PACTS CIVIL RIGHTS PLAN:
Title VI, Environmental Justice, and Non-Discrimination
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The Metropolitan Planning Organization for the Portland Urbanized Area
970 Baxter Boulevard, Suite 201 • Portland, Maine 04103
PACTS CIVIL RIGHTS PLAN: TITLE VI, ENVIRONMENTAL JUSTICE, AND NON-DISCRIMINATION

October 1, 2019 – September 30, 2020

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PACTS Civil Rights Plan 2019-2020
CHAPTER 1: BACKGROUND AND PURPOSE

ABOUT PACTS

PACTS – the Portland Area Comprehensive Transportation System – was designated in 1975 as the federally mandated Metropolitan Planning Organization (MPO) for the Greater Portland region. The PACTS region encompasses 18 municipalities with a total population of approximately 280,000 people. The region spans two counties and includes rural, suburban, and urban municipalities.

As an MPO, PACTS is responsible for leading the federally required metropolitan transportation-planning process for the Greater Portland region. PACTS uses the 3C planning process – Continuing, Cooperative, and Comprehensive – to develop a vision for the region and then decides how to allocate federal and state transportation funds to programs and projects that support this vision. Transportation activities led by PACTS include plans, studies, and investment programs for roads, bridges, public transportation, and facilities for pedestrians and bicyclists.

FEDERAL REQUIREMENTS AND GUIDANCE

To perform the 3C planning process, PACTS receives funding from both the Federal Transit Administration (FTA) and Federal Highway Administration (FHWA). As a recipient of this federal funding, PACTS is required to comply with various civil rights statutes, executive orders, and regulations that are intended to ensure that traditionally underserved populations are included in the planning process, benefit equally from investments, and do not experience a disparately negative impact from decisions. These civil rights authorities are summarized below:

Title VI

The purpose of the Title VI Program is to ensure that public funds are not spent in a manner that encourages, subsidizes, perpetuates, or results in discrimination. Title VI of the Civil Rights Act of 1964 states that “no persons in the United States shall, on the grounds 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.” Title VI requires recipients of federal financial assistance from the U.S. Department of Transportation to assess the nature, extent, and incidence of probable impacts, both negative and positive, from any transportation-related activity on racial and ethnic minority populations.

Language Access Plan

Issued in 2000, Executive Order 13166, “Improving Access to Services for Persons with Limited English Proficiency (LEP)”, directs federal agencies and recipients of federal funding to provide meaningful language access to their services. Agencies receiving federal financial assistance have a responsibility to ensure meaningful access to their programs and activities by persons with limited English proficiency. See 28 CFR 42.104(b)(2).
Environmental Justice

Executive Order 12898, “Federal Actions to Address Environmental Justice (EJ) in Minority Populations and Low-income Populations,” issued in 1994, requires federal agencies and recipients of their funding to address EJ concerns. The Executive Order on Environmental Justice strengthened the Title VI protections by adding low-income populations.

Americans with Disabilities Act (ADA)

The Americans with Disabilities Act (ADA) of 1990 and the Rehabilitation Act of 1973 prohibit a public entity from discriminating against qualified persons with disabilities in access to facilities and services that the public entity provides. For PACTS, these services, facilities, or activities are related to the planning, design, construction, maintenance, and operations of transportation systems.

PURPOSE OF PLAN

Both the FTA and FHWA require PACTS to comply with these civil rights mandates by developing programs to include underserved populations and by monitoring and reporting regularly on the programs’ success. PACTS strives to ensure that the PACTS planning process and its decisions on funding transportation projects attain equitable distribution of services, facilities, and resources within the PACTS planning area. In response to the above civil rights mandates outlined above, PACTS maintains this plan, which is developed in accordance with all relevant federal laws and regulations. The plan includes:

- Federal and State Reporting Requirements
- Demographic profiles including the methodology and analysis used to identify relevant groups covered by Title VI
- PACTS Language Access Plan
- All Required Certifications and Assurances
- PACTS Complaint Procedures
- Accomplishments of PACTS Civil Rights Program for the most recent Federal Fiscal Year
- Goals of PACTS Civil Rights Program for the next Federal Fiscal Year
CHAPTER 2: RESPONSIBILITIES AND REPORTING

The PACTS Title VI Coordinator has the lead responsibility for ensuring compliance with Title VI, Environmental Justice, and the Americans with Disabilities Act. PACTS compliance is monitored by FTA, FHWA, and the Maine Department of Transportation (MaineDOT). To maintain compliance under these civil rights authorities, PACTS has the following responsibilities and must provide the related assurances.

TITLE VI COMPLIANCE PLAN

PACTS is required to maintain this plan – the *PACTS Title VI, Environmental Justice, ADA Plan* – and update it each year by October 1.

ANNUAL TITLE VI CERTIFICATIONS & ASSURANCES

PACTS FTA and FHWA Title VI assurances for FFY 2020 are included as Appendices of this document.

PUBLIC NOTICE TO BENEFICIARIES

PACTS is required to post information about Title VI protections on its website and in public areas of its office. PACTS will disseminate the *Title VI, Environmental Justice, Non-Discrimination Plan* to PACTS members, staff, stakeholders and the general public.

SUBRECIPIENT OVERSIGHT & GUIDANCE

This Title VI plan will be submitted to subrecipients and contractors. PACTS will include Title VI assurances in consultant contracts and will post the PACTS Policy Statement on the PACTS website.

PACTS ENDORSEMENT

PACTS endorsement is included as Appendix A at the end of this document.

COMPLAINT PROCEDURES

If any individual believes that they or any other program beneficiaries have been the object of an unequal treatment or discrimination as to the receipt of benefits and/or services, or on the grounds of race, color, national origin (including Limited English Proficiency), sex, age, or disability, they may exercise their right to file a complaint with PACTS. Complaints may be filed with the Title VI Coordinator. Every effort will be made to resolve complaints informally at the lowest level. Complaints may also be filed directly with the MaineDOT and/or the appropriate federal agency. The procedures and complaint form are available on the PACTS website and included as Appendix C.

TITLE VI INVESTIGATIONS, COMPLAINTS, AND LAWSUITS

PACTS did not receive any Title VI complaints in FFY19, nor has PACTS been involved in any investigations or lawsuits.

PACTS LANGUAGE ACCESS PLAN

To ensure meaningful access to and participation in PACTS programs by LEP persons, PACTS has developed a Language Access Plan (LAP). The LAP outlines how PACTS assesses
the need for language services and implements those services within the budgetary constraints of the organization. The LAP is provided in Chapter 4 of this document.

MINORITY REPRESENTATION ON PLANNING AND ADVISORY BODIES

PACTS does not currently have any planning or advisory bodies for which PACTS selects the membership. As outlined in the 2019 update to the PACTS Public Involvement Plan, PACTS has the goal of piloting approaches for supporting meaningful involvement by underrepresented communities on the PACTS governance committees. PACTS often consults the Transportation & Community Well-Being Network for input on projects and programs. The Network is an ad hoc group of stakeholders including representatives from health care, housing, aging and disability organizations, as well as people with lived experience of transportation barriers. The Network is convened by GPCOG.

PUBLIC INVOLVEMENT

During the development and adoption of its federally mandated plans and programs, PACTS identifies and implements strategies for meaningfully engaging protected populations. The PACTS Public Involvement Plan (Appendix H) outlines the numerous ways that PACTS informs, engages, and involves Title VI populations, and LEP in particular. A summary of outreach conducted in FFY 2019 is included in Appendix G, Annual Goals & Accomplishments Report.

DEMOGRAPHIC PROFILES

PACTS is required to maintain updated demographic profiles of protected populations and minority representation. These are provided in Chapter 3 of this document.

ANALYSIS OF BENEFITS & DISPARATE IMPACTS

PACTS has developed an equitable target areas map of the region (see Chapter 3). This dataset will be used in the development of the Unified Planning Work Plan (UPWP), Transportation Improvement Plan (TIP), and Long Range Transportation Plan (LRTP). In FFY 2020, PACTS will develop an analysis and public-facing interactive map that shows these areas relative to capital and public transportation investments.

MOBILITY NEEDS OF TITLE VI POPULATIONS

PACTS has been working with GPCOG to better integrate the needs of those who rely on public transit, volunteer driver programs, and rides from family and friends into its overall transportation planning. Using focus groups with partner organizations, outreach in multiple languages, and other face-to-face engagement techniques, PACTS is working to reflect the needs and perspectives of protected populations in its planning process and its decisions on funding transportation projects. PACTS 2020-2021 priorities include: “Expand Mobility for All: To better meet the diverse transportation needs of people with mobility challenges, PACTS will integrate mobility management solutions into our public transportation and capital improvements planning.” The 2019 PACTS Public Involvement Plan (Appendix H) provides a set of goals and strategies for advancing the inclusion of underrepresented communities. These include:

- Expanding use of inclusive engagement in PACTS plans and studies
- Strengthening partnerships to engage underrepresented communities
- Piloting approaches for meaningful involvement by underrepresented communities on PACTS Governance Committees
FTA TITLE VI COMPLIANCE REVIEWS
At least every three years in August, a report will be submitted to FTA in accordance with FTA Circular 4702.1B, Title VI Program Guidelines for Federal Transit Administration recipients. The report may be submitted more often should conditions warrant.

ANNUAL GOALS AND ACCOMPLISHMENTS
An annual report will be prepared and submitted to MaineDOT by September 30th of each year. This report will outline goals for the coming year and review the accomplishments achieved toward the previous year’s goals. See Appendix G for the 2019 report.
CHAPTER 3: DEMOGRAPHIC PROFILES

This section provides a mapping and data analysis of protected population groups, and some additional groups with barriers to transportation access, in the PACTS region. Using U.S. Census American Community Survey 2013-2017 5-year estimates, the following population groups were mapped and evaluated:

- Population Living Below Poverty Level
- Racial/Ethnic Minority Population
- Population Over 65 Years Old
- Population with Limited English Proficiency
- Population with Disabilities
- Households with No Vehicles
- Foreign Born Population
- Equitable Target Areas (ETAs)

*A more detailed description of data sources is provided at the end of the section

PACTS uses these maps to inform plans, studies, and programs, in particular the UPWP and the TIP, to evaluate the equitable distribution of transportation benefits and potentially adverse impacts caused by future projects. These maps can also be used to verify past compliance with Title VI. Identifying prior PACTS projects and mapping them against these maps will let PACTS know if fair and equitable distribution of services, facilities, and resources within the PACTS planning area has been achieved.

1 In addition to the individually themed maps, PACTS and GPCOG staff have developed an “Equitable Target Areas” map. This map is a composite of all mapped data points for each census tract. Each parameter received equal weighting. The ETAs were then categorized into three levels of ETA concentrations: Very High, High, and Medium.
POPULATION LIVING BELOW POVERTY LEVEL

Percent of Population Living Below Poverty Level

Data Source: U.S. Census 2013-2017 ACS 5-yr Estimate | Geography: Census Block Group
POPULATION OVER 65 YEARS OLD

Percent of Population Age 65 and Over

- < 5%
- 5.1% - 10%
- 10.1% - 15%
- 15.1% - 20%
- > 20%

Data Source: U.S. Census 2013-2017 ACS 5-yr Estimate | Geography: Census Block Group
POPULATION LIVING WITH A DISABILITY

Percent of Population Living with a Disability

Data Source: U.S. Census 2013-2017 ACS 5-yr Estimate | Geography: Census Block Group
HOUSEHOLDS WITH NO VEHICLES

Percent of Households with No Vehicle Available

- < 5%
- 5.1% - 10%
- 10.1% - 15%
- 15.1% - 20%
- > 20%

Data Source: U.S. Census 2013-2017 ACS 5-yr Estimate | Geography: Census Block Group
FOREIGN BORN POPULATION

Percent Foreign Born Population

- < 5%
- 5.1% - 10%
- 10.1% - 15%
- 15.1% - 20%
- > 20%

Data Source: U.S. Census 2013-2017 ACS 5-yr Estimate | Geography: Census Block Group
The Equitable Target Area (ETA) Index is a composite of all previously mapped data points for each census tract. Each parameter received equal weighting. The ETAs were then categorized into three levels of ETA concentrations: Very High, High, and Medium.
REGIONAL DATA SUMMARY

Table 1, below, provides totals for the PACTS region for each of the six population groups identified for Title VI / Environmental Justice analysis.

Table 1: Protected Population Groups in the PACTS Region

<table>
<thead>
<tr>
<th>Population Group</th>
<th>Count</th>
<th>Percent</th>
</tr>
</thead>
<tbody>
<tr>
<td>Population Living Below Poverty Level</td>
<td>29,558 People</td>
<td>11%</td>
</tr>
<tr>
<td>Minority Population</td>
<td>27,651 People</td>
<td>10%</td>
</tr>
<tr>
<td>Households with No Vehicles</td>
<td>9,721 Occupied Housing Units</td>
<td>8%</td>
</tr>
<tr>
<td>Population Over 65 Years Old</td>
<td>45,469 People</td>
<td>16%</td>
</tr>
<tr>
<td>Population Living with a Disability</td>
<td>32,688 People</td>
<td>12%</td>
</tr>
<tr>
<td>Population with Limited English Proficiency</td>
<td>8,093 People</td>
<td>3%</td>
</tr>
<tr>
<td>Foreign Born Population</td>
<td>18,883 People</td>
<td>7%</td>
</tr>
</tbody>
</table>

According to the latest 2013-2017 American Community Survey 5-Year Estimate, the 18 municipalities that comprise PACTS are home to approximately 280,499 people and 116,378 households. From these totals, considerable portions of the population fall within one (or more) of the population groups of high concern shown above. Table 2, below, provides a breakdown of race/ethnicity totals for the PACTS region.

Table 2: Race/Ethnicity in the PACTS Region

<table>
<thead>
<tr>
<th>Race/Ethnicity</th>
<th>Count</th>
<th>Percent</th>
</tr>
</thead>
<tbody>
<tr>
<td>Black</td>
<td>8,695</td>
<td>3%</td>
</tr>
<tr>
<td>Hawaiian</td>
<td>16</td>
<td>0.01%</td>
</tr>
<tr>
<td>White</td>
<td>252,849</td>
<td>90%</td>
</tr>
<tr>
<td>Asian</td>
<td>6,173</td>
<td>2%</td>
</tr>
<tr>
<td>Hispanic</td>
<td>6,063</td>
<td>2%</td>
</tr>
<tr>
<td>American Indian</td>
<td>691</td>
<td>0.3%</td>
</tr>
<tr>
<td>Single Race Other</td>
<td>336</td>
<td>0.3%</td>
</tr>
<tr>
<td>Two or More Races Other</td>
<td>5,676</td>
<td>2%</td>
</tr>
<tr>
<td>Total</td>
<td>280,499 People</td>
<td>100%</td>
</tr>
</tbody>
</table>
About the Data

The following is a brief description of data sources used in the previous analysis. All data values are taken from the U.S. Census Bureau’s 2013-2017 American Community Survey 5-Year Estimate.

- **Population Living Below Poverty Level:** This dataset contains the estimated number of persons with income in the past 12 months who are below the poverty level and for whom poverty status can be determined. (Poverty status cannot be determined for people in institutional group quarters such as prisons or nursing homes, college dormitories, military barracks, or living situations without conventional housing). The Census Bureau uses a set of money income thresholds that vary by family size and composition to determine who is in poverty. If the total income for a family falls below the relevant threshold, then the family (and every individual in it) or unrelated individual is considered in poverty.

- **Minority Population:** The data values were calculated by taking the total population minus the white (not Latino, Not Hispanic) population.

- **Households with No Vehicles:** This dataset represents the count of occupied housing units, categorized by the number of vehicles available. There are four vehicle availability categories (no vehicle, one vehicle, two vehicles, and three or more vehicles).

- **Population Over 65 Years Old:** This dataset represents the population age 65 and over.

- **Population Living with a Disability:** This dataset represents the civilian noninstitutionalized population living with a disability. The civilian noninstitutionalized population is defined as “all U.S. civilians not residing in institutional group quarters facilities such as correctional institutions, juvenile facilities, skilled nursing facilities, and other long-term care living arrangements.” The Census Bureau defines a disability as a “long-lasting physical, mental, or emotional condition. This condition can make it difficult for a person to do activities such as walking, climbing stairs, dressing, bathing, learning, or remembering. This condition can also impede a person from being able to go outside the home alone or to work at a job or business.”

- **Population with Limited English Proficiency:** This dataset represents the count of people age 5 and over categorized into two groups based on the ability to speak English. The first grouping includes people who speak English very well. The second group are those individuals who speak a language other than English at home and who speak English less than very well.

- **Foreign Born Population:** This dataset represents the count of people who are foreign born. Foreign-born is defined by the American Community Survey as “people who are not U.S. Citizens at birth. This includes naturalized U.S. citizens, lawful permanent residents (immigrants), temporary migrants (such as foreign students), humanitarian migrants (such as refugees and asylees), and persons illegally present in the United States.”
CHAPTER 4: LANGUAGE ACCESS PLAN

Executive Order 13166: Improving Access to Service for Persons with Limited English Proficiency, which requires meaningful access to all federally assisted programs and activities by persons with Limited English proficiency (LEP), was signed into law in August 2000. Executive Order 13166 states that individuals who do not speak English well and who have a limited ability to read, write, speak or understand English are entitled to language assistance under Title VI of the Civil Rights Act of 1964 with respect to a particular type of service, benefit or encounter. It reads in part:

Each Federal agency shall prepare a plan to improve access to its federally conducted programs and activities by eligible LEP persons. Each plan shall be consistent with the standards set forth in the LEP Guidance and shall include the steps the agency will take to ensure that eligible LEP persons can meaningfully access the agency’s programs and activities.

Federal agencies are required to prepare LEP plans, and all recipients of federal financial assistance must comply with Title VI and LEP guidelines of the federal agency from which funds are provided. The FHWA has mandated that all “…recipients must take reasonable steps to ensure that such persons have meaningful access to the programs, services and information those recipients provide, free of charge…”

Who is a Limited English Proficient Person?

Individuals who do not speak English as their primary language and who have a limited ability to read, speak, write, or understand English can be considered limited English proficient. The U.S. Census Bureau reports data based on four categories of English-speaking ability: very well, well, not well, and not at all. In this Plan, LEP refers to anyone age 5 and over who reported speaking English “less than very well.” Language for LEP persons can be a barrier to accessing important benefits or services, understanding and exercising important rights, complying with applicable responsibilities, or understanding other information provided by PACTS or other government agencies.

Framework for Deciding When Language Services are Needed

As a recipient of federal funds, PACTS must take reasonable steps to ensure meaningful access to the information and services it provides. Under guidance from the U.S. Department of Transportation, and in accordance with Circular FTA 4702.1B, four factors are considered in determining “reasonable steps.” This “Four-Factor Analysis” is outlined below:

- **Factor 1**: The number or proportion of LEP persons eligible to be served or likely to be encountered by the program or recipient;
- **Factor 2**: The frequency with which LEP persons come in contact with the program;
- **Factor 3**: The nature and importance of the program, activity, or service provided by the program to people’s lives; and
- **Factor 4**: The resources available to the recipient for LEP outreach, as well as the costs associated with that outreach.
DETERMINING THE NEED OF LIMITED ENGLISH PROFICIENCY

The following is a self-assessment of need in the PACTS region in relation to the four-factor analysis and the transportation planning process.

Factor 1: The number and proportion of LEP persons likely to be encountered by PACTS.

The first step in determining components of an LEP Plan is to understand the proportion of LEP persons who may encounter the PACTS regional transportation planning process, their literacy skills in English, their native language, and the location of their communities and neighborhoods.

To do this, PACTS evaluated the level of English literacy and to what degree individuals in our planning area speak a language other than English and what those languages are. PACTS conducted this analysis using the most recent U.S. Census American Community Survey 2013-2017 5-year estimate data. As Table 3 shows, in the PACTS region there are an estimated 8,093 residents over age 5 who report speaking English less than very well. This accounts for approximately 3% of the total PACTS population (over age 5) which is estimated at 266,701 people. (The most recent estimate for the total PACTS population, including those under age 5, is 280,499 people).

Table 3: Ability to Speak English in the PACTS Region

<table>
<thead>
<tr>
<th>Ability to Speak English</th>
<th>Count</th>
<th>Percent</th>
</tr>
</thead>
<tbody>
<tr>
<td>Very Well</td>
<td>258,608</td>
<td>97%</td>
</tr>
<tr>
<td>Less Than Very Well</td>
<td>8,093</td>
<td>3%</td>
</tr>
<tr>
<td>Total</td>
<td>266,701</td>
<td>100%</td>
</tr>
</tbody>
</table>


Highest Limited English Proficiency Neighborhoods

Table 4 shows specific Census estimates of counts and percentages for the 10 census tracts (listed by approximate neighborhood), with the highest proportion of people with limited English proficiency. (These census tracts are also shown in the “Population with Limited English Proficiency” map in the Demographics section).

Table 4: Highest Limited English Proficiency Neighborhoods in the PACTS Region

<table>
<thead>
<tr>
<th>Approximate Neighborhood</th>
<th>City</th>
<th>Total*</th>
<th>Count</th>
<th>Percent</th>
</tr>
</thead>
<tbody>
<tr>
<td>West Bayside</td>
<td>Portland</td>
<td>2,508</td>
<td>760</td>
<td>30.3%</td>
</tr>
<tr>
<td>East Bayside</td>
<td>Portland</td>
<td>2,993</td>
<td>458</td>
<td>15.3%</td>
</tr>
<tr>
<td>Riverton</td>
<td>Portland</td>
<td>5,301</td>
<td>774</td>
<td>14.6%</td>
</tr>
<tr>
<td>Parkside</td>
<td>Portland</td>
<td>2,599</td>
<td>369</td>
<td>14.2%</td>
</tr>
<tr>
<td>West End</td>
<td>Portland</td>
<td>4,514</td>
<td>483</td>
<td>10.7%</td>
</tr>
<tr>
<td>Nason’s Corner</td>
<td>Portland</td>
<td>3,533</td>
<td>325</td>
<td>9.2%</td>
</tr>
<tr>
<td>Portland Downtown / Waterfront</td>
<td>Portland</td>
<td>2,442</td>
<td>210</td>
<td>8.6%</td>
</tr>
<tr>
<td>Downtown Biddeford</td>
<td>Biddeford</td>
<td>7,095</td>
<td>525</td>
<td>7.4%</td>
</tr>
<tr>
<td>Broadview / Stanwood Park</td>
<td>South Portland</td>
<td>3,069</td>
<td>221</td>
<td>7.2%</td>
</tr>
<tr>
<td>Libbytown</td>
<td>Portland</td>
<td>2,645</td>
<td>164</td>
<td>6.2%</td>
</tr>
</tbody>
</table>
The census tracts with the highest concentration of LEP individuals are largely in Portland, with one tract in Downtown Biddeford and one tract in South Portland.

For more information on what specific languages are spoken in these households, PACTS has found that the most reliable and detailed source of information is the local school departments. According to the Portland Public School Department, approximately one out of every three students in Portland schools speak a primary language other than English at home. Of the 60 languages spoken, the most commonly identified by students/families are shown in descending order in Table 5 below. According to school department staff, Portuguese, French, and Lingala speakers are currently the fastest growing language groups, and Portuguese recently passed Arabic as the second highest non-English language spoken at home in the district.

Table 5: Most Common Non-English Languages Spoken at Home by Portland Public School Students

<table>
<thead>
<tr>
<th>Language</th>
<th>Count</th>
<th>Percent</th>
</tr>
</thead>
<tbody>
<tr>
<td>Somali</td>
<td>416</td>
<td>20%</td>
</tr>
<tr>
<td>Portuguese</td>
<td>341</td>
<td>16%</td>
</tr>
<tr>
<td>Arabic</td>
<td>321</td>
<td>15%</td>
</tr>
<tr>
<td>French</td>
<td>295</td>
<td>14%</td>
</tr>
<tr>
<td>Spanish</td>
<td>247</td>
<td>12%</td>
</tr>
<tr>
<td>Vietnamese</td>
<td>82</td>
<td>4%</td>
</tr>
<tr>
<td>Kinyarwanda</td>
<td>68</td>
<td>3%</td>
</tr>
<tr>
<td>Khmer</td>
<td>66</td>
<td>3%</td>
</tr>
<tr>
<td>Lingala</td>
<td>57</td>
<td>3%</td>
</tr>
<tr>
<td>Other</td>
<td>221</td>
<td>10%</td>
</tr>
<tr>
<td><strong>Total</strong></td>
<td>2,114</td>
<td>100%</td>
</tr>
</tbody>
</table>

*2018-2019 data provided by the Portland Public School Department.

Factor 2: How LEP persons interact with PACTS, and the frequency with which LEP persons come in contact with programs, activities or services of PACTS.

PACTS has identified the languages, outlined above in Factor 1, as the most prevalent languages spoken by the LEP population in the PACTS area. The LEP population in this region will likely continue to grow, increasing the probability of future contact with PACTS.

PACTS conducts regular committee meetings and public hearings throughout the year. Community outreach and the PACTS website are the main sources of potential contact between PACTS and LEP persons. As a result, the frequency of contact is difficult to anticipate. The PACTS Public Involvement Plan highlights the need for outreach opportunities that engage the population groups that are traditionally not involved in the transportation process.
Factor 3: The nature and importance of programs, activities or services to the LEP population.

PACTS programs use federal funds to implement and plan for future transportation improvements and projects, and therefore this work impacts every resident of the region. PACTS does not manage any direct services or programs that provide vital, immediate or emergency assistance, such as medical treatment or services for basic needs like food or shelter. Further, PACTS does not conduct required activities such as applications, interviews, or other activities prior to participation in its programs or events. Involvement by any citizen with PACTS or its committees is voluntary. However, PACTS is committed to ensuring that all segments of the population, including LEP persons, are involved or have had the opportunity to be involved in the transportation planning process to be consistent with the goal of the Federal Environmental Justice program and policy.

Factor 4: The resources available to the recipient and overall costs to provide LEP assistance.

PACTS is committed to ensuring that its public meetings, documents, and website are accessible to people with limited English proficiency. To support this, PACTS allots financial resources and staff time for all plans and programs. PACTS regularly contracts with the Maine Access Immigrant Network and House of Languages to provide translation and interpreter services.
APPENDIX A: PACTS POLICY STATEMENT

The Portland Area Comprehensive Transportation System (PACTS) is committed to ensuring that the fundamental principles of equal opportunity are upheld in all decisions involving our employees and contractors/consultants and to ensuring that the public-at-large is afforded access to our programs and services.

To that end, no person shall be excluded from participation in, be denied the benefits of, or be otherwise subjected to discrimination under any PACTS program or activity on the grounds of race, color, national origin, income, sex, age, disability, or limited English proficiency. PACTS assures all its programs and activities will be free from discrimination, whether those programs and activities are federally funded or not.

PACTS conducts its Title VI / Environmental Justice Program in a team approach involving all PACTS personnel. The Director of PACTS is responsible to ensure compliance by PACTS with the Title VI / EJ implementing regulations.

Inquiries concerning PACTS policies, investigations, complaints, compliance with applicable laws, regulations, and concerns regarding compliance with Title VI / Environmental Justice may be directed to the Director, Portland Area Comprehensive Transportation System, 970 Baxter Boulevard, Suite 201, Portland, Maine, telephone 207-774-9891.

This policy statement must be circulated throughout PACTS and be included by reference in all contracts, agreements, programs and services administered by PACTS.

Christopher Chop, GPCOG Transportation Director
August 4, 2020
APPENDIX B: PACTS TITLE VI ASSURANCE

The United States Department of Transportation (USDOT)
FHWA STANDARD TITLE VI/NONDISCRIMINATION ASSURANCES
DOT Order No. 1050.2A

The Portland Area Comprehensive Transportation System (herein referred to as the "Recipient"), HEREBY AGREES THAT, as a condition to receiving any Federal financial assistance from the U.S. Department of Transportation (DOT), through the Federal Highway Administration (FHWA), is subject to and will comply with the following:

Statutory/Regulatory Authorities
- Title VI of the Civil Rights Act of 1964 (42 U.S.C. § 2000d et seq., 78 stat. 252), (prohibits discrimination on the basis of race, color, national origin);
- 49 C.F.R. Part 21 (entitled Nondiscrimination In Federally-Assisted Programs Of The Department Of Transportation—Effectuation Of Title VI Of The Civil Rights Act Of 1964);
- 28 C.F.R. section 50.3 (U.S. Department of Justice Guidelines for Enforcement of Title VI of the Civil Rights Act of 1964);

The preceding statutory and regulatory cites hereinafter are referred to as the "Acts" and "Regulations," respectively.

General Assurances
In accordance with the Acts, the Regulations, and other pertinent directives, circulars, policy, memoranda, and/or guidance, the Recipient hereby gives assurance that it will promptly take any measures necessary to ensure that:

“No person in the United States shall, on the grounds of race, color, or national origin, be excluded from participation in, be denied the benefits of, or be otherwise subjected to discrimination under any program or activity,” for which the Recipient receives Federal financial assistance from DOT, including FHWA.

The Civil Rights Restoration Act of 1987 clarified the original intent of Congress, with respect to Title VI and other Nondiscrimination requirements (The Age Discrimination Act of 1975, and Section 504 of the Rehabilitation Act of 1973), by restoring the broad, institutional-wide scope and coverage of these nondiscrimination statutes and requirements to include all programs and activities of the Recipient, so long as any portion of the program is Federally assisted.

Specific Assurances
More specifically, and without limiting the above general Assurance, the Recipient agrees with and gives the following Assurances with respect to its federally assisted programs:

1. The Recipient agrees that each “activity,” “facility,” or “program,” as defined in §§ 21.23 (b) and 21.23 (e) of 49 C.F.R. § 21 will be (with regard to an “activity”) facilitated, or will be (with regard to a “facility”) operated, or will be (with regard to a “program”) conducted in compliance with all requirements imposed by, or pursuant to the Acts and the Regulations.

2. The Recipient will insert the following notification in all solicitations for bids, Requests For Proposals for work, or material subject to the Acts and the Regulations made in connection with all Federal
Highway Programs and, in adapted form, in all proposals for negotiated agreements regardless of funding source:

“The Portland Area Comprehensive Transportation System, in accordance with the provisions of Title VI of the Civil Rights Act of 1964 (78 Stat. 252, 42 U.S.C. §§ 2000d to 2000d-4) and the Regulations, hereby notifies all bidders that it will affirmatively insure that any contract entered into pursuant to this advertisement, disadvantaged business enterprises will be afforded full opportunity to submit bids in response to this invitation and will not be discriminated against on the grounds of race, color, or national origin in consideration for an award.”

3. The Recipient will insert the clauses of Appendix A and E of this Assurance in every contract or agreement subject to the Acts and the Regulations.

4. The Recipient will insert the clauses of Appendix B of this Assurance, as a covenant running with the land, in any deed from the United States effecting or recording a transfer of real property, structures, use, or improvements thereon or interest therein to a Recipient.

5. That where the Recipient receives Federal financial assistance to construct a facility, or part of a facility, the Assurance will extend to the entire facility and facilities operated in connection therewith.

6. That where the Recipient receives Federal financial assistance in the form, or for the acquisition of real property or an interest in real property, the Assurance will extend to rights to space on, over, or under such property.

7. That the Recipient will include the clauses set forth in Appendix C and Appendix D of this Assurance, as a covenant running with the land, in any future deeds, leases, licenses, permits, or similar instruments entered into by the Recipient with other parties:
   a. for the subsequent transfer of real property acquired or improved under the applicable activity, project, or program; and
   b. for the construction or use of, or access to, space on, over, or under real property acquired or improved under the applicable activity, project, or program.

8. That this Assurance obligates the Recipient for the period during which Federal financial assistance is extended to the program, except where the Federal financial assistance is to provide, or is in the form of, personal property, or real property, or interest therein, or structures or improvements thereon, in which case the Assurance obligates the Recipient, or any transferee for the longer of the following periods:
   a. the period during which the property is used for a purpose for which the Federal financial assistance is extended, or for another purpose involving the provision of similar services or benefits; or
   b. the period during which the Recipient retains ownership or possession of the property.

9. The Recipient will provide for such methods of administration for the program as are found by the Secretary of Transportation or the official to whom he/she delegates specific authority to give reasonable guarantee that it, other recipients, sub-recipients, sub-grantees, contractors, subcontractors, consultants, transferees, successors in interest, and other participants of Federal financial assistance under such program will comply with all requirements imposed or pursuant to the Acts, the Regulations, and this Assurance.

10. The Recipient agrees that the United States has a right to seek judicial enforcement with regard to any matter arising under the Acts, the Regulations, and this Assurance.

FHWA may include additional Specific Assurances in this section.

By signing this ASSURANCE, the Portland Area Comprehensive Transportation System also agrees to comply (and require any subrecipients, sub-grantees, contractors, successors, transferees, and/or assignees to comply) with all applicable provisions governing the FHWA and USDOT access to records, accounts, documents,
information, facilities, and staff. You also recognize that you must comply with any program or compliance reviews, and/or complaint investigations conducted by FHWA and USDOT. You must keep records, reports, and submit the material for review upon request to FHWA and USDOT, or their designees in a timely, complete, and accurate way. Additionally, you must comply with all other reporting, data collection, and evaluation requirements, as prescribed by law or detailed in program guidance.

The Portland Area Comprehensive Transportation System gives this ASSURANCE in consideration of and for obtaining any Federal grants, loans, contracts, agreements, property, and/or discounts, or other Federal-aid and Federal financial assistance extended after the date hereof to the recipients by the U.S. Department of Transportation. This ASSURANCE is binding on the Portland Area Comprehensive Transportation System, other recipients, sub-recipients, sub-grantees, contractors, subcontractors and their subcontractors', transferees, successors in interest, and any other participants in its programs. The person(s) signing below is authorized to sign this ASSURANCE on behalf of the Recipient.

DATED: August 4, 2020

Christopher Chop, GPCOG Transportation Director

Appendices A, C, D, and E
APPENDIX C: PACTS CIVIL RIGHTS DISCRIMINATION COMPLAINT PROCEDURES

Any person who believes they were subjected to discrimination based on race, color, national origin, limited English proficiency, sex, age, or disability has a right to file a complaint within 180 days of the alleged discrimination. The complainant can file with the federal department, the state recipient, or the agency providing the service (e.g. Federal Highway Administration (FHWA), Federal Transit Administration (FTA), or Maine Department of Transportation (MaineDOT). The complaint can be filed through a legal representative. The identity of the complainant is not necessary, provided the information is sufficient to determine the identity of the recipient and indicates the possibility of a violation. If the complaint is submitted to PACTS, then the following procedures will be followed.

A. Complaints may be submitted online, in writing or verbally to the Title VI Coordinator, including through an interpreter (provided at no cost to the person making the complaint). When a complaint is submitted verbally, the Title VI Coordinator will record the complaint in writing.

B. Complaints should contain the following information:
   i. Name, address and telephone number of the complainant if available.
   ii. Name and location of the entity delivering the service.
   iii. Nature of the incident that led the complainant to believe discrimination was a factor.
   iv. Basis of the complaint, i.e., race, color, national origin, limited English proficiency, sex, age, or disability.
   v. Names, addresses and phone numbers of people who may have knowledge of the event.
   vi. Date or dates on which the alleged discriminatory event or events occurred.
   vii. A complaint log shall be kept by PACTS for the record and date of submission of the complaint by PACTS to the proper federal authorities.

C. Complaint investigation process:
   i. Complaints received by PACTS shall be forwarded to the MaineDOT Civil Rights Department for evaluation within 72 hours.
   ii. PACTS will log the complaint and send a certified letter verifying receipt of the complaint to the complainant.
   iii. MaineDOT will forward the complaint to the appropriate federal agency, either the Federal Transit Administration (for complaints related to bus, paratransit or demand-response service) or the Federal Highway Administration (for complaints related to roads, bridges, sidewalks, pedestrian/bicycle facilities) for processing and potential investigation.
   iv. If the FHWA Office of Civil Rights determines a Title VI or ADA complaint against PACTS can be investigated by MaineDOT, the FHWA Office of Civil Rights may
delegate the task of investigating the complaint to MaineDOT Civil Right Office. MaineDOT will conduct the investigation and forward the Report of Investigation to the FHWA Office of Civil Rights for review and final disposition.

v. The disposition of all Title VI complaints will be undertaken by the FHWA Office of Civil Rights, through either (1) informal resolution or (2) issuance of a Letter of Finding of compliance or noncompliance with Title VI and ADA. A copy of the Letter of Finding will be sent to the FHWA Division Office.

D. Records and investigative working files shall be kept for a period of three years.
1. Name:

2. Address:

3. Telephone Number:

4. Name of person or organization charged with discrimination (respondent):

5. Date of alleged discriminatory act:

6. Type of discrimination:

7. Please write a summary of the facts supporting your complaint (use additional pages as necessary):

8. Names of witnesses to the alleged discriminatory act:

9. What do you want as a remedy for the alleged discrimination?

Signed: _____________________________

Date: _____________________________
APPENDIX D: DEFINITIONS

Adverse Effects
The totality of significant individual or cumulative human health or environmental effects, including interrelated social and economic effects, which may include, but are not limited to: (See Appendix B for additional discussion of “significant.”)

- bodily impairment, infirmity, illness or death
- air, noise, and water pollution and soil contamination
- destruction or disruption of man-made or natural resources
- destruction or diminution of aesthetic values
- destruction or disruption of community cohesion or a community's economic vitality
- destruction or disruption of the availability of public and private facilities and services
- adverse employment effects
- displacement of persons, businesses, farms, or nonprofit organizations
- increased traffic congestion, isolation, exclusion or separation of minority or low-income individuals within a given community or from the broader community
- denial of, reduction in, or significant delay in the receipt of benefits of PACTS programs, policies, or activities

Significant Adverse Effects on Minority and Low-Income Populations
An adverse effect that:

a. is predominately borne by a minority population and/or a low-income population, or
b. will be suffered by the minority population and/or low-income population and is shown to be appreciably more severe or greater in magnitude than the adverse effect that will be suffered by the non-minority population and/or non-low-income population

Limited English Proficiency
Individuals with a primary or home language other than English who must, due to limited fluency in English, communicate in that primary or home language if the individuals are to have an equal opportunity to participate effectively in or benefit from any aid, service or benefit provided by the transportation provider or other PACTS recipient.

Federal Assistance
Includes grants and loans of federal funds; the grant or donation of federal property and interests in property; the detail of federal personnel, Federal property of any interest in such property without consideration or at a nominal consideration or at a consideration which is reduced for the purpose of assisting the recipient, or in recognition of the public interest to be served by such sale or lease to the recipient; and any federal agreement, arrangement, or other contract which has, as one of its purposes, the provision of assistance.

Low-Income
A person whose median household income is at or below the Department of Health and Human Services poverty guidelines. (http://aspe.os.dhhs.gov/poverty/poverty.htm)

Low-Income Population
Any readily identifiable group of low-income persons who live in geographic proximity and, if circumstances warrant, geographically dispersed/transient persons (such as migrant workers or
Native Americans) who will be similarly affected by a proposed Portland Area Comprehensive Transportation System (PACTS) program, policy or activity.

**Minority**
A person who is:

- **a. Black** - a person having origins in any of the black racial groups of Africa;
- **b. Hispanic** - a person of Mexican, Puerto Rican, Cuban, Central or South American, or other Spanish culture or origin, regardless of race;
- **c. Asian American** - a person having origins in any of the original peoples of the Far East, Southeast Asia, the Indian subcontinent, or the Pacific Islands; or
- **d. American Indian and Alaskan Native** - a person having origins in any of the original people of North America and who maintains cultural identification through tribal affiliation or community recognition.

**Minority Population**
Any readily identifiable groups of minority persons who live in geographic proximity and, if circumstances warrant, geographically dispersed/transient persons (such as migrant workers or Native Americans) who will be similarly affected by a proposed PACTS program, policy or activity.

**Noncompliance**
A recipient has failed to meet prescribed requirements and has shown an apparent lack of good faith effort in implementing all the requirements of Title VI/ Environmental Justice and related statutes.

**Persons**
Where designation of persons by race, color, or national origin is required, the following designations ordinarily may be used: "White not of Hispanic origin," "Black not of Hispanic origin," "Hispanic," "Asian or Pacific Islander," "American Indian or Alaskan Native." Additional subcategories based on national origin or primary language spoken may be used, where appropriate, on either a national or a regional basis.

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

**Recipient**
Any state, territory, possession, the District of Columbia, Puerto Rico, or any political subdivision, or instrumentality thereof, or any public or private agency, institution, or organization, or other entity, or any individual, in any state, territory, possession, the District of Columbia, or Puerto Rico, to whom Federal assistance is extended, either directly or through another recipient, for any program. Recipient includes any successor, assignee, or transferee thereof, but does not include any ultimate beneficiary under any such program.

**Sub-Recipient**
An agency such as a council of governments, regional planning agency, educational institution, for example, that receives Federal Highway Administration (FHWA) funds through the State DOTs and not directly from the FHWA. Other agencies, local governments, contractors, consultants that receive these funds are all considered sub-recipients.
During the performance of this contract, the contractor, for itself, its assignees, and successors in interest (hereinafter referred to as the “contractor”) agrees to comply with the following non-discrimination statutes and authorities; including but not limited to:

**Pertinent Non-Discrimination Authorities:**

- The Uniform Relocation Assistance and Real Property Acquisition Policies Act of 1970, (42 U.S.C. §4601), (prohibits unfair treatment of persons displaced or whose property has been acquired because of Federal or Federal-aid programs and projects);
- Federal-Aid Highway Act of 1973, (23 U.S.C. §324 *et seq.*), (prohibits discrimination on the basis of sex);
- The Age Discrimination Act of 1975, as amended, (42 U.S.C. §6101 *et seq.*), (prohibits discrimination on the basis of age);
- Airport and Airway Improvement Act of 1982, (49 U.S.C. §471, Section 47123), as amended, (prohibits discrimination based on race, creed, color, national origin, or sex);
- The Civil Rights Restoration Act of 1987, (PL 100-209), (Broadened the scope, coverage and applicability of Title VI of the Civil Rights Act of 1964, The Age Discrimination Act of 1975 and Section 504 of the Rehabilitation Act of 1973, by expanding the definition of the terms “programs or activities” to include all of the programs or activities of the Federal-aid recipients, sub-recipients and contractors, whether such programs or activities are Federally funded or not);
- Titles II and III of the Americans with Disabilities Act, which prohibit discrimination on the basis of disability in the operation of public entities, public and private transportation systems, places of public accommodation, and certain testing entities (42 U.S.C. §§12131-12189) as implemented by Department of Transportation regulations at 49 C.F.R. Parts 37 and 38;
- The Federal Aviation Administration’s Non-discrimination statute (49 U.S.C. §47123) (prohibits discrimination on the basis of race, color, national origin and sex);
- Executive Order 12898, Federal Actions to Address Environmental Justice in Minority Populations and Low-Income Populations, which ensures discrimination against minority populations by discouraging programs, policies, and activities with disproportionately high and adverse human health or environmental effects on minority and low-income populations;
- Executive Order 13166, Improving Access to Services for Persons with Limited English Proficiency, and resulting agency guidance, national origin discrimination includes discrimination because of limited English proficiency (LEP). To ensure compliance with Title VI, you must take reasonable steps to ensure that LEP persons have meaningful access to your programs (70 Fed. Reg. at 74087 to 74100);
- Title IX of the Education Amendments of 1972, as amended, which prohibits you from discriminating of sex in education programs or activities (20 U.S.C. 1681 *et seq.*).
APPENDIX F: FTA CIRCULAR 4702.1B DATA COLLECTION & REPORTING

CHAPTER III

GENERAL REQUIREMENTS AND GUIDELINES

1. **INTRODUCTION.** This chapter describes requirements that all FTA recipients must follow to ensure that their programs, policies, and activities comply with DOT’s Title VI regulations.

2. **REQUIREMENT TO PROVIDE TITLE VI ASSURANCES.** In accordance with 49 CFR Section 21.7(a), every application for financial assistance from FTA must be accompanied by an assurance that the applicant will carry out the program in compliance with DOT’s Title VI regulations. This requirement shall be fulfilled when the applicant/recipient submits its annual certifications and assurances to FTA. Primary recipients shall collect Title VI assurances from subrecipients prior to passing through FTA funds. The text of FTA’s annual certifications and assurances is available on FTA’s website.

3. **REQUIREMENTS FOR FIRST-TIME APPLICANTS.** First-time applicants must submit a Title VI Program that is compliant with this Circular and submit an assurance (as noted in Section 2 above) that it will comply with Title VI. In addition, and consistent with 28 CFR § 50.3, entities applying for FTA funding for the first time shall provide information regarding their Title VI compliance history if they have previously received funding from another Federal agency. This shall include a copy of any Title VI compliance review activities conducted in the previous three years. The summary shall include:
   - The purpose or reason for the review.
   - The name of the agency or organization that performed the review.
   - A summary of the findings and recommendations of the review.
   - A report on the status and/or disposition of such findings and recommendations. This information shall be relevant to the organizational entity actually submitting the application, not necessarily the larger agency or department of which the entity is a part.
   - In addition, first-time applicants shall submit a brief description of any pending applications to other Federal agencies for assistance, and whether any Federal agency has found the applicant to be in noncompliance with any civil rights requirement.

4. **REQUIREMENT TO PREPARE AND SUBMIT A TITLE VI PROGRAM.** Title 49 CFR Section 21.9(b) requires recipients to “keep such records and submit to the Secretary timely, complete, and accurate compliance reports at such times, and in such form and containing such information, as the Secretary may determine to be necessary to enable him to ascertain whether the recipient has complied or is complying with this [rule].” FTA requires that all direct and primary recipients document their compliance with DOT’s Title VI regulations by submitting a Title VI Program to their FTA regional civil rights officer once every three years.
or as otherwise directed by FTA. For all recipients (including subrecipients), the Title VI Program must be approved by the recipient’s board of directors or appropriate governing entity or official(s) responsible for policy decisions prior to submission to FTA. For State DOTs, the appropriate governing entity is the State’s Secretary of Transportation or equivalent. Recipients shall submit a copy of the board resolution, meeting minutes, or similar documentation with the Title VI Program as evidence that the board of directors or appropriate governing entity or official(s) has approved the Title VI Program. FTA will review and concur or request the recipient provide additional information.

Subrecipients shall submit Title VI Programs to the primary recipient from whom they receive funding in order to assist the primary recipient in its compliance efforts. Such Programs may be submitted and stored electronically at the option of the primary recipient. Subrecipients may choose to adopt the primary recipient’s notice to beneficiaries, complaint procedures and complaint form, public participation plan, and language assistance plan where appropriate. Operational differences between the primary recipient and subrecipient may require, in some instances, that the subrecipient tailor its language assistance plan. Subrecipients shall develop and submit to the primary recipient a list of complaints, investigations, or lawsuits. Subrecipients that have transit-related non-elected planning boards, advisory councils, or committees, the membership of which is selected by the subrecipient, 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. Subrecipients must submit all the above information to the primary recipient on a schedule requested by the primary recipient. Collection and storage of subrecipient Title VI Programs may be electronic at the option of the primary recipient.

a. Contents. Every Title VI Program shall include the following information:

(1) A copy of the recipient’s Title VI notice to the public that indicates the recipient complies with Title VI and informs members of the public of the protections against discrimination afforded to them by Title VI. Include a list of locations where the notice is posted. A sample Title VI notice is in Appendix B.

(2) A copy of the recipient’s instructions to the public regarding how to file a Title VI discrimination complaint, including a copy of the complaint form. Sample complaint procedures are in Appendix C, and a sample Title VI complaint form is in Appendix D.

(3) A list of any public transportation-related Title VI investigations, complaints, or lawsuits filed with the recipient since the time of the last submission. See Appendix E for an example of how to report this information. This list should include only those investigations, complaints, or lawsuits that pertain to allegations of discrimination on the basis of race, color, and/or national origin in transit-related activities and programs and that pertain to the recipient submitting the report, not necessarily the larger agency or department of which the recipient is a part.

(4) A public participation plan that includes an outreach plan to engage minority and limited English proficient populations, as well as a summary of outreach efforts made since the last Title VI Program submission. A recipient’s targeted public
Participation plan for minority populations may be part of efforts that extend more broadly to include other constituencies that are traditionally underserved, such as people with disabilities, low-income populations, and others.

(5) A copy of the recipient’s plan for providing language assistance to persons with limited English proficiency, based on the DOT LEP Guidance.

(6) Recipients that have transit-related, non-elected planning boards, advisory councils or committees, or similar bodies, 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 or councils.

(7) Primary recipients shall include a narrative or description of efforts the primary recipient uses to ensure subrecipients are complying with Title VI, as well as a schedule of subrecipient Title VI program submissions.

(8) If the recipient has constructed a facility, such as a vehicle storage facility, maintenance facility, operation center, etc., the recipient shall include a copy of the Title VI equity analysis conducted during the planning stage with regard to the location of the facility.

(9) Additional information as specified in chapters IV, V, and VI, depending on whether the recipient is a fixed route transit provider, a State, or an MPO.

b. **Upload Title VI Program to TEAM.** Direct and primary recipients must upload their Title VI Program into FTA’s Transportation Electronic Award Management (TEAM) system, or other tracking system as directed by FTA. The Title VI Program shall be attached via the paper clip function on the Civil Rights screen, and not attached to a particular grant. Recipients must also notify their FTA Regional Civil Rights Officer via email that they have uploaded their Title VI Program to TEAM. The Title VI Program must be uploaded to TEAM no fewer than sixty calendar days prior to the date of expiration of the Title VI Program.

c. **Determinations.** The status of a direct or primary recipient’s Title VI Program will be noted in TEAM. The three status determinations are:

(1) **Concur.** This status indicates that the recipients’ Title VI Program meets the requirements as set out in this Circular. The recipient may receive grant funds.

(2) **In review.** This status indicates that the recipient’s Title VI Program is being reviewed by FTA staff and a determination as to sufficiency has not yet been made. “In review” status is only effective for sixty days and grants may be processed while a Title VI Program has an “in review” status.

(3) **Expired/Expiration.** This status indicates that the recipients’ Title VI Program has expired and that an updated Title VI Program must be submitted. A recipient with an expired Title VI Program may have its draw-down privileges suspended and grants may not be processed.
4. Reporting Requirement Exemptions. Recipients whose only FTA funding is through FTA’s University Transportation Center Program, National Research and Technology Program, Transportation Cooperative Research Program, Over the Road Bus Accessibility program, or the Public Transportation on Indian Reservations program are exempt from submitting a Title VI Program to FTA. In addition, FTA may exempt a recipient, upon receipt of a request for a waiver submitted to the Director of the Office of Civil Rights, from the requirement to submit a Title VI Program, or from some elements of the Title VI Program. The absence of the requirement to submit a Title VI Program does not obviate the underlying obligations to comply with DOT’s Title VI regulations. Furthermore, with the exception of the Public Transportation on Indian Reservation program, FTA may, at any time, request information from an exempt recipient in order to determine compliance with Title VI regulations and statutes.

5. REQUIREMENT TO NOTIFY BENEFICIARIES OF PROTECTION UNDER TITLE VI. Title 49 CFR Section 21.9(d) requires recipients to provide information to the public regarding the recipient’s obligations under DOT’s Title VI regulations and apprise members of the public of the protections against discrimination afforded to them by Title VI. At a minimum, recipients shall disseminate this information to the public by posting a Title VI notice on the agency’s website and in public areas of the agency’s office(s), including the reception desk, meeting rooms, etc. Recipients should also post Title VI notices at stations or stops, and/or on transit vehicles. A sample Title VI notice to the public is provided in Appendix B.

a. Contents. The Title VI notice shall include:

(1) A statement that the agency operates programs without regard to race, color, or national origin.

(2) A description of the procedures that members of the public should follow in order to request additional information on the recipient’s Title VI obligations.

(3) A description of the procedures that members of the public shall follow in order to file a Title VI discrimination complaint against the recipient.


(1) Dissemination. Agencies shall inform the public of their rights under Title VI through such measures as posting the Title VI notice on posters, comment cards, or flyers placed at stations, bus shelters, and in transit vehicles. The type, timing, and frequency of these measures are at the recipient’s discretion, as long as the type, timing, and frequency are sufficient to notify passengers and other interested persons of their rights under DOT’s Title VI regulations with regard to the recipient’s program.

(2) Document translation. Notices detailing a recipient’s Title VI obligations and complaint procedures shall be translated into languages other than English, as needed and consistent with the DOT LEP Guidance and the recipient’s language assistance plan.
(3) **Subrecipients.** In order to reduce the administrative burden associated with this requirement, subrecipients may adopt the Title VI Notice developed by the primary recipient; however, subrecipients shall notify passengers and other interested persons that they may file discrimination complaints directly with the subrecipient.

6. **REQUIREMENT TO DEVELOP TITLE VI COMPLAINT PROCEDURES AND COMPLAINT FORM.** In order to comply with the reporting requirements established in 49 CFR Section 21.9(b), all recipients shall develop procedures for investigating and tracking Title VI complaints filed against them and make their procedures for filing a complaint available to members of the public. Recipients must also develop a Title VI complaint form, and the form and procedure for filing a complaint shall be available on the recipient’s website. FTA requires direct and primary recipients to report information regarding their complaint procedures in their Title VI Programs in order for FTA to determine compliance with DOT’s Title VI regulations. In order to reduce the administrative burden associated with this requirement, subrecipients may adopt the Title VI complaint investigation and tracking procedures and complaint form developed by the primary recipient. Sample complaint procedure and complaint forms are located in Appendices C and D. See Chapter IX of this Circular for more information on complaints.

7. **REQUIREMENT TO RECORD AND REPORT TRANSIT-RELATED TITLE VI INVESTIGATIONS, COMPLAINTS, AND LAWSUITS.** In order to comply with the reporting requirements of 49 CFR Section 21.9(b), FTA requires all recipients to prepare and maintain a list of any of the following that allege discrimination on the basis of race, color, or national origin: active investigations conducted by entities other than FTA; lawsuits; and complaints naming the recipient. This list shall include the date that the investigation, lawsuit, or complaint was filed; a summary of the allegation(s); the status of the investigation, lawsuit, or complaint; and actions taken by the recipient in response, or final findings related to, the investigation, lawsuit, or complaint. This list shall be included in the Title VI Program submitted to FTA every three years. See Appendix E for an example of how to report this information.

8. **PROMOTING INCLUSIVE PUBLIC PARTICIPATION.** The content and considerations of Title VI, the Executive Order on LEP, and the DOT LEP Guidance shall be integrated into each recipient’s established public participation plan or process (i.e., the document that explicitly describes the proactive strategies, procedures, and desired outcomes that underpin the recipient’s public participation activities). Recipients have wide latitude to determine how, when, and how often specific public participation activities should take place, and which specific measures are most appropriate. Recipients should make these determinations based on a demographic analysis of the population(s) affected, the type of plan, program, and/or service under consideration, and the resources available. Efforts to involve minority and LEP populations in public participation activities can include both comprehensive measures, such as placing public notices at all transit stations, stops, and vehicles, as well as targeted measures to address linguistic, institutional, cultural, economic, historical, or other barriers that may prevent minority and LEP persons from effectively participating in a recipient’s decision-making process. FTA has developed a Circular, 4703.1, “Environmental Justice Policy Guidance for Federal Transit Administration Recipients,” that includes many examples of effective strategies for engaging minority and low-income populations. FTA encourages
recipients to review that Circular for ideas when developing their public engagement strategy. Some of those effective practices include:

a. Scheduling meetings at times and locations that are convenient and accessible for minority and LEP communities.

b. Employing different meeting sizes and formats.

c. Coordinating with community- and faith-based organizations, educational institutions, and other organizations to implement public engagement strategies that reach out specifically to members of affected minority and/or LEP communities.

d. Considering radio, television, or newspaper ads on stations and in publications that serve LEP populations. Outreach to LEP populations could also include audio programming available on podcasts.

e. Providing opportunities for public participation through means other than written communication, such as personal interviews or use of audio or video recording devices to capture oral comments.

Grant recipients are required to comply with the public participation requirements of 49 U.S.C. Sections 5307(b) (requires programs of projects to be developed with public participation) and 5307(c)(1)(I) (requires a locally developed process to consider public comment before raising a fare or carrying out a major reduction in transportation service). FTA/FHWA (Federal Highway Administration) joint planning regulations (23 CFR part 450) require States and MPOs engaged in planning activities to seek out and consider the needs and input of the general public, including interested parties and those traditionally underserved by existing transportation systems, such as minority and LEP persons, who may face challenges accessing employment and other services, as States and MPOs develop and conduct their public involvement activities. Recipients engaged in planning and other decision-making activities at the local level should consider the principles embodied in the planning regulations, and develop and use a documented public participation plan or process that provides adequate notice of public participation activities, as well as early and continuous opportunities for public review and comment at key decision points.

9. REQUIREMENT TO PROVIDE MEANINGFUL ACCESS TO LEP PERSONS. 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), recipients 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). This Circular contains only a summary of the LEP requirements as they apply to FTA recipients; recipients are encouraged to review DOT’s LEP guidance for additional information (70 FR 74087, Dec. 14, 2005) http://www.gpo.gov/fdsys/pkg/FR-2005-12-14/pdf/05-23972.pdf. Recipients are also encouraged to review DOJ’s guidelines on self-assessment, Language Access Assessment and Planning Tool for Federally Conducted and Federally Assisted Programs (May 2011), as well as other materials, available at www.lep.gov.
a. **Four Factor Analysis.** In order to ensure meaningful access to programs and activities, recipients shall use the information obtained in the Four Factor Analysis to determine the specific language services that are appropriate to provide. A careful analysis can help a recipient determine if it communicates effectively with LEP persons and will inform language access planning. The Four Factor Analysis is an individualized assessment that balances the following four factors:

1. **The number or proportion of LEP persons eligible to be served or likely to be encountered by the program or recipient.** This population will be program-specific. In addition to the number or proportion of LEP persons served, the recipient’s analysis should, at a minimum, identify:
   
   a) How LEP persons interact with the recipient’s agency;
   
   b) Identification of LEP communities, and assessing the number or proportion of LEP persons from each language group to determine the appropriate language services for each language group;
   
   c) The literacy skills of LEP populations in their native languages, in order to determine whether translation of documents will be an effective practice; and
   
   d) Whether LEP persons are underserved by the recipient due to language barriers.

2. **The frequency with which LEP persons come into contact with the program.** Recipients should survey key program areas and assess major points of contact with the public, such as:

   a) Use of bus and rail service;
   
   b) Purchase of passes and tickets through vending machines, outlets, websites, and over the phone;
   
   c) Participation in public meetings;
   
   d) Customer service interactions;
   
   e) Ridership surveys;
   
   f) Operator surveys.

3. **The nature and importance of the program, activity, or service provided by the program to people’s lives.** Generally speaking, the more important the program, the more frequent the contact and the likelihood that language services will be needed. The provision of public transportation is a vital service, especially for people without access to personal vehicles. An MPO’s regional planning activities will impact every person in a region. Development of a coordinated plan to meet the specific transportation needs of seniors and people with disabilities
will often also meet the needs of LEP persons. A person who is LEP may have a
disability that prevents the person from using fixed route service, thus making the
person eligible for ADA complementary paratransit. Transit providers, States, and
MPOs must assess their programs, activities and services to ensure they are
providing meaningful access to LEP persons. Facilitated meetings with LEP
persons are one method to inform the recipient on what the local LEP population
considers to be an essential service, as well as the most effective means to provide
language assistance.

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

b. Developing a Language Assistance Plan. After completing the Four Factor Analysis,
the recipient shall use the results of the analyses to determine which language
assistance services are appropriate. Additionally, the recipient shall develop an
assistance plan to address the identified needs of the LEP population(s) it serves. The
DOT LEP Guidance recognizes that certain recipients, such as those serving very few
LEP persons or those with very limited resources, may choose not to
develop a written plan. However, FTA has determined it is necessary to require its recipients to
develop an assistance plan in order to ensure compliance. A recipient may formally
request an exemption from this requirement if it believes it fits within the exception
described.

Recipients have considerable flexibility in developing a Language Assistance Plan, or
LEP Plan. An LEP Plan shall, at a minimum:

(1) Include the results of the Four Factor Analysis, including a description of the LEP
population(s) served;

(2) Describe how the recipient provides language assistance services by language;

(3) Describe how the recipient provides notice to LEP persons about the availability of
language assistance;

(4) Describe how the recipient monitors, evaluates and updates the language access
plan; and

(5) Describe how the recipient trains employees to provide timely and reasonable
language assistance to LEP populations.

FTA will solely determine, at the time the recipient submits its Title VI Program or
subsequent to a complaint investigation or compliance review, whether a recipient’s
The plan is sufficient to ensure meaningful access and thus ensure the recipient is not engaging in discrimination on the basis of national origin.

After completing the Four Factor Analysis, a recipient may determine that an effective LEP plan for its community includes the translation of vital documents into the language of each frequently encountered LEP group eligible to be served and/or likely to be affected by the recipient’s programs and services. Vital written documents include, but are not limited to, consent and complaint forms; intake and application forms with the potential for important consequences; written notices of rights; notices of denials, losses, or decreases in benefits or services; and notices advising LEP individuals of free language assistance services. Examples of vital documents include an ADA complementary paratransit eligibility application, a Title VI complaint form, notice of a person’s rights under Title VI, and other documents that provide access to essential services. Failure to translate these vital documents could result in a recipient denying an eligible LEP person access to services and discrimination on the basis of national origin.

c. Safe Harbor Provision. DOT has adopted DOJ’s Safe Harbor Provision, which outlines circumstances that can provide a “safe harbor” for recipients regarding translation of written materials for LEP populations. The Safe Harbor Provision stipulates that, if a recipient provides written translation of vital documents for each eligible LEP language group that constitutes five percent (5%) or 1,000 persons, whichever is less, of the total population of persons eligible to be served or likely to be affected or encountered, then such action will be considered strong evidence of compliance with the recipient’s written translation obligations. Translation of non-vital documents, if needed, can be provided orally. If there are fewer than 50 persons in a language group that reaches the five percent (5%) trigger, the recipient is not required to translate vital written materials but should provide written notice in the primary language of the LEP language group of the right to receive competent oral interpretation of those written materials, free of cost.

These safe harbor provisions apply to the translation of written documents only. They do not affect the requirement to provide meaningful access to LEP individuals through competent oral interpreters where oral language services are needed and are reasonable. A recipient may determine, based on the Four Factor Analysis, that even though a language group meets the threshold specified by the Safe Harbor Provision, written translation may not be an effective means to provide language assistance measures. For example, a recipient may determine that a large number of persons in that language group have low literacy skills in their native language and therefore require oral interpretation. In such cases, background documentation regarding the determination shall be provided to FTA in the Title VI Program.

10. MINORITY REPRESENTATION ON PLANNING AND ADVISORY BODIES. Title 49 CFR Section 21.5(b)(1)(vii) states that a recipient may not, on the grounds of race, color, or national origin, “deny a person the opportunity to participate as a member of a planning, advisory, or similar body which is an integral part of the program.” 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.

11. PROVIDING ASSISTANCE TO SUBRECIPIENTS. Title 49 CFR Section 21.9(b) states that if “a primary recipient extends Federal financial assistance to any other recipient, such other recipient shall also submit such compliance reports to the primary recipient as may be necessary to enable the primary recipient to carry out its obligations under this part.” See Appendix L for clarification of reporting responsibilities by recipient category. Primary recipients should assist their subrecipients in complying with DOT’s Title VI regulations, including the general reporting requirements. Assistance shall be provided to the subrecipient as necessary and appropriate by the primary recipient. Primary recipients should provide the following information to subrecipients; such information, forms, and data may be kept in a central repository and available for all subrecipients:

   a. Sample notices to the public informing beneficiaries of their rights under DOT’s Title VI regulations, procedures on how to file a Title VI complaint, and the recipient’s Title VI complaint form.
   
   b. Sample procedures for tracking and investigating Title VI complaints filed with a subrecipient, and when the primary recipient expects the subrecipient to notify the primary recipient of complaints received by the subrecipient.
   
   c. Demographic information on the race and English proficiency of residents served by the subrecipient. This information will assist the subrecipient in assessing the level and quality of service it provides to communities within its service area and in assessing the need for language assistance.
   
   d. Any other recipient-generated or obtained data, such as travel patterns, surveys, etc., that will assist subrecipients in complying with Title VI.

12. MONITORING SUBRECIPIENTS. In accordance with 49 CFR 21.9(b), and to ensure that subrecipients are complying with the DOT Title VI regulations, primary recipients must monitor their subrecipients for compliance with the regulations. Importantly, if a subrecipient is not in compliance with Title VI requirements, then the primary recipient is also not in compliance.

   a. In order to ensure the primary and subrecipient are in compliance with Title VI requirements, the primary recipient shall undertake the following activities:

      (1) Document its process for ensuring that all subrecipients are complying with the general reporting requirements of this circular, as well as other requirements that apply to the subrecipient based on the type of entity and the number of fixed route vehicles it operates in peak service if a transit provider.
      
      (2) Collect Title VI Programs from subrecipients and review programs for compliance. Collection and storage of subrecipient Title VI Programs may be electronic at the option of the primary recipient.
(3) At the request of FTA, in response to a complaint of discrimination, or as otherwise deemed necessary by the primary recipient, the primary recipient shall request that subrecipients who provide transportation services verify that their level and quality of service is provided on an equitable basis. Subrecipients that are fixed route transit providers are responsible for reporting as outlined in Chapter IV of this Circular.

b. When a subrecipient is also a direct recipient of FTA funds, that is, applies for funds directly from FTA in addition to receiving funds from a primary recipient, the subrecipient/direct recipient reports directly to FTA and the primary recipient/designated recipient is not responsible for monitoring compliance of that subrecipient. The supplemental agreement signed by both entities in their roles as designated recipient and direct recipient relieves the primary recipient/designated recipient of this oversight responsibility. See Appendix L for clarification of reporting responsibilities by recipient category.

13. DETERMINATION OF SITE OR LOCATION OF FACILITIES. Title 49 CFR Section 21.9(b)(3) states, “In determining the site or location of facilities, a recipient or applicant may not make selections with the purpose or effect of excluding persons from, denying them the benefits of, or subjecting them to discrimination under any program to which this regulation applies, on the grounds of race, color, or national origin; or with the purpose or effect of defeating or substantially impairing the accomplishment of the objectives of the Act or this part.” Title 49 CFR part 21, Appendix C, Section (3)(iv) provides, “The location of projects requiring land acquisition and the displacement of persons from their residences and businesses may not be determined on the basis of race, color, or national origin.” For purposes of this requirement, “facilities” does not include bus shelters, as these are transit amenities and are covered in Chapter IV, nor does it include transit stations, power substations, etc., as those are evaluated during project development and the NEPA process. Facilities included in this provision include, but are not limited to, storage facilities, maintenance facilities, operations centers, etc. In order to comply with the regulations:

a. The recipient shall complete 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. Recipients shall engage in outreach to persons potentially impacted by the siting of facilities. The Title VI equity analysis must compare the equity impacts of various siting alternatives, and the analysis must occur before the selection of the preferred site.

b. When evaluating locations of facilities, recipients should give attention to other facilities with similar impacts in the area to determine if any cumulative adverse impacts might result. Analysis should be done at the Census tract or block group where appropriate to ensure that proper perspective is given to localized impacts.

c. If the recipient determines that the location of the project will result in a disparate impact on the basis of race, color, or national origin, the recipient may 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. The recipient must show how both tests are met; it is important to understand that in order to make this
showing, the recipient must consider and analyze alternatives to determine whether those alternatives would have less of a disparate impact on the basis of race, color, or national origin, and then implement the least discriminatory alternative.

14. REQUIREMENT TO PROVIDE ADDITIONAL INFORMATION UPON REQUEST. FTA may request, at its discretion, information other than that required by this Circular from a recipient in order for FTA to investigate complaints of discrimination or to resolve concerns about possible noncompliance with DOT’s Title VI regulations.
APPENDIX G: ANNUAL GOALS & ACCOMPLISHMENTS REPORT

GOALS FOR FFY 2020

1. Ensure Accessibility of Key Information
   a. Evaluate website accessibility for protected populations.
   b. Develop Language Access Procedures and provide training to staff, consultants, and other relevant stakeholders.
   c. Develop and disseminate a basic “Introduction to PACTS” document that is screen reader friendly and translated into the top five languages.
   d. Update the PACTS Title VI Brochure to include Arabic and Portuguese translations and ensure screen reader compliance. Disseminate to libraries, town halls and community locations.

2. Assess Equity Impacts
   a. Develop an equity analysis of the Transportation Improvement Program.
   b. Prepare a public-facing interactive map that shows the geographical distribution of investments relative to equitable target areas.
   c. Develop performance measures for public engagement.

3. Engage Protected Populations in Plans and Programs
   a. Require use of the Inclusive Transportation Planning Toolkit by staff and consultants.
   b. Work with the Transportation & Community Well-Being Network, the Mobility Liaisons, and stakeholder organizations to engage Title VI, Environmental Justice, and ADA-protected populations in PACTS forums, public meetings, and planning opportunities.
   c. Host at least two focus groups with protected populations, where PACTS committee members are invited and have the opportunity to learn more about the transportation needs and experiences of underrepresented communities.
   d. Utilize social media to increase engagement with PACTS by protected populations.
   e. Pilot approaches for supporting meaningful involvement by underrepresented communities on PACTS Governance Committees.
   f. Pilot the Community Transportation Leaders Training as an opportunity for protected community members to gain the knowledge and tools for meaningful participation in transportation planning and decision-making.

4. Support Public Transportation Agencies with Title VI Compliance
   a. Provide technical assistance to the region’s seven transit agencies with meeting their Title VI responsibilities. This may include mapping, data procurements, and analysis.
I. Project Input
Throughout FFY2019, GPCOG convened the Transportation & Community Well-Being Network as a forum to engage Title VI, Environmental Justice, and ADA-protected populations in PACTS’ initiatives. Studies, plans and projects that have used the Network meeting and/or its members to get input from these populations in FFY2019 include:

- Transit Stop Access Project Phase II
- METRO Peninsula Loop Reboot Project
- Regional Traffic Management System Phase II
- Moving Southern Maine Forward Implementation (PACTS short-term transit plan)

II. General Engagement
Throughout FFY2019, GPCOG used social media to increase engagement with PACTS by protected populations. GPCOG posted regularly to its Facebook page with items about the Inclusive Transportation Planning Project using the hashtag #Plan2IncludeMe. GPCOG created this brief film to assist with engagement https://www.facebook.com/watch/?v=377139319816291. The film has over 2,000 views.

III. Inclusive Transportation Planning Project
This project is engaging older adults, people with disabilities, and people of color in driving more inclusive regional transportation planning. The project includes both the PACTS and GPCOG geography. The key deliverable for the first phase was to develop and present strategies for more inclusive planning to PACTS leadership.

In Fall 2018, six focus groups were conducted to inform the project. Each session was hosted at a community location in partnership with a stakeholder organization and attended by transit agency staff. Partners included Age Friendly organizations in Biddeford, Raymond, Old Orchard Beach, and Saco, Catholic Charities of Maine, the Cities of Biddeford and South Portland, Maine Immigrant Access Network, Portland Housing Authority, and South Portland Housing Authority. The focus groups were held in Portland, Raymond, Saco, and South Portland and included 70 older adults, people with disabilities, and people of color.

The Inclusive Transportation Planning Recommendations were presented to the PACTS Policy Committee in January 2019. The Committee unanimously approved the recommendations to be used to inform the Public Involvement Plan update.

A second round of funding from the Transit Planning 4 All initiative, beginning in 2019, is allowing GPCOG and PACTS the Community Transportation Leaders (CTL) Training Program and develop the Inclusive Planning Toolkit. The Inclusive Planning Toolkit will be presented for adoption in October as an appendix of the Public Involvement Plan.

In Spring and Summer of 2019, GPCOG staff began planning for a pilot program called the Community Transportation Leaders Training. The training is an opportunity for protected community members to gain the knowledge and tools for meaningful participation in transportation planning and decision-making. The Planning Group is composed of older adults, people with disabilities, people of color, PACTS members, and representatives from aging and disability organizations. The training pilot will happen in Fall 2019 and include at least 20 participants.
APPENDIX H: PACTS PUBLIC INVOLVEMENT PLAN

The plan can be accessed at this link: https://www.gpcog.org/219/Public-Involvement-Plan