



MEIGS COUNTY PUBLIC TRANSIT

Meigs County Public Transit
Title VI Program
February 2023- December 2025

Adopted Date
February 23, 2023

Revised Date
February 8, 2024

Theresa Lavender, Director

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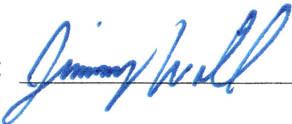
The Meigs County Office of Public Transit Title VI plan includes the following elements:

1. Plan Approval and Revision Log
2. Policy Statement
3. Notice to the Public
4. Complaint Procedure
5. Complaint Form
6. List of transit related Title VI Investigations, Complaints and Lawsuits
7. Public Participation Plan
8. Language Assistance Plan
9. Minority Representation Table and Description
10. Providing Assistance to and Monitoring Subrecipients
11. Title VI Equity Analysis
12. MPO Requirements

Section 1: Title VI Plan Approval

Title VI Plan
Adopted on: 2.8.24

Adopted by: Meigs County Commissioners

Signature(s): 

Title VI Plan Revision Log

Date Month/day/year	Section Revised	Summary of Revisions
2/23/23	Adoption of original plan	Adoption of original plan
2/8/2024	Section 2, 3, 5, 6, 8	Update Policy Statement, Civil Rights Coordinator, implemented LEP Plan, updated forms.

Section 2: Title VI Policy Statement

Policy Statement

Title VI of the Civil Rights Act of 1964 prohibits discrimination on the basis of race, color, or national origin in programs and activities receiving Federal financial assistance. Specifically, Title VI provides that "no person in the United States shall, on the ground of race, color, or national origin, be excluded from participation in, be denied the benefits of, or be subjected to discrimination under any program or activity receiving Federal financial assistance" (42 U.S.C. Section 2000d).

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

Meigs County Public Transit is committed to ensuring that no person is excluded from participation in, or denied the benefits of its transit services on the basis of race, color, or national origin, as protected by Title VI in Federal Transit Administration (FTA) Circular 4702.1.B. This plan was developed to guide MCPT in its administration and management of Title VI related activities.

Section 3: Notice to the Public

Title VI Notice to the Public

The Meigs County Public Transit notice to the Public is as follows:

Notifying the Public of Rights Under Title VI

Meigs County Public Transit

- The Meigs County Office of Public Transit operates its programs and services without regard to race, color, and national origin in accordance with Title VI of the Civil Rights Act. Any person who believes she or he has been aggrieved by any unlawful discriminatory practice under Title VI may file a complaint with the Meigs County Public Transit.
- For more information on the Meigs County Public Transit's civil rights program, the procedures to file a complaint, or to file a complaint, please contact Julie Scherfel, Civil Rights Coordinator at 740-444-7647, (TTY 866-874-3972); email Julie.Scherfel@jfs.ohio.gov or visit our administrative office at 175 Race Street, Middleport, Ohio 45760.
- For transportation-related Title VI matters, a complaint may also be filed directly with the:

Ohio Department of Transportation, Attn: Office of Equal Opportunity, 1980 West Broad Street, Mailstop 3270, Columbus, OH 43223; or

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

If information is needed in another language, contact 844-737-4999, enter 21223#, Enter 9

The Meigs County Office of Public Transit's notice to the Public is posted in the public areas of the office and inside the transit vehicles.

1. Main entry - MCDJFS
2. Main entry- Ohio Means Jobs Meigs County
3. Main entry- MCPT

Section 4: Title VI Complaint Procedure

Meigs County Office of Public Transit's Title VI Complaint Procedure is made available in the following locations:

- Agency website, if available:
 - Hard copy in the central MCPT office or main office of MCDJFS
 - Agency Title VI Plan
-

Any individual, group of individuals or entity that believes they have been discriminated against on the basis of race, color, or national origin by Meigs County Public Transit may file a Title VI complaint by completing and submitting the agency's Title VI Complaint Form.

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

A complaint must be filed with Meigs County Public Transit no later than 180 days after the following:

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

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

Meigs County Public Transit has 45 days to investigate the complaint. If more information is needed to resolve the case, Meigs County Public Transit may contact the complainant requesting further information. The complainant has 10 business days from the date of the letter to send requested information to the investigator assigned to the case. If the investigator is not contacted by the complainant or does not receive the additional information within 10 business days, the Meigs County Public Transit can administratively close the case.

After the investigator reviews the complaint, she/he will issue one of two (2) letters to the complainant: a closure letter or a letter of finding (LOF).

- ✓ A closure letter summarizes the allegations and states that there was not a Title VI violation and that the case will be closed.
- ✓ A letter of finding (LOF) summarizes the allegations and the interviews regarding the alleged incident, and explains whether any disciplinary action, additional training of the staff member, or other action will occur.

If the complainant wishes to appeal the decision, she/he has 10 days after the date of the closure letter or the letter of finding to do so. The appeal process information will be included in the letter.

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

If information is needed in another language, then contact 844-737-4999, enter 21223#, Enter 9.

Section 5: Title VI Complaint Form

The Meigs County Public Transit Title VI Complaint Procedure is made available in the following locations:

- Agency website
- Hard copy in the central office or main office of MCDJFS
- Agency Title VI Plan

TITLE VI COMPLAINT FORM

Title VI of the Civil Rights Act of 1964 states “No person in the United States shall, on the ground of race, color or national origin, be excluded from participation in, denied the benefits of, or be subjected to discrimination under any program or activity receiving Federal financial assistance.” Title 42 U.S.C. Section 2000d

Please provide the following information necessary to process your complaint. A formal complaint must be filed within 180 days of the occurrence of the alleged discriminatory act. Assistance is available upon request. Please contact Julie Scherfel at 740-444-7647.

Complete this form and return to:
Meigs County Public Transit
Attention: Julie Scherfel
175 Race Street, Middleport Ohio 45760
Julie.Scherfel@jfs.ohio.gov
Fax: (740) 992-7500

Complainants Name: _____
 Address: _____ City: _____ State: ____ Zip Code: _____
 Telephone Home: _____ Telephone Cell: _____
 Email Address: _____

Are Are you filing this complaint on your own Yes No
 behalf?

Accessible Format Requirements?	<input type="checkbox"/>	Large Print TDD	<input type="checkbox"/>	Audio Tape Other
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Person (s) Discriminated Against (if other than complainant):
 Name: _____
 Address: _____ City: _____ State: ____ Zip Code: _____
 Telephone Home: _____ Telephone Cell: _____
 Email Address: _____

If not, please supply the name and relationship of the person for whom you are complaining:	
Please explain why you have filed for a third party:	

Please confirm that you have obtained the permission of the aggrieved party if you are filing on behalf of a third party.	Yes	No
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I believe the discrimination I experienced was based on (check all that apply):

Race Color National Origin

Date of Alleged Discrimination (Month, Day, Year) _____ Time: _____

Location	Agency/Person who was responsible for alleged discrimination
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Explain as clearly as possible what happened and why you believe you were discriminated against. Describe all persons who were involved. Include the name and contact information of the person(s) who discriminated against you (if known) as well as names and contact information of any witnesses. If more space is needed, please use the back of this form.

attached any written material or other supporting information that you think is relevant to your complaint.

Have you previously filed a Title VI complaint with this agency?	<input type="checkbox"/> Yes	<input type="checkbox"/> No
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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: _____
 Federal Court _____ State Agency _____
 State Court _____ Local Agency _____

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

Agency:
Name/Title:
Address: _____ Telephone: _____

Signature	Date

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

Meigs County Public Transit maintains a list or log of all Title VI investigations, complaints, and lawsuits, pertaining to its transit-related activities.

Check One:

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

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

Title VI Complaints Log

FISCAL YEAR 20 <u> </u>	DATE (MM/DD/YY)	SUMMARY (Include basis of complaint)	STATUS	OUTCOME (May use separate paper)
Complaints				
		<input type="checkbox"/> Race <input type="checkbox"/> Color <input type="checkbox"/> National <input type="checkbox"/> Other Origin		
		<input type="checkbox"/> Race <input type="checkbox"/> Color <input type="checkbox"/> National <input type="checkbox"/> Other Origin		
		<input type="checkbox"/> Race <input type="checkbox"/> Color <input type="checkbox"/> National <input type="checkbox"/> Other Origin		
Investigation				
		<input type="checkbox"/> Race <input type="checkbox"/> Color <input type="checkbox"/> National <input type="checkbox"/> Other Origin		
		<input type="checkbox"/> Race <input type="checkbox"/> Color <input type="checkbox"/> National <input type="checkbox"/> Other Origin		
		<input type="checkbox"/> Race <input type="checkbox"/> Color <input type="checkbox"/> National <input type="checkbox"/> Other Origin		
Lawsuits				
		<input type="checkbox"/> Race <input type="checkbox"/> Color <input type="checkbox"/> National <input type="checkbox"/> Other Origin		
		<input type="checkbox"/> Race <input type="checkbox"/> Color <input type="checkbox"/> National <input type="checkbox"/> Other Origin		
		<input type="checkbox"/> Race <input type="checkbox"/> Color <input type="checkbox"/> National <input type="checkbox"/> Other Origin		

Section 7: Public Participation Plan

Strategies and Desired Outcomes

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

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

Public Outreach Activities

The public outreach and involvement activities conducted by the Meigs County Public Transit since the last Title VI Program submission are summarized in the table below.

Enter specific Public Participation activities in the table below.

Event Date	MCPT Staffer(s)	Activity	Communication Method (Public Notice, Posters, Social Media)	Notes

*Meigs County Public Transit is a new program. This is the first Title VI Program submission.

Section 8: Language Assistance Plan

Plan Components

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

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

The Meigs County Public Transit Language Assistance Plan includes the following elements:

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

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

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

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

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

Four Factor Analysis Methodology

To determine if an individual is entitled to language assistance and what specific services are appropriate, the Meigs County Public Transit has conducted a *Four Factor Analysis* of the following areas: 1) LEP Demography, 2) Contact Frequency, 3) Importance of Service, and 4) Resources and Costs.

Meigs County Limited English Proficiency Plan (LEP)

Consistent with Title VI of the Civil Rights Act of 1964, DOT's implementing regulations, and Executive Order 13166, "Improving Access to Services for Persons with Limited English Proficiency" (65 FR 50121, Aug. 11, 2000), the Meigs County Public Transit (MCPT) shall take reasonable steps to ensure meaningful access to benefits, services, information, and other important portions of their programs and activities for individuals who are limited-English proficient (LEP).

Plan Summary

The MCPT has developed this Limited English Proficiency Plan (LEP) to help identify reasonable steps to provide language assistance for LEP persons seeking meaningful access to MCPT services as required by Executive Order 13166. Limited English Proficiency person is one who does not speak English as their primary language and who has a limited ability to read, speak, write, or understand English. This plan details procedures on how to identify a person who may need language assistance, the ways in which assistance may be provided, training staff, how to notify LEP persons that assistance is available, and information for future plan updates.

In developing the plan while determining the MCPT's extent of obligation to provide LEP services, the MCPT conducted a U.S. Department of Transportation four factor LEP analysis which considers the following: 1) The number or proportion of LEP persons eligible in the MCPT service area who may be served or likely to encounter a MCPT program, activity, or service; 2) the frequency with which LEP individuals come in contact with MCPT services; 3) the nature and importance of the program, activity or service provided by the MCPT to the LEP population; and 4) the resources available to the MCPT and overall costs to provide LEP assistance. A brief description of these considerations is provided in the following section.

Four Factor Analysis

1. The number or proportion of LEP persons eligible in the MCPT service area who may be served or likely to encounter a MCPT program, activity, or service.

Of the 21,151 residents in Meigs County, the transit system examined the US Census and Census tracts in the MCPT service area determined that approximately .7%, or 140 people within MCPT's service area spoke a language other than English. People of Spanish descent are the primary LEP persons likely to utilize MCPT services (.4%). For the Meigs County Public Transit service area, the latest U.S. Census Bureau data shows that among the area's population .02% speak English "less than very well". **For these groups** who speak English "less than very well", 100% speak Spanish.

Meigs County – Languages Spoke at Home

	Total Number	Percent of Population	Total Population of County
Speak Language other than English	140	0.7%	21,151
Speak English Less than Very Well	52	.02	21,151
Spanish	86	.04%	21,151
Other Indo-European Language	53	0.3%	21,151
Other Language	1	0.0%	21,151

2. The frequency with which LEP individuals come in contact with a MCPT program, activity, or service.

The MCPT assesses the frequency at which staff and drivers have or could possibly have contact with LEP persons. This includes documenting phone inquiries and surveying drivers and customer service personnel. The MCPT implemented a language line service for LEP individuals. Since the implementation of this service, the MCPT has had no requests for interpreters and zero requests for translated MCPT documents. MCPT staff and drivers have had minimal contact with LEP individuals. The MCPT has not had any requests for document translation.

3. The nature and importance of the program, activity, or service provided by the MCPT to LEP community.

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

4. The resources available to the MCPT and overall costs.

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

The agency has a contract with CTS Language Link for Over-the Phone Interpretation Services (OPI). The agency pays for the cost of the services, as this service is available to all passengers free of charge. The agency is charged for \$1.25 per minute for Spanish and \$1.45 per minute for all other languages. Administration will work directly with first line staff to evaluate the services

Meigs County – Languages Spoke at Home

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3. The nature and importance of the program, activity, or service provided by the MCPT to LEP community.

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

4. The resources available to the MCPT and overall costs.

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The agency has a contract with CTS Language Link for Over-the Phone Interpretation Services (OPI). The agency pays for the cost of the services, as this service is available to all passengers free of charge. The agency is charged for \$1.25 per minute for Spanish and \$1.45 per minute for all other languages. Administration will work directly with first line staff to evaluate the services and their experience on having any direct or indirect contact with LEP individuals. The agency will continue to evaluate and assess translation services and update the plan as needed.

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

The Meigs County Public Transit has identified, developed, and uses the following:

- Individuals who have contact with the public are provided with “I Speak” language cards to identify language needs in order to match them with available services. Language cards verified and distributed by the Director as need.
- Contract with CTS Language Link for Over-the Phone Interpretation Services (OPI). Translation Services available in over 185 languages. This is available to all direct line staff.
- The Meigs County Public Transit has developed partnerships with local agencies that are available to assist with LEP responsibilities.

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

In order to ensure that LEP individuals are aware of Meigs County Public Transit’s language assistance measures, Meigs County Public Transit provides the following:

- Title VI Program including the LEP Plan is made available on parent website, if applicable, and hard copy in central office.
- Drivers and dispatchers are provided “I Speak” language cards to identify language needs to match them with available services.
- Notice of Notifying the Public of Rights Under Title VI Sheet located at Public Transit Office and in each vehicle.

Item # 4 – Description of how the Language Assistance Plan is Monitored and Updated

This plan is designed to be flexible and is one that can be easily updated. At a minimum, the MCPT will follow the Title VI Program update schedule for the LEP Plan. At a minimum, the plan will continue to be reviewed and updated every three (3) years in conjunction with the Title VI submission, or when data from the U.S. Census is available, or when it is clear that the concentrations of LEP individuals are present in the Meigs County Public Transit service area.

Updates will continue to include the following:

- The number of documented LEP person contacts encountered annually.
- How the needs of LEP persons have been addressed.
- Determination of the current LEP population in the service area.
- Determination as to whether the need for translation services has changed.
- Determine whether local language assistance programs have been effective and sufficient to meet the need.
- Determine whether Meigs County Public Transit’s financial resources are sufficient to fund language assistance resources needed.

- Determine whether Meigs County Public Transit has fully complied with the goals of this LEP Plan.
- Determine whether complaints have been received concerning Meigs County Public Transit's failure to meet the needs of LEP individuals.

<p>Item # 5 - Description of how Employees are Trained to Provide Language Assistance to LEP Persons</p>
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The All MCPT staff will be provided with the LEP Plan and will be educated on procedures to follow. Training will occur annually. This information will also be part of the MCPT staff orientation process for new hires. Training topics are listed below:

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

Dissemination of the MCPT Limited English Proficiency Plan

- The MCPT includes the LEP plan on the MCPT website (www.meigsjfs.net/meigstransit) together with its Title VI Policy and Complaint Procedures.
- The MCPT's Notice of Rights under Title VI to the public is available in the MCPT Transit Center and on all vehicles.
- Any person, including social service, non-profit, and law enforcement agencies, along with other community partners with internet access will be able to access the plan.
- Copies of the LEP Plan will be provided upon request. LEP persons may obtain copies/translations of the plan upon request.

Any questions or comments regarding this plan should be directed to the MCPT Title VI Coordinator, **Julie Scherfel, 175 Race Street, Middleport Ohio 45760 (740)444-7647**
Julie.Scherfel@jfs.ohio.gov.

“I Speak” Language Identification Card

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

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

Log of LEP Encounters

Date	Time	Language Spoken By Individual (if available)	Name and Phone Number of Individual (if available)	Service Requested	Follow Up Required	Staff Member Providing Assistance	Notes

Section 9: Minority Representation Information

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

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

A. Minority Representation Table

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

Body	Caucasian	Hispanic	African American	Asian American	Native American	Two or More Races
Population						

B. Efforts to Encourage Minority Participation

There are no non-elected transit-related boards, committees, or councils.

Section 10: Providing Assistance to and Monitoring Subrecipients

1. Does agency provide funding to subrecipients?

No, the agency does not have subrecipients.

Yes. If yes, list the subrecipient names: (list other agency names here)

Section 11: Title VI Equity Analysis

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

No, the agency has not built a facility.

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

Section 12: Requirements for Metropolitan Planning Organizations (MPOs)

N/A

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

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