	33%
Paratransit Appeal Board	25%	75%
Local Advisory Councils	0%	100%

Subrecipients Assistance & Monitoring Plan

All subcontractors and vendors who receive payments from DDOT where funding originates from any federal assistance are subject to the provisions of Title VI of the Civil Rights Act of 1964 as amended.

Written contracts shall contain non-discrimination language, either directly or through the bid specification package which becomes an associated component of the contract.

Determination of Site or Location Facilities

In determining the site or location of facilities, DDOT will not make selections with the purpose or effect of excluding persons from, denying them the benefits of, or subjecting them to discrimination under any program to which Title 49 CFR Section 21.9(b)(3) applies, on the grounds of race, color, or national origin.

DDOT will comply with the regulation by:

- Completing a Title VI equity analysis during the planning stage with regard to where a project is located or sited to ensure the location is selected without regard to race, color, or national origin.
- DDOT will engage in outreach to persons potentially impacted by the siting of facilities.
- DDOT should give attention to other facilities with similar impacts in the area to determine if any cumulative adverse impacts might result.
- If determined that the location of the project will result in a disparate impact on the basis of race, color, or national origin, DDOT will only locate the project in that location if there is a substantial legitimate justification for locating the project there, and where there are no alternative locations that would have a less disparate impact on the basis of race, color, or national origin.

DDOT has not made a determination of site or location of facilities during this Title VI reporting period.



Public Participation & Involvement Plan

TITLE VI OF THE CIVIL RIGHTS ACT OF 1964

October 2018

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I. Introduction

A. Foundation of Public Participation in Transportation Planning

The Detroit Department of Transportation's (DDOT) strong belief is that public participation and involvement are based on customers whose lives are affected by transportation planning/investment decisions, which give them the right to be involved in decision-making processes and influential choices that result in the best strategies possible for transit unity and growth. Directly engaging customers in this process promote successful problem solving, diversity and new ideas, and give all a sense of ownership of the developed solutions.

Public participation must be a proactive process in which governing bodies strive to find innovative ways to identify and engage the affected customers, provide a wide variety of opportunities for interested parties to become involved, and create a meaningful process that is transparent and ensures effective communication about how customer contributions influence decisions. It is also important that a public participation process be continuously evaluated and improved upon to ensure that under-represented communities are given a voice for solutions as well.

DDOT complies with all Federal rules, policies, guidelines, and regulations, essentially related to the Title VI programs, but not limited to the Equity Analysis Assessment (EAA), by ensuring that its programs and services do not discriminate on the basis of race, color or national origin. The EAA identifies impacts resulting from service changes and fare increases channeled to low-income and minority populations and the population surrounding impacted transit routes as compared to the population of the service area. As indicated in FTA Circular 4702.1B ("Circular") and reinforced in March 8, 2011, DDOT will conduct Title VI equity analyses in the course of planning major service changes or any magnitude of fare changes. Equity analyses are required regardless of whether proposed changes would be detrimental or beneficial to riders on the whole. In addition, a service expansion or fare decrease must also be evaluated according to similar processes as noted in service reductions or fare increases.

The Detroit Department of Transportation (DDOT) is committed to a public participation and involvement process that:

- Involves customers in decisions that affect their lives
- Ensures that customer contributions will influence decision making
- Communicates how customer contributions will influence decisions
- Is adaptable and sensitive to diverse audiences
- Promotes respect
- Provides equal access to opportunities, information, and education
- Ensures timely response to participants
- Is consistent and reliable
- Promotes continued engagement
- Allows flexibility and use of creative approaches

- Maintains honesty and integrity throughout the process
- Continuously strives to educate and inform affected and interested customers to more meaningful participatory experiences
- Encourages early, active and “hands-on” participation at times of initial preparation of initiatives
- Involves process evaluation and monitoring tools

In addition, the Public Participation & Involvement Plan:

- Shall be developed in consultation with all stakeholders and interested parties
- Shall provide that all interested parties have reasonable opportunities to comment on the content of the transportation plan.

In carrying out these required elements of the Public Participation & Involvement Plan, DDOT shall, to the maximum extent practicable:

- Hold any public meetings/hearings at convenient and accessible locations and times
- Employ visualization techniques to describe plans
- Make public information available in electronically accessible format and means, such as the Social Media, Website (www.RideDetroitTransit.com), press releases, E-Blast notices, Rider Alerts, interior bus signage, to afford reasonable opportunity for consideration of public awareness.
- We have confirmed that proper notification was not given to the public for the service changes in 2012. From this point forward, DDOT will comply with all guidelines displayed in Illustration 1 – Public Hearing Policies & Procedures (pgs. 13-15) within this document.

B. Purpose of the Public Participation & Involvement Plan

DDOT seeks to provide opportunities in the transportation planning process, to parties interested in engaging and involving members of the community who have not traditionally been involved. The purpose of this plan is to provide a framework from which to guide the public participation process in planning projects at DDOT.

This plan specifies DDOT’s underlying goals as well as strategies and techniques to be considered and employed in achieving the goals of the public participation process. The plan describes the importance of environmental justice and provides a framework for including it as a part of the public participation process. Additionally, the plan describes how DDOT will work to incorporate visualization and scenario planning techniques into its public participation process to better depict transportation plans and studies. There are two basic forms of public involvement: 1) Public Participation - where public input/feedback is sought; and 2) Public Information/Education - where information is disseminated for public awareness.

DDOT seeks public input not only because it is required by government regulations, but also to put the best services possible into effect for customer satisfaction. There are other times when it is necessary to provide information only. Informational meetings may be held to notify the public of minor changes, policy or other services, which do not fall under government requirements.

at the Administrative Building. These quarterly meetings are held at DDOT's main office due to costly venue rental charges, which can range in the vicinity of \$200 to \$500 per event. The costs are expended, however, when public hearings are conducted to reach out to various audiences on proposed changes and allow adequate space for attendees. All venues are accessible and in close vicinity to major bus routes for ease in travel. In addition, public hearings occur less frequently than the scheduled meetings Federal mandates require public participation prior to raising fares, implementing major reductions in service, or applying for grants/loans to finance transportation improvement projects. Public input is also required before establishing a new route or eliminating an existing one.

D. Purpose of the Language Assistance Plan and Limited English Proficiency Plan

The purpose of DDOT's Language Assistance Plan (LAP) is to meet Federal Transit Administration's (FTA's) requirements to comply with Title VI of the Civil Rights Act of 1964, which prohibits discrimination on the basis of race, color, or national origin. As a subrecipient of FTA funds, DDOT pledges to take reasonable steps to provide meaningful access to its transit services for persons who do not speak English as their primary language and who have a limited ability to read, speak, write, or understand English. FTA refers to these persons as Limited English Proficient (LEP) persons.

The completion of this plan for persons with Limited English Proficiency conforms to the requirements of the FTA Circular 4702.1B Title VI Requirements and Guidelines for Federal Transit Administration Recipients.

The U.S. DOT's FTA Office of Civil Rights' publication "Implementing the Department of Transportation's Policy Guidance Concerning Recipients' Responsibilities to Limited English Proficient Persons – A Handbook for Public Transportation Providers," dated April 13, 2007, was used in the preparation of this plan.

The plan for DDOT contains:

1. A needs assessment based on the four-factor analysis.
2. Language assistance measures.
3. Methods for notifying LEP persons about available language assistance.
4. Methods for monitoring, evaluating, and updating the plan.

More information on the LAP and LEP can be obtained via:

1. Facebook ~ RideDDOT
2. Twitter ~ @RideDDOT
3. DDOT's Website ~ www.RideDetroitTransit.com
4. Upon request for a mailed copy by contacting Customer Services Office at (313) 933-1300

E. Legal Framework and Plan Application

The Moving Ahead for Progress in the 21st Century (MAP-21) was signed into law on July 6, 2012, and contains specific language outlining Federal requirements regarding public involvement processes and procedures. In general, MAP-21 legislation built upon previous transportation legislation (ISTEA, TEA-21 and SAFETEA-LU) to provide states and MPOs specific direction in conducting and promoting broad-based public involvement activities.

MAP-21 Legislation (Public Law 112-141) requires MPOs to provide citizens, affected public agencies, representatives of public transportation employees, freight shippers, providers of freight transportation services, private providers of transportation, representatives of users of public transportation, representatives of users of pedestrian walkways and bicycle transportation facilities, representatives of the disabled, and other interested parties with a reasonable opportunity to comment on the transportation plan.

II. Engaging Interested Parties

A. DDOT's Feedback Channels

1. Customers
2. Non-Riders
3. Citizens
4. Title VI Responsibilities
 - a. Equity Analysis Assessments
 - b. Limited English Proficiency (LEP) Individuals
5. Affected public agencies (Mayor and Executive Cabinet, Detroit City Council, other City of Detroit Departments, State Agencies, community entities, etc.)
6. Faith-Based Community
7. DDOT Employees
8. Representatives of public transportation entities
9. Private providers of transportation
10. Representatives of users of public transportation
11. Representatives of users of pedestrian walkways and bicycle transportation facilities
12. Representatives of the elderly and disabled
13. Other interested parties, as specified

B. Feedback from Internet/Social Networks

1. Facebook ~ RideDDOT
2. Twitter ~ @RideDDOT
3. DDOT's Website ~ www.RideDetroitTransit.com

III. Goals for Public Participation

It is DDOT's goal to have significant and ongoing public involvement in the transportation planning process. Education and public outreach are an essential part of fulfilling DDOT's desire and responsibility to successfully inform the public about the planning process at the metropolitan level. In addition to its informative roles, DDOT also seeks to empower and improve opportunities for customers to voice ideas and values regarding transportation. DDOT strives to ensure early and continuous public involvement in all major actions and decisions. There are two basic forms of public involvement: 1) Public Participation - where public input/feedback is sought; and 2) Public Information/Education - where information is disseminated to the public.

The following goals embody these strategies and set out to guide the participation process to successfully achieve the principles that have been outlined.

A. GOAL 1: Inform and Educate the Public of DDOT's Programs and the Benefits of Public Transit

Objective: It is DDOT's responsibility to make information accessible to the public and to provide timely public notice. DDOT will provide information to the public that is accurate, understandable, and pertinent to transportation planning and engagement activities and will do so through the use of varied communication tools. In addition to informing the public, DDOT will make every effort to educate the public about the planning process and provide supportive policy, program and technical information at its quarterly Customer Information Meetings held every third Thursday (5:00 p.m. to 7:00 p.m.) and other venues as necessary. Educating the public supports informed public contribution and continued engagement by the public. Education will be enhanced through the use of visualization tools that will help the public understand and relate to DDOT's various planning products and activities (via the Internet, Website (www.RideDetroitTransit.com), social media, press releases, E-Blast, Rider Alerts, interior bus signage, mailings, etc.).

In addition, the plan and effective educational opportunities provide the outlet for the public to ask questions, make comments and to meet directly with DDOT administrators via meetings/hearings, one-on-one discussions, and also to disseminate information on DDOT's services, projects and products.

Actions:

- Develop and distribute meeting/hearing notices to community entities and libraries and all DDOT distribution outlets Select meeting venues Post meeting notices via the Internet, Website (RideDetroitTransit.com), social media, press releases, E-Blast, Rider Alerts, interior bus signage
- Provide a Court Reporter to record the Minutes at all public hearings
- Provide special needs requests within 72 hours prior to meeting occurrences (Braille, Signers for hearing impaired, interpreter(s) for Limited English Proficiency individuals, etc.)
- Develop and produce handout materials for the public, as well as LEP-affected communities.

Measures: Customer Information Meetings are held the third Thursday of every month. The Local Advisory Council meetings are held on the third Tuesday every other month for January, March, May, July, September and November. Other meetings, if necessary, will be scheduled on an as-needed basis, such as pre-bid meetings to provide more clarification to proposed contractors on DDOT's expectations on forthcoming projects, introduction of new products, such as "TextMyBus", HR job fairs to hire bus drivers and mechanics, etc. Customer participation also includes the opportunity to fill out request-to-speak forms, meet with staff after the meetings to provide more details on subject-matter issues and to provide follow-through results until resolution are accomplished.

Deadline: Public hearing notifications for public awareness will be presented to the public five (5) to ten (10) days prior to public hearing occurrences. Customer Information Meetings are held every third Thursday of each month, as departmental information is discussed and presented.

B. GOAL 2: Planning and Criteria Strategies Support for Public Hearings

Objective: To conduct Public Hearings in accordance to DDOT's public hearing policy and procedures.

Actions:

- Secure venues at least ten days prior to meeting occurrence
- Prepare public notice ad for publication in local newspapers (publish five to 10 days prior to Hearings)
- Develop press releases for public awareness (publish five to 10 days prior to Hearings)
- Prepare public hearing booklet for public review (to be read and distributed at all Public Hearings)
- Distribute public hearing booklet to all DDOT distribution outlets for public review
- Provide a Court Reporter to record Minutes at all Public Hearings
- Provide special needs services no later than 72 hours prior to the Public Hearing date(s) (Braille, signers for hearing impaired, interpreter for Limited English Proficiency)

individuals, etc.) ter Public Hearings, all public comments are to be analyzed by DDOT staff, as public viewpoints are taken into consideration for final service-change decisions.

- After the final public hearing has occurred, customer comments can be received up to fifteen (15) days after the last public hearing
- DDOT staff will analyze all public comments to input valid information in the changes, if applicable
- Conduct follow-up informational meeting specifying all finalized changes/details (which includes public participation)

Measures: Honoring strict deadlines (on or prior to the activities), responding immediately to customer requests (within two days, depending upon request), constant activity follow-through for customer awareness (via the Internet, Website (RideDetroitTransit.com), social media, press releases, E-Blast, Rider Alerts, interior bus signage, etc.)

Deadline: Public Hearings are scheduled at least ten days prior to the first meeting occurrence (necessitation of Public Hearings occur if 25% or more of service is affected by the service or fare rate changes).

C. GOAL 3: Outreach to Build Stronger Connections to Communities

Objective: DDOT recognizes that large segments of the population rarely participate in the transportation planning process, including minority, non-English speaking, and low-income groups. It is a priority to increase the diversity and number of participants in previous engagement activities through building new relationships with organizations and communities that serve these under-represented populations.

Actions:

- Participate in community/organizational events (making calls to attend meetings and coordinating efforts for special events, etc.)
- Reinstitute Transit Education Program (providing training to schools and other agencies on products, services and how to properly ride public transit buses)
- Participate in Public School Career Days
- Hold and attend special events (transit fairs, school-open activities, healthcare forums) by setting up displays for public awareness and participation

Measures: Develop surveys to know the customer and address customer concerns, issues, wants and needs

Deadline: Conduct survey participation at least twice a year, although community outreach activities are ongoing and occur throughout the year (school career days, health fairs, etc.)

D. GOAL 4: Engage the Public and Encourage Continued Participation for Consensus

Building

Objective: DDOT will encourage continued public participation by ensuring an engagement process that is meaningful. This includes providing various ways to engage and communicate with the public, responding to all comments and questions in a timely manner, presenting a clear process for incorporating public input into DDOT's plans, and providing other opportunities for further engagement and education. DDOT will also enlist representatives from key stakeholders to form partnerships for consensus-building initiatives. In this way, community relations will be improved upon by including all groups in the decision-making processes. DDOT conducts Customer Information Meetings each third Thursday of the month and information will be continuously transmitted through this measure via print materials, presentations, and inviting to obtain assistance from the communities, businesses and organizations, as scheduled. All Public Hearing comments, relative to service changes, are received by the Scheduling Manager for consideration of changes made.

Actions:

- Develop a partnership agreement with key stakeholder groups
- Extend invitations to advocacy groups, community-based organizations, governmental agencies, businesses, contractors, schools, educational institutions to form alliances
- Conduct focus groups to solicit ideas
- Conduct surveys

- Collect feedback forms
- Establish partnerships with key stakeholders
- Develop a mailing list of community groups to distribute DDOT materials
- Hold periodic partnership meetings (quarterly)

Measures: Direct mailing lists, surveys, and partnership agreements

Deadline: Ongoing

E. GOAL 5: Customer Input Usage to Shape Policies, Plans and Programs

Objective: DDOT will document all input received from the public. This documentation will provide a record of received comments and will assist DDOT staff in reviewing public input, which can then be used in the development of transportation plans and programs. The process of incorporating public input into transportation planning documents will be transparent and open to the public. DDOT will inform the public of the decision-making process for each planning activity in which public comment is solicited. This will be presented to the public at the beginning of each planning activity and throughout the engagement process by way of the social networks, DDOT's Website, E-Blast, Rider Alerts and Customer Information Meetings held the third Thursday of each month.

Actions:

- Keep documented record of all comments and suggestions from public's input obtained from public hearing forums, mail-ins, customer meetings, etc.
- Document action taken relative to addressing all comments and suggestions from the public (beginning to end follow-through methods)

Measures: Responding immediately to customer requests (within two days, depending upon request), constant activity follow-through for customer awareness (via the snail mail, Internet, Website (RideDetroitTransit.com), social media, press releases, E-Blast notices, Rider Alerts, interior bus signage, etc.)

Deadline: Public notification should be presented for public awareness no later than 15 days after the decisions made via email, mail, Internet, Website (RideDetroitTransit.com), social media, press releases, E-Blast notices, Rider Alerts, interior bus signage, etc.

F. GOAL 6: Evaluate Public Participation & Involvement Strategies Relative to Capital Project Management

Project managers are responsible for developing a unique public participation strategy for each project that uses the appropriate techniques for capital project management planning. This effort will include assistance from the Strategic Planning and Customer Programs & Communication Divisions. The strategy should include a timeline showing engagement techniques and other relevant activities, and should outline targeted audiences and expected outcomes. The techniques and strategies will serve as a guide for expectations of the project managers to consider when developing the public participation component of their projects. Finding a balance of various techniques and strategies will be key, and the end result will be a tailored mix of approaches that ensure early, continuous, and accessible public participation and involvement.

In addition to internal planning work, any contracted planning work, which includes public engagement activities, performed by consultants and managed by DDOT will be held to the goals outlined in this plan. It is suggested that all requests for proposals should include a project requirement specifically identifying DDOT's Public Participation Plan as a guiding document for proposed engagement strategies. Successfully identifying techniques that support all of DDOT's goals for public engagement will be beneficial to a proposal in a competitive procurement process.

In order to sustain best practices in public participation, DDOT will continually monitor the public engagement process and create a framework for evaluating and improving this document and the strategies that guide how we engage the public in project management. All updates will appear on the social networks and DDOT's Website.

A variety of strategies and techniques will be used to encourage early and continuous public participation throughout the development of DDOT's core plans. DDOT will also participate in a variety of special and local studies. These include alternatives analyses, corridor studies, major

investment studies and feasibility studies. As new plans are federally mandated and incorporated into DDOT's roles and responsibilities, DDOT will continue to apply community engagement techniques to accomplish the goals outlined in this plan.

As DDOT continues to serve, service standards are in place so that there is a level of consistency among the different planning efforts. This document is displayed on DDOT's Website www.RideDetroitTransit.com or can be requested by calling the Customer Service Office at (313) 933-1300.

DDOT's planning activities and programs, including those for the purposes of public engagement, must be sensitive to diverse audiences. DDOT ensures that no person will, on the ground of race, religion, age, gender, disability, national origin, or economic status, be excluded from participation in, be denied the benefits of, or be subjected to discrimination under any DDOT program or activity. DDOT also promotes the full and fair participation of all affected populations in the transportation decision-making process. Any information, education and participation opportunities will be equally accessible.

The DDOT website offers an easily identifiable place for public comment on DDOT transportation projects and studies. When updates and amendments to programs and projects are released for public review and comment, DDOT will make them available on the website at www.RideDetroitTransit.com or requests can be made through snail mail or email ddotcomments@detroitmi.gov

ILLUSTRATION 1:

PUBLIC HEARINGS POLICIES AND PROCEDURES

PUBLIC HEARINGS

The Detroit Department of Transportation (DDOT) will schedule Public Hearings if service changes affect 25% or more of service to the fixed-route service of fare changes. The Hearings are conducted to solicit comments from the public at open public forums. Public Hearing schedules, notification and implementation shall follow the policies and procedures as indicated in this document.

Public Hearings are required as follows:

- Prior to raising fares or implementing a major service change in transit service. (Federal Transit Act. Section 9 (e) (3) (H))
- If there is any reduction in service of 25 percent or more, the number of transit route miles of a route, or 25 percent or more of the number of transit revenue vehicle miles of a route computed on a daily basis for the day of the week for which the change is made

- Before eliminating an existing transit route

Exemptions:

If reduced or free promotional fares are instituted on a daily basis or periodically within a period of 180 days.

If an emergency situation occurs, a service change may be implemented immediately. Examples of emergency service changes include but are not limited to those made because of a power failure for a fixed-guide-way system, the collapse of a bridge over which bus routes pass, major road or rail construction or inadequate supplies of fuel, etc.

Experimental service changes instituted for 180 days, or less. For headway adjustments of up to five (5) minutes during peak-hour service and up to (fifteen) 15 minutes during non-peak hour service.

Standard seasonal variations are exempt unless the number, timing or type of standard seasonal variation changes.

Venue

The following criteria will be used to determine the location(s) for public hearing(s):

- Public Hearings will be held within DDOT's fixed-route service area, near or in proximity to bus services.
- The Public Hearings will be conducted in the morning and evening at designated times (generally 11:00 a.m. to 1:00 p.m. for mornings and for evenings from 6:00 p.m. to 8:00 p.m.), which allow attendance for seniors, students and the working class.
- Public Hearings will be accessible and presented to LEP individuals (interpretive services requested 72 hours in advance of the meeting), the elderly and persons with disabilities.
- Public Hearing venues should be available for use at no or minimal charge to DDOT.

PUBLIC HEARING NOTIFICATION PROCESS

Vital documents are defined as those documents without which a person would be unable to access services. The following are written communications that are printed in both Spanish and Arabic:

1. Complaint Procedure
2. Compliant Forms
3. Public Meeting Notices

DDOT has concluded that Arabic and Spanish are the most prevalent languages spoken by LEP persons in DDOT's service area and should be the primary focus of any translation of vital documents or language assistance activities. However, there are populations in the community that speak non-English languages other than Spanish and Arabic. Therefore, DDOT will provide meaningful access to LEP individuals through language assistance when language services are requested.

The public shall be notified of the public hearing through the following methods:

- Notices of scheduled public hearings shall be placed not more than ten (10) business days nor less than five (5) business days prior to the hearing and placed in community newspaper(s), general circulation (e.g. Detroit News/Detroit Free Press and Detroit Legal News) and also published in newspapers oriented to specific groups or neighborhoods that may be affected (e.g. Michigan Chronicle, Arab American News, El Central Hispanic News, etc.).
- Press releases are sent to newspapers, radio and television stations, covering more than 125 media outlets.

The public notice must contain:

- Description of specific proposed service changes or fare changes in detail
- Time and place of hearing(s)
- A paragraph indicating that written statements and phone calls concerning the hearing topic will be accepted at the Detroit Department of Transportation, Coordinator of Public Hearing, 1301 E. Warren, Detroit, MI 48207, (313) 933-1300 until 4:00 p.m. on the date of the hearing, and comments may be emailed to ddotcomments@detroitmi.gov. All comments received by the hearing date will be read into the proceedings.
- Paragraph explaining that materials, in accessible formats for persons with disabilities, will be furnished upon request. All requests for special assistance should be directed to Detroit Department of Transportation, ADA Coordinator, 1301 E. Warren, Detroit, MI 48207 or by calling 313-933-1300. As well, a sign language interpreter can be made available if needed, but a request for special assistance, including interpreters, must be made at least three days (72 hours) in advance prior to the Public Hearing.

ILLUSTRATION 2

SERVICE CHANGES / FARE CHANGES PUBLIC HEARING VENUE PROCESSES

The following are the rules to conduct all public hearings held by the Detroit Department of Transportation.

1. Individuals may appear and speak for themselves, or, if duly authorized, for any local government, civic group, organization, club, or association, subject to all the rules provided herein.
2. All persons desiring to be heard must register with the facilitator presiding over the hearing (or his/her designated representative). Speakers will be heard in the order in which they register.
3. Speakers are encouraged to make their statements brief and concise and, where possible, to summarize and furnish the full text of their statements in writing. Each speaker will be allowed two (2) minutes within which to make his/her oral presentation and must relinquish the floor to the next speaker at the end of the two (2) minutes period. Any speaker desiring additional time may request some from the presiding official, but such additional time, if granted, will be allowed only after all remaining speakers have been heard.
4. Relinquishing of time by one speaker to another will not be allowed.
5. Additional prepared statements, literature or comments may be submitted in writing at the hearings. Any prepared statements forwarded to DDOT during the public comment period will also be entered into the hearing proceedings as a matter of public record.
6. All statements, oral or written, must be directed to the Chair and must be pertinent to the subject matter under consideration.
7. Speakers will be allowed the opportunity to use their time, with the time limitations provided, to their best advantage without interruption.
8. Each person speaking or asking questions must do so from the rostrum or other designated place. This is necessary for accurate stenographic transcriptions and tape recordings of the hearing.
9. All hearing proceedings will be recorded by a court reporter or tape machine.
10. Comments received from the public will be forwarded to management (Strategic Planning Division) for further review and evaluation with recommendations for acceptance.
11. After thorough review, any revisions recommended for implementation are submitted to the DDOT director who will make the final decision on the schedule, routes, and/or fare changes.

PRINTED MATERIALS/SERVICES FOR PUBLIC HEARING

1. Copies of Service and/or Fare Changes (document for public review)
2. Housekeeping rules for conducting a public hearing
3. Public Hearing Comment Card (for public input who do not want to speak)
4. Speaker's sign-in card (to speak at the hearing)
5. Sign-in sheet
6. Court Reporter (at all sessions)
7. Signer and/or LEP Interpreter (upon request ~ 3 days or 72 hours prior to hearing)

MEETING PROCESS

1. Call to order
2. State time and introduce public transit hearing/moderator
3. Introduce other DDOT staff for attendees to contact after the hearing has ended
4. Describe public hearing process prior to and during meeting opening and comment on all forms being passed out
5. Explain that public comments occur in the order of card received. Written and oral comments are encouraged. Only individuals who complete and turn in a speaker card may speak.
6. Read the proposed service/fare changes to occur that resulted in the public hearing
7. Attendees time to speak (2-minute comment)
8. Adjournment

Public Ads

DDOT places public ads in the Arab American News, Detroit Free Press, Detroit News and its Internet Website, El Central Hispanic News and Michigan Chronicle newspapers.

Service/Fare Changes Document Distribution

Detroit Department of Transportation, 1301 E. Warren, Detroit (Strategic Planning Division)
Detroit Public Library (all branches) Main Library Tip Service (313) 833-4007
25 Agencies/Organizations

Documented information on DDOT's Websites:

- www.RideDetroitTransit.com
- [@RideDDOT](https://twitter.com/RideDDOT) (Twitter)
- [@RideDDOT](https://www.facebook.com/RideDDOT) (Facebook)

ILLUSTRATION 3

CONDUCTING CUSTOMER INFORMATION MEETINGS

The Detroit Department of Transportation (DDOT) will conduct Customer Information Meetings on a quarterly basis held every third Thursday at DDOT from 5:00 p.m. to 7:00 p.m.

The following are the rules to conducting Customer Information Meetings:

1. The meetings will begin at 5:00 p.m. and will end promptly 7:00 p.m.
2. Agendas will be distributed outlining the contents of the meetings as well as the topic to be discussed.

3. All persons desiring to be heard must complete a comment/request form upon entering the meeting. Speakers will be heard according to the order in which they submit their form. Interpretive telephone service (24 hours) will be available to LEP Individuals and those individuals whose language trigger the Safe Harbor Provision.
4. Speakers are encouraged to make their statements brief and concise. Each speaker will be allowed two (2) minutes within which to make his/her oral presentation. Each speaker as well as the audience will respect each other, refrain from interruptions/ loud outburst, and will also refrain from using abusive/offensive language.
5. Relinquishing of time to another speaker will not be allowed.
6. Additional prepared statements, literature or comments may be submitted in writing at the meeting. Any prepared statements forwarded to DDOT during the public comment meeting that are not addressed will be addressed during the next meeting.
7. All statements, oral or written, must be directed to the Facilitator and must be pertinent to the subject matter at hand.
8. Speakers will be allowed the opportunity to use their time, with the time limitations provided, to their best advantage without interruption.
9. Each person speaking or asking questions must do so from the rostrum or other designated place.
10. No one will be allowed to approach the table while the meeting is in progress.
11. Adhere to code of conduct.

ILLUSTRATION 4

CONDUCTING ELDERLY AND DISABLED LOCAL ADVISORY COUNCIL (LAC) MEETINGS

The LAC is a representative group of consumers and interested persons or agencies that represent the elderly and disabled within the Detroit Department of Transportation service area. This group also advises DDOT and staff on public transportation issues relevant to persons in the ranks of the elderly and disabled.

As established under State Act 51 of the Public Acts 1951, as amended; an eligible governmental agency with funds made available under the act to provide demand responsive service under an approved plan must establish a local advisory council (LAC) with no less than fifty percent of its membership representing persons sixty-five or older and/or disabled within its applicable service area.

The meeting format as outlined in the LAC Bylaws, Article IX states:

1. The LAC shall meet at a regular time, i.e. Bi-monthly on the third Tuesday of the designated month (January, March, May, July, September, and November).
2. All LAC meetings shall be held in an accessible facility.
3. Meetings of the LAC shall be governed by Robert's Rules of Order, Revised.

4. The Chairperson and the Secretary shall develop meeting agendas jointly. Items may be added or material introduced the day of the meeting by a majority vote of the voting members present.
5. The minutes of the LAC meetings shall be compiled by the Secretary and distributed with the next meeting notice and agenda to the LAC membership at least ten (10) days before the next regularly scheduled meeting.
6. It shall be the Chairperson's prerogative to recognize speakers and to limit debate.

Printed material for LAC meetings will be available upon request to be mailed upon customer requests.

The LAC By-Laws can be obtained upon customer request.



Limited English Proficiency Plan/Language Assistance Plan

TITLE VI OF THE CIVIL RIGHTS ACT OF 1964

October 2018

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Introduction

This ***Limited English Proficiency (LEP) Plan*** is a resource tool that will serve as a guide in addressing responsibilities as a recipient of federal financial assistance from the U.S. Department of Transportation (USDOT) concerning the needs of individuals with limited English language skills. This plan was prepared in accordance with Title VI of the Civil Rights Act of 1964, 42 U.S.C. 2000d, et seq., and its implementing regulations, which state that no person shall be subjected to discrimination on the basis of race, color, or national origin under any DOT-assisted program or activity because they face challenges communicating in English.

Detroit Department of Transportation (DDOT) has conducted a Four Factor Analysis to meet the requirements under Title VI of the Civil Rights Act of 1964. The Four Factor Analysis provides a framework to conduct a needs assessment of people with Limited English Proficiency (LEP). Based on the needs assessment, a language assistance plan was developed that was consistent with the provisions of Section VII of the LEP guidance.

LEP Four Factor Analysis

Factor 1: The number and proportion of LEP persons eligible to be served or encountered by a program, activity, or service of DDOT.

DDOT's service area includes Detroit, Hamtramck, Highland Park and bordering cities located in Macomb, Oakland and Wayne counties. The bordering cities includes Redford Township, River Rouge, Grosse Pointe, Grosse Pointe Farms, Grosse Pointe Park, Grosse Pointe Woods, Harper Woods, Dearborn, Dearborn Heights, Southfield Township, Southfield, Farmington, Farmington Hills, Ferndale, Oak Park, Hazel Park, Warren, Madison Heights, Royal Oak, Royal Oaks Township, Eastpointe and St. Clair Shores. An analysis of the U.S. Census American Community Survey 2011-2015 "Language Spoken at Home 5-Year Estimates (Table S1601)" data was conducted to estimate the LEP population in DDOT's service area (See Table 1).

The analysis determined that 85% of DDOT's service area population speaks only English. The analysis showed there are 13 non-English languages spoken at home by over 1,000 persons in DDOT's service area (See Table 1). Thirteen (13) languages meet the Department of Justice Safe Harbor threshold of 1,000 speakers. People who speak Arabic at home represents 31,116 (2.16%) of DDOT's service area population. People who speak Spanish at home was 20,227 (1.40%) of DDOT's service area population. The other 11 language that speaks English less than "very well" was less than 0.5% of the population in DDOT's service area.

Table 1: Language Spoken at Home by 1,000+ Persons in DDOT's Service Area

2011-2015 American Community Survey 5-Year Estimates – S1601 Speak English less than "very well"		
Total Population of 5 Years and over	1,449,955	
Speak Only English	1,237,819	85.37%
Spanish	20,227	1.40%
French (incl. Patino, Cajun)	1,059	0.07%
Russian	1,782	0.12%
Polish	2,263	0.16%
Serbo-Croatian	1,294	0.09%
Other Slavic Languages	1,697	0.12%
Other Indic Languages	7,582	0.52%
Other Indo-European Languages	2,681	0.18%
Chinese	2,135	0.15%
Vietnamese	1,207	0.08%
Arabic	31,116	2.15%
African Languages	1,517	0.10%
Other and unspecified languages	3,317	0.23%

DDOT used the U.S. Census B16001, “2011-2015 Language Spoken at Home: Population 5 Years and Over by Language Home and Ability to Speak English,” to determine the LEP population by geographic place within DDOT’s service area. The following chart provides a breakdown of the ethnic groups and languages spoken in DDOT’s service area. The population that speak English less than “very well” was estimated by summing the Census responses from Speak Only English and less than “very well”. The data is categorized by the language groups spoken by respondents: “Spanish, Indo-European, Asian or Pacific Islander or Other.” Figures 1-14 shows the total number LEP populations for each language that met the safe harbor threshold within DDOT’s service area.

Figure 1. Total Arabic Speaking Population in DDOT's S Service Area

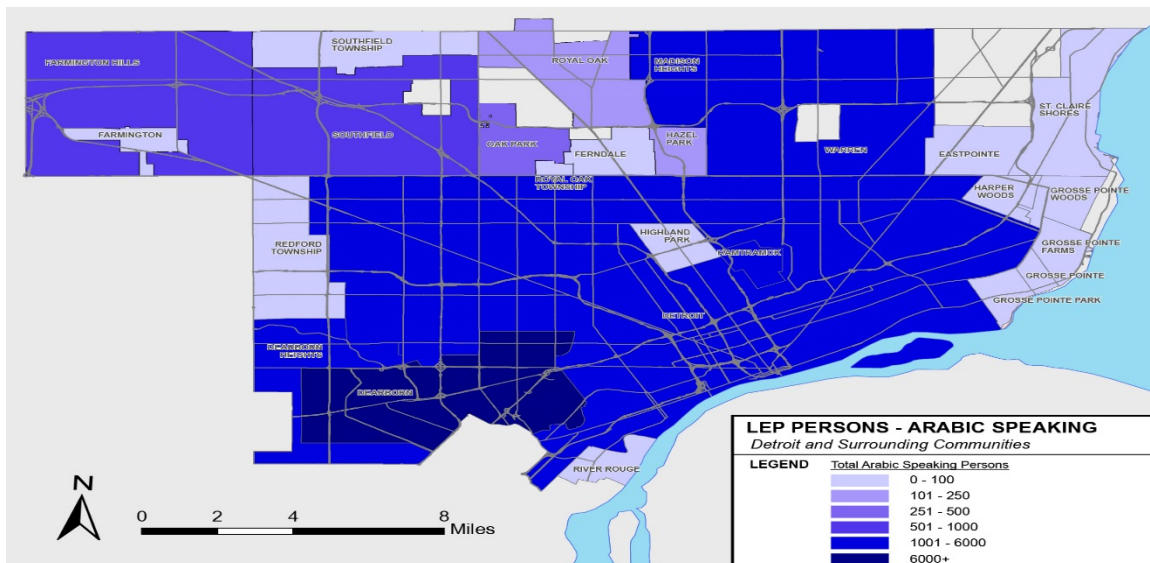


Figure 2. Total Spanish Speaking Population in DDOT's Service Area

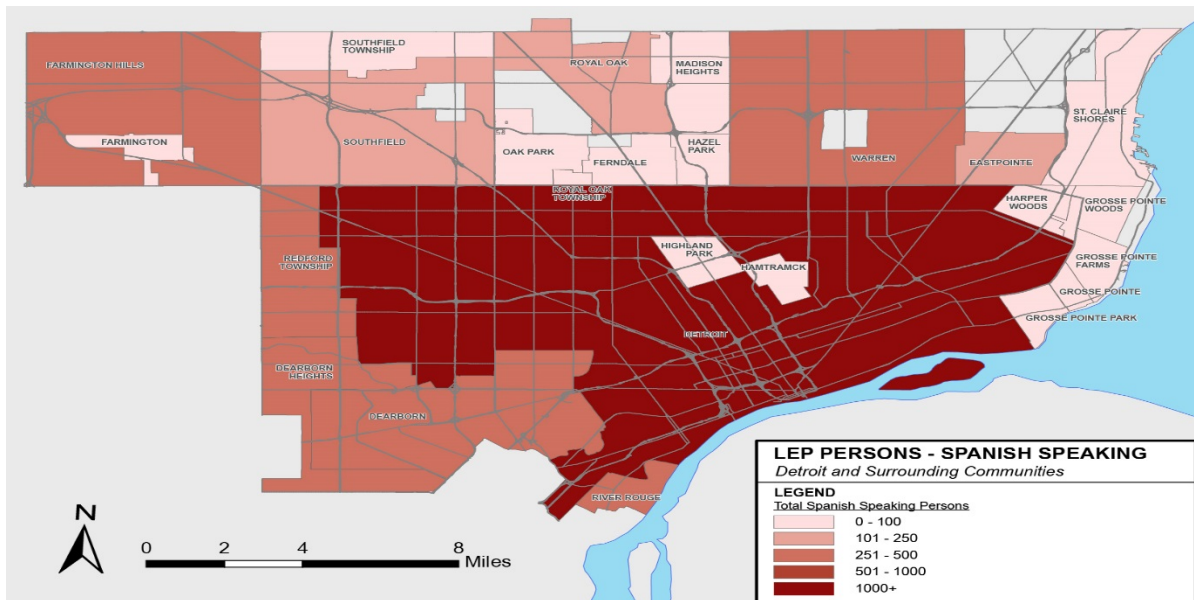


Figure 3. Total French Speaking Population in DDOT's Service Area

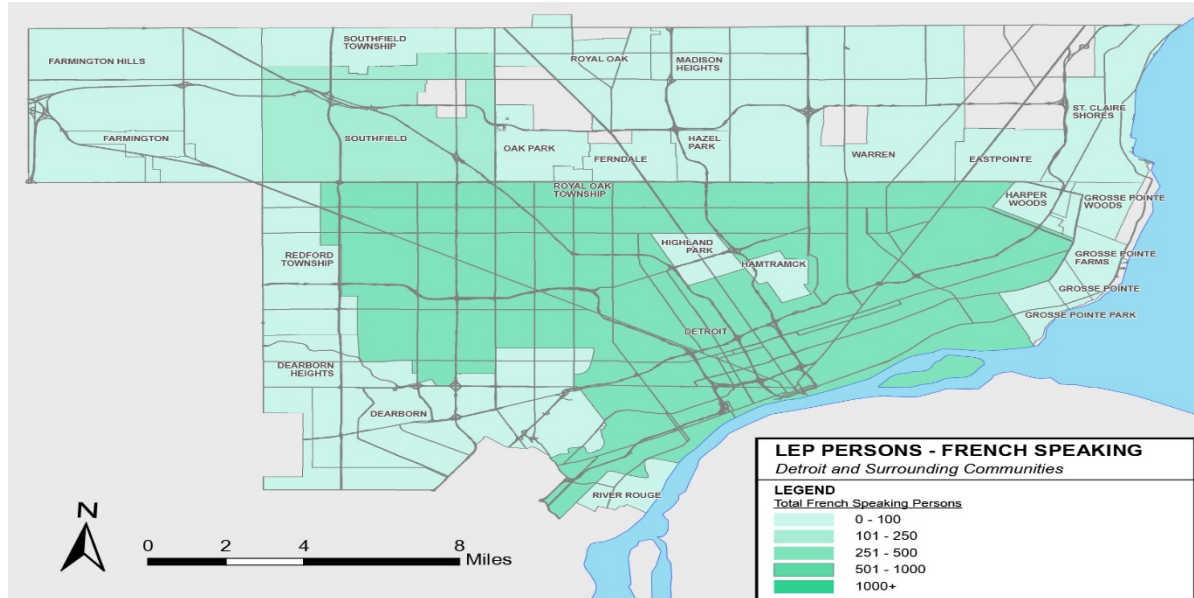


Figure 4. Total Russian Speaking Population in DDOT's Service Area

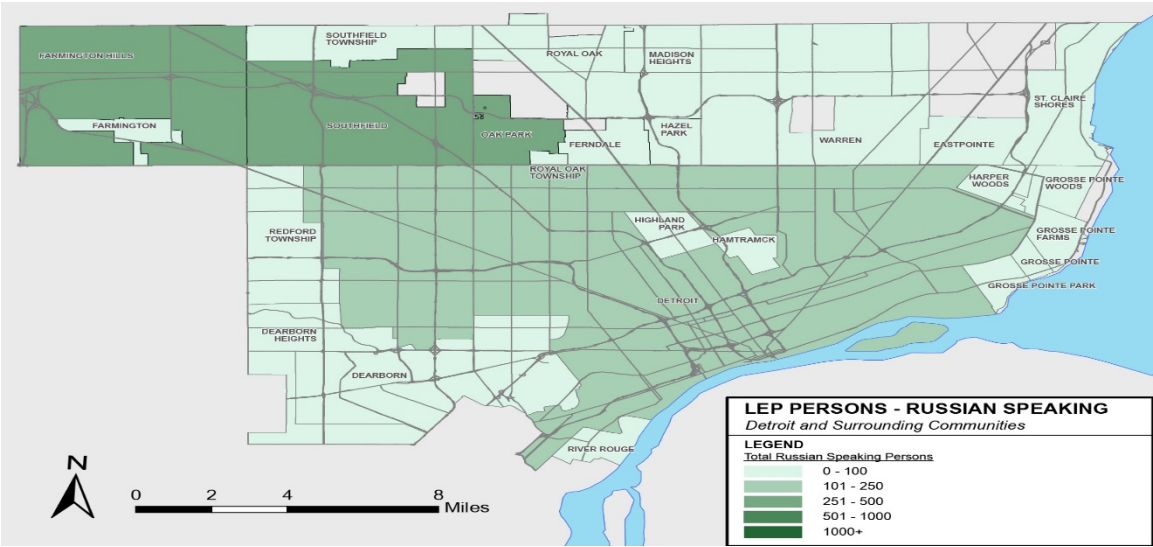


Figure 5. Total Polish Speaking Population in DDOT's Service Area

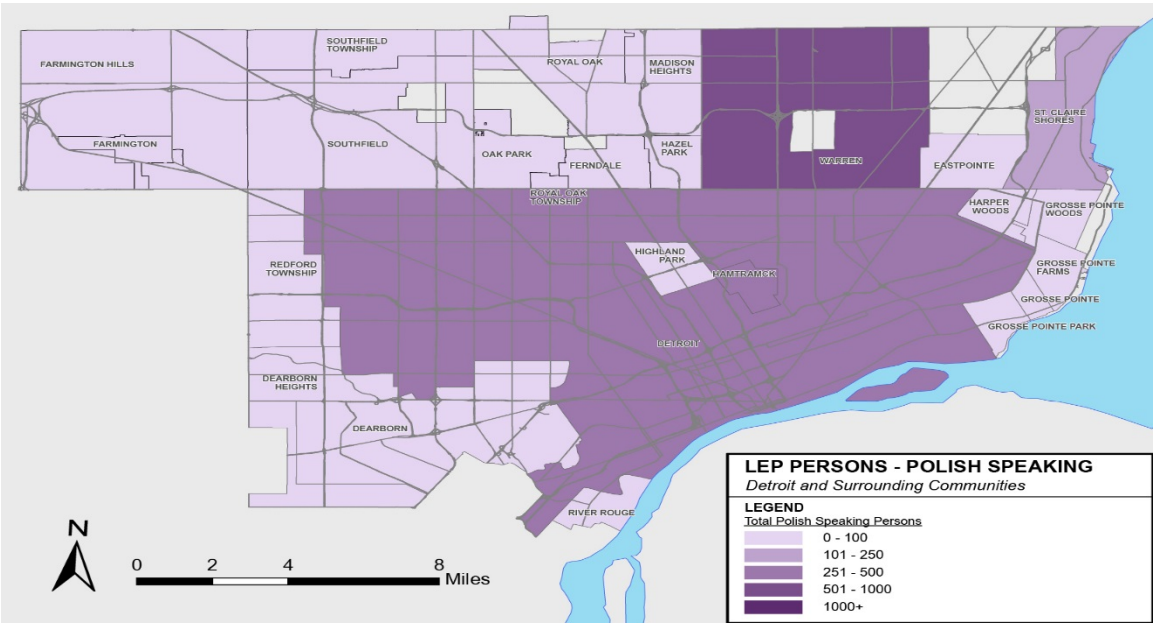


Figure 6. Total Serbo-Croatian Speaking Population in DDOT's Service Area

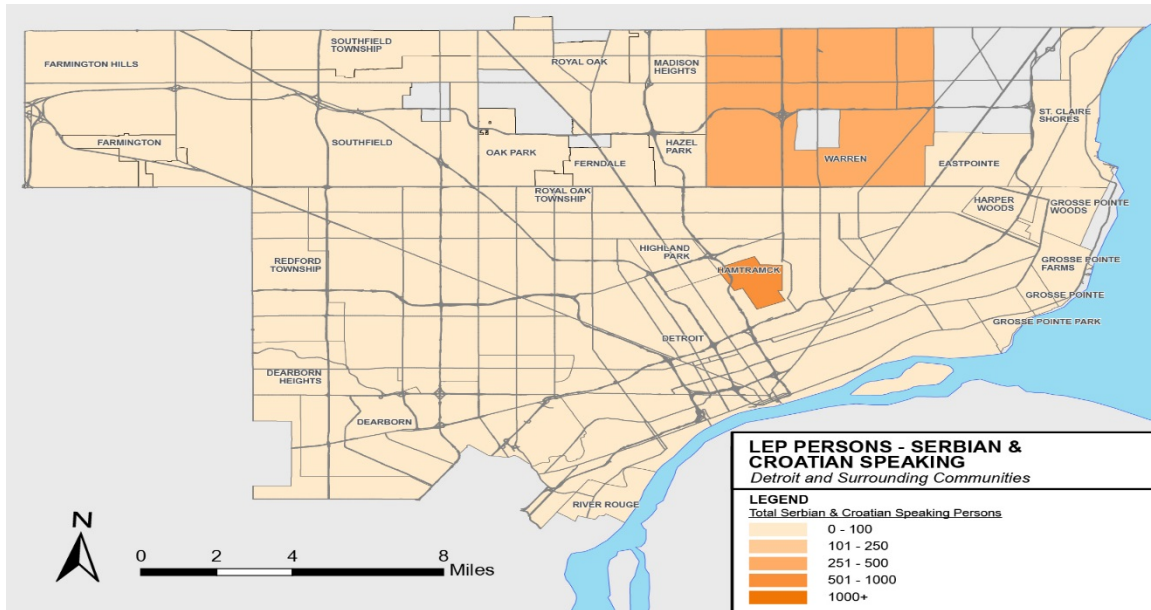


Figure 7. Total Other Slavic Languages Speaking Population in DDOT's Service Area

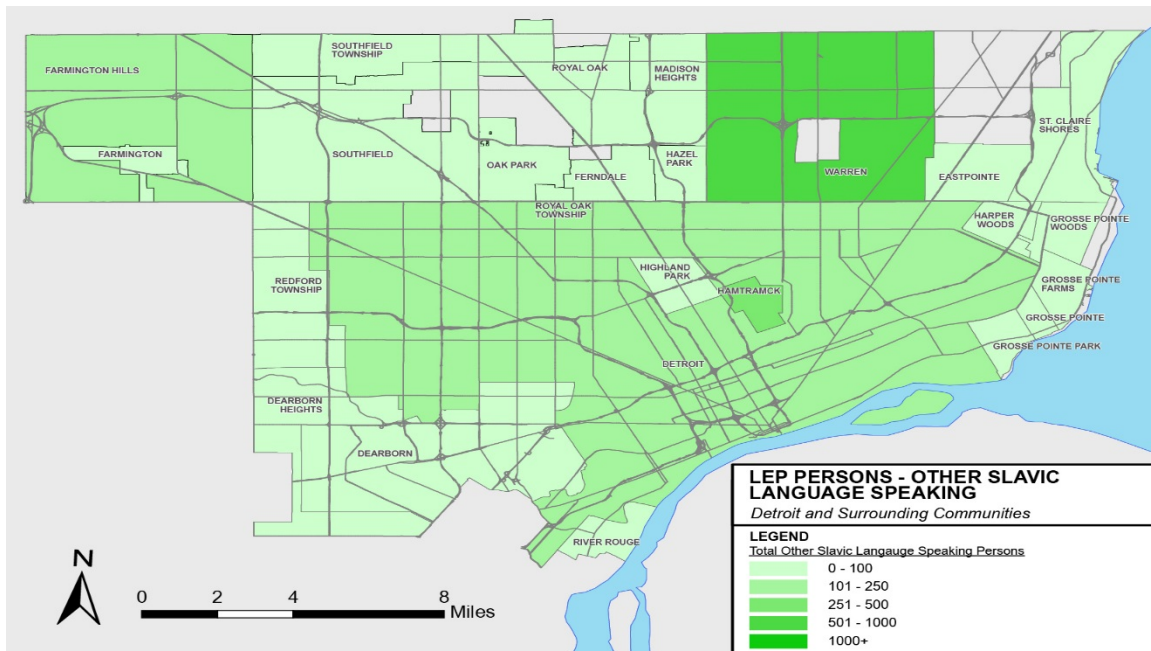


Figure 8. Total Other Indic Languages Speaking Population in DDOT's Service Area

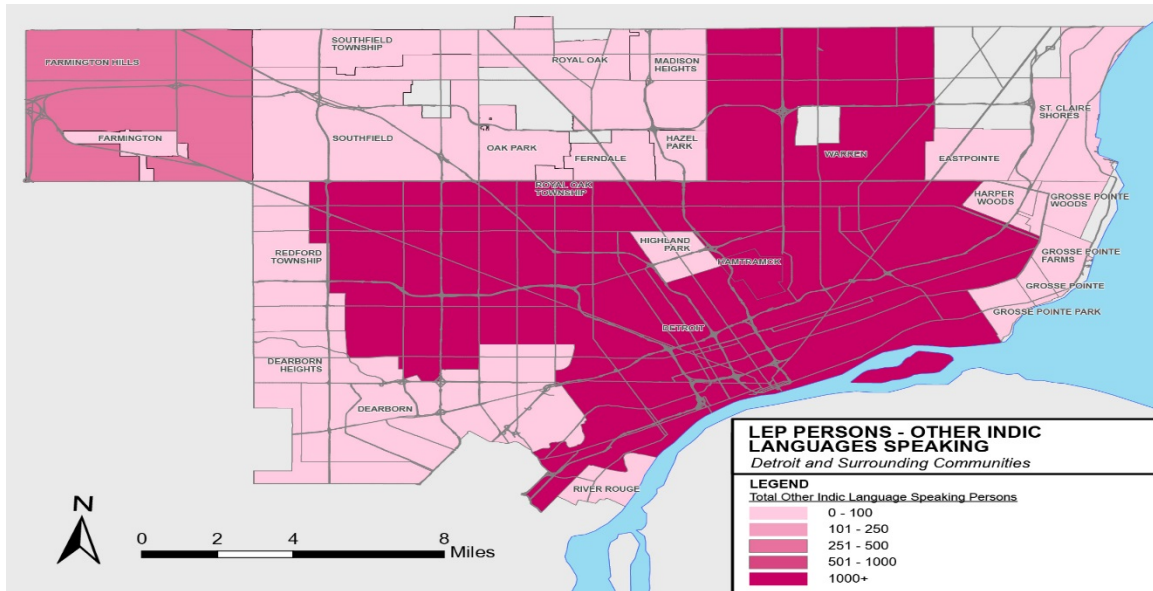


Figure 9. Total Other Indo-European Languages Speaking Population in DDOT's Service Area

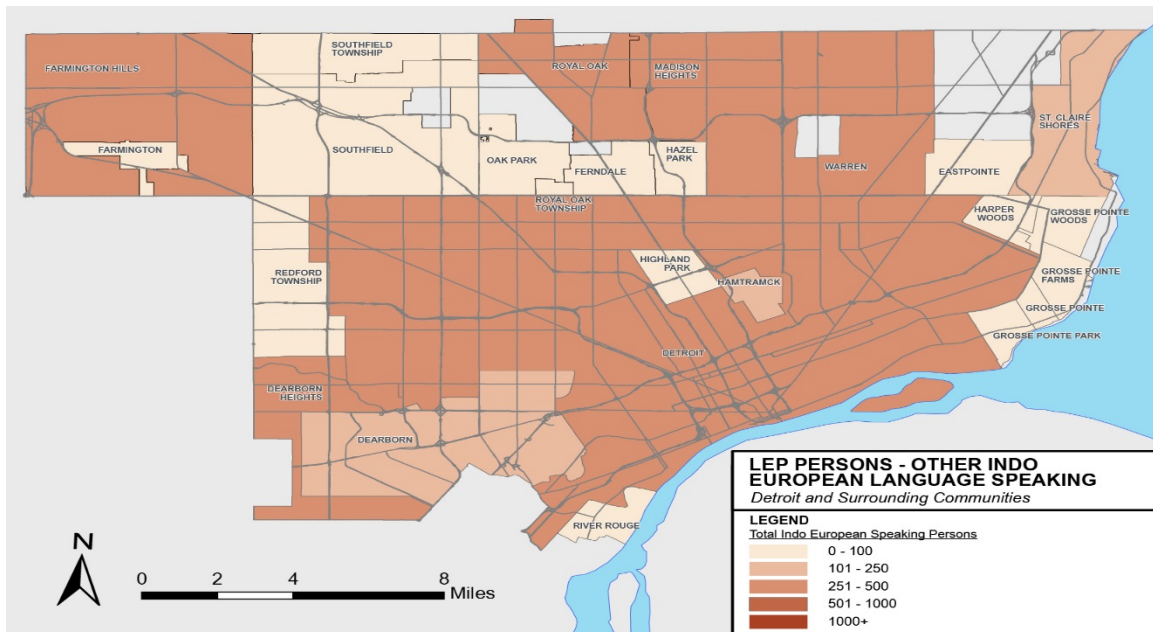


Figure 10. Total Chinese Speaking Population in DDOT's Service Area

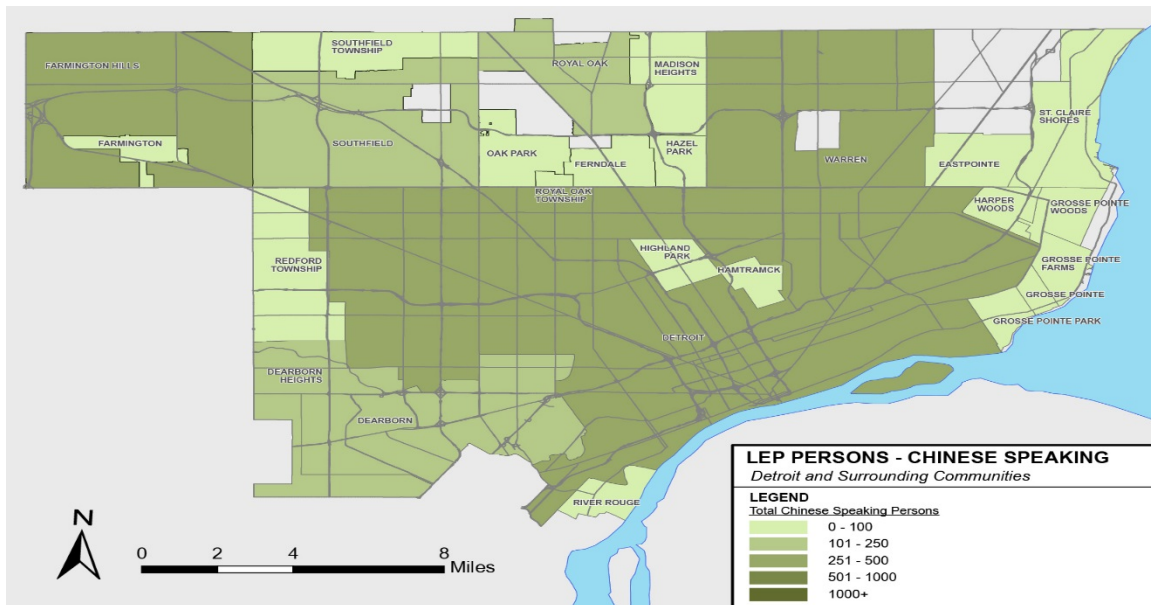


Figure 11. Total Vietnamese Speaking Population in DDOT's Service Area

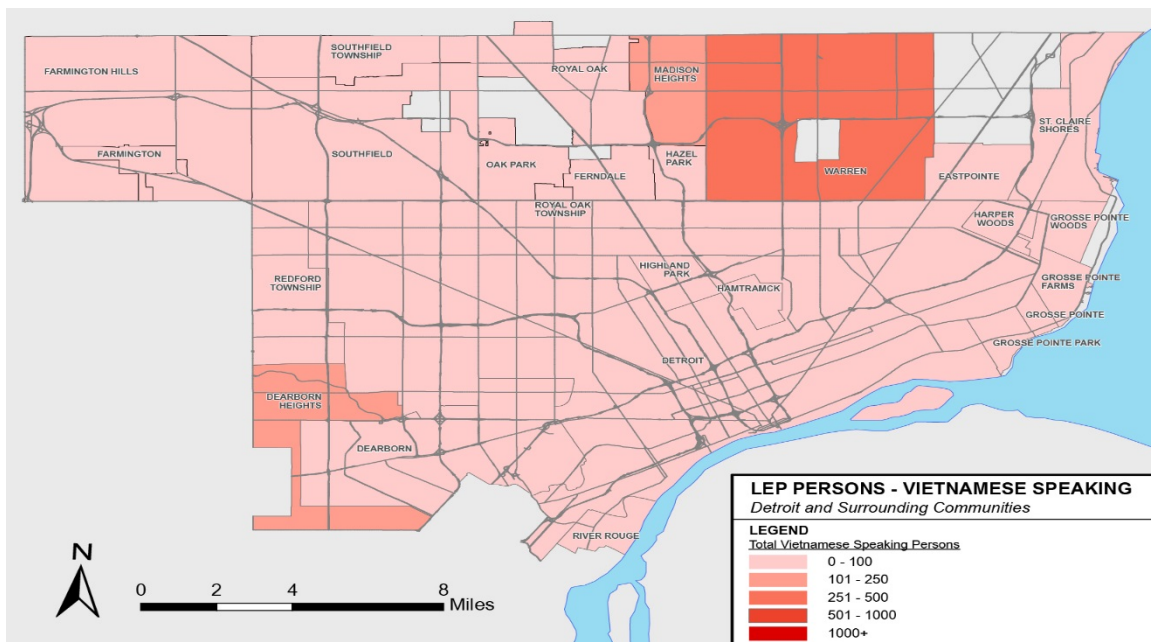


Figure 14. Total African Languages Speaking Population in DDOT's Service Area

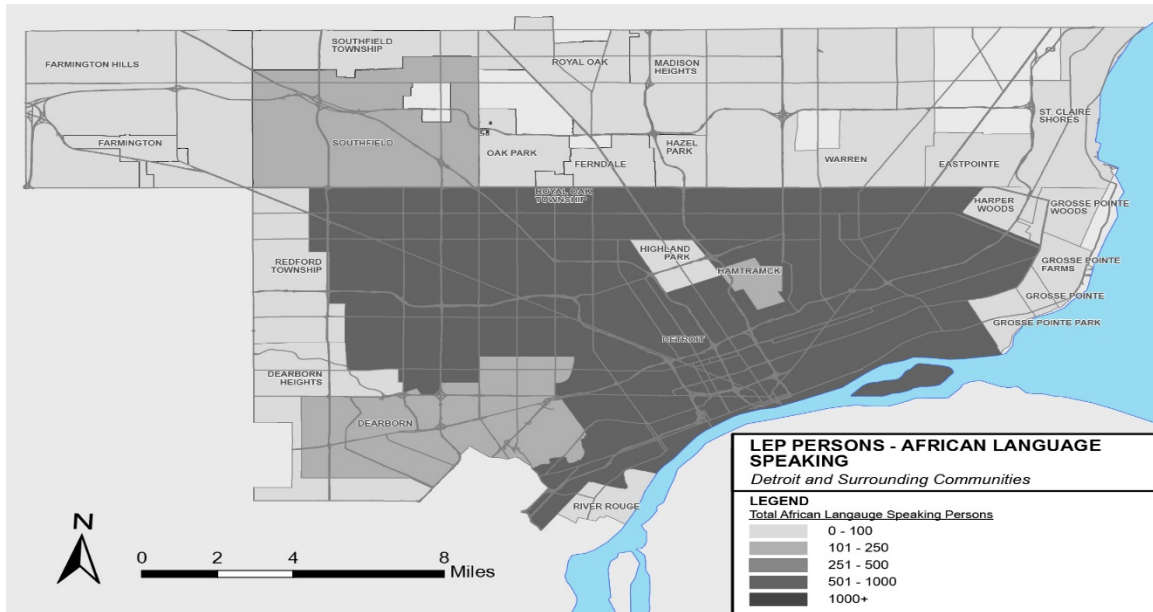


Figure 15. Total Other and Unspecified Languages Speaking Population in DDOT's Service Area

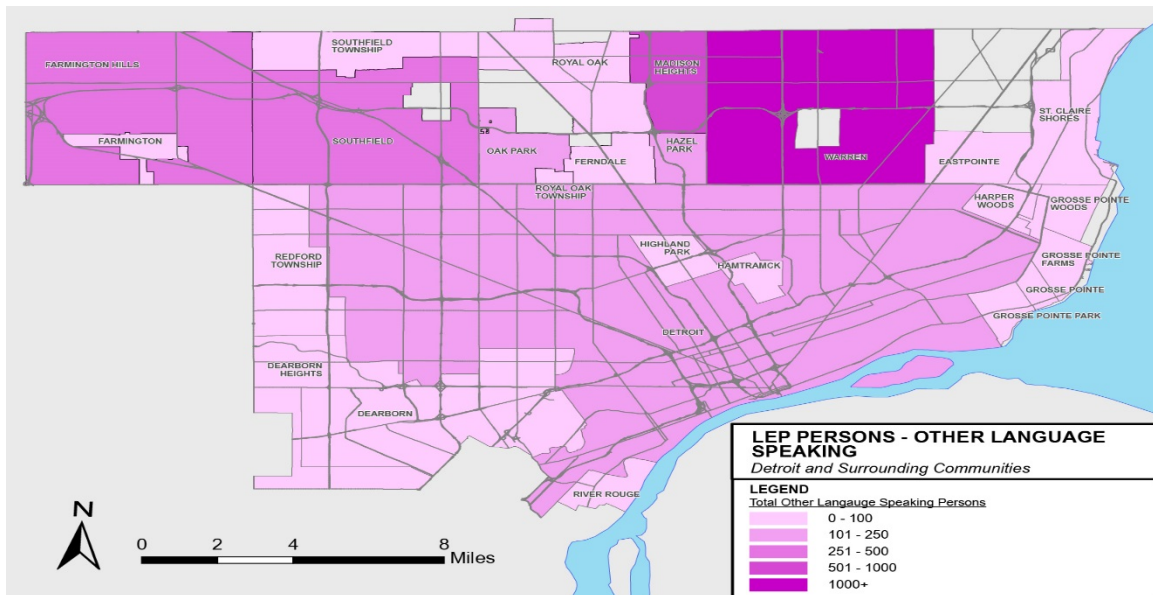


Table 2 shows that the study determined that approximately 6% (85,809 divided by 1,449,955) of the population over the age of 5 in DDOT's service area speak English less than "very well". Detroit has the largest population of 17,334 people who speak Spanish. Detroit, Hamtramck, Dearborn, Farmington Hills and Warren shows a large population of 22,493 people that speak Indo-European languages. The City of Farmington Hills shows population of 7,012 people who speak an Asian & Pacific. Detroit, Hamtramck, Dearborn, Dearborn Heights, Southfield and Warren makes up the majority of the LEP population, that is 36,105 of the 85,809, who speak other languages.

**Table 2: Language Spoken at Home by 1,000+ Persons in DDOT's Service Area
U.S. Census 2011-2015 Table B16001 "Language Spoken at Home Less than "Very Well"**

					Speak English Less than "Very Well"									
Geographic Area (City)	County	Population Age 5+	Speak only English		Spanish		Other Indo- European		Asian & Pacific		All Other Languages		Estimated Total LEP Population	
Detroit	Wayne County	641,341	574,501	90%	17,334	2.70%	4,900	0.76%	979	0.15%	4,560	0.71%	27,773	4%
Hamtramck	Wayne County	19,972	6,872	34%	47	0.24%	4,626	23.16%	111	0.56%	3,080	15.42%	7,864	39%
Highland Park	Wayne County	10,475	10,312	98%	0	0.00%	35	0.33%	10	0.10%	0	0.00%	45	0%
Redford Township	Wayne County	44,494	41,944	94%	276	0.62%	301	0.68%	18	0.04%	94	0.21%	689	2%
River Rouge	Wayne County	7,045	6,329	90%	276	3.92%	0	0.00%	16	0.23%	5	0.07%	297	4%
Grosse Pointe	Wayne County	4,996	4,677	94%	16	0.32%	15	0.30%	10	0.20%	0	0.00%	41	1%
Grosse Pointe Farms	Wayne County	8,888	8,483	95%	41	0.46%	12	0.14%	5	0.06%	0	0.00%	58	1%
Grosse Pointe Park	Wayne County	10,706	9,849	92%	26	0.24%	139	1.30%	11	0.10%	57	0.53%	233	2%
Grosse Pointe Woods	Wayne County	15,006	13,848	92%	54	0.36%	171	1.14%	27	0.00%	48	0.32%	300	2%
Harper Woods	Wayne County	13,175	12,427	94%	57	0.43%	85	0.65%	118	0.90%	7	0.05%	267	2%
Dearborn	Wayne County	88,390	46707	53%	398	0.45%	1,200	1.36%	294	0.33%	14,776	16.72%	16,668	19%
Dearborn Heights	Wayne County	52,790	35927	68%	383	0.73%	906	1.72%	431	0.82%	3,477	6.59%	5,197	10%
Southfield Township	Oakland County	14,100	12952	92%	4	0.03%	87	0.62%	87	0.62%	27	0.19%	205	1%
Southfield	Oakland County	68,916	61,647	89%	168	0.24%	799	1.16%	437	0.63%	1,634	2.37%	3,038	4%
Royal Oak	Oakland County	55,788	51,658	93%	150	0.27%	665	1.19%	218	0.39%	199	0.36%	1,232	2%
Royal Oak Township	Oakland County	2,175	2,119	97%	4	0.18%	0	0.00%	0	0.00%	20	0.92%	24	1%
Farmington	Oakland County	9,892	8,152	82%	9	0.09%	173	1.75%	265	2.68%	28	0.28%	475	5%
Farmington Hills	Oakland County	77,062	59,675	77%	355	0.46%	2,043	2.65%	1,372	1.78%	1,345	1.75%	5,115	7%
Ferndale	Oakland County	18,922	18,006	95%	33	0.17%	22	0.12%	29	0.15%	16	0.08%	100	1%
Hazel Park	Oakland County	15,438	14,236	92%	0	0.00%	43	0.28%	0	0.00%	426	2.76%	469	3%
Madison Heights	Oakland County	27,876	22,661	81%	33	0.12%	529	1.90%	373	1.34%	2,252	8.08%	3,187	11%
Oak Park	Oakland County	27,936	24,384	87%	77	0.28%	615	2.20%	256	0.92%	614	2.20%	1,562	6%
Eastpointe	Macomb County	30,738	29,406	96%	115	0.37%	90	0.29%	96	0.31%	68	0.22%	369	1%
St. Clair Shores	Macomb County	57,134	56,057	98%	62	0.11%	682	1.19%	236	0.41%	97	0.17%	1,077	2%
Warren	Macomb County	126,700	106,870	84%	281	0.22%	4,355	3.44%	1613	1.27%	3,275	2.58%	9,524	8%
DDOT Service Area	Tri-Counties	1,449,955	1,239,699	85%	20,199	1.39%	22,493	1.55%	7,012	0.48%	36,105	2.49%	85,809	6%

Factor 2: The frequency with which LEP individuals come in contact with DDOT programs and services?

LEP individuals currently have infrequent and unpredictable contact with the DDOT services. DDOT surveyed our cashiers, customer service representatives, marketing/community engagement staff, office staff, security guards, dispatchers, and drivers who have, or could have, contact with LEP individuals regarding the frequency of contact. To date, DDOT has had three telephone request for language assistance in Spanish. There were no other requests for translation of documents or interpreter services. DDOT also reviewed its 2014 Ridership survey for Language spoken at home there were 31 riders who spoke Spanish and one rider who spoke Arabic out of 1,508 riders surveyed.

Factor 3: The importance of the programs, activities and services provided by DDOT to the LEP population.

DDOT assesses its fixed route and ADA Complementary Paratransit services, public outreach and hearing meetings, schedules, flyers and riders alerts and facilities to ensure we are providing meaningful access to the LEP population. DDOT reviewed all available resources that could be used for providing LEP assistance. The following language assistance services are available, but no limited to, at no cost: Interpreters Unlimited which offers a language line to LEP individuals, Language assistance arranged with a professional translation service, and translation of printed documents. Such as schedules, applications, complaint forms, public meeting notices, and flyers/rider alerts.

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

The City of Detroit provides DDOT with translation and interpreter services free of charge through the Department of Civil Rights, Inclusion, & Opportunity. Due to the low volume of translation/interpreter calls received via the Customer Service Center, Interpreters Unlimited services has been free of charge. DDOT's Marketing Division annually budgets dollars to translate written documents and provide interpreters during public meetings, however, no request have been made. A bi-lingual Arabic staff member assists with translating functional areas from English to the appropriate language at no cost. Title VI Notice are posted at all facilities in English, Spanish and Arabic. DDOT places public ads in Arab American News and El Central Hispanic News. Customer information meetings are held every third Thursday of each month.

Vital documents are defined as those documents without which a person would be unable to access services. The following are written communications that are printed in both Spanish and Arabic:

4. Complaint Procedure
5. Compliant Forms
6. Public Meeting Notices

DDOT has concluded that Arabic and Spanish are the most prevalent languages spoken by LEP persons in DDOT's service area and should be the primary focus of any translation of vital documents or language assistance activities. However, there are populations in the community that speak non-English languages other than Spanish and Arabic. Therefore, DDOT will provide meaningful access to LEP individuals through language assistance when language services are requested.

DDOT has Language Identification Cards and Translation Services (interpreters) available at all times. On average, written translation requests of vital documents will be made available within five to seven business days. However, DDOT will have copies of complaint forms, complaint procedures and public meeting notices readily available for languages that trigger the safe harbor threshold.

All requests should be made at the Detroit Department of Transportation's (DDOT) Main Office Building, Customer Services Office, 1301 E. Warren, Detroit, MI 48207.

Safe Harbor Stipulation

Federal Law provides a "Safe Harbor" stipulation so that recipients can ensure with greater certainty that they comply with their obligations to provide written translations in languages other than English. A "Safe Harbor" means that if a recipient provides written translations of vital documents for each eligible LEP language group that constitutes five percent (5%) or 1,000 persons, whichever is less, of the total population of persons eligible to be served or likely to be affected or encountered.

Language Assistance Measures

DDOT currently employs various methods and strategies to provide LEP customers with information critical to using DDOT services. Many of these efforts focus on reaching Arabic and Spanish speaking persons, the dominant LEP population in DDOT's service area. DDOT's current and planned efforts to provide language assistance to LEP customers into the future includes the following:

1. **Translation services via phone:** "Interpreters Unlimited": DDOT has access to interpreters who can assist riders with bus schedule information in more than 50 languages.
2. **Interpretation services:** DDOT has access to Arabic and Spanish interpretation Services
3. **Vital documents:** Title VI complaint procedure, complaint form and public hearing meeting notices are available upon request in Arabic and Spanish.
4. **DDOT Website:** DDOT's Title VI Program and a Title VI complaint form are available in Spanish and Arabic and other documents on DDOT website (future implementation).
5. **Direct engagement with LEP population and community organizations:** Through working with various community organizations, DDOT will seek to identify and engage

LEP populations in the community and inform them of available public transportation services and related language assistance mediums. Conducting “How to Ride” clinics in partnership with community organizations.

6. **Workshop/Public Hearing:** If a staff member knows that they will be presenting a topic that could be of potential importance to a LEP person or if staff will be hosting a meeting or a workshop in a geographic location with a known concentration of LEP persons, they will have meeting notices, fliers, advertisements, and agendas printed in an alternative language, such as Arabic and/or Spanish.

Training of Staff

There are four primary staff groups who come into contact with LEP individuals: Transit Equipment Operators, Customer Service Representatives, Administration Staff and Marketing Staff.

1. Transit Equipment Operators have the greatest potential to interact with LEP person, through daily interaction with passengers.
2. Customer Service Representatives are also likely to come into contact with LEP persons by telephone or when direct contact with passengers.

LEP training for both groups occurs during their initial training and orientation. This training includes what procedures to follow when encountering an LEP person. See Appendix D for LEP training handout.

Monitoring and Updating the LEP Plan

DDOT will routinely review and update its LEP plan as necessary. A full review of the LEP Plan will occur with each triennial Title VI Program submission. DDOT’s Office of Compliance Division will be responsible for collecting and analyzing requested information, and assisting in investigating external complaints of discrimination.

LEP Contact:


Any questions or comments regarding this plan should be directed to the DDOT Title VI Coordinator at the address listed below:

Detroit Department of Transportation
Alicia Miller - Title VI Coordinator
1301 East Warren Avenue
Detroit, MI 48207
Phone: 313-833-3658 or Fax: 313-833-1496
Email: Title6@detroitmi.gov

Approvals:

This Language Assistance Plan policy is hereby endorsed and approved by:

Alicia Miller -Title VI Coordinator: _____

Angelica Jones - Department Director: _____



Service Standards & Policies

2018-2020

October 2018

SERVICE STANDARDS

2018/2019/2020

This document outlines transit service standards for Detroit Department of Transportation. All standards regard the Motor Bus mode; the Department does not operate any other modes.

As outlined by Title VI, this document covers these required standards:

- Standards
 - Vehicle Load
 - Vehicle Headways
 - On-Time Performance
 - Service Availability
- Policies
 - Transit Amenities
 - Vehicle Assignment
 - Service & Fare Equity Analysis

1. Vehicle Load

Vehicle Load Factor is described as follows by FTA Circular 4702.1B:

Vehicle load can be expressed as the ratio of passengers to the total numbers of seats on a vehicle. For example, on a 40-seat bus, a vehicle load of 1.3 means all seats are filled and there are approximately 12 standees. A vehicle load standard is generally expressed in terms of peak and off-peak times.

The standard load factor for bus service is **1.25**, not to exceed **1.50** on a regular basis. Therefore:

- A typical 40-foot bus has 38 seats. A total of 48 riders is standard; 57 or more riders exceeds the maximum load standard;
- A typical 60-foot bus has 57 seats. A total of 71 riders is standard; 86 or more riders exceeds the maximum load standard.

DDOT does not distinguish load standards for peak vs off-peak times. School dismissal times may cause short-term load surges. Staff will assess if school-related loads are consistent enough to warrant additional scheduled service.

If the Service Development & Scheduling group receives reports of crowding, it will monitor the route and/or trips affected. If overcrowding can be documented on five (5) separate occasions over a period of

one month, Service Development & Scheduling will add service at the next available opportunity, pending the availability of equipment and operators.

2. Vehicle Headways

Vehicle headway is described as follows by FTA Circular 4702.1B:

Vehicle headway is the amount of time between two vehicles traveling in the same direction on a given line or combination of lines. A shorter headway corresponds to more frequent service. Vehicle headways are measured in minutes (e.g., every 15 minutes. Headways and frequency of service are general indications of the level of service provided along a route. Vehicle headway is one component of the amount of travel time expended by a passenger to reach his/her destination.

Standard headways are as follows:

- Weekday morning and afternoon peak period: **every 45 minutes or less**
- Weekday off-peak, Weekends: **every 75 minutes or less**

Off-peak standards apply to routes that maintain the same frequency during peak and off-peak periods. **No route shall have headways wider than every 75 minutes.**

These factors determine the establishment of headways:

- Load factor
- Customer demand
- Ridership trends
- Proximity to other routes
- Standard “start and end” times of major destinations along the route ☐ Population trends
- Population density

DDOT is working actively to improve base headways. Staff hopes to improve this service standard in future versions of this document.

3. On-Time Performance

On-time performance is described as follows by FTA Circular 4702.1B:

On-time performance is a measure of runs completed as scheduled. The criterion first must define what is considered to be “on time.” For example, a transit provider may consider it acceptable if a vehicle completes a scheduled run between zero and five minutes late in comparison to the established schedule. On-time performance can be measured against route origins and destinations only, or against origins and destinations as well as specified time points along the route. Some transit providers set an on-time performance standard that

prohibits vehicles from running early (i.e., ahead of schedule) while others allow vehicles to run early within a specified window of time (e.g., up to five minutes ahead of schedule). An acceptable level of performance must be defined (expressed as a percentage). The percentage of runs completed system-wide or on a particular route or line within the standard must be calculated and measured against the level of performance for the system.

Mid-route on-time performance checks **actual departure times** against **scheduled departure times**. Departures that are **6 or more minutes behind schedule** are considered late. The count of on-time departures is divided by the total number of scheduled departures; the resulting percentage is the ontime performance rate.

Using AVL data, DDOT Service Development & Scheduling produces an AVL On-Time report every week.

Standards measured by AVL Data are as follows:

- On-target: **85 percent or better**
- Needs improvement: 75 to 84 percent
- Fail: below 75 percent

Routes that fall below target for six (6) consecutive weeks shall be reviewed. Service Development & Scheduling will remedy poorly performing routes by adjusting running times at the next quarterly schedule change.

Please note, a completely new AVL system (software and hardware) will arrive at DDOT during the term of this document. Service Standard targets will remain in effect with the new system, but methods to compile data may change.

4. Service Availability

Service Availability is described as follows by FTA Circular 4702.1B:

Service availability is a general measure of the distribution of routes within a transit provider's service area. For example, a transit provider might set a service standard to distribute routes such that a specified percentage of all residents in the service area are within a one-quarter mile walk of bus service or a one-half mile walk of rail service. A standard might also indicate the maximum distance between stops or stations. These measures related to coverage and stop/station distances might also vary by population density.

As a municipal department, DDOT's transit service area is coterminous with **Detroit city limits**. Selected DDOT services operate beyond city limits. Such services may exist for these reasons:

- Linear routing along the border of Detroit
- Irregularly shaped municipal boundaries, causing incidental coverage to a neighboring jurisdiction that sits between different areas of Detroit
- Legacy transit routing never assumed by a suburban provider

- Route extensions to connect Detroit residents to major activity centers or transfer points that are outside of city limits (such services shall not be “free-standing” suburban routes, but rather suburban extensions of regular city-focused routes)
- Cross-municipal routes funded by regional agencies and operated by DDOT

These types of routes enter the service area of neighboring transit systems. DDOT does not set out to provide full coverage to suburban areas; as such, for the purposes of this standard, suburban areas receiving DDOT service are not considered part of the service area.

Standard service availability is as follows:

- Service area residents within 1/4 mile of a bus stop: **80 percent**
- Service area residents within 1/2 mile of a bus stop with Weekday all-day service: **95 percent**

5. Transit Amenities

Transit Amenities are described as follows by FTA Circular 4702.1B:

Transit amenities refer to items of comfort, convenience, and safety that are available to the general riding public. Fixed-route transit providers must set a policy to ensure equitable distribution of transit amenities across the system. Policies in this area address how these amenities are distributed within a transit system, and the manner of their distribution determines whether transit users have equal access to these amenities. This...is not intended to impact funding decisions for transit amenities. Rather, this...applies after a transit provider has decided to fund an amenity.

In regards to specific amenities, DDOT has established the following standards:

- **Seating:** DDOT does not have a bench or seating program. Benches exist only as part of shelters (see below).
- **Escalators & Elevators:** DDOT operates only one elevator at a revenue facility. The elevator is located at a downtown bus station served by routes from all over the service area. All interaction with transit vehicles takes place on the ground floor of the bus station; the elevator is only useful for occasional events on the second floor of the building.
- **Information:** DDOT does not have an active program for on-street customer information. Limited maps and digital displays are provided at two transit hubs.
- **Waste receptacles:** In partnership with Department of Public Works (DPW), DDOT is placing waste receptacles at high-ridership bus stops. A stop qualifies if it averages seven (7) or more boardings and deboardings per day. Such stops are distributed evenly throughout the service area.
- **Shelters:** DDOT has developed standards for placement of shelters. They are as follows: o **Level of Service.** Level of service is measured in frequency (time between buses) and span

(hours of operation per day). Bus stops with higher levels of service will be given higher priority for shelters.

- **Stability of Route within Service Network.** Some routes run on corridors where service will always be needed. Others are located in areas where demand for service is likely to evolve over time, and where there may be a need to restructure the route to meet customer needs. Shelters are a long-term infrastructure investment, and as such will be directed toward bus stops whose locations and levels of service are likely to be constant over time.
- **Site Dimensions and Pavement Characteristics.** Shelters must be safely sited and anchored, and installation sites must conform to the federal Americans with Disabilities Act and all other applicable laws and regulations. Sidewalk width, type and condition of pavement, and the presence or absence of driveways, crosswalks, and obstacles in the right of way may determine where and how shelters can be installed.
- **Position on Route.** Bus shelters are an amenity for customers and are most useful at stops where customers tend to board rather than alight. Stops located within 1 mile of the end of the route will be deprioritized for shelter installation. However, since different routes generate traffic at different points based on the destinations they serve, each route will be evaluated independently to determine which segments of the route should be prioritized for shelter installation.
- **Transfer Points.** Where two or more bus routes intersect, it is desirable to provide a pleasant waiting environment for customers seeking to transfer between them. Transfers between stable routes with high levels of service will be prioritized for shelter installation.
- **Stops Shared by Multiple Routes.** Where two or more routes share a bus stop location, the same amenity can be utilized by customers on different routes. Stops shared by stable routes with high levels of service will be prioritized for shelter installation.
- **Proximity to Major Destinations.** Many routes serve destinations where large numbers of people travel by bus. Destinations include schools, hospitals, and large retail outlets. Bus stops within 500 feet of such destinations will be prioritized for shelter installation.
- **Distribution of Shelters on Route.** To maintain an equitable distribution of amenities throughout the DDOT service area, locations within 1/2 mile of other shelter stops on the same route will be deprioritized for shelter installation.
- **Legacy Shelters.** Some existing DDOT shelters may not meet the above criteria, either because demand for service has shifted over time, or because they were evaluated according to earlier sets of criteria. In most cases, these shelters will be left in place until the end of their useful lives, but will not be replaced with new shelters once they become deteriorated or damaged beyond repair. Where necessary, legacy shelters may be moved to new locations where they will meet the needs of larger numbers of customers.
- **Shelter Requests from Customers and the Community.** DDOT will evaluate all shelter requests according to the above criteria, and will consider and prioritize

them accordingly. While we will not accommodate every request we receive, we welcome customer input to help us recognize where unmet needs may exist.

6. Vehicle Assignment

Vehicle Assignment is described as follows by FTA Circular 4702.1B:

Vehicle assignment for each mode. Vehicle assignment refers to the process by which transit vehicles are placed into service in depots and on routes throughout the transit provider's system. Policies for vehicle assignment may be based on the age of the vehicle, where age would be a proxy for condition. For example, a transit provider could set a policy to assign vehicles to depots so that the age of the vehicles at each depot does not exceed the system-wide average. The policy could also be based on the type of vehicle. For example, a transit provider may set a policy to assign vehicles with more capacity to routes with higher ridership and/or during peak periods. The policy could also be based on the type of service offered. For example, a transit provider may set a policy to assign specific types of vehicles to express or commuter service. Transit providers deploying vehicles equipped with technology designed to reduce emissions could choose to set a policy for how these vehicles will be deployed throughout the service area.

DDOT vehicles are assigned to two operating facilities. Each batch of vehicles is split between the facilities in roughly even proportions. DDOT's fleet consists of 40-foot buses and 60-foot buses of varying ages.

DDOT operates two types of specialty vehicles. **60-foot articulated buses** are assigned based on ridership levels. Service Development & Scheduling selects high-ridership trips for coverage by articulated buses. **40-foot hybrid buses** are assigned to both operating facilities and may be used on any route.

Otherwise, DDOT does not assign specific vehicles or vehicle types to specific routes. Any vehicle type, old or new, may appear on any route at any time. A review of daily vehicle assignments will exhibit this vehicle assignment technique.

7. Service & Fare Equity Analysis

Transit requirements to evaluate service and fare changes are described as follows by FTA Circular 4702.1B:

To further ensure compliance with 49 CFR Section 21.5(b)(2), 49 CFR Section 21.5(b)(7), and Appendix C to 49 CFR part 21, all providers of public transportation to which this Section applies shall develop written procedures consistent with this Section to evaluate, prior to implementation, any and all service changes that exceed the transit provider's major service change threshold, as well as all fare changes, to determine whether those changes will have a discriminatory impact based on race, color, or national origin. The written procedures and

results of service and/or fare equity analyses shall be included in transit provider's Title VI Program.

At DDOT, we have developed standards and policies to meet this requirement. Measurements for service change are revenue hours and revenue miles.

Major Service Change Policy

A service equity analysis will be conducted whenever DDOT implements a major service change to the bus system. A major service change is defined as the addition of, or reduction in, more than 25 percent of revenue hours and/or revenue miles on any one route.

Disparate Impact Policy

A major service change to the bus system will be deemed to have a disparate impact on minority populations if 25 percent or more of the affected service falls in census block groups with minority populations higher than the DDOT service area average.

Disproportionate Burden Policy

A major service change to the bus system will be deemed to have a disproportionate burden if 25 percent or more of a service reduction falls in census block groups with minority populations higher than the DDOT service area average.

In any instance where the service change reaches or exceeds 25 percent, staff conducts an equity analysis.

Most census block groups in DDOT's service area are low-income and/or minority; as such, the transit routes that serve these areas are often classified as low-income and/or minority. As part of a commitment to fair, equitable and accessible service planning, staff may conduct an equity analysis even when the change does *not* reach the 25 percent threshold.

Fare Equity Analysis and Evaluation

A fare equity analysis/evaluation will be conducted whenever DDOT implements a fare change, regardless of the amount of increase or decrease.

A fare change includes system-wide fare changes, a change on certain routes and/or a change to fare payment type or fare media.

Promotional fare programs are not subject to a fare equity analysis/evaluation. Such instances may include:

- Clean air promotions, where a local governmental entity or DDOT itself makes free fare available for all riders;
- Temporary fare reductions that are mitigating measures for other actions, such as construction activities that close a segment of the bus system; ☐ Promotional fare reductions that last less than 180 days.

Monitoring Transit Service

As part of the Title VI Program update, the Federal Transit Administration (FTA) requires transit providers to monitor the performance of their transit system relative to their system-wide service standards and service policies not less than every three years in order to remain in compliance with Title VI requirements. Although the FTA requires monitoring not less than every three years, DDOT monitors its service every year in order to ensure that potential problems are found and rectified in a timely fashion. DDOT will submit the results of its monitoring program as well as documentation verifying the Department Director's approval of the monitoring results to the FTA as part of its Title VI Program.

DDOT's service monitoring results are divided into six sections corresponding to the four standards and two policies established in Circular 4702.1B for service monitoring:

- Standards
 - Vehicle Load
 - Vehicle Headway
 - On-Time Performance
 - Service Availability
- Policies
 - Distribution of Transit Amenities
 - Vehicle Assignment.

Using the methodology and standards developed for each of these metrics in the Service Standards and Policies section of DDOT's 2018 Title VI Comprehensive Review Update (set for the three year period 2018 – 2020), DDOT concludes that there are no disparate impacts in the levels of service that it provides. DDOT's October 2018 Service Standard Monitoring Report is provided in Appendix D.

Appendix A

Title VI Equity Analysis

Copies of the following fare equity analyses conducted by the DDOT during the review period are included in Appendix A.

- September 2016, January 2017, April 2017 Service Change Equity Analysis
- September 2017 Service Change Equity Analysis
- September 2018 Service Change Equity Analysis

Appendix B

Demographic & Service Profile

DDOT regularly evaluates demographic information as part of any proposed service or fare change, as required by the FTA. In addition, DDOT conducted an On-Board Ridership Survey for this program submission. The results are included in Appendix B.

Appendix C

Title VI Staff Training

Title VI Employee Acknowledgement of Policy Form and LEP Language Assistance Plan Tools.

Appendix D

Monitoring Training Service

October 2018 Service Standards Monitoring Report