

Detroit Department of Transportation

# 2025-2027 Title VI Program Plan



**November 1, 2025**



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# INTRODUCTION

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## Organization Description

The Detroit Department of Transportation (DDOT) provides service in the City of Detroit and destinations beyond the city limits in Wayne and Oakland counties. According to the US Census Bureau, DDOT's service area population is 645,765. All fixed-route service is operated in-house. DDOT directly operates a network of 37 fixed routes with a fleet of 292 Federal Transit Administration (FTA)-funded buses. The current peak requirement is 189 vehicles.

DDOT's Paratransit is currently operated by five (5) Service Providers: People's Express, Big Star, Checker Cab, Delray United, and MOE Transportation.

The in-house staff of DDOT Paratransit is responsible for the reservation, scheduling, and dispatch functions. Customer complaints are processed by DDOT Paratransit employees; the eligibility certification process is administered by DDOT Paratransit employees. Both fixed-route and paratransit services are operated 24 hours a day.

DDOT operates five (5) administrative, operations, and maintenance facilities and two (2) transit centers as noted below.

ADMINISTRATIVE, OPERATIONS, AND MAINTENANCE	
Main Administrative Office	100 Mack, Detroit, MI 48201
Central Heavy Repair Building (Maintenance & Materials)	1301 E. Warren, Detroit, MI 48207
Gilbert Terminal (Bus Operations and Maintenance)	5600 Wabash, Detroit, MI 48208
Coolidge Terminal & Garage (Under construction)	14044 Schaefer, Detroit, MI 48208
Shoemaker Terminal & Garage (Bus Operations and Maintenance)	5149 St. Jean, Detroit, MI 48213
TRANSIT CENTER	
Rosa Parks Transit Center	360 Michigan, Detroit, MI 48226
Jason Hargrove Transit Center	1121 West Eight Mile, Detroit, MI 48203



## 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 shall, based on the grounds 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 DDOT receives federal financial assistance (42 U.S.C. Section 2000d). Furthermore, it is the policy of DDOT, as a recipient of federal-aid funding, to ensure nondiscrimination in all of its programs and activities.

To ensure compliance with Title VI of the Civil Rights Act of 1964, DDOT commits daily to promptly taking all measures necessary to ensure compliance with Title VI of the Civil Rights Act is upheld.

DDOT includes Title VI assurances in all written contracts and monitors for compliance when distributing federal aid funds to other entities. DDOT's Title VI Program Coordinator 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 DDOT's Title VI Program should contact the Office of Compliance Title VI Coordinator, Alicia Miller, at DDOT's Main Office located at 100 Mack, Detroit MI 48201; by telephone at (313) 244-2327; or by email at [DDOTTitle6@detroitmi.gov](mailto:DDOTTitle6@detroitmi.gov).

As the Executive Director of Transit, I am fully committed to the goals of achieving nondiscrimination for all beneficiaries and participants, contractors, and subrecipients.

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Robert John Cramer, Executive Director of Transit

Date

# GENERAL REQUIREMENTS

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## Title VI Notice to the Public & Locations Where Title VI Notices are Posted

DDOT posts “Know Your Rights” notices to notify the public of their rights under Title VI at the following locations listed in Table 1 below. The “Know Your Rights” notices are also publicly displayed on revenue vehicles.

**TABLE 1 – PUBLIC NOTICE LOCATIONS**

LOCATION NAME	ADDRESS	CITY
Main Administration Office	100 Mack	Detroit
Central Heavy Repair Building	1301 East Warren	Detroit
Rosa Park Transit Center	360 Michigan Avenue	Detroit
Gilbert Terminal & Garage	5600 Wabash	Detroit
Shoemaker Terminal & Garage	5149 St. Jean	Detroit
Jason Hargrove Transit Center	1121 W. Eight Mile Rd	Detroit
Coolidge Terminal & Garage	14044 Schaefer	Detroit
Website	<a href="http://www.detroitmi.gov/ddot">www.detroitmi.gov/ddot</a>	

DDOT’s Title VI notices are available on our buses in English, Spanish, and Arabic (Figure 1). When DDOT’s outreach events and activities take place in geographic areas with known concentrations of Other Indo-European languages that meet the “Safe Harbor” threshold, we will provide a Title VI notice translated in that languages as well.

Figure 1 - Title VI Notice to the Public Poster – English, Spanish, and Arabic

KNOW YOUR RIGHTS	CONOZCA SUS DERECHOS	اعرف حقوقك
<b>THE CITY OF DETROIT DEPARTMENT OF TRANSPORTATION</b> <ul style="list-style-type: none"><li>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.</li><li>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 DDOTitle6@detroitmi.gov; visit our administrative office at 100 Mack Ave, Detroit, MI 48201 or website at <a href="http://www.ridedetroittransit.com">www.ridedetroittransit.com</a>.</li></ul>	<b>DEPARTAMENTO DE TRANSPORTE DE LA CIUDAD DE DETROIT</b> <ul style="list-style-type: none"><li>El Departamento de Transporte de la Ciudad de Detroit (City of Detroit Department of Transportation) dirige sus programas sin discriminar por raza, color y origen nacional de conformidad con el Título VI de la Ley de derechos civiles. Las personas que se hayan sentido agraviadas por alguna práctica discriminatoria ilegal de acuerdo al Título VI pueden presentar una queja al Departamento de Transporte de la Ciudad de Detroit.</li><li>Para más información sobre el programa de derechos civiles del Departamento de Transporte de la Ciudad de Detroit, nuestras obligaciones y los procedimientos para presentar una queja, llame al (313) 933-1300, envíe un correo electrónico a DDOTitle6@detroitmi.gov; visite nuestra oficina administrativa situada en 100 Mack Ave, Detroit, MI 48201 o entre en nuestro sitio web <a href="http://www.ridedetroittransit.com">www.ridedetroittransit.com</a>.</li></ul>	<b>وزارة النقل التابعة ل مدينة ديترويت</b> <ul style="list-style-type: none"><li>تدير وزارة النقل في مدينة ديترويت برامجها بغض النظر عن العرق واللون والأصل القومي وفقاً للمادة السادسة من قانون الحقوق المدنية. يمكن للأشخاص الذين يعتقدون أنهم تعرضوا للظلم من أي ممارسة تمييزية غير قانونية بموجب الباب السادس تقديم شكوى إلى إدارة النقل بمدينة ديترويت.</li><li>لمزيد من المعلومات حول برنامج الحقوق المدنية التابع لوزارة النقل في مدينة ديترويت، والتزاماتها وإجراءاتها لتقديم شكوى، اتصل بالرقم (313) 933-1300، بريد الإلكتروني DDOTitle6@detroitmi.gov، قم بزيارة مكتبنا الإداري في 100 Mack Ave، Detroit، MI 48201 أو موقع الويب على <a href="http://www.ridedetroittransit.com">www.ridedetroittransit.com</a>.</li></ul>

**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) 933-1300.**  
وللمساعدة في الترجمة اتصل بمكتب خدمة الزبائن التابع لوزارة النقل في مدينة ديترويت على الرقم (313) 933-1300.



## Title VI Complaint Procedures

Any person who believes they have been subjected to discrimination based on race, color, or national origin may file a Title VI complaint by completing and submitting DDOT's Title VI Complaint Form to DDOT's Office of Compliance. A copy of the DDOT Title VI Complaint Form is shown in Figure 2 and is available on DDOT's website. DDOT investigates complaints received no more than 180 days after the alleged incident. DDOT will process complaints that are complete. Signed complaint forms may be filed in writing via U.S. mail to:

Detroit Department of Transportation  
Office of Compliance  
Attention: Title VI Coordinator  
100 Mack Avenue  
Detroit, MI 48201

Complaint forms may also be faxed to DDOT's Office of Compliance at (313) 833-1496.

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

### **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 15 days from the date of the letter to send requested information to the investigator assigned to the complaint. If the investigator is not contacted by the complainant or does not receive the additional information within 15 days, DDOT may administratively close the complaint. A complaint can be administratively closed if the complainant no longer wishes to pursue their complaint.

After the investigator reviews the complaint, he or she 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 the actions of the agency in response to the findings. If the complainant wishes to appeal the decision, he or she has 10 days after the date of the closure letter or the LOF to submit a written request to the Executive Director of DDOT.

A person may also file a complaint directly with the Federal Transit Administration Office of Civil Rights:

Federal Transit Administration  
Office of Civil Rights  
East Building, 5<sup>th</sup> Floor - TCR  
1200 New Jersey Avenue SE  
Washington, DC 20590

DDOT's complaint form and all procedures are also located on our website:  
[www.detroitmi.gov/ddot](http://www.detroitmi.gov/ddot).

### **Title VI Complaint Form**

A copy of the DDOT Title VI Complaint Form is shown in Appendix A and is available on DDOT's website at [www.detroitmi.gov/ddot](http://www.detroitmi.gov/ddot).

## Title VI Investigations, Complaints, and Lawsuits

DDOT is required to prepare and maintain a list of active investigations, lawsuits, and complaints naming DDOT and that allege discrimination based on race, color, or national origin. Table 2 below shows the required categories that must be included in the list of active investigation, lawsuits, and complaints.

- the date that the transit-related Title VI investigation, lawsuit, or complaint was filed,
- a summary of the allegation(s),
- the status of the investigation, lawsuit, or complaint, and
- actions taken by DDOT in response, or final findings related to the investigation, lawsuit, or complaint.

Since the approval of DDOT's last 2023-2025 Title VI Program, there have been two Title VI complaints received alleging that DDOT has discriminated against an individual based on race, color, or national origin.

**Table 2 - Title VI Investigations, Complaints, and Lawsuits**

COMPLAINT NUMBER	COMPLAINANT	RESPONDENT	DATE FILED	SUMMARY OF ALLEGATIONS (INCLUDE BASIS OF COMPLAINT: RACE, COLOR OR NATIONAL ORIGIN)	TYPE	DATE CLOSED	ACTION(S) TAKEN
1. CAF 13646	Christopher Sanders	Alicia Miller	3/17/2025	Denied ride due to race	Discrimination	3/28/2025	No discrimination found
2. CAF 14146	Daril Gonzalez	Scharron Rambus	5/12/2025	Non-English fare dispute	Discrimination	5/28/2025	No discrimination found.

## Title VI Training

The City of Detroit's Human Rights/Resources Department provides Title VI training to all employees during new employee orientation training. All DDOT employees are required to read and sign an "Acknowledgement of Title VI Plan Policy" form during the onboarding process. The Acknowledgment of Title VI Plan Policy form is shown below in Appendix B. DDOT's Office of Compliance Division conducts Title VI Awareness training for all safety-sensitive and non-safety sensitive employees within 90-days of employment.

## DDOT Non-Elected Advisory Committees

DDOT has two non-elected advisory committees:

- Local Advisory Council (LAC)
- Paratransit Appeals Board (PAB)



DDOT actively encourages minority representation on the LAC and PAB. We directly reach out to community-based organizations to increase awareness of the committees and solicit applications for new members. DDOT's Office of Compliance and the Executive Office solicit applications during general public meetings, committee meetings, and community-based organizations events. DDOT encourages all interested individuals to apply via a downloadable application (Appendix C) and return it to us by email at [DDOTTitle6@detroitmi.gov](mailto:DDOTTitle6@detroitmi.gov) or mail (see address below). The application is also available in Spanish and Arabic. For committee openings, please call (313) 933-1300.

**Mailing Address:**

Detroit Department of Transportation  
Attention: Office of Compliance  
100 Mack  
Detroit, MI 48201

**Local Advisory Council (LAC)**

The LAC serves as a liaison to the disabled community. This advisory body advises DDOT in areas relating to the planning, delivery, and operation of fixed route and Detroit MetroLift paratransit services. The meetings provide a forum for comments on proposed changes in service, policies, and procedures.

The purpose of the LAC is to review and comment on DDOT's Section 10E plans, Americans with Disabilities Act Accessibility plan, and proposed service changes and policies. The LAC is composed of nine (9) members, with at least one (1) member being a resident of each of the seven (7) City Council Districts and two (2) at-large members, who shall represent the Detroit Area Agency on Aging. Meetings are held four (4) times a year on the third Tuesday of the months of February, May, August, and November.

**Paratransit Appeals Board (PAB)**

The PAB is a requirement of the Americans with Disabilities Act of 1990 (ADA) (49 Part 37 Subpart F, Section 37.125), that DDOT will accept appeals from its determinations of eligibility. The PAB shall hear the appeals of individuals who were denied paratransit eligibility, service suspension, or limitations or conditions place on eligibility.

The Appeals Board consists of six (6) members, three (3) members that have disabilities, and have significant knowledge of both the fixed-line and paratransit bus systems. The other three (3) members may be agency representatives who have the same body of knowledge, and it is preferred that they have knowledge of disabilities. It is also desired that the Appeals Board members either live or work in Detroit, Hamtramck, or Highland Park. Their appointments do not expire. The Paratransit Appeals Board meets monthly, unless otherwise noted, on the fourth Wednesday at 10:00 a.m. in the DDOT administration building. This meeting is closed and not open to the public.

## Minority Representation on Committees

Table 3 compares the racial breakdown for each of DDOT's three committees to the approximated rider profile of DDOT's service area. All three committees have a high percentage of minority representation.

**Table 3 – Minority Representation on Committees**

NAME	WHITE	LATINO	BLACK	ASIAN AMERICAN	AMERICAN INDIAN & ALASKA NATIVE	TOTAL
Population of Detroit	12%	8%	77%	1.6%	1%	
Paratransit Appeal Board	29%	0%	71%	0%	0%	100%
Local Advisory Council	14%	0%	86%	0%	0%	100%

# Title VI Public Participation Plan

## Introduction

The Detroit Department of Transportation (DDOT) developed this Public Participation Plan (PPP) to guide the decision-making process for all transit planning activities that require public outreach. The DDOT PPP is designed to meet the Federal Transit Administration's (FTA) Title VI regulations to provide "early and continuous opportunities for the public to be involved in the identification of social, economic, and environmental impacts of proposed transportation decisions." With this in mind, DDOT developed the PPP with the flexibility to adjust appropriately and as needed to accommodate public involvement.

DDOT is the largest public transit provider in Michigan, and serves the City of Detroit, surrounding suburbs, and neighboring cities, including Highland Park and Hamtramck. DDOT prides itself on providing reliable, clean, safe, and efficient service to an average of 42,210 riders daily.

This PPP complies with Title VI of the federal Civil Rights Act of 1964 (42 U.S.C. 2000d), the Americans with Disabilities Act (as defined in Title 49, Part 37, of the United States Code), Executive Order 12898, Federal Actions on Environmental Justice, Executive Order 13166 on Limited English Proficiency, and other relevant laws and guidance to ensure consideration of social equity, environmental justice, and accessibility. DDOT is committed to ensuring that no person is excluded from participation in, denied the benefits of, or discriminated against under its projects, programs, or activities on the basis of race, color, creed, national origin, sex, age, or disability as provided in state and federal law.

Lastly, the PPP is an ongoing working document that will be updated and adjusted every three years in response to issues and circumstances throughout the planning process per FTA Circular 4702(b).

## Goals & Objectives

The goal of this PPP is to create a variety of opportunities for minority, low income, limited English proficient (LEP) populations, individuals, organizations, agencies, and other stakeholders to provide meaningful input about DDOT's transit-related services and programs.

DDOT will use the following objectives to achieve this goal:

- **Input and Participation** – Public comments received by DDOT are reviewed and considered during the planning stage of projects and policies.
- **Consistent Communication** – DDOT staff will communicate with communities in our service areas to develop trust and to allow for public input.
- **Diversity** – DDOT will monitor that participants represent minorities, low incomes, and LEPs by conducting voluntary public involvement surveys at public meetings.
- **Accessibility** – DDOT will ensure opportunities to participate by selecting venues that are physically, geographically, linguistically, and culturally accessible.

- **Partnerships Satisfaction** – DDOT will provide meaningful outlets for people who take the time to participate to join the discussion and provide feedback.

### **Public Participation Strategies**

The following strategies will be used to reach the PPP goal. Each strategy includes those used to inform (Public Information), reach out to invite participation (Outreach), and those to seek input (Public Input). Each strategy could be used, and decisions are based on input collected from the community and DDOT staff experience.

### **Printed Materials Produced by DDOT (Public Information and Outreach)**

Outreach information is publicized in printed materials and produced by DDOT such as rider notices, flyers, posters, and interior cards (Appendix D). Based on experience, DDOT has found a combination of these strategies along with social media notifications, to be the most effective forms of notification. Per the Language Assistance Plan, we translate printed vital information into Spanish and Arabic, and into additional languages by request. Vital documents are defined as those documents without translation 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 Website (Public Information, Outreach, and Public Input)**

DDOT's website, [www.detroitmi.gov/ddot](http://www.detroitmi.gov/ddot) is a communication tool providing substantial information about DDOT policies, strategies, and plans. DDOT's website provides the option to translate many of the web pages into a number of languages.

### **Transit Information Resources (Public Information and Outreach)**

Bus schedules and service updates are available on DDOT's website, [www.detroitmi.gov](http://www.detroitmi.gov) and in the Rosa Parks and Jason Hargrove Transit Centers to provide transit information and to conduct outreach. Click [here](#) for the downloadable bus schedules.

### **Media Targeted to Ethnic Communities (Public Information and Outreach)**

Participation opportunities may be publicized through newspaper publications serving English, Spanish, and Arabic speaking audiences.

### **Coordination with Community Events (Public Information, Outreach, and Public Input)**

In cooperation with the City of Detroit, local community groups, small businesses, and a host of other external stakeholders, DDOT participates in community resource fairs and city-led events, in addition to hosting our own outreach events.

### **Communication with Elected Officials (Public Information and Outreach)**

DDOT's executive staff and the Marketing Division provide updates about DDOT's plans and projects to federal, state, and local elected officials. The executive staff sends letters and/or emails summarizing DDOT's decisions and potential decisions in advance of public notification to ensure elected officials are aware of transit issues in the event they receive comments from their constituents and to offer the opportunity to provide their input.

### **Meeting with Civic and Community Organizations (Public Information, Outreach, and Public Input)**

DDOT provides updates on its policies, projects, and strategies by accepting invitations to participate in scheduled meetings of local, civic, and community organizations. These gatherings provide an opportunity to make a presentation, answer questions, and to address transit issues.

### **Informational Public Meetings (Public Information, Outreach, and Public Input)**

DDOT conducts Community Input, Local Advisory Council, and several different types of meetings throughout the year. The meetings are designed to share information about upcoming initiatives, services, or programs. Other meetings are designed to engage the public to provide their input, feedback, or comments about proposed service changes. Meeting agendas are provided for attendees.

### **Meeting Formats & Logistics**

#### *Open House and Workshops (Public Information, Outreach, and Public Input)*

This format provides opportunities for participants to receive information at their own pace by visiting a series of informational meetings that may include table-top displays, maps, Power Point presentations, photographs, visualizations, and other tools. Participants have the opportunity for one-on-one conversations with the appropriate DDOT staff. Occasionally, these forums include a short educational presentation followed by a forum. Participants are given comment forms to provide written comments. DDOT staff are available to take verbal comments and transcribe them to provide a written record. The open house and workshop format is effective when DDOT is seeking to propose service changes.

#### *Informational Meeting (Public Information, Outreach, and Public Input)*

These meetings are usually focused on a specific topic and feature an informational presentation followed by a discussion and/or a question and answer and comment period. The comment period can be formal or informal depending on the number of participants and the type of meeting. Individual comments are often limited to two minutes.

#### *Meeting Venues (Public Information, Outreach, and Public Input)*

Venues for meetings are selected to be fully accessible for persons with disabilities, and in general, served by public transit. DDOT considers the best areas or communities to conduct meetings and hearings by first examining the topic and/or issues that may affect riders and communities. DDOT secures meeting venues with consideration to time of day, length of time



required for the meetings, and the number of expected attendees. Venues include public libraries, local schools, colleges, and state or city-owned buildings.

#### *Meeting Times (Public Information, Outreach, and Public Input)*

Public participation meetings are scheduled at varied times of the day and preferably on different days of the week. Typically, meetings are conducted on weeknights after traditional work hours.

#### *Number of Meetings (Outreach and Public Input)*

Some transportation decisions require more meetings than others. DDOT will hold a minimum of one (1) meeting to more than twenty (20) meetings for system-wide decisions affecting community members.

### **Community Meeting Considerations**

#### *Scheduling (Outreach and Public Input)*

Community meetings are scheduled to allow a minimum of two (2) weeks between the last meeting and the next phase of the project.

#### *Virtual Meetings (Public Information, Outreach, and Public Input)*

Meetings will be conducted using Zoom ([www.zoom.us](http://www.zoom.us)) in that participants can join via a smartphone, tablet, or computer via the Zoom app and join the meeting with an ID number or by phone with the dial-in number. Participants will be able to submit questions or comments in advance to the meeting to [DDOTComments@detroitmi.gov](mailto:DDOTComments@detroitmi.gov). DDOT virtual meetings will follow a similar format to in-person meetings.

#### *Surveys (Public Information, Outreach, and Public Input)*

On-board ridership surveys are conducted once every five years to hear and learn concerns from our customers and the communities about their concerns regarding DDOT services. These surveys also provide DDOT with a snapshot of ridership demographics to service them better. Surveys are compiled and analyzed utilizing expert, experienced third-party contractors to ensure that the results are fair, unbiased, inclusive, and address all markets that could be affected by the results of the survey.

#### *Telephone Information and Comment Line (Public Information, Outreach, and Public Input)*

DDOT Call Center agents and other DDOT Departments may receive complaints alleging violation of Title VI and are responsible for forwarding such complaints to DDOT's Office of Compliance for processing and monitoring. DDOT welcomes suggestions, questions, compliments, or complaints at any time via DDOT Customer Service at (313) 933-1300 or by email to [DDOTComments@detroitmi.gov](mailto:DDOTComments@detroitmi.gov).

### **Public Hearing Process**

DDOT is required to conduct public hearings when proposing the following actions:

- Prior to raising or decreasing fares on the entire system, or on certain transit modes, or by fare payment type or fare media

- Implementing a major service change in transit service
- If there is any reduction in service of 20 percent or more, the number of miles of a route, or 20 percent or more of the number of 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 route
- When a new route is established
- New facilities

### **Procedures for Planning Public Hearings**

DDOT follows a set of established procedures for planning public hearings, which are described in the following bullet points:

- Secure venues with ADA accessibility for in-person hearings.
- Prepare written material to promote public involvement.
- Translate vital documents for LEP populations within the service area affected by the proposed changes.
- Notify elected officials whose constituents may be affected by the proposed service changes.
- Fifteen (15) days prior to the first hearing date begin public outreach:
  - Post hearing notices at transit centers and hubs affected by the proposed change.
  - Post the proposal of changes in, English, Spanish, and Arabic at DDOT headquarters in the lobby of 100 Mack and on the DDOT website.
  - Disseminate hearing information and proposed changes.
  - May publish hearing notices in any of the following: major newspapers, Spanish and Arabic language newspapers, local/community newspapers, and newsletters.
- Share published material with local community groups and organizations.
- Notify community and neighborhood leaders and advocates, in addition to groups or organizations that may be affected by the proposed changes.
- Arrange for a stenographer, audio system, and language interpreters (when requested).
- Prepare additional printed materials for distribution at the in-person public hearings:
  - Copies of the proposed changes (English, Spanish, and Arabic)
  - Copies of the hearing announcements (English, Spanish, and Arabic)
  - Comment forms for written testimony
- Fifteen (15) days comment period following the final public hearing:
  - Collect and document comments received at the hearing and via USPS and email.
  - Once the comment period concludes, the DDOT office responsible for proposing the change and making the final decision will provide copies of all written comments and verbal testimony from the hearing.

- File all hearing documents: transcripts, sign-in sheets, written testimony, letters received, and documentation of publication.
- Provide comment forms for written testimony (English and Spanish).

### *Options for Submitting Input*

Official comment forms are available at public hearing registration tables, DDOT headquarters, and online at [www.detroitmi.gov/ddot](http://www.detroitmi.gov/ddot). All comments, verbal and written, receive the same consideration when making decisions. Interested persons may choose one of the following four (4) methods to submit their comments, which are recorded in the official hearing documentation:

- Verbal testimony at a public hearing;
- Submit a written statement at a public hearing using a specific DDOT comment form;
- Submit written statements via email;
- USPS with or without the specific DDOT comment form.

## **Ongoing Efforts**

### *Partnerships with Community Based Organizations*

DDOT's marketing and transit ambassador divisions have partnerships with local businesses and community associations. These departments are responsible for planning public hearings, workshops, informational meetings, and inviting public involvement in the decision-making processes.

### *Translation and Interpretive Services*

DDOT is committed to reducing the barriers encountered by persons with Limited English Proficiency (LEP) when accessing services and benefits. To minimize or eliminate any language barrier, the Marketing Department works with the City of Detroit's Civil Rights Inclusion & Opportunity department to provide on-demand language interpretation via telephone, on-site at specified locations, and written documents.

Translation and interpretation vendors are available 7 days per week, 24 hours per day. Printed public information is translated into Spanish and Arabic. However, requests for translations into other languages are accommodated. Onsite language interpretation service is provided upon request for public meetings/hearings. The use of informational posters, videos, or other visual aids are used to reduce barriers for LEP persons.

### *DDOT's Continuing Public Participation Strategies*

DDOT continues to promote and enhance the use of its ongoing public participation strategies to reach minority, low income, and LEP populations. DDOT will conduct proactive outreach to expand the reach, inclusivity, and effectiveness of these ongoing strategies. Examples of existing strategies include:

- DDOT website: [www.detroitmi.gov/ddot](http://www.detroitmi.gov/ddot)
- DDOT Facebook page: [www.facebook.com/rideddott](http://www.facebook.com/rideddott)

- DDOT X page: [www.x.com/rideddot](http://www.x.com/rideddot)
- DDOT Instagram page: [www.instagram.com/rideddot](http://www.instagram.com/rideddot)
- DDOT LinkedIn: [www.linkedin.com/company/Detroit-department-of-transportation](http://www.linkedin.com/company/Detroit-department-of-transportation)
- Email: [DDOTComments@detroitmi.gov](mailto:DDOTComments@detroitmi.gov)
- Token Transit Mobile Payment App: <https://tokentransit.com/app>
- Customer Service: (313) 933-1300 Monday through Friday from 6 a.m. to 10 p.m., or by mail at 100 Mack, Detroit, MI 48201
- Email subscription: sign up to receive emails at [DDOTComments@detroitmi.gov](mailto:DDOTComments@detroitmi.gov)
- Public information: written materials, public notices, reports, presentations
- Web-Based Communications: website, social media platforms, email updates, text messaging
- Media: earned and paid media
- Community Input Meetings: 5 p.m. every third Thursday of each month
- Local Advisory Council (LAC): 10 a.m. every third Tuesday of the month quarterly
- Public workshops and hearings
- Informational posters at the Transit Center and Hub
- American Sign Language (ASL) interpreters and translation professionals in attendance at meetings to provide content in Spanish, Arabic, or other languages (available upon request)
- Language assistance line: 1-855-393-4432
- Staff language assistance
- Audio recording: devices to obtain feedback and comments at meetings
- Research: gained from public opinion focus groups, roundtable discussions, and surveys
- Public Information: Flyers, posters, and brochures, email and website, presentations, meetings, events, community locations, media, and other notices and advertisements
- Multimedia Presentations
- Public Notices
- Frequently Asked Questions (FAQs)
- Presentations to City Officials
- Participation in Community Events
- Outreach to Major Employers and their Employees
- Outreach to Local Colleges and Universities
- Outreach to Community-Based Organizations
- Outreach to Local Transit Partners and Travel Groups
- Email Alerts
- Micro-Surveys
- Distribute News Releases/Media Alerts to Local Media
- Press Conferences
- Paid Media: Newspaper advertising, public service announcements, and online ads

## Overview of Outreach Strategies

Listed below are steps representative of the strategy used to encourage public participation for a variety of DDOT projects. The list provides guidance towards developing a tailored strategy distinctive to each project identified as having impacts on minority, low income, and LEP communities. This demonstrates the level of specificity DDOT could provide when developing outreach strategies for public participation regarding transportation decisions. At the community level, DDOT may utilize the following steps to develop and implement a geographically focused public participation strategy:

1. Identify Target Populations and Public Participation Needs
  - Identify significant populations for targeted outreach.
2. Coordinate Internally
  - Marketing and Planning and Scheduling Development will determine the most appropriate form of outreach as well as the goals and objectives for meetings.
  - Develop draft public participation strategies.
  - Identify the best way to publicize the public participation strategies, select meeting dates and venues, and determine translation needs.
3. Coordinate with Community-Based Organization Partners (CBO)
  - Identify CBO partners in the areas affected by a project or proposed service changes.
  - Consider the following types of CBOs to reach minority, low income, and LEP populations within the affected areas: faith-based, geographic-specific such as neighborhood and community associations, education, social services, recreation, environmental, political, youth and senior oriented organizations.
  - Explain the desired outcomes for the different public participation strategies such as sharing information, collection input, and setting community priorities.
4. Conduct Outreach
  - Ensure all printed material clearly describe the issue and purpose of meetings or public participation activities.
  - Publicize the activities.
5. Identify Language Interpretation Needs
  - Identify possible language interpretation needs, translate outreach documents, and provide language interpretation services at activities when requested.
6. Implementing Public Participation Strategies
  - Implement the strategies identified in the public participation strategy.
7. Compile, Review, and Report Results of Public Feedback
  - Continue to review the participation objectives established at the beginning of PPP strategy development and monitor progress and performance.
  - Communicate the results back to the community.



## **Public Participation Measurement**

DDOT evaluates the public involvement strategies and techniques to make adjustments as needed. These evaluations may include:

- A summary of all outreach efforts (Appendix E).
- An assessment of how effective the efforts are to obtain input from minorities, low income, LEP populations reached, and the type of input provided.
- An assessment of the public involvement effort, including the number of meetings/events participated, survey responses, number of comments received, and the number of media impressions.

# Language Assistance Plan

## Introduction

The Detroit Department of Transportation (DDOT) is committed to serving individuals who may require language assistance. This Language Assistance Plan (LAP) includes measures that are currently provided by DDOT to ensure meaningful access to its transit services. The plan is an in-depth language study which was designed to reduce barriers to transit usage by individuals who may require language assistance. Individuals who have a limited ability to read, write, speak, or understand English are characterized as limited English proficient (LEP).

This LAP may use a combination of data sources – including Census figures, ridership surveys, frontline staff interviews or surveys, and data on riders’ requests for translation or interpretation – to understand the use of DDOT services. DDOT, language accommodation resources are housed under the Office of Compliance. The Title VI Coordinator and ADA Coordinator are responsible for coordinating across departments to ensure resources are made available and that staff are trained in the appropriate protocol. See [Appendix G](#).

## LEP Four Factor Analysis

The Four Factor Analysis provides a framework through which recipients of federal funding can determine the extent of their obligation to provide services to LEP individuals. The FTA requires that all recipients use the Four Factor Analysis to ensure their programs, policies, and activities comply with Title VI regulations, and to aid in Language Assistance Planning. The following factors were taken into account when developing DDOT’s Language Assistance Plan:

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

#### *How LEP Persons Interact with DDOT*

DDOT LEP riders interact with DDOT through the usage of the fixed route and paratransit services. LEP persons interact with bus operators, security officers, cashiers, and customer service agents. They provide trip planning aids, including system maps, route schedules, directions, other printed materials, or online resources, and sell fare passes. Riders interact with DDOT staff in the Reduced Fare office, Transit Center, and administrative office when seeking assistance with relevant programs. In addition, they solicit help from and provide feedback to DDOT staff at public outreach activities. Finally, LEP riders interact with DDOT’s transit police force.

#### *Frontline Staff Interviews or Surveys*

To further address the questions of how, why, and where LEP persons interact with DDOT, in August 2024, the Office of Compliance conducted a survey and interviewed frontline staff.

The staff interviewed offered insight on languages frequently encountered during LEP interactions, common LEP rider boarding locations along routes, and issues commonly arising (such as directions or fare payment). Table 4 highlights language groups most commonly

encountered; and routes most likely to serve LEP riders (as identified by DDOT Office of Compliance personnel). Spanish and Arabic were identified consistently.

**Table 4 – 2024 DDOT Staff Interviews Summary**

2024 DDOT STAFF INTERVIEWS SUMMARY	
Language Groups Most Commonly Encountered	Routes Where LEP Speakers Most Commonly Encountered
<ul style="list-style-type: none"> <li>Spanish - 42%</li> <li>Arabic - 42%</li> <li>Other Languages – 16%</li> </ul>	<ul style="list-style-type: none"> <li>1-Vernor</li> <li>2-Michigan</li> <li>4-Woodward</li> <li>8-Warren</li> <li>12-Conant</li> <li>52-Chene</li> </ul>

Source: DDOT Office of Compliance Staff

## LEP Communities and English Proficiency

### Census Data

DDOT uses population data to identify potential LEP persons who may require language assistance services to ensure meaningful access to DDOT programs and services.

Table 5 identifies the number of LEP persons from each language group with at least 1,000 speakers, spoken by people age five (5) and older, who stated they spoke English less than “very well” in Wayne County, Michigan. The source of this data is the 2023 American Community Survey (ACS) 5-Year Estimated Detailed Table. This dataset is not dispositive because it does not account for a significant portion of DDOT’s service and thus DDOT is only using this data for reference purposes.

**Table 5 – Speak English Less Than “Very Well”**

2023 AMERICAN COMMUNITY SURVEY 5-YEAR ESTIMATE – C16001 SPEAK ENGLISH LESS THAN “VERY WELL”		
Total Population of 5 Years and over	1,112,527	%
Speak Only English	944,834	84.93%
Arabic	37,792	3.98%
Spanish	20,659	1.81%
Other Indo-European Languages	10,212	1.29%
Russian, Polish, and other Slavic Languages	2,323	0.43%

Table 5 Data Source: U.S. Census American Community Survey 2023 “Language Spoken at Home 1-Year Estimates” (Table C16001)

Table 6 identifies LEP communities and the number of LEP persons from each language group with at least 1,000 speakers, spoken by people age five (5) and older, in DDOT’s service area (broken out by City of Detroit, Dearborn, Dearborn Heights, Hamtramck, and Southfield). The source of this data is the Five-Year ACS (2023). This dataset includes the individuals spoke English “lease than very well”, it does assist with the analysis of determining how many of these individuals are LEP.

The analysis determined that majority of DDOT’s service area population speaks only English. The analysis identified six (6) languages in DDOT’s service area that meet the Safe Harbor threshold of 1,000 speakers. Arabic households who speak English less than “very well” represent 44,570 persons of DDOT’s service area population. Spanish households who speak English less than “very well” represent 19,064 of DDOT’s service area population. The other four (4) languages that speak English less than “very well” was less than 1% of DDOT’s service area population.

**Table 6 – Speak English Less Than “Very Well” Five Years Old and Older**

Language Spoken at Home by 1,000+ Person in DDOT’s Service Area by LEP Speakers							
Geographic Area (City)	City of Detroit	City of Dearborn	City of Dearborn Heights	City of Hamtramck	City of Southfield	City of Warren	Service Area
County	Wayne	Wayne	Wayne	Wayne	Oakland	Macomb	Total
Total Population	593,046	100,103	57,925	25,345	71,761	129,092	<b>977,272</b>
Speak Only English	527,173	48,646	33,999	7,189	64,722	104,532	<b>78,261</b>
Spanish	17,139	348	698	0	520	359	<b>19,064</b>
Russian, Polish, or other Slavic Languages	485	45	305	1,283	622	1,332	<b>4,072</b>
Other Indo European	4,186	431	362	4,369	95	4,627	<b>13,744</b>
Asian & Pacific	397	82	41	45	90	1,128	<b>1,783</b>
Arabic	6,887	20,902	7,534	5,879	297	2,071	<b>43,570</b>
All Other Languages	621	27	0	82	328	1,117	<b>2,175</b>

Table 6 Data Source: 2023 ACS 5-year Estimates, “Language Spoken at Home 5-Year Estimates” (Table C16001)

## Ridership Survey

Ridership survey data offers additional insight into LEP status in the DDOT service area. DDOT’s 2023 Title VI On-Board Ridership Survey was completed in March 2023 ([Appendix F](#)). A total of 1,018 riders were surveyed on weekdays and weekends throughout various times of the day. The surveys were collected between January 20, 2023 to February 11, 2023.

The survey results in Table 7, shows that ninety-four percent (94%) of DDOT’s ridership primary language spoken in the home is English. Three percent (3%) of DDOT’s riders surveyed speak Spanish in the home, while two percent (2%) speaks Arabic. Participants were also asked if they speak English; ninety-two (92%) answered yes, while two percent (2%) answered less than very well and one-percent (1%) answered not at all.

In summary, the ridership survey results largely reinforce findings from data obtained from the Census: While LEP ridership of DDOT services is relatively quite low, Spanish and Arabic are the predominant LEP language groups among the DDOT ridership.

**Table 7 – 2023 Title VI On-Board Ridership Survey Results**

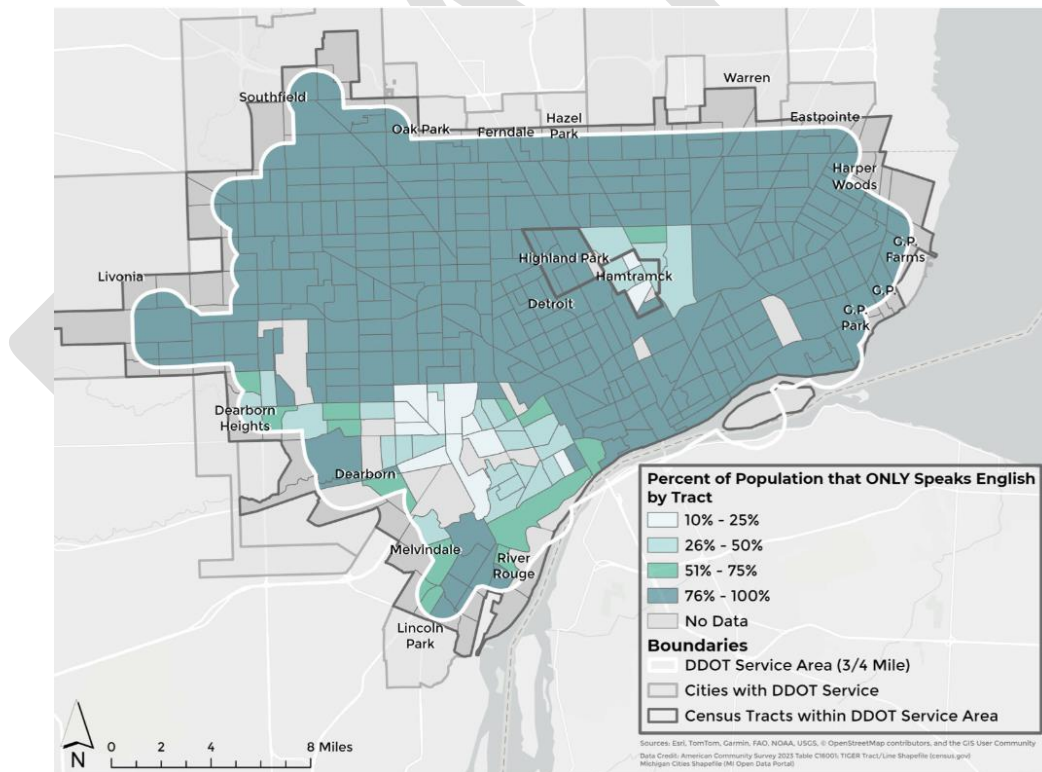
Primary Language Spoken in the Home	
ENGLISH	94%
SPANISH	3%
ARABIC	2%

### Literacy Skills of LEP Populations in their Native Languages

DDOT considers that not all LEP riders are literate in their home language. To ensure language access for non-literate LEP individuals, DDOT may choose to incorporate universal visuals and graphics into outreach materials. Such an intervention can effectively reach riders with low literacy. In addition, DDOT will strive to collect data on literacy in native languages via future surveys.

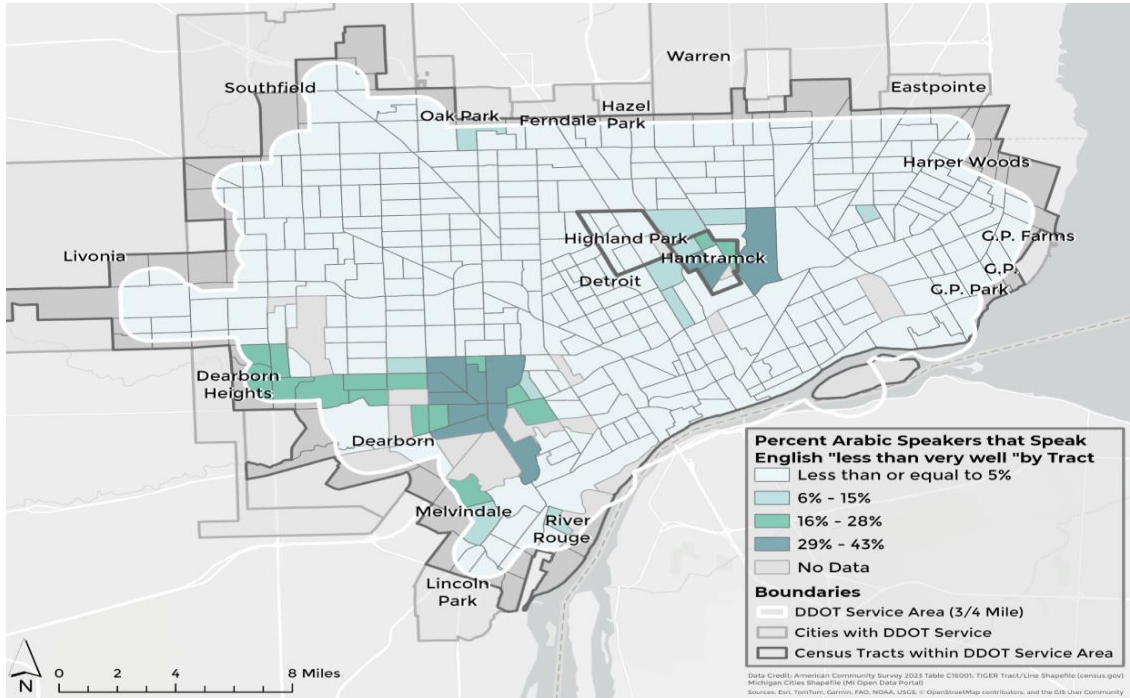
Figures 5-11 show the total number LEP populations for each language that met the Safe Harbor threshold within DDOT's service area.

**Figure 5 – Total English-Speaking Population in DDOT's Service Area**

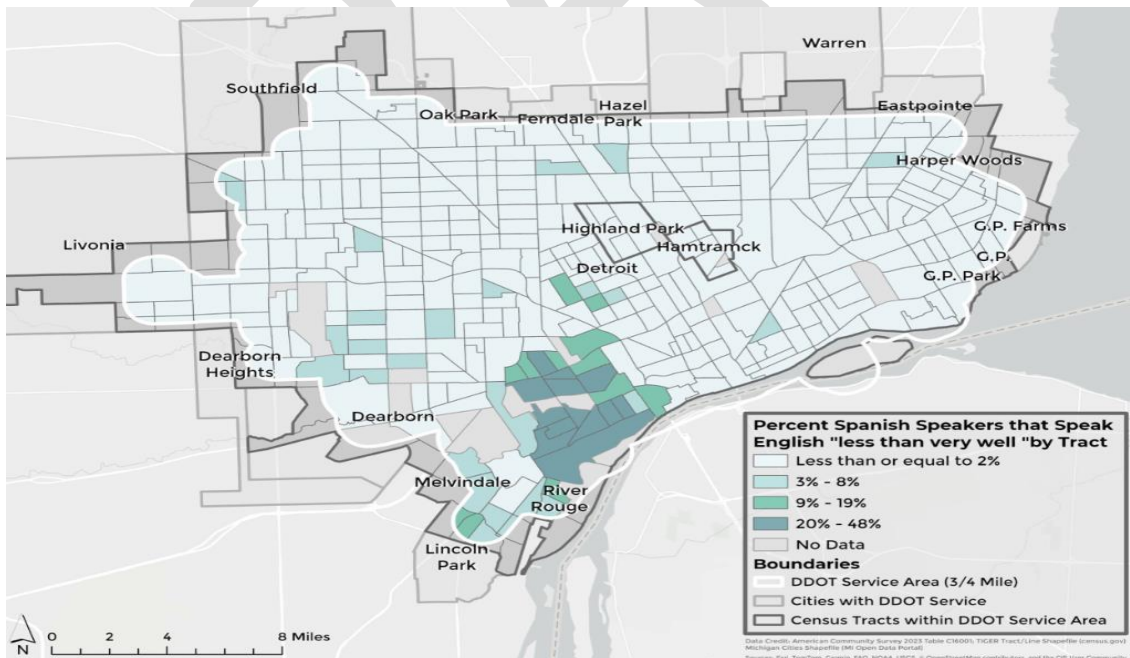




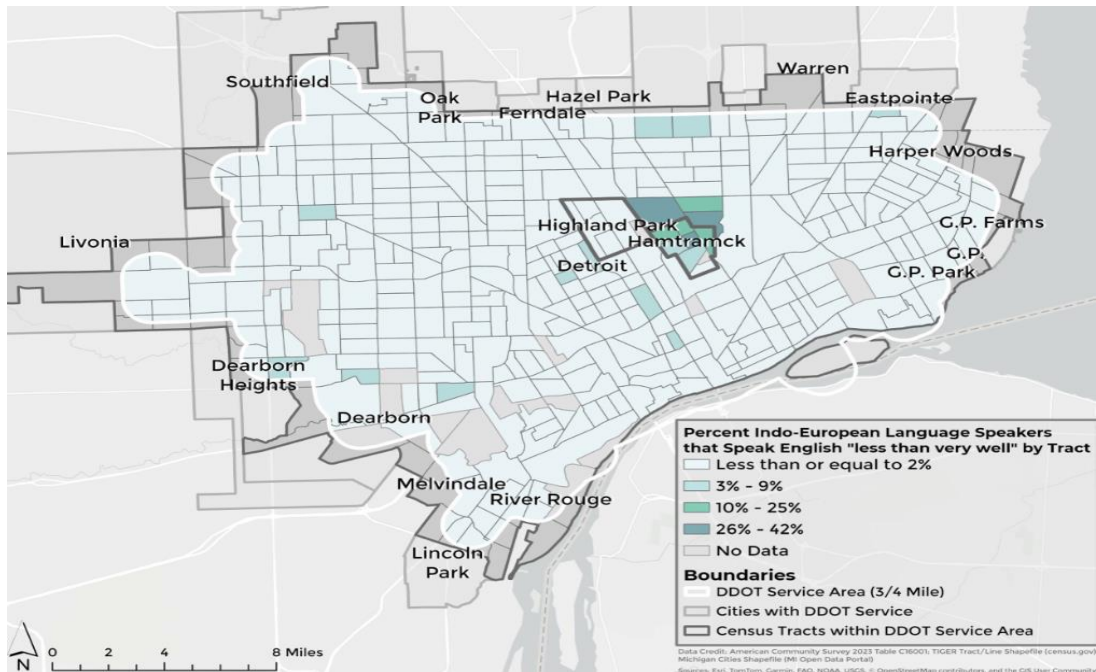
**Figure 6 – Total Arabic-Speaking Population in DDOT's Service Area**



**Figure 7 – Total Spanish-Speaking Population in DDOT's Service Area**



**Figure 8 – Total Indo-European-Speaking Population in DDOT's Service Area**



**Figure 9 – Total Russian, Polish, Other Slavic-Speaking Population in DDOT's Service Area**

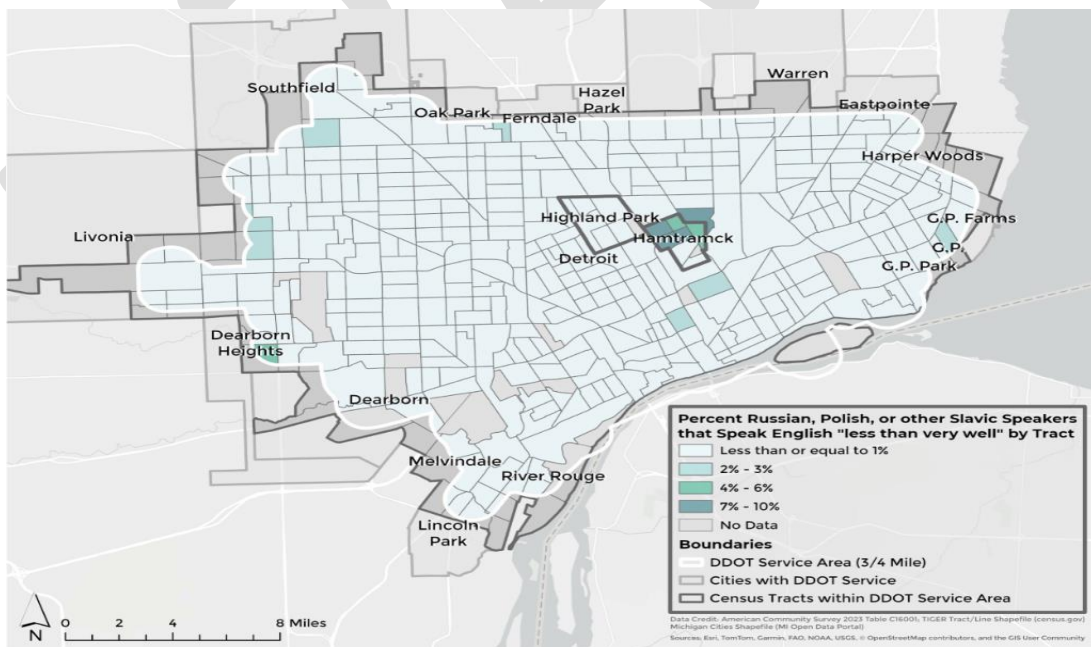


Figure 10 – Total Asian and Pacific-Speaking Population in DDOT’s Service Area

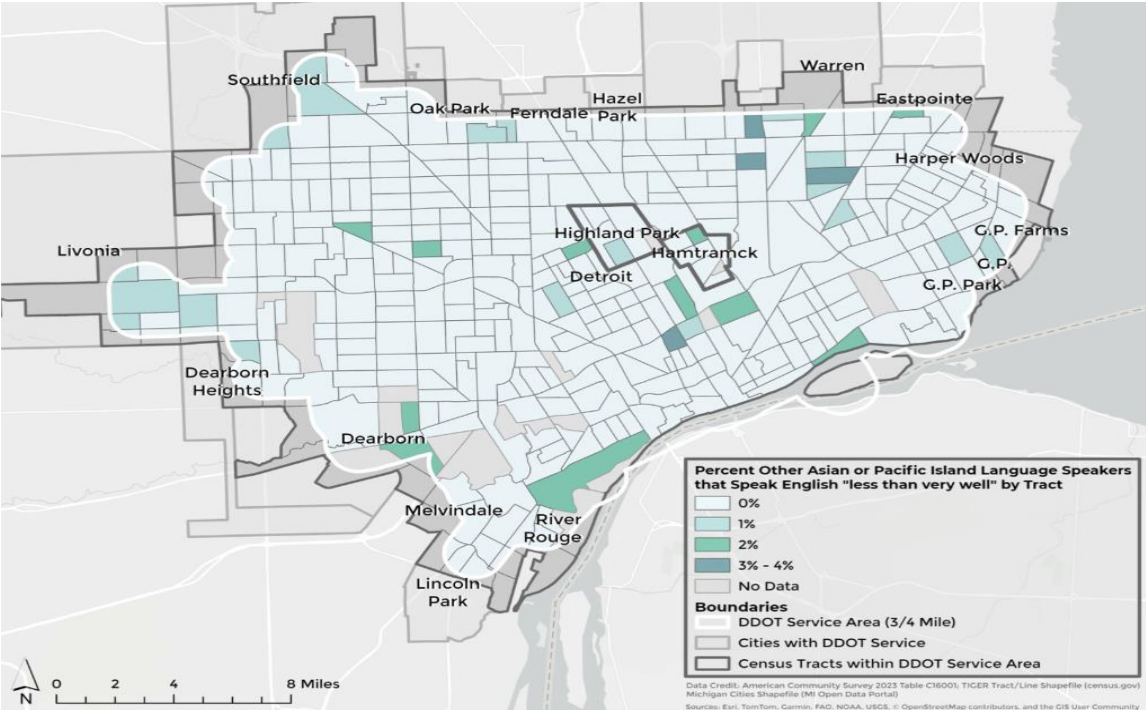
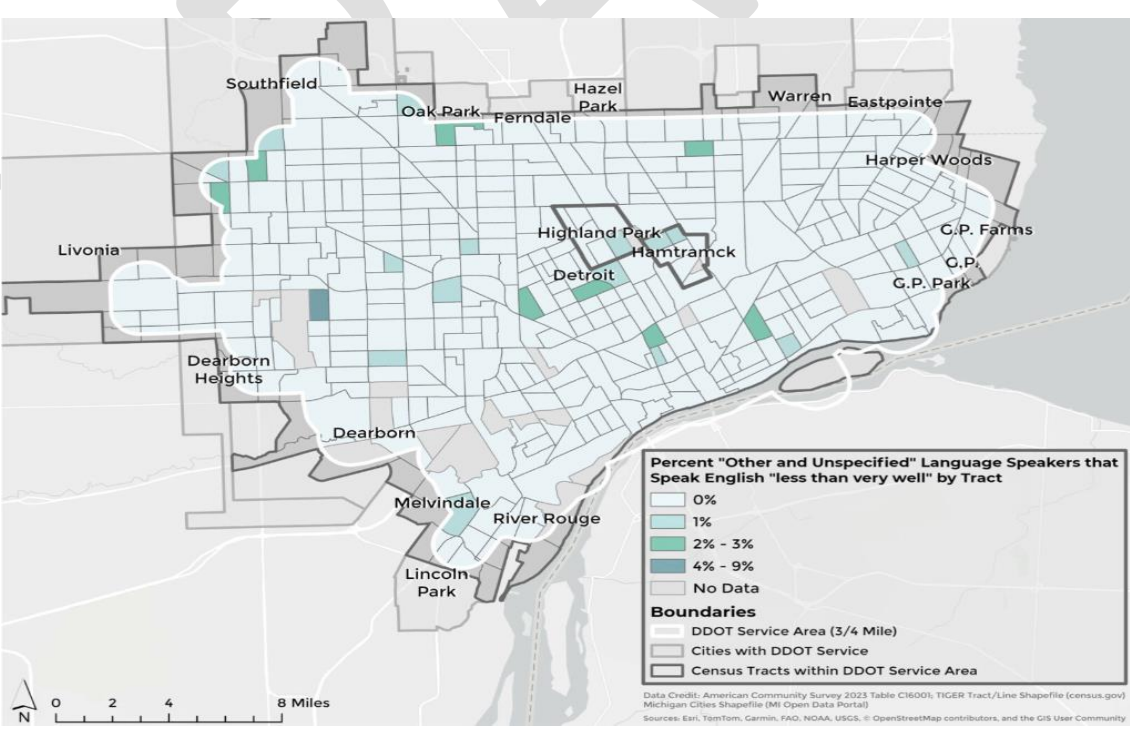


Figure 11 – Total All Other Languages-Speaking Population in DDOT’s Service Area





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

### **Language Phone Line Usage**

During the period spanning August 2023 to June 2025, DDOT's customer service agents used the language phone line thirty-two times to assist customers requiring language assistance in Arabic. There is no cost for providing language line services.

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

DDOT's 2023 On-Board Ridership survey results indicated DDOT's service is critical to a large share of riders who would have limited alternatives if DDOT service were not available. Twenty percent (20%) of DDOT's riders use the bus service to go home. Other purposes included going to work thirty-nine percent (39%), visiting doctor/dentist nine percent (9%) and shopping sixteen (16%). Sixty-three percent (63%) of riders ride the bus both on weekdays and weekends, sixty-two percent (62%) ride the bus during the day. There are forty-five percent (45%) of riders that do not have a driver's license and sixteen percent (16%) have a disability.

Results from the on-board survey reinforce that there is a very small LEP population among DDOT riders. The ninety-four percent (94%) of riders speak English in their home, three percent (3%) speak Spanish, and two percent (2%) speak Arabic. While ninety-eight (98%) of riders reported English as their primary language, only two percent (2%) speak English less than very well. The survey questions provide evidence for how vital DDOT is in its rider's daily lives.

## **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 through the Department of Civil Rights, Inclusion, & Opportunity. The total cost of providing the translation of documents or interpreter services during this period was \$1,749.87. DDOT's Marketing Division's annual budget includes funds to translate written documents and provide interpreters during public meetings; however, minimal requests are made by the LEP population. Bilingual staff member(s) assists with translating from English to the appropriate language at no cost. Title VI Notices are posted at all facilities in English, Spanish, and Arabic. DDOT may also place public ads in Arab American News and El Central Hispanic News. Community Input meetings are held every third Thursday of each month to receive customer feedback as well.

Vital documents are defined as those documents that without them 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 Spanish and Arabic 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.

There are four (4) additional LEP populations in the DDOT's service area that meet the "Safe Harbor" law. Therefore, DDOT will translate 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 when public meetings are held in those communities. DDOT will also provide meaningful access to LEP individuals through language assistance when language services are requested.

All requests can be made by email to [DDOTComments@detroitmi.gov](mailto:DDOTComments@detroitmi.gov) or by mail to Detroit Department of Transportation, ATTN: Customer Services, 100 Mack, Detroit, MI 48201.

DDOT is committed to reducing the barriers encountered by LEP persons when accessing services and benefits. This section summarizes strategies DDOT employs to accomplish this goal. DDOT does not anticipate that any strategy listed in this document will be cost prohibitive in terms of resources, staff, or dollars.

1. **Translation services via phone:** 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. **Language Identification Cards:** "I Speak" language identification is available to quickly identify a LEP individual's spoken language.
4. **Vital documents:** Title VI complaint procedure, complaint form, and public hearing meeting notices are available in Arabic and Spanish.
5. **DDOT website:** DDOT's Title VI Program and a Title VI complaint form are available in Spanish and Arabic and other documents on DDOT's website (future implementation).
6. **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.
7. **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 three (3) primary staff groups who come into contact with LEP individuals: Transit Equipment Operators, Customer Service Representatives, and Administration 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 in direct contact with passengers.
3. Administration Staff are also likely to come into contact with LEP persons by telephone or in person during public outreach and engagement events.

LEP training for all groups occurs during their initial training and orientation. This training includes what procedures to follow when encountering a LEP person. See [Appendix G](#) for the 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  
100 Mack Avenue  
Detroit, MI 48201  
Phone: (313) 244-2327 or Fax: (313) 833-1496  
Email: [DDOTTle6@detroitmi.gov](mailto:DDOTTle6@detroitmi.gov)



## Language Assistance Plan Approval Page

### Language Assistance Plan

I have received, considered, and approve the Detroit Department of Transportation 2025-2027 Language Assistance Plan.

---

Robert John Cramer, Executive Director of Transit

Date

## Subrecipient Assistance & Monitoring Plan

All Subrecipients 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 that becomes an associated component of the contract.

DDOT had no Subrecipients during this Title VI reporting period.

## Determination of Site or Location Facilities

In determining the site or location of facilities, DDOT will comply with the Title 49 CFR Section 21.9(b) (3) 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 sitting of facilities.
- DDOT should pay 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, 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 did not make a determination of facility site or location during this Title VI reporting period.

## Proposed Title VI Program Plan Public Hearing Results

DDOT held a Proposed Title VI Program Plan 2023-2025 virtual public hearing followed by a 15-day comment period. Notices of the public hearing was posted on DDOT's website, social media pages, and printed notices was posted on buses, with text in English, Spanish, and Arabic. An email describing the upcoming public hearing was sent to the following groups:

- Detroit Employment Solutions Corp
- Emmanuel Community House
- Global Talent Retentive Center
- Van Dyke Center
- City Department of Neighborhoods
- City Council Members
- Sinai-Grace Guild
- Hannan Center
- Wayne State Rides

- Bedrock Mobility
- Bridging Communities
- Warriors on Wheels
- Southwest Solutions
- DDOT Committee Members
- Michigan Minority Suppliers Council
- Arab American Chaldean Council
- Michigan Minority Business Development Council
- Detroit Peoples Platform
- SER Metro-Detroit
- Bridging Communities
- Community Development Advocates of Detroit
- Congress of Communities
- Eastside Community Network
- Genesis HOPE CDC
- Southwest Detroit Business Association Inc.
- The Brightmoor Alliance
- The Villages of Detroit
- U SNAP BAC
- Woodbridge Neighborhood Development Corporation

# REQUIREMENTS FOR FIXED-ROUTE TRANSIT PROVIDERS

## Service Standards and Policies

### Service Standards

This document outlines transit service standards for the 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:

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

### Vehicle Load

Vehicle load can be expressed as the ratio of passengers to the total number 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.

DDOT’s standard load factor for bus service is **1.25**, not to exceed **1.50** on a regular basis.

AVERAGE PASSENGER CAPACITIES				
Vehicle Type	Seated	Standing	Total	Maximum Load Factor
40 Foot Standard Bus	38	48	57	1.50
60 Foot Standard Bus	57	71	86	1.50

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.

The Service Development & Scheduling staff review monthly ridership for each route. If overcrowding is identified, the Service Development & Scheduling group 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 consider adding service at the next available opportunity, pending the availability of equipment and operators.

## Vehicle Headways

Vehicle headway is described as the amount of time between two (2) vehicles traveling in the same direction on a given route.

Standard headways are as follows:

- Weekday morning and afternoon peak period: **no less frequent than every 60 minutes**
- Weekday off-peak, weekends: **no less frequent than every 75 minutes**

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. If a route has a headway wider than every 75 minutes, Service Development & Scheduling will remedy the headway routes by adjusting frequency times at the next quarterly schedule change.

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 & density

## On-Time Performance

On-time performance refers to “schedule performance,” Schedule performance is measured in the automated systems by comparing actual time to the scheduled time at each timepoint event that is detected by the systems. If the system records a timepoint departure event between zero and five (5) minutes 59 seconds late or no more than 59 seconds early, the system records the event as “on time.” The count of on-time departures is divided by the total number of recorded timepoint event; the resulting percentage is the on-time performance rate. Using AVL data, DDOT Service Development & Scheduling produces an AVL System On-Time report with every weekly Metrics report. OTP By Route reports is produced every quarter or in advance of runtime recalibrations.

Standards measured by AVL Data are as follows:

1. On-target: **85% or better**
2. Needs improvement: 75% to 84%
3. Failure: below 75%

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.

## **Service Availability**

Service availability is a general measure of the distribution of routes within a transit provider's service area. 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%
- Service area residents within 1/2 mile of a bus stop with weekday all-day service: 95%

## **Route Performance Standards**

A route is considered to be in "Critical Status" if its productivity in passengers per revenue-hour falls below forty percent (40%) of that of the composite system productivity. If it remains in "Critical Status" for six consecutive months, staff will review possible reasons for the low performance and attempt corrective measures. Those measures may include marketing; modification or elimination of unproductive segments; reduction in service days, hours, or frequency, and total elimination of service.

## **Analysis of Service Policies**

This section analyzes DDOT service policies among minority and non-minority routes. 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.

## **Transit Amenities**

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.



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

- **Seating:** DDOT does not currently have a seating program, benches exist only as part of shelters. However, DDOT may introduce seating amenities at locations that do not qualify for shelters or where shelter placement is constrained by spatial characteristics. Locations with a point value of 7 or greater (see shelter criteria below) will be considered for seating installation, if they have sufficient existing concrete to anchor the seat while maintaining minimum clearances, and if they are not under consideration for shelters.
- **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 the Department of Public Works (DPW), DDOT places waste receptacles at high-ridership bus stops. A stop qualifies if it averages seven (7) or more boardings and alights per day. Such stops are distributed evenly throughout the service area. As some high-ridership locations may not be suitable for waste receptacles, DPW may, from time to time, have surplus receptacles in its inventory. Such receptacles may be installed at locations just below the threshold, or locations where receptacles are requested by the community, subject to approval by DDOT and DPW.
- **Bike Rack:** DDOT installs bicycle racks on all transit buses. The bicycle racks are available on a first-come, first-served basis.
- **Shelters:** DDOT has developed a point-based warrant system to ensure that bus shelter placement is consistent with customer needs. Locations that are warranted based on these standards will be considered for future bus shelter investments. Existing bus shelters in locations that do not meet warrants will be retained in place for the remainder of their useful life but will not be prioritized for replacement.
  - **Criteria & Points for Shelter Warrants:**
    - Minimum Site Conditions: No point value. See next section.
    - Average Daily Boardings (APC): 1 point per boarding.
    - Lengthy Wait Times: 1 point for a peak-hour weekday headway greater than 30 minutes but less than 60 minutes; 2 points for a peak-hour weekday headway of 60 minutes or greater.
    - Concentration of Vulnerable Users: 2 points for locations within 500 feet of public housing; hospitals; high schools; or grocery stores.
    - Transfer Point: 1 point for locations that serve as on-street transfer points between intersecting routes.
    - Integration with Streetscape or Recreational Facility: 1 point for locations serving a Community Recreation Center (within 500 feet); a City-designated greenway (at intersection with greenway routing); or a City-designated streetscape (bus stop within streetscape project area).

- Community request: 1 point for locations with at least one shelter request from the community; 2 points for locations with at least three shelter requests in the past five years from separate individuals or entities.
- Existing Location: 1 point for locations that currently have a shelter.
- Minimum Site Standards: All prospective bus shelter locations will be subjected to a preliminary test to determine if they are eligible for consideration under the warrants system. The existing bus boarding area will be evaluated to determine if it has the minimum clear dimensions and a suitable slope to accommodate a bus shelter. Criteria to be considered will include USDOT's ADA Standards for Transportation Facilities; City of Detroit sidewalk standards; specifications and standards furnished by the shelter manufacturer; and other relevant considerations at the discretion of DDOT.
- Locations will be placed into one of three categories:

Category 1: Suitable pad in serviceable condition

Category 2: Concrete work needed

Category 3: Unsuitable site

- DDOT will enter into a Memorandum of Understanding (MOU) with the property owner outlining the roles and responsibilities of each party. The MOU must be approved by the DDOT Director, the City of Detroit Corporation Counsel, and an authorized representative of the property owner.
- Where the owner cannot be contacted, or mutually acceptable terms cannot be negotiated in a timely manner, the location will remain in Category 3.
- Shelter Replacement Policy
  - Existing shelters are eligible for replacement once they are past their useful life. The City of Detroit Office of Departmental Financial Services (ODFS) is responsible for determining the useful life of all newly-installed DDOT bus shelters. Shelters that are past their useful life but still in serviceable condition may be returned to inventory and used as spares once a replacement shelter is installed.
  - Shelters which are destroyed while still in service due to vehicle collisions or other incidents will be replaced with spare shelters that have passed their useful life, subject to staff time and equipment availability as well as the following constraints:
    - If no suitable older shelters are available in inventory, replacement with a new shelter will only be considered if
      - 1) DDOT is able to recoup the value of the shelter from the motorist's insurance, or
      - 2) local funds are available to repay FTA for its remaining interest in the destroyed shelter.

Where costs cannot be recouped or repaid to FTA, or where a shelter in the same location has been destroyed three times within a five-year period or the stop has been determined to be unsafe to repeated damage or destruction, the location will be redesignated as Category 3 and will not be eligible for replacement.

- Site Recategorization Policy:

- Existing or prospective shelter locations that prove to be unsuitable through experience will be placed in Category 3 and removed from consideration on a permanent or temporary basis.
- Equity Analysis:
  - Large-scale expansions of the shelter program (defined as ten or more shelters installed in new locations within the same calendar year) will be subject to an Equity Analysis to identify any disparate impacts or disproportionate burdens to Title VI-protected populations.
  - The Equity Analysis will be conducted in accordance with DDOT's Standard Operating Procedure for Title VI Amenity Analysis.
  - Routine replacements of existing shelters with new shelters are not defined as expansion and will not be subject to analysis.

## Vehicle Assignment

DDOT's vehicle assignment refers to the process by which transit vehicles are placed into service in depots and on routes throughout the transit provider's service area.

DDOT's vehicles assignment policy is to distribute bus vehicles relatively evenly among the two operating facilities with an aim to keep the average fleet age at each division as equal as possible, and as close as possible to the system average vehicle age. This ensures that no one division has a predominantly new or old fleet at a given time. The Vehicle Maintenance Division staff assigns buses to the routes and operators. Assignment is often based on estimated route ridership by time of day; thus, vehicle size plays a role in vehicle assignment.

DDOT's fleet consists of 40-foot buses and 60-foot buses of varying ages. **The 60-foot articulated buses** are assigned based on ridership levels and suitability of operating along a route. Service Development & Scheduling selects high-ridership trips for coverage by articulated buses. **The 40-foot hybrid buses** are assigned to both operating facilities and may be used on any route.

DDOT will receive 40-foot electric buses in 2025 and will assign them to route based on the road infrastructure. The electric buses will initially be assigned to a "pilot" route and later to other routes based on the results of the pilot and placement of electrical charging infrastructure. Routes with charging infrastructure and schedules tailored to electric bus operation will receive priority for assignment of electric buses.

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.

## Service Standards Monitoring Report

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 policies not less than every three years to remain in compliance with Title VI requirements. DDOT will monitor its service standards and policies every three years 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 (6) sections corresponding to the four (4) standards and two (2) 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, DDOT concludes that there are no disparate impacts to minority or low-income populations in the levels of service that it provided. DDOT's November 21, 2023 Service Standard Monitoring Report is provided in Appendix H.

## Service & Fare Equity Analysis

Transit agencies are required to evaluate service and fare changes. The written procedures and results of service and/or fare equity analyses shall be included in the Transit provider's Title VI Program. DDOT 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 20% of revenue hours and/or revenue miles on any one route.

### What does a Major Service Change mean?

A major service change is analyzed by route and does not include pilots lasting less than one year, detours, or seasonal routes coming on or off their normally scheduled season. In order to be considered in an equity analysis, the route change must meet at least one of the following criteria:

1. New coverage area that is more than 1/5 mile from the original location. For example, if a route is redirected from 2<sup>nd</sup> St. to 3<sup>rd</sup> St., then it does not meet the qualification because the streets are less than 1/4 mile from each other.

2. A new route. This excludes identity changes such as name and number for existing service.
3. An elimination of a route. This excludes identity changes.
4. An extension or shortening of a route by 1/4 mile.
6. A 20% change in revenue miles or hours.
7. Changes in service days on a route.
8. Changes in service span on a route greater than 2 hours.
9. Changes in headway greater than 15 minutes.

### Analysis Data

Data used for determining Title VI route classifications and service area is based on the latest available census data for race (minority) and poverty (low-income) at the block-group level. Minorities are considered all population counts not under the “white only” race/ethnicity classification. While some agencies expand their low-income thresholds to capture people above the poverty line, they tend to serve populations with a median income well above the poverty line. Detroit’s median income is at the federal poverty line and similar sized agencies use the same threshold.

**Table 8 - DDOT’s Service Area Demographics**

TABLE 8 - DDOT’S SERVICE AREA DEMOGRAPHICS FOR DDOT’S SERVICE AREA		
Type	Total	Percent
Population	1,024,571	100%
<b>Race</b>		
White	299,248	30%
Black or African American	604,179	61%
Hispanic or Latino	69,458	7%
Two or More Races	55,205	6%
American Indian/Alaska Native	4,323	0%
Asian	23,837	2%
Native Hawaiian and Other Pacific Islander	177	0%
Some Other Race Alone	37,602	4%
<b>Income</b>		
Lower-Income	168,086	23%
Higher-Income	552,305	77%
<b>Language</b>		
English	794,120	83%
Spanish	49,239	2%
Indo-European	18,212	2%
Asian	2,568	0%
Arabic	75,785	8%
Russian, Polish, or other Slavic languages	4,655	0%
Other and unspecified languages	4,073	0%
French, Haitian, or Cajun	2,451	0%
German or West Germanic	1,594	0%

## Fare Change Analysis

Any change in DDOT's fare cost or structure will be analyzed. For fares, the total cost burden is analyzed rather than the hours, trips, and miles by any route. Calculations are based on pass cost and pass type used by minority/non-minority and low-income/non-low-income classifications. All costs are summed up and compared between the populations. If the percentage difference between the protected populations and their counter population is over more than 20%, then alternatives and justifications need to be made. If the percentage difference does not exceed 20%, then we may proceed with the changes.

### Methodology of the analysis

1. Determine if the routes match the criteria for major service change on an individual basis.
2. Classify the routes that meet the criteria for a major service change as minority and/or low-income using census data and GIS software.
3. Compare new service benefits.
  - a. For Criteria A: if the new service area has 20% less minority or low-income populations than the original service area, then there may be an adverse impact.
  - b. For Criteria B through E, group the routes by classification and find the cumulative percent changes for revenue hours and miles between minority/non-minority and low-income/non-low-income. Compare the percentage changes in revenue hours and miles between the minority and income classifications.
    - i. If Title VI specified populations see less than 80% of the cumulative benefits for their counterpart populations, then there may be an adverse impact.
    - ii. If Title VI specified populations see a reduction in service that is greater than 20% compared to what their counterpart population lost, then there may be an adverse impact.
  - c. If there is an adverse impact, then DDOT staff must do at least one of the following before proceeding with the next step:
4. Change the original proposal to add benefits or reduce service losses to the specified population.
  - a. Mitigate any reductions with alternatives.
  - b. Provide justification as to why the proposal is the fairest option or the best one available.
5. If there is no adverse impact, then proceed to the next step.
6. Submit the analysis for approval.

### Equity Analysis - Definitions

Due to Metro Detroit's unique racial and economic makeup, the percentage of minorities and the percentage of people living under the poverty line are higher than the national average. 71% of DDOT's service area population are minorities and 24% are low-income. The analysis used ArcGIS, American Community Survey (ACS) 2023 5-year estimates, and TIGER 2023 tracts.

This methodology relies on these definitions:



- **Service area** – The service area for this analysis is any block group with a centroid within a half-mile of a stop or intersect DDOT stops with a search distance of 60 meters to account for street width.
- **Minority population** – Minority counts are based on all individuals classified not as “white only” for race in the ACS 2023 block group data. This methodology does not account for the large concentration of Arab populations in Southwest Detroit and Dearborn who have historically counted as “white” in the census.
- **Low-income population** – Low-income counts are based on all individuals classified as below poverty for income in the 2023 ACS block group data.
- **Minority and low-income averages** – The total minority population and the total low-income population are each divided by the total population in the system service area to find the system average. The population characteristics are based on ACS 2023 data. The minority average is 71% and the low-income average is 24%.
- **Minority route** – A route that has at least 1/3 (33%) of its total revenue mileage in census blocks, block groups, or traffic analysis zone(s) with a percentage of minority population that exceeds the system wide average. DDOT uses block group level data.
- **Low-income route** – The FTA defines this as a route that has at least 1/3 (33%) of its total revenue mileage in census blocks, block groups, or traffic analysis zone(s) with a percentage of below-poverty population that exceeds the system wide average. DDOT uses block group level data.
- **Disparate impact** – Refers to a neutral policy or practice that disproportionately affects members of a group identified by race, color, or national origin, where the recipient’s policy or practice lacks a substantial legitimate justification and where there exists one or more alternatives that would serve the same legitimate objectives but with less disproportionate effect on the basis of race, color, or national origin.
- **Disproportionate burden** – Refers to a neutral policy or practice that disproportionately affects low-income populations more than non-low-income populations. A finding disproportionate burden requires the recipient to evaluate alternatives and mitigate burdens where practicable.

### **Disparate Impact Policy**

A major service change to the bus system will be deemed to have a disparate impact on minority populations if 20% 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 20% or more of a service reduction falls in census block groups with low-income populations higher than the DDOT service area average.

In any instance where the service change reaches or exceeds 20%, staff conducts an equity analysis.

Most census block groups in DDOT's service areas 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 20% threshold.

### *Disparate Impact and Disproportionate Burden Evaluation*

The impact on these vulnerable populations should be no less than 20% of the impact on non-vulnerable populations. For example, if the percent change in improved service for non-protected populations is 100%, the percent change for protected populations should be no less than 80%. If the percentage of change for vulnerable populations is less than the threshold, there may be a disparate impact or disproportionate burden. If either occurs, DDOT must present legitimate justification, and mitigation efforts, and discuss alternatives that were not pursued.

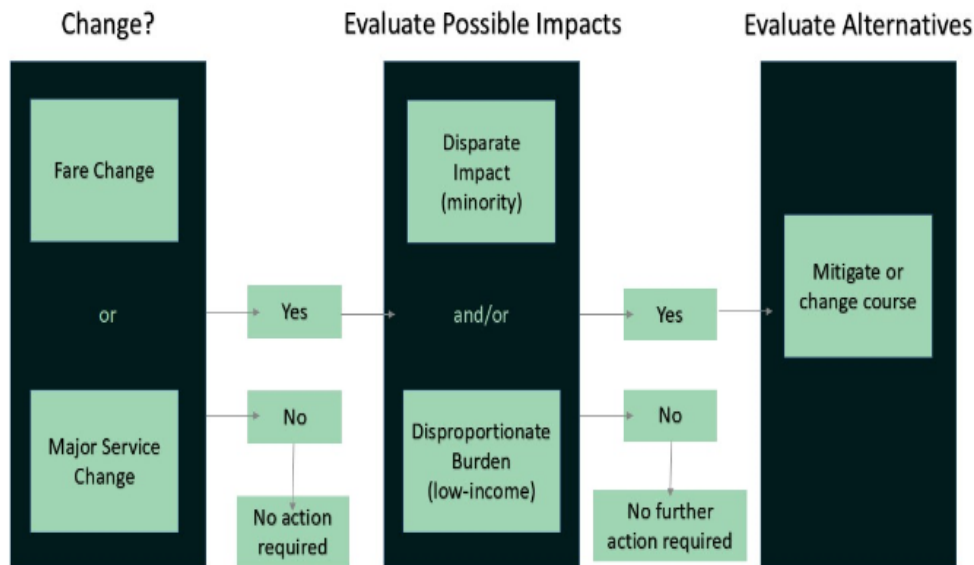
#### Alternate method – Remix Person-Trips Analysis

Remix is a software product that is used to analyze potential changes to the bus network including route changes, route additions, route deletions, and changes to service frequencies. The Remix tool can be used to compare a proposed network with the existing network for Title VI Equity Analysis purposes. Remix computes the volume of person-trips provided overall, and to protect Title VI populations (minorities and low income). It is important to note that this function can only be run using Block level Census data.

Disparate Impact and Disproportionate Burdens may be evaluated using Remix person-trips using the same criteria as in the previous section and the same 20 percentage point tolerance. For example, if the percent change in person-trips for a service improvement is 100% for non-protected populations, the percent change in person-trips for protected populations should be no less than 80%. For a service reduction, if person-trips for non-protected populations were to decrease by 60%, the person-trips of protected populations may not decrease by more than 80%.

It is also possible that the capabilities of Remix for Title VI analysis may also become a feature of a future version of Hastus or Clever.

**Table 8 – Disparate Impact and Disproportionate Burden Evaluation**



### Fare Equity Analysis Procedure

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 the 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 six (6) months.

### Public Engagement Process for Major Service Change Policy

To ensure that DDOT provides services that best serve the community, DDOT will engage its riders and other stakeholders with at least four virtual or in-person meetings where DDOT gathers and analyzes community feedback before finalization of any major service or fare change. Once a new service or fare plan is established, DDOT will conduct at least two, virtual or in-person, public hearings, where DDOT will present the plan and gather public comment.

## Service Standard Approval Page

### Service Standard Approval Signature Page

I have received, considered, and approve the Detroit Department of Transportation 2025-2027 Service Standards Plan and Policies.

---

Robert John Cramer, Executive Director of Transit

Date

## Results of Service and Fare Equity Analyses Conducted 2023-2025

### **January 2024 Service Change Equity Analysis – Appendix I**

The Title VI equity analysis compared the proposed January service changes to the previously scheduled service. Based on DDOT's Major Service Change definition, it was found that only route 9-Jefferson has undergone a major service change due to the implementation of Bus Rapid Transit (BRT). Route 9-Jefferson is considered a minority and low-income route, the service analysis found no disparate impact or disproportionate burden on minority or low-income populations.

### **June 2024 Service Change Equity Analysis – Appendix J**

In the June 2024 schedule, four (4) routes underwent a major service change. The pilot of 20-minutes peak service on route 60 Evergreen resulted in a 20.65% increase in both revenue miles and hours. Routes 4-Woodward, 12-Conant, and 17-Eight Mile were permanently rerouted to include stops at Jason Hargrove Transit Center, resulting in the overall length of the routes being extended by over 0.25 miles. All four routes are minority and low-income, but no disparate impact or disproportionate burden on the minority or low-income populations.

### **January 2025 Service Change Equity Analysis – Appendix K**

The new 4-Woodward route alignment, implemented in January 2025, resulted in a major service change. The change was presented to the community at a public hearing on October 17, 2024, and was met with overwhelmingly positive feedback. Many community members applauded the change as it would make it easier for senior citizens and riders with disabilities to reach transfers at Rosa Parks Transit Center. Furthermore, the equity analysis found no disparate impact or disproportionate burden on minority or low-income populations.

### **April 2025 Service Change Equity Analysis – Appendix L**

In the April 2025 service change, twelve (12) routes underwent a major service change. The introduction of 20-minute peak weekday frequency on 31-Mack resulted in a 20.4% and a 21% increase in revenue hours and miles, respectively. Routes 12-Conant, 15-Chicago-Davison, 18-Fenkell, 27-Joy, 29-Linwood, 30-Livernois, 38-Plymouth, 43-Schoolcraft, 52-Chene, 54-Wyoming, and 68-Chamlers saw service span increases greater than 2-hours. The equity analysis found no disparate impact or disproportionate burden on minorities or low-income populations.

### **June 2025 Service Change Equity Analysis – Appendix M**

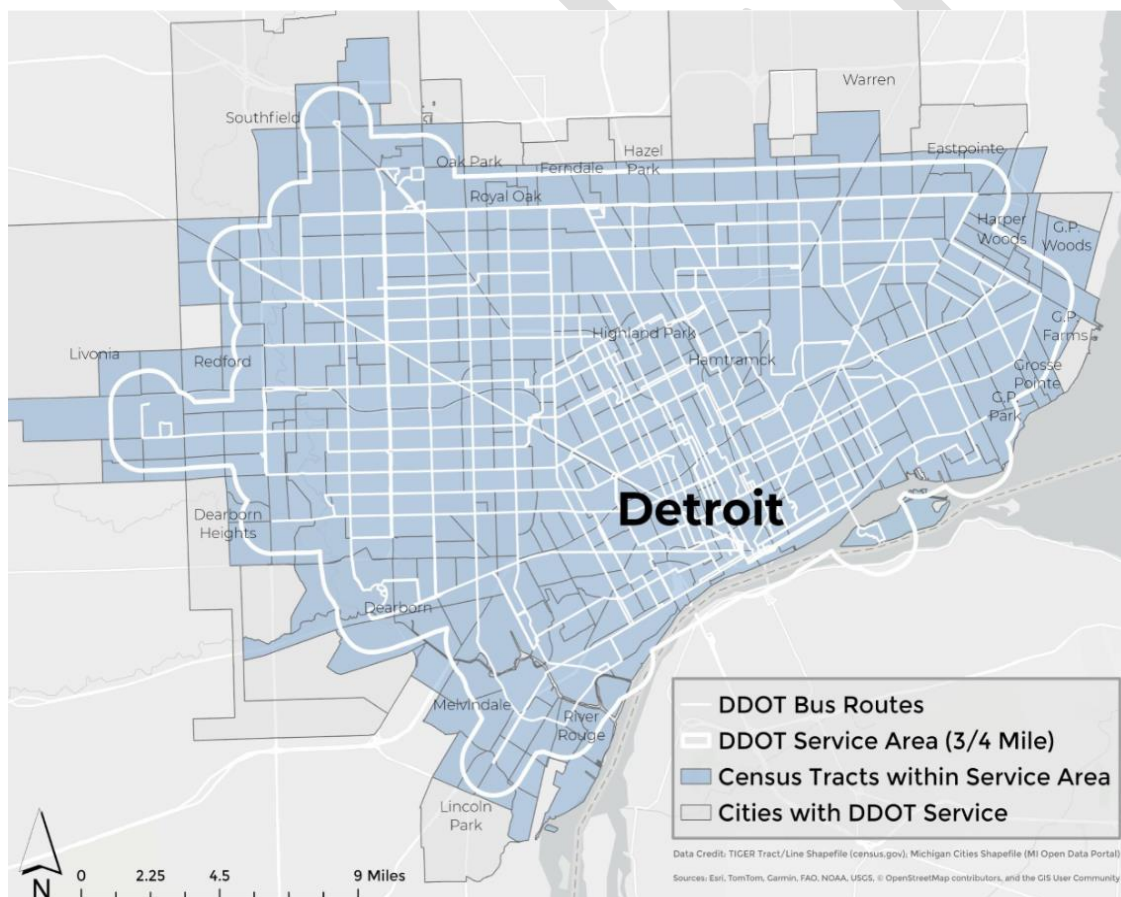
In the June 2025 service change, three (3) routes underwent a major service change. Route 3-Grand River saw a 33% and a 34% increase in revenue miles and hours, respectively. The extension of route 9-Jefferson to Mack and Alter will lengthen the route by 2.24 miles. Despite the extension of route 16-Dexter to Old Redford Meijer, the removal of service from Greenfield to Northland will shorten the overall length of the route by 4.57 miles. The equity analysis found no disparate impact or disproportionate burden on minority or low-income populations.

## Demographic and Service Profile Maps and Charts

DDOT regularly evaluates demographic information as part of any proposed service or fare change, as required by the FTA. In addition, DDOT conducted an additional analysis using Census data for this program submission.

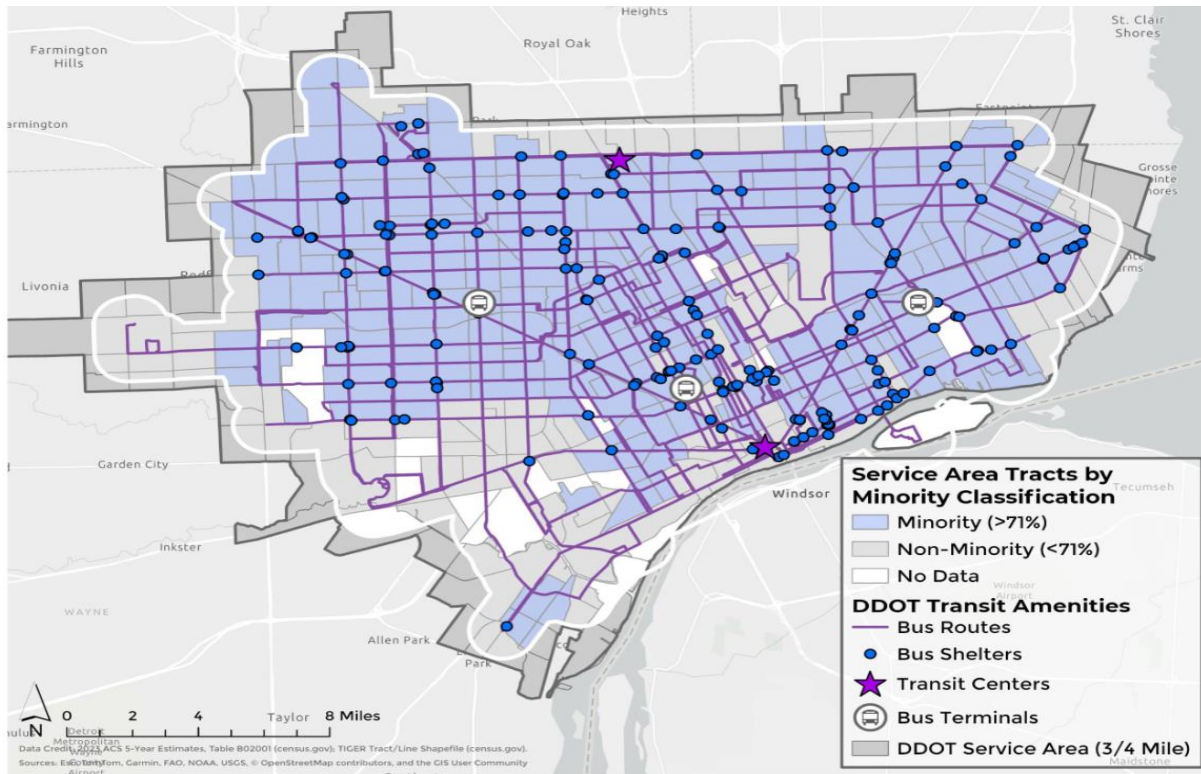
DDOT's Service profile maps based on 2023 census tract data and American Community Survey (ACS) 5-year Estimates census tract data are used to examine the extent of transit service available to minority and low-income populations within the DDOT service area (Figure 15-17). Maps displaying the geographic coverage of transit service in relation to the census tracts identified as minority and non-minority and low income and non-low-income level populations based on the service area threshold can be found in maps below.

**Figure 15 – DDOT Service Area in Metro Detroit**

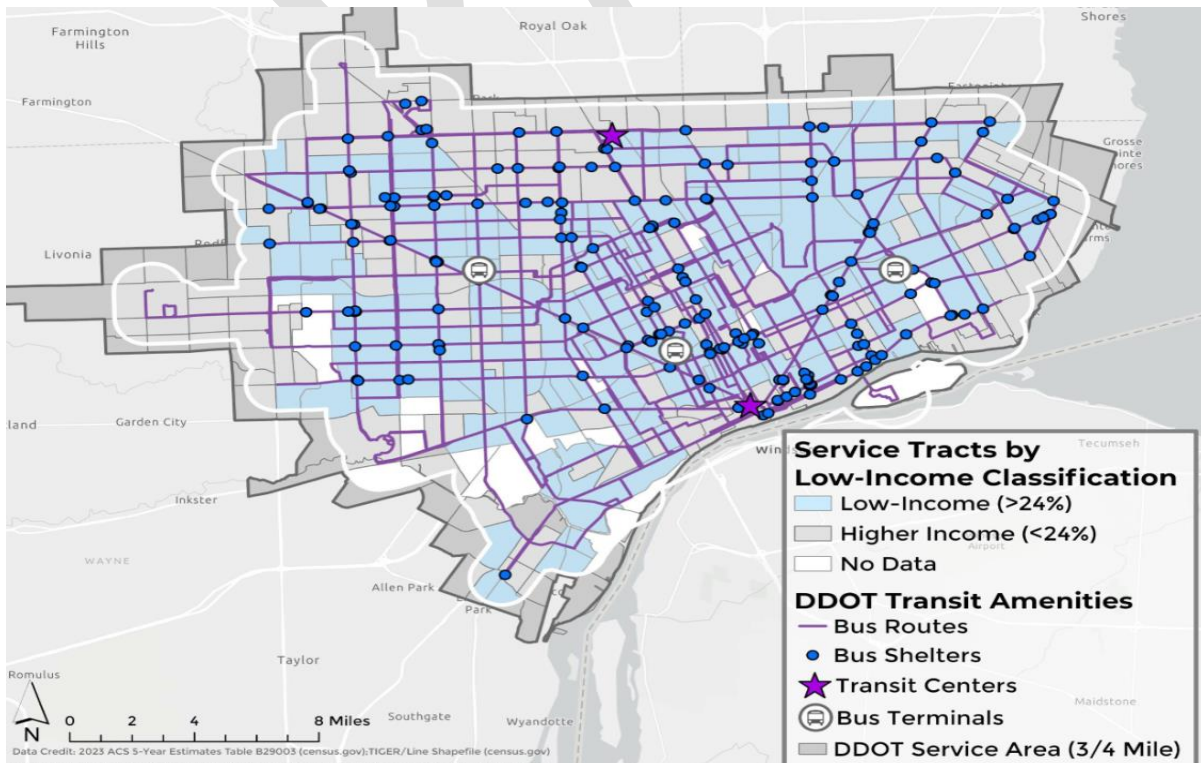




**Figure 16 – DDOT Service Area Minority Population**



**Figure 17 – DDOT Service Area Low-Income Population**



## Demographic Ridership and Travel Patterns, Collected by Surveys

DDOT conducted an On-Board Ridership Survey in January 2023 ([Appendix F](#)). The charts below characterize the demographics of the entire service area. Additional surveys may be conducted prior to a major service or fare change.

RACE OR ETHNICITY	
Black or African American	77%
Native American or Alaska Native	9%
White	6%
Multiracial	5%
Hispanic	1%
Other	1%
Native Hawaiian or Pacific Islander	.3%

HOW OLD ARE YOU?	
12-17	6%
18-25	22%
26-41	29%
42-57	25%
59 and over	19%

WHERE ARE YOU GOING ON THIS TRIP?	
Work	39%
Home	20%
Shopping/Errands	16%
Doctor/Dentist	9%
School	5%
Other	6%
Entertainment	4%

WHAT WAS YOUR TOTAL HOUSEHOLD INCOME	
Under \$32,498	64%
\$32,498 - \$50,000	25%
\$50,000 - \$70,000	10%
Over \$75,000	1%

HOW MANY DAYS PER WEEK DO YOU USUALLY RIDE THE BUS?			
6-7 Day/Week	3-5 Day/Week	1-2 Day/Week	Less than 1 Day/Week
44%	40%	13%	3%

## **Transit Service Monitoring Program Report & Governing Entity Approval**

DDOT's service standards and policies provide benchmarks to ensure that service design and operations practices do not result in discrimination on the basis of race, color, or national origin. DDOT performs on-going monitoring and evaluation of the existing service. Results of service monitoring will be submitted triennially (in conjunction with the Title VI Program Update submission to the FTA.) In accordance with FTA Circular 4702.1B, the Service Monitoring Report must be reviewed and approved by the Executive Director and included in the next Title VI Program update.

Appendix H summarizes the 2023 Service Monitoring results. No disparate impacts on minority populations were identified during the evaluation.

## Title VI Program Plan Approval Signature Page

### Title VI Program Plan Approval Signature Page

I am committed to ensuring that no person is excluded from participation in or denied the benefits of transportation-related programs on the basis of race, color, or national origin, as protected by Title VI according to the Title VI requirements and guidelines for Federal Transit Administration recipients (FTA Circular 4702.1B).

I hereby acknowledge the receipt and approve the Detroit Department of Transportation 2025-2027 Title VI Program Plan.

---

Robert John Cramer, Executive Director of Transit

Date



## APPENDIX A: DDOT'S TITLE VI COMPLAINT FORM (CONT.)

# Detroit Department of Transportation

## Title VI Complaint Form

### SECTION III

I believe the discrimination I experienced was based on (check all that apply):

☐ Race    ☐ Color    ☐ National origin

Date of alleged discrimination (mm/dd/yyyy): \_\_\_\_\_ / \_\_\_\_\_ / \_\_\_\_\_

DDOT investigates complaints received no more than 180 days after the alleged incident.

**Describe how you were discriminated against.** What happened and who was responsible?  
Please provide the names and contact information of all persons and witnesses involved, the location of the incident, and bus number. For additional space, attach additional sheets of paper or use the back of the form.

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## APPENDIX A: DDOT'S TITLE VI COMPLAINT FORM (CONT.)

# Detroit Department of Transportation

## Title VI Complaint Form

### SECTION IV

Have you previously filed a Title VI complaint with this agency? ☐ Yes ☐ No

### SECTION V

Have you filed this complaint with any other Federal, State, or local agency or with any Federal or State court? ☐ Yes ☐ No

If yes, check all that apply:

☐ Federal agency: \_\_\_\_\_ ☐ State agency: \_\_\_\_\_

☐ Federal court: \_\_\_\_\_ ☐ State court: \_\_\_\_\_

☐ Local agency: \_\_\_\_\_

Please provide information about a contact person at the agency/court where the complaint is filed.

Name: \_\_\_\_\_

Title: \_\_\_\_\_

Agency: \_\_\_\_\_

Address: \_\_\_\_\_

Phone number: \_\_\_\_\_

### SECTION VI

Name of agency complaint is against: \_\_\_\_\_

Contact person: \_\_\_\_\_

Title: \_\_\_\_\_

Phone number: \_\_\_\_\_

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## APPENDIX A: DDOT'S TITLE VI COMPLAINT FORM (CONT.)

# Detroit Department of Transportation

## Title VI Complaint Form

A signature and date are required to complete and submit the form.

Signature: \_\_\_\_\_

Date: \_\_\_\_\_

Please submit completed form by:

1. Email to [DDOTtitle6@detroitmi.gov](mailto:DDOTtitle6@detroitmi.gov); or
2. Mail to: Detroit Department of Transportation  
ATTN: Office of Compliance – Title VI  
100 Mack Ave  
Detroit, MI 48201

[www.ridedetroittransit.com](http://www.ridedetroittransit.com) | (313) 933-1300 | [@rideddott](#)

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# APPENDIX B: TITLE VI NEW HIRE ACKNOWLEDGEMENT FORM



Detroit Department of Transportation  
1301 East Warren Ave. | Detroit MI 48207 • 313.933.1300 • [www.RideDetroitTransit.com](http://www.RideDetroitTransit.com)

**TO: ALL DEPARTMENT OF TRANSPORTATION EMPLOYEES**

**RE: TITLE VI PROGRAM PLAN**

The Detroit Department of Transportation (DDOT) is committed to ensuring that no person is excluded from participation in or denied the benefits of its services on the basis of race, color, or national origin, as provided by Title VI of the Civil Rights Act of 1964, as amended. Toward this end, it is the objective of all DDOT employees to:

- Ensure that the level and quality of transportation service is provided without regard to race, color, or national origin;
- Identify and address, as appropriate, disproportionately high and adverse human health and environmental effects, including social and economic effects of programs and activities on minority populations and low income populations;
- Promote the full and fair participation of all affected populations in transportation decision making;
- Prevent the denial, reduction, or delay in benefits related to programs and activities that benefit minority populations or low-income populations;
- Ensure meaningful access to programs and activities by persons with limited English proficiency.

All employees share the responsibility for carrying out DDOT's commitment to Title VI. The Title VI Coordinator is responsible for the day-to-day operation of the program and receives and investigates Title VI complaints that come through the complaint procedures process. For additional information on DDOT's nondiscrimination obligations, please email to: [DDOT-Title6@detroitmi.gov](mailto:DDOT-Title6@detroitmi.gov). DDOT is committed to a policy of non-discrimination in the conduct of its business, including its Title VI responsibilities and to the delivery of equitable and accessible transportation services.

I ACKNOWLEDGE THAT I HAVE RECEIVED A COPY OF THE DDOT TITLE VI PROGRAM, TRAINING AND MY SIGNATURE APPEARS BELOW.

\_\_\_\_\_  
SIGNATURE OF EMPLOYEE

\_\_\_\_\_  
LAST FOUR DIGITS OF SS#

DATED AT DETROIT, MICHIGAN THIS \_\_\_\_ DAY OF \_\_\_\_\_, 20 \_\_\_\_

WITNESS: \_\_\_\_\_

TITLE: \_\_\_\_\_

12/28/18 – DDOT OFFICE OF COMPLIANCE

# APPENDIX C: COMMITTEE MEMBERSHIP APPLICATION

## Committee Membership Application



**Please select the committee of interest:**

☐ Advisory Commission      ☐ Local Advisory Councils      ☐ Paratransit Appeal Board

Name: \_\_\_\_\_

Address: \_\_\_\_\_

City: \_\_\_\_\_ State: \_\_\_\_\_ Zip code: \_\_\_\_\_

Home phone: \_\_\_\_\_ Cell phone: \_\_\_\_\_ Work phone: \_\_\_\_\_

Email: \_\_\_\_\_

**How often do you use public transit?**    ☐ Daily    ☐ Weekly    ☐ Sometimes    ☐ Rarely    ☐ Not at all

**What type of public transit service do you use?**    ☐ Bus    ☐ Paratransit

**When you use public transit, please tell us which bus route you ride most often.**

\_\_\_\_\_

**Please provide a brief statement telling us why you want to serve on this committee.**

\_\_\_\_\_

**Please tell us how you, as a member of the committee, will solicit input and feedback from DDOT riders and community residents.**

\_\_\_\_\_

## APPENDIX C: COMMITTEE MEMBERSHIP APPLICATION (CONT.)

# Committee Membership Application

Please list all community involvement and volunteer activities that you are currently involved with.

Please provide three references including telephone and e-mail contact information.

Name: \_\_\_\_\_ Cell phone: \_\_\_\_\_ Work phone: \_\_\_\_\_

1. \_\_\_\_\_

2. \_\_\_\_\_

3. \_\_\_\_\_

Which best describes your race?

☐ African American/Black ☐ White/Caucasian ☐ Hispanic/Latino

☐ Asian ☐ Native American ☐ Other

Which best describes the language primarily spoken in your home?

☐ English ☐ Spanish ☐ Arabic ☐ Other

I swear or affirm that:

1) I am not an DDOT contractor; 2) I am not an elected public official; 3) all of the information provided here is true; 4) if selected I will sign a code of conduct agreement; 5) I will have sufficient time to devote to this responsibility; and 6) I will commit to attend the required meetings.

Signature \_\_\_\_\_ Date \_\_\_\_\_

# APPENDIX D: PROMOTIONAL CONTENT

## Public Hearings



**DETROIT DEPARTMENT OF TRANSPORTATION**  
**PUBLIC HEARINGS**

**UPCOMING DATES**

**Wednesday, September 25**  
Joseph Walker Williams Center  
Room 120  
8431 Rosa Parks Blvd.  
Detroit, MI 48206  
11 a.m. – 12:30 p.m.

**Thursday, September 26**  
Pizzaflex  
4458 W. Vernor  
Detroit, MI 48209  
6 – 7:30 p.m.

**Tuesday, October 1**  
Conely Detroit Public Library  
4600 Martin  
Detroit, MI 48210  
5:30 – 7 p.m.

Learn about the following proposed service changes to take effect on Saturday, November 16:

<b>3 Grand River</b>	<b>11 Clairmount</b>
<b>6 Gratiot</b>	<b>18 Fenkell</b>
<b>26 Junction</b>	

Serving McGraw, Junction, Michigan Department of Health and Human Services, Southwest Service Center, Clark Park, and Southwest Public Safety Center

Submit all comments about any of the proposed changes by Friday, October 18 to [ddotcomments@detroitmi.gov](mailto:ddotcomments@detroitmi.gov).

Any person who needs accommodation to participate in this meeting, including persons with disabilities, may contact Customer Service at (313) 933-1300 or [ddot-adjs@detroitmi.gov](mailto:ddot-adjs@detroitmi.gov) to request assistance at least five (5) days in advance of the meeting.

**(313) 933-1300 | @rideddott**  
[www.ridedetroittransit.com](http://www.ridedetroittransit.com)

SUMMER 2019

Flyer, English Version



**DEPARTAMENTO DE TRANSPORTE DE DETROIT**  
**AUDIENCIAS PÚBLICAS**

**PRÓXIMAS FECHAS**

**Miércoles, 25 de septiembre**  
Centro Joseph Walker Williams  
Sala 120  
8431 Rosa Parks Blvd.  
Detroit, MI 48206  
11 a.m. – 12:30 p.m.

**Jueves, 26 de septiembre**  
Pizzaflex  
4458 W. Vernor  
Detroit, MI 48209  
6 – 7:30 p.m.

**Martes, 1 de octubre**  
Biblioteca pública de Detroit Conely  
4600 Martin  
Detroit, MI 48210  
5:30 – 7 p.m.

Conozca los siguientes cambios propuestos en el servicio que entrarán en vigencia el sábado 16 de noviembre:

<b>3 Grand River</b>	<b>11 Clairmount</b>
<b>6 Gratiot</b>	<b>18 Fenkell</b>
<b>26 Junction</b>	

Serviendo a McGraw, Junction, Departamento de Salud y Servicios Humanos de Michigan, Southwest Service Center, Clark Park, y Southwest Public Safety Center

Enviar todos los comentarios sobre cualquiera de los cambios propuestos antes del viernes, 18 de octubre a [ddotcomments@detroitmi.gov](mailto:ddotcomments@detroitmi.gov).

Cualquier persona que necesite alojamiento para participar en esta junta, incluyendo personas con discapacidad, puede dirigirse con servicio al cliente al (313) 933-1300 o [ddot-adjs@detroitmi.gov](mailto:ddot-adjs@detroitmi.gov) para pedir asistencia al menos cinco (5) días antes de la reunión.

**(313) 933-1300 | @rideddott**  
[www.ridedetroittransit.com](http://www.ridedetroittransit.com)

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**قسم جلسات الاستماع العامة لخدمات النقل في ديترويت**

**المواعيد القادمة**

**الأربعاء 25 أيلول**  
مركز جوزيف ووكر ويليامز - غرفة 120  
8431 Rosa Parks Blvd., Detroit, MI 48206  
11 صباحاً إلى 12:30 ظهراً

**الخميس 26 أيلول**  
بيزافليكس  
4458 W. Vernor  
Detroit, MI 48209  
6:00 - 7:30 مساءً

**الثلاثاء 1 من تشرين الأول**  
مكتبة كونلي ديترويت العامة  
4600 Martin  
Detroit, MI 48210  
5:30 - 7 مساءً

تعرف على تغييرات الخدمات المقترحة التالية والتي ستصبح سارية المفعول في يوم السبت 16 من تشرين الثاني

<b>11 Clairmount</b>	<b>3 Grand River</b>
<b>18 Fenkell</b>	<b>6 Gratiot</b>
<b>26 Junction</b>	

خدمة ماكليو، ميكلين، وزارة الصحة والخدمات الإنسانية العامة - مركز خدمات ماكليو ويست، كلارك بارك - ومركز السلامة العامة ماكليو ويست

يرجى إرسال جميع التعليقات حول التغييرات المقترحة قبل حلول يوم الجمعة 18 من تشرين الأول في البريد الإلكتروني [ddotcomments@detroitmi.gov](mailto:ddotcomments@detroitmi.gov).

يرجى إخطار أي شخص لديه حاجة إلى مساعدة خاصة للمشاركة في هذا الاجتماع، بما في ذلك الأشخاص ذوي الإعاقة، بالخدمة العامة على الهاتف (313) 933-1300 أو [ddot-adjs@detroitmi.gov](mailto:ddot-adjs@detroitmi.gov) قبل خمسة (5) أيام من الاجتماع.

**(313) 933-1300 | @rideddott**  
[www.ridedetroittransit.com](http://www.ridedetroittransit.com)

صيف 2019

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# APPENDIX D: PROMOTIONAL CONTENT (CONT.)

## Public Hearings



### PUBLIC HEARING

#### TITLE VI PROGRAM UPDATE / DBE OVERALL GOAL

Learn and share your opinion about the Detroit Department of Transportation's proposed FY 2023-2025 Title VI Program Plan.

**JOIN VIA ZOOM**

**Date:** Tuesday, May 9, 2023  
**Time:** Noon  
**Phone:** (267) 831-0333  
**Meeting ID:** 893-8178-7194

**HOW TO COMMENT**

Submit comments about the proposed policies by Thursday, May 25, 2023 to:

- [DDOTComments@detroitmi.gov](mailto:DDOTComments@detroitmi.gov)
- Detroit Department of Transportation  
ATTN: Compliance Manager  
100 Mack Ave., Detroit, MI 48201
- (313) 933-1300 or 7-1-1 (TTY)
- [www.detroitmi.gov/ddot](http://www.detroitmi.gov/ddot)

**For more information or to inquire about special needs arrangements:** such as interpreters, call Customer Service at (313) 933-1300 or email [DDOT-ADA@detroitmi.gov](mailto:DDOT-ADA@detroitmi.gov) no later than Tuesday, May 2, 2023.



### AUDIENCIA PÚBLICA

#### ACTUALIZACIÓN DEL PROGRAMA DEL TÍTULO VI / OBJETIVO GENERAL DE DBE

Conozca y comparta su opinión sobre el Plan del Programa del Título VI propuesto por el Departamento de Transporte de Detroit para el año fiscal 2023-2025.

**ÚNETE CON ZOOM**

**Fecha:** Martes, 9 de mayo  
**Tiempo:** Mediodía  
**Teléfono:** (267) 831-0333  
**ID de junta:** 893-8178-7194

**COMO COMENTAR**

Envíe sus comentarios sobre las políticas propuestas antes del jueves 25 de mayo a:

- [DDOTComments@detroitmi.gov](mailto:DDOTComments@detroitmi.gov)
- Detroit Department of Transportation  
ATTN: Compliance Manager  
100 Mack Ave., Detroit, MI 48201
- (313) 933-1300 or 7-1-1 (TTY)
- [www.detroitmi.gov/ddot](http://www.detroitmi.gov/ddot)

**Para obtener más información o para consultar sobre arreglos para necesidades especiales,** como intérpretes, llame a Servicio al Cliente al (313) 933-1300 o envíe un correo electrónico a [DDOT-ADA@detroitmi.gov](mailto:DDOT-ADA@detroitmi.gov) a más tardar el martes 2 de mayo.



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### جلسة الاستماع العامة

#### العنوان السادس تحديث حالة البرنامج / الهدف العام DBE

تعلم وشارك رأيك حول خطة برنامج العنوان السادس المقترحة من وزارة النقل في ديترويت للسنة المالية 2023-2025

**التاريخ: الثلاثاء 9 مايو**  
**الوقت: الظهر**  
**الهاتف: (267) 831-1300**  
**معرف الاجتماع: 893-8178-7194**

**معرفة الترخيص**

أرسل طلبك حول الخدمات المترجمة بحلول يوم الخميس 25 مايو إلى:

- [DDOTComments@detroitmi.gov](mailto:DDOTComments@detroitmi.gov)
- Detroit Department of Transportation  
ATTN: Compliance Manager  
Mack Ave 100  
Detroit, MI 48201
- (313) 933-1300 أو 7-1-1 (TTY)
- [www.detroitmi.gov/ddot](http://www.detroitmi.gov/ddot)

**للمزيد من المعلومات أو للاستعلام عن ترتيبات الاحتياجات الخاصة:** مثل المترجمين الفوريين، اتصل بخدمة العملاء على (313) 933-1300 أو أرسل بريدًا إلكترونيًا إلى [DDOT-ADA@detroitmi.gov](mailto:DDOT-ADA@detroitmi.gov) في موعد أقصاه يوم الثلاثاء 2 مايو.



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# APPENDIX D: PROMOTIONAL CONTENT (CONT.)

## Outreach



Community Input Meeting Flyer



State Fair Virtual Town Hall

# APPENDIX D: PROMOTIONAL CONTENT (CONT.)

## Public Workshops



Flyer, English Version



Flyer, English Version

# APPENDIX E: SUMMARY OF OUTREACH EVENTS OCTOBER 2023–JUNE 2025

## Community Outreach, Workshops, & Public Hearings

ITEM	EVENT	HOSTED BY	Location	DATE	TIME	ATTENDED/ PROVIDED RESOURCES	MINORITY	LOW INCOME	TRANSLATOR
1	Eastside Coalition Transportation Fair	ECAC	Eastside Community Network	10/1/2023	5:00 pm - 7:00 pm	Attended	Yes	Yes	No
2	DPD All Abilities Fair	DPD	Detroit Public Safety Headquarters	10/18/2023	10:00 am - 2:00 pm	Attended	Yes	Yes	No
3	Community Input Meeting	DDOT	Zoom	10/19/2023	5:00 pm - 6:30 pm	Attended	Yes	Yes	Yes
4	Virtual Public Hearing for January Service Changes	DDOT	Zoom	11/16/2023	5:00 pm - 6:30 pm	Attended	Yes	Yes	Yes
5	Local Advisory Commission	DDOT	Zoom	11/21/2023	10:00 am - 12:00 pm	Attended	Yes	Yes	Yes
6	Community Input Meeting	DDOT	Zoom	1/18/2024	5:00 pm - 6:30 pm	Attended	Yes	Yes	Yes
7	Local Advisory Commission	DDOT	Zoom	2/13/2024	10:00 am - 12:00 pm	Attended	Yes	Yes	Yes
8	Virtual Final Public Hearing for DDOT Reimagined	DDOT	Zoom	2/15/2024	5:00 pm - 6:30 pm	Attended	Yes	Yes	Yes
9	Community Input Meeting	DDOT	Zoom	3/21/2024	5:00 pm - 6:30 pm	Attended	Yes	Yes	Yes
10	Community Input Meeting	DDOT	Zoom	4/18/2024	5:00 pm - 6:30 pm	Attended	Yes	Yes	Yes

## Community Outreach, Workshops, & Public Hearings

ITEM	EVENT	HOSTED BY	Location	DATE	TIME	ATTENDED/ PROVIDED RESOURCES	MINORITY	LOW INCOME	TRANSLATOR
11	Community Input Meeting	DDOT	Zoom	5/16/2024	5:00 pm - 6:30 pm	Attended	Yes	Yes	Yes
12	District 3 Clergy Community Luncheon	Council Member Benson	Farwell Community Center	6/5/2024	11:30 am - 1:30 pm	Attended	Yes	Yes	No
13	City of Detroit Juneteenth Event	City of Detroit	Spirit Plaza	6/14/2024	11:00 am - 2:00 pm	Attended	Yes	Yes	No
14	Community Input Meeting	DDOT	Zoom	6/20/2024	5:00 pm - 6:30 pm	Attended	Yes	Yes	Yes
15	City of Detroit Disability Pride Month	City of Detroit	Spirit Plaza	7/12/2024	11:00 am - 2:00 pm	Attended	Yes	Yes	No
16	Community Input Meeting	DDOT	Zoom	7/18/2024	5:00 pm - 6:30 pm	Attended	Yes	Yes	Yes
17	Eastside Community Network Transportation Fair	ECN	Eastside Community Network	8/22/2024	5:00 pm - 7:00 pm	Attended	Yes	Yes	No
18	Wayne State Festifall	WSU	WSU	8/25/2024	3:00 pm - 6:00 pm	Attended	Yes	Yes	No
19	Community Input Meeting	DDOT	Zoom	9/19/2024	5:00 pm - 6:30 pm	Attended	Yes	Yes	Yes
20	Virtual Public Hearing for January Service Changes	DDOT	Zoom	10/17/2024	5:00 pm - 6:30 pm	Attended	Yes	Yes	Yes
21	DPD All Abilities Fair	DPD	Detroit Public Safety Headquarters	10/25/2024	10:00 am - 2:00 pm	Attended	Yes	Yes	No
22	D1 Financial Literacy and Community Resource Fair	District 1	Crowell Recreation Center	11/2/2024	12:00 pm - 2:00 pm	Attended	Yes	Yes	No
23	Local Advisory Commission	DDOT	Zoom	11/19/2024	10:00 am - 12:00 pm	Attended	Yes	Yes	Yes
24	Hybrid Community Input Meeting	DDOT	zoom and Rosa Parks Transit Center	11/21/2024	5:00 pm - 6:30 pm	Attended	Yes	Yes	Yes
25	Community Input Meeting	DDOT	Zoom	1/16/2025	5:00 pm - 6:30 pm	Attended	Yes	Yes	Yes
26	IPH and Detroit Healthy Start Community Consortium	IPH	Zoom	1/23/2025	1:00 pm - 2:00 pm	Attended	Yes	Yes	Yes



## Community Outreach, Workshops, & Public Hearings

ITEM	EVENT	HOSTED BY	Location	DATE	TIME	ATTENDED/ PROVIDED RESOURCES	MINORITY	LOW INCOME	TRANSLATOR
27	Transit Advocates Meeting	DDOT	Zoom	2/18/2025	4:00 pm - 5:00 pm	Attended	Yes	Yes	Yes
28	Community Input Meeting	DDOT	Zoom	2/20/2025	5:00 pm - 6:30 pm	Attended	Yes	Yes	Yes
29	Challenge Detroit Transit Community Project Presentation	Detroit People Mover	The Guardian Building	2/28/2025	11:00 am - 12:00 pm	Attended	Yes	Yes	No
30	Transit Advocates Meeting	DDOT	Zoom	3/18/2025	4:00 pm - 5:00 pm	Attended	Yes	Yes	Yes
31	Hybrid Public Hearing for June Service Changes	DDOT	Rosa Parks Transit Center and Zoom	3/20/2025	5:00 pm - 6:30 pm	Attended	Yes	Yes	Yes
32	Transit Advocates Meeting	DDOT	Zoom	4/15/2025	4:00 pm - 5:00 pm	Attended	Yes	Yes	Yes
33	Community Input Meeting	DDOT	Zoom	4/17/2025	5:00 pm - 6:30 pm	Attended	Yes	Yes	Yes
34	Transit Advocates Meeting	DDOT	Zoom	5/13/2025	4:00 pm - 5:00 pm	Attended	Yes	Yes	Yes
35	Community Input Meeting	DDOT	Zoom	5/15/2025	5:00 pm - 6:30 pm	Attended	Yes	Yes	Yes