

# ALM Hopewell Center

## Title VI Program

Date Approved by

June 14<sup>th</sup>, 2022

This TEMPLATE is provided by the Missouri Department of Transportation (MoDOT) Transit Section, as a resource for producing the triennial Title VI Program document for Federal Transit Administration recipients and subrecipients. FTA Circular 4702.1B, dated October 1, 2012, *“Title VI Requirement and Guidelines for Federal Transit Administration Recipients”* was the primary source of material for this template. Use of this template does not override each agency’s responsibility to interpret the requirements as expressed in FTA Circular 4702.1B, or as amended in the future.

This template is available online under Presentations – Title VI Presentation Template at the following link:

<http://www.modot.org/othertransportation/transit/transitapplicationsreportsprograms.htm>

*Check this link periodically for most recent, dated template updates.*

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### A. Title VI Assurances

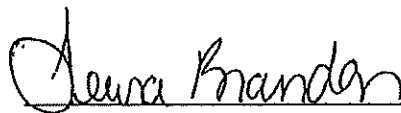
ALM Hopewell Center agrees to comply with all provisions prohibiting discrimination on the basis of race, color, or national origin of Title VI of the Civil Rights Act of 1964, as amended, 42 U.S.C. 200d *et seq.*, and with U.S. DOT regulations, "Nondiscrimination In Federally-Assisted Programs of the Department of Transportation – Effectuation of Title VI of the Civil Rights Act," 49 CFR part 21.

ALM Hopewell Center assures that no person shall, as provided by Federal and State civil rights laws, be excluded from participation in, be denied the benefits of, or be subjected to discrimination under any program or activity. ALM Hopewell Center further ensures every effort will be made to ensure non-discrimination in all programs and activities, whether those programs and activities are federally funded or not.

ALM Hopewell Center meets the objectives of the FTA Master Agreement which governs all entities applying for FTA funding, including ALM Hopewell Center and its third-party contractors by promoting actions that:

- A. Ensure that the level and quality of transportation service is provided without regard to race, color, or national origin.
- B. Identify and address, as appropriate, disproportionately high and adverse effects of programs and activities on minority populations and low-income populations.
- C. Promote the full and fair participation of all affected Title VI populations in transportation decision making.
- D. Prevent the denial, reduction, or delay in benefits related to programs and activities that benefit minority populations or low-income populations.
- E. Ensure meaningful access to programs and activities by persons with Limited English Proficiency (LEP).

Signed:

 \_\_\_\_\_

Title:

Chief Behavioral Health Officer

Date:

06/14/2022

**B. Agency Information**

**1. Mission of ALM Hopewell Center**

The mission of ALM Hopewell Center is to improve the quality of life for the mentally challenged by decreasing the incidences of mental disabilities and co-occurring disorders and negative impact on their lives through hope, treatment, and wellness.

**2. History (including year started)**

Amanda Lockett Murphy Hopewell Center grew out of a 30-year history of service within the Yeatman/ Union – Sarah network. In 1988, Yeatman / Union-Sarah transferred its assets to Hopewell Center under the leadership of its founder, Dr. Amanda L. Murphy and continued to service the behavioral health population for many years. In the fall of 2009, the board of directors of Hopewell Center elected to change the name of the organization to Amanda Lockett Murphy Hopewell Center to honor its founder and CEO. Incorporated as a not-for-profit 501(c)(3) since 1979, ALM Hopewell Center provides comprehensive behavioral health services to children and adults in the northern and central parts of the City of St. Louis and North St. Louis City. ALM Hopewell Center is an administrative agent for the Missouri Department of Mental Health and is CARF accredited.

**3. Regional Profile (regional population; growth projection)**

Amanda Lockett Murphy Hopewell Center currently services children and adults in northern and central parts of the City of St. Louis, MO. The agency currently services 3833 children and adults combined and anticipates increasing the number of consumers by 10% during the next fiscal year.

**4. Population served (in relation to regional population)**

Relative to the regional population of an agency with equal size, ALM Hopewell Center services nearly the same portion of consumers as other agencies of its size.

**5. Service area (include map, with any routes utilized)**

The service area of ALM Hopewell Center encompasses North and Central St. Louis City.

**6. Governing body make-up (include terms of office)**

The current governing Body for ALM Hopewell Center includes:

Charles Saulsberry, Esq. (2yr)	Board Chairman
Sterling Adams (6yr)	Treasurer
Irvin Clay (6yr)	Member
Herman Noah (6yr)	Member
Cozy Marks (6 yr)	Secretary
Hattie Jackson(6 yr)	Member

## C. Notice to the Public

### Notifying the Public of Rights under Title VI

ALM Hopewell Center posts Title VI notices on our agency's website, in public areas of our agency, in our board room, and on our buses and/or paratransit vehicles.

ALM Hopewell Center operates its programs and services without regard to race, color, or national origin, in accordance with Title VI of the Civil Rights Act of 1964.

For more information on the ALM Hopewell Center's Title VI program, and the procedures to file a complaint, contact Moses Waithaka, Director of Quality and Compliance at (314) 531-1770 x 2012; [mkwaithak@hopwellcenter.com](mailto:mkwaithak@hopwellcenter.com); or visit our administrative office at 4236 Lindell Blvd, suite 200 Saint Louis MO 63108. For more information visit <https://hopwellcenter.com/>.

If you believe you have been discriminated against on the basis of race, color, or national origin by ALM Hopewell Center, you may file a Title VI complaint by completing, signing, and submitting the agency's Title VI Complaint Form.

To obtain additional information about your rights under Title VI, contact: Teresa Brandon, Chief Behavioral Health Officer

#### How to file a Title VI/ADA complaint with ALM Hopewell Center:

1. A compliant form may be obtained from our agency website at [www.hopwellcenter.com](http://www.hopwellcenter.com)  
Or  
From  
Teresa Brandon  
4236 Lindell Blvd, Suite 200  
St. Louis, MO 63108  
Tel: 314-531-1770
2. In addition to the complaint process at ALM Hopewell Center, complaints may be filed directly with the Federal Transit Administration, Office of Civil Rights, East Building, 5<sup>th</sup> Floor – TCR 1200 New Jersey Ave., SE Washington, DC 20590.

3. Complaints must be filed within 180 days following the date of the alleged discriminatory occurrence and should contain as much detailed information about the alleged discrimination as possible.
4. The form must be signed and dated and include your contact information.

If information is needed in another language, contact (312)353-2789

<p>See sample Title VI Complaint Form</p> <p><b>ATTACHMENT 2</b></p>
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#### **D. Procedure for Filing a Title VI Complaint**

##### **Filing a Title VI Complaint**

The complaint procedures apply to the beneficiaries of ALM Hopewell Center's programs, activities, and services.

**RIGHT TO FILE A COMPLAINT:** Any person who believes they have been discriminated against on the basis of race, color, or national origin by ALM Hopewell Center may file a Title VI complaint by completing and submitting the agency's **Title VI Complaint Form**. Title VI complaints must be received in writing within 180 days of the alleged discriminatory complaint.

**HOW TO FILE A COMPLAINT:** Information on how to file a Title VI complaint is posted on our agency's website, and in public areas of our agency.

You may download the ALM Hopewell Center Title VI Complaint Form at [www.hopwellcenter.com](http://www.hopwellcenter.com), or request a copy by writing to ALM Hopewell Center 4236 Lindell Blvd, Suite 200, St. Louis, MO 63108. Information on how to file a Title VI complaint may also be obtained by calling ALM Hopewell Center at (314) 531-1770 x 2012.

You may file a signed, dated complaint no more than 180 days from the date of the alleged incident. The complaint should include:

- Your name, address, and telephone number.
- Specific, detailed information (how, why and when) about the alleged act of discrimination.
- Any other relevant information, including the names of any persons, if known, the agency should contact for clarity of the allegations.

Please submit your complaint form to ALM Hopewell Center 4236 Lindell Blvd, suite 200 St. Louis, MO 63108.

**COMPLAINT ACCEPTANCE:** ALM Hopewell Center will process complaints that are complete. Once a completed Title VI Complaint Form is received, ALM Hopewell Center will review it to determine if ALM Hopewell Center has jurisdiction. The complainant will receive an

acknowledgement letter informing them whether or not the complaint will be investigated by ALM Hopewell Center.

INVESTIGATIONS: ALM Hopewell Center will generally complete an investigation within 90 days from receipt of a completed complaint form. If more information is needed to resolve the case, ALM Hopewell Center may contact the complainant. Unless a longer period is specified by ALM Hopewell Center, the complainant will have ten (10) days from the date of the letter to send requested information to the ALM Hopewell Center investigator assigned to the case.

If the requested information is not received within that timeframe the case will be closed. Also, a case can be administratively closed if the complainant no longer wishes to pursue the case.

LETTERS OF CLOSURE OR FINDING: After the Title VI investigator reviews the complaint, the Title VI investigator will issue one of two letters to the complainant: a closure letter or letter of finding (LOF).

- A closure letter summarizes the allegations and states that there was not a Title VI violation and that the case will be closed.

- A Letter of Finding (LOF) summarizes the allegations and provides an explanation of the corrective action taken.

If the complainant disagrees with ALM Hopewell Center's determination, the complainant may request reconsideration by submitting the request in writing to the Title VI investigator within seven (7) days after the date of the letter of closure or letter of finding, stating with specificity the basis for the reconsideration. ALM Hopewell Center will notify the complainant of the decision either to accept or reject the request for reconsideration within ten (10) days. In cases where reconsideration is granted, ALM Hopewell Center will issue a determination letter to the complainant upon completion of the reconsideration review.

A person may also file a complaint directly with the Federal Transit Administration, at the FTA Office of Civil Rights, East Building, 5<sup>th</sup> Floor - TCR 1200 New Jersey Avenue SE, Washington, DC 20590.

If information is needed in another language, contact ALM Hopewell Center at 4236 Lindell Blvd, Suite 200, St. Louis, MO 63108.

**E. Monitoring Title VI Complaints, Investigations, Lawsuits  
and Documenting Evidence of Agency Staff Title VI Training**

See sample Title VI Self-Survey Form  <b>ATTACHMENT 3</b>
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**Documenting Title VI Complaints/Investigations**

All Title VI complaints will be entered and tracked in ALM Hopewell Center’s complaint log. Active investigations will be monitored for timely response on the part of all parties. The agency’s Title VI Coordinator shall maintain the log.

During the reporting period, 2017 to 2021, ALM Hopewell Center had Title VI Complaints.

**Agency Title VI Complaint Log**

Date complaint filed	Complainant	Basis of complaint R-C-NO	Summary of allegation	Pending status of complaint	Actions taken	Closure Letter (CL)	Letter of Finding (LOF)	Date of CL or LOF
none	none	none	none	none	none	none	none	none

**Documenting Evidence of Agency Staff Title VI Training**

ALM Hopewell Center’s staff are given Title VI training, and agency can answer affirmatively to all the following questions:

1. Are new employees made aware of Title VI responsibilities pertaining to their specific duties? **Yes**
2. Do new employees receive this information via employee orientation? **Yes**
3. Is Title VI information provided to all employees and program applicants? **Yes**
4. Is Title VI information prominently displayed in the agency and on any program materials distributed, as necessary? **Displayed on vehicles/facilities**



## **F. Public Engagement Plan**

### **Goal**

The goal of the Public Engagement Plan is to have significant and ongoing public involvement, by all identified audiences, in the public participation process for major agency outreach efforts.

#### **Objectives**

- To understand the service area demographics and determine what non-English languages and other cultural barriers exist to public participation.
- To provide general notification of meetings and forums for public input, in a manner that is understandable to all populations in the area.
- To hold public meetings in locations that are accessible to all area stakeholders, including but not limited to minority and low income members of the community.
- To provide methods for two-way communication and information and input from populations which are less likely to attend meetings.
- To convey the information in various formats to reach all key stakeholder groups.

### **Identification of Stakeholders**

Stakeholders are those who are either directly or indirectly affected by an outreach effort, system or service plan or recommendations of that plan. Stakeholders include but are not limited to the following:

- Board of Directors – the governing board of the agency. The role of the Board is to establish policy and legislative direction for the agency. The Board defines the agency's mission, establishes goals, and approves then budget to accomplish the goals.
- Advisory Bodies – non-elected advisory bodies review current and proposed activities of the agency, and are encouraged to be active in the agency's public engagement process. Advisory bodies provide insight and feedback to the agency.
- Agency Transit riders and clients
- Minority and low income populations, including limited English proficient persons
- Local jurisdictions and other government stakeholders
- Private businesses and organizations
- Employers
- Partner agencies

## **Elements of the Public Engagement Plan**

It is necessary to establish a public participation plan that includes an outreach plan to engage minority and limited English proficient (LEP) populations.

Elements of the Public Engagement Plan include:

### **1. Public Notice**

- a. Official notification of intent to provide opportunity for members of the general public to participate in public engagement plan development, including participation in open Board/council meetings, and advisory committees.

### **2. Public Engagement Process/Outreach Efforts:**

- a. Public meetings: During food drives our staff conveys information including providing opportunities to participate
- b. Open houses: In our open houses, we invite the public to get to know our programs, including opportunities to discuss in an open forum
- c. Rider forums
- d. Rider outreach; at schools, churches
- e. Public hearings
- f. Focus groups: Staff reach out to various focus groups to discuss in a two-way communication, including seeking input from groups.
- g. Surveys
- h. Services for the Disabled (Notices of opportunities for public involvement include contact information for people needing these or other special accommodations.)

Events such as public meetings and/or open houses are held at schools, churches, libraries and other non-profit locations easily accessible to public transit and compliant with the Americans with Disabilities Act.

### **3. Public Comment**

- a. Formal public comment periods are used to solicit comments on major public involvement efforts around an agency service or system change.
- b. Comments are accepted through various means:
  - i. Dedicated email address. [Compliancehwc@hopewellcenter.com](mailto:Compliancehwc@hopewellcenter.com)
  - ii. Website. <https://hopewellcenter.com>
  - iii. Regular mail. 4236 Lindell Blvd, Suite 200, Saint Louis MO 63108
  - iv. Forms using survey tool for compilation.
  - v. Videotaping.
  - vi. Phone calls to Customer Service Center [314]531-1770 x2012

### **4. Response to Public Input**

All public comments are provided to the Board of Directors prior to decision making. A publicly available summary report is compiled, including all individual comments.

### **Title VI Outreach Best Practices**

ALM Hopewell Center ensures all outreach strategies, communications and public involvement efforts comply with Title VI. ALM Hopewell Center's Public Engagement Plan proactively initiates the public involvement process and makes concerted efforts to involve members of all social, economic, and ethnic groups in the public involvement process. Aligned with the above referenced communication tactics, ALM Hopewell Center provides the following:

- a. Public notices published in non-English publications (if available).
- b. Title VI non-discrimination notice on agency's website.
- c. Agency communication materials in languages other than English (subject to Safe Harbor parameters).
- d. Services for Limited English Proficient persons. Upon advance notice, translators may be provided.

### **2022 – 2024 Title VI Program Public Engagement Process**

ALM Hopewell Center will conduct a Public Engagement Process for the 2022-2024 Title VI Program. This process includes Community Meetings to seek input, provide education, and highlight key components of the Title VI Plan. Materials have been created to explain Title VI policies as well as provide education on how they relate to minority populations.

ALM Hopewell Center will provide briefings to the Board of Directors and Advisory Bodies.

ALM Hopewell Center will conduct a 30 day public comment period to provide opportunities for feedback on the 2022-2024 Title VI Program.

Comments are accepted during the public outreach period via:

- a. Email
- b. Mail
- c. Phone
- d. In person
- e. Survey tool (agency option)

### **Summary of 2019-2021 Public Outreach Efforts**

Public outreach through community meeting, food drives, including staff attending public meeting to seek input.

## G. Language Assistance Plan

### ALM Hopewell Center Limited English Proficiency Plan

This limited English Proficiency (LEP) Plan has been prepared to address ALM Hopewell Center's responsibilities as a recipient of federal financial assistance as they relate to the needs of individuals with limited language skills. The plan has been prepared in accordance with Title VI of the Civil Rights Act of 1964; Federal Transit Administration Circular 4702.1B, dated October 1, 2012, which states that the level and quality of transportation service is provided without regard to race, color, or national origin.

Executive order 13166, titled "Improving Access to Services for Persons with Limited English Proficiency," indicates that differing treatment based upon a person's inability to speak, read, write or understand English is a type of national origin discrimination. It directs each federal agency to publish guidance for its respective recipients clarifying their obligation to ensure that such discriminations do not take place. This order applies to all state and local agencies which receive federal funds.

#### Service Area Description:

ALM Hopewell Center provides services in DMH service area 24 which encompasses North St. Louis City and parts of Central St. Louis City. The catchment areas has a population of at least 90 percent identifying as speakers of English only, with at least 4 percent constituting of non-English speakers or do not speak English well. ALM Hopewell provides interpreter services through a contract with the International Institute.

ALM Hopewell Center has developed this LEP Plan to help identify reasonable steps for providing language assistance to persons with limited English proficiency who wish to access services provided by ALM Hopewell Center. As defined in Executive Order 13166, LEP persons are those who do not speak English as their primary language and have limited ability to read, speak, write or understand English. This plan outlines how to identify a person who may need language assistance, and the ways in which assistance may be provided.

In order to prepare this plan, ALM Hopewell Center undertook the **four-factor LEP analysis** which considers the following factors:

### Four Factor Analysis

**1. The number and proportion of LEP persons eligible to be served or likely to be encountered in the service area:**

A significant majority of people in the ALM Hopewell Center service area proficient in the English language. Based on 2020 5-Year American Community Survey data, 5 percent of the population five years of age and older speak English “less than very well” – a definition of limited English proficiency.

<b>LEP Population in ALM Hopewell Center___ Service Area</b>					
<b>Population 5 years and over by language spoken at home and ability to speak English</b>	<b>Service Area Sector [1]</b>	<b>Service Area Sector [1]</b>	<b>Service Area Sector [1]</b>	<b>Service Area Total</b>	<b>Percentage of Population 5 Years and Older</b>
<b>Population 5 Years and Over</b>	3,337				
Speak English “less than very well”	3,150				94%
<b>Spanish</b>	25				
Speak English “less than very well”	0				
<b>Other Indo-European</b>	11				
Speak English “less than very well”	0				
<b>Asian and Pacific Island</b>	0				
Speak English “less than very well”	0				
<b>All Other</b>	1				
Speak English “less than very well”	0				

**2. Frequency of Contact by LEP Persons with ALM Hopewell's Services:**

The ALM Hopewell staff reviewed the frequency with which office staff, dispatchers and drivers have, or could have, contact with LEP persons. To date, ALM Hopewell Center has, on average, 2 percent per month for an interpreter. ALM Hopewell Center averages 5 phone calls per month.

<b>LEP Staff Survey Form</b>	
ALM Hopewell Center is studying the language assistance needs of its riders so that we can better communicate with them if needed.	
<ol style="list-style-type: none"> <li>1. How often do you come into contact with passengers who do not speak English or have trouble understanding you when you speak English to them?  <div style="text-align: center;">DAILY   WEEKLY   MONTHLY   LESS THAN MONTHLY</div> </li> <li>2. What languages do these passengers speak?</li> <li>3. What languages (other than English) do you understand or speak?</li> <li>4. Would you be willing to serve as a translator when needed?</li> </ol>	

<b>Frequency of Contact with LEP Persons</b>	
<b>Frequency</b>	<b>Language Spoken by LEP Persons</b>
Daily	<b>0</b>
Weekly	<b>1</b>
Monthly	<b>5</b>
Less frequently than monthly	Click or tap here to enter text.

**3. The importance of programs, activities or services provided by ALM Hopewell Center to LEP persons:**

Outreach activities, summarized in ALM Hopewell Center's Title VI Public Engagement Plan, include events such as public meetings and/or open houses held at schools, churches, libraries and other non-profit locations, and include specific outreach to LEP persons to gain understanding of the needs of the LEP population, and the manner (if at all) needs are addressed.

<b>Outside Organization LEP Survey</b>	
Organization: ALM Hopewell Center	
<ol style="list-style-type: none"> <li>1. What language assistance needs are encountered?</li> <li>2. What languages are spoken by persons with language assistance needs?</li> <li>3. What language assistance efforts are you undertaking to assist persons with language assistance needs?</li> <li>4. When necessary, can we use these services?</li> </ol>	

**4. The resources available to ALM Hopewell Center and overall cost to provide LEP assistance:**

Strategies for Engaging Individuals with Limited English Proficiency include:

1. Language line. Upon advance notice, translators can be provided.
2. Language identification flashcards.
3. Written translations of vital documents (identified via safe harbor provision)
4. One-on-one assistance through outreach efforts.
5. Website information.
6. To the extent feasible, assign bilingual staff for community events, public hearings and Board of Directors meetings and on the customer service phone lines.

*As applicable:* Based on our demographic analysis (Factor 1) ALM Hopewell Center has determined that no language group(s) within its service area meets Safe Harbor criteria requiring written translated “vital documents” by language group(s).

ALM Hopewell Center will provide assistance and direction to LEP persons who request assistance.

### **Staff LEP Training**

The following training will be provided to ALM Hopewell Center staff:

1. Information on ALM Hopewell Center Title VI Procedures and LEP responsibilities.
2. Description of language assistance services offered to the public.
3. Use of Language Identification Flashcards.
4. Documentation of language assistance requests.

### **Monitoring and Updating the LEP Plan**

The LEP Plan is a component of ALM Hopewell Center’s Title VI Plan requirement.

ALM Hopewell Center will update the LEP plan as required. At minimum, the plan will be reviewed and updated when it is clear that higher concentrations of LEP individuals are present in the ALM Hopewell Center service area. Updates include the following:

1. How the needs of LEP persons have been addressed.
2. Determine the current LEP population in the service area.
3. Determine as to whether the need for, and/or extent of, translation services has changed.
4. Determine whether local language assistance programs have been effective and sufficient to meet the needs.
5. Determine whether ALM Hopewell Center’s financial resources are sufficient to fund language assistance resources as needed.
6. Determine whether ALM Hopewell Centers has fully complied with the goals of this LEP Plan.
7. Determine whether complaints have been received concerning ALM Hopewell Center’s failure to meet the needs of LEP individual.

## H. Advisory Bodies

Table Depicting Membership of Committees, Councils, By Race

Committee [examples]	Caucasian	Latino	African American	Asian American		Total
Population Committee	1		16			100%
Access Committee	1		16			100%
Citizens Advisory Council	1		16			100%

### Description of efforts made to encourage minority participation on committees:

- Sending invitation to participate
- Staff members encouraging participation
- Reaching out to minorities groups



## **I. Subrecipient Assistance**

### **Subrecipient Assistance**

#### **OPTION A**

ALM Hopewell Center does not have any subrecipients.

#### **OPTION B**

Primary recipients should provide subrecipients:

- Sample public notices, Title VI complaint procedures, and the recipient's Title VI complaint form.
- Sample procedures for tracking and investigating Title VI complaints filed with a subrecipient.
- Direction regarding obtaining demographic information of population served by subrecipients.
- Technical assistance.
- Reviews of Title VI Programs; follow-up as necessary.

## **J. Subrecipient Monitoring**

### **Subrecipient Monitoring**

#### **OPTION A**

ALM Hopewell Center does not have any subrecipients.

#### **OPTION B**

Primary recipients must monitor subrecipients.

- Non-compliant subrecipient means primary recipient is also non-compliant.

Primary recipients shall:

- Document process for ensuring all subrecipients are complying with the general and specific requirements.
- Collect and review subrecipients' Title VI Programs.
- At MoDOT's request, the primary recipient shall request that subrecipients who provide transportation services verify that their level and quality of service is equitably provided.

## K. Equity Analysis of Facilities

### OPTION A

ALM Hopewell Center has not constructed any storage facilities, maintenance facilities, or operations centers in the last three years.

### OPTION B

Click or tap here to enter text. has constructed a new Choose an item. in the last three years. The new construction was analyzed through the NEPA process through an EA/EIS, which is attached.

### OPTION C

Click or tap here to enter text. has constructed a new Choose an item. in the last three years. The project was granted a CE in the NEPA process, so a Title VI facility equity analysis was conducted, which is attached.

### OPTION D

Click or tap here to enter text. has constructed a new Choose an item. in the last three years. There were no federal funds and thus no NEPA. Click or tap here to enter text. conducted a Title VI facility equity analysis, which is attached.

#### **Equity Analysis Guidance**

*Refer to FTA Title VI Circular 4702.1B Chapter III, section 13.*

#### **Demographic data and mapping**

*Guidance may be obtained from either a Regional Planning Commission or Metropolitan Planning Organization.*

**L. System-Wide Service Standards and Policies\***

*\*applies to all fixed route providers (including those that do not meet volume threshold)*

**Template for System-Wide Service Standards (1. 2. 3. 4.)  
is presented in detail  
in FTA Circular 4702.1B Appendix G.**

**Template for System-Wide Service Policies (1. 2.)  
is presented in detail  
in FTA Circular 4702.1b Appendix H.**

**NOTE: Template for Major Service Change and Impact Policies  
is located at O. Service and Fare Equity Analysis.**

**M. Requirement to Collect and Report Demographic Data\***

***\*applies to providers that operate 50 or more fixed route transit vehicles in peak service; and  
200,000+ population.***

**Template for Demographic Profile and Travel Patterns  
is presented in detail  
in FTA Circular 4702.1B Appendix I.**

**N. Requirement to Monitor Transit Service\***

***\*applies to providers that operate 50 or more fixed route transit vehicles in peak service; and  
200,000+ population.***

**Template for Demographic Profile and Travel Patterns  
is presented in detail  
in FTA Circular 4702.1B Appendix J.**

## O. Service and Fare Equity Analysis\*

***\*applies to providers that operate 50 or more fixed route transit vehicles in peak service; and 200,000+ population.***

### Major Service Change and Impact Policies

The Board of Directors of ALM Hopewell Center has established formal hearing procedures for the adoption of major changes in transit routes.

A major change in route includes the addition or elimination of a route within ALM Hopewell Center's transit system, **increasing or decreasing the number of service hours operated on a route by 25% or more, or routing changes that alter 25% or more of a route's path.** Minor changes to an existing route shall not constitute a "major change in route".

A service change that is deemed a "Major Service Change" based on the description above would require a Title VI analysis.

Service changes that are deemed as a "Major Service Change" will also be required to have disparate impact analysis and disproportionate burden analysis done.

The ALM Hopewell Center Title VI Program includes disparate impact and disproportionate burden policies.

### ALM Hopewell Center's Disparate Impact and Disproportionate Burden Policy

Adverse Effects: Major Service Change proposals and all fare change proposals shall be analyzed to measure and compare the level of adverse effect (loss) or benefit (gain) between minority and non-minority populations and between low-income and non-low-income populations as determined by demographic analysis of proposed changes and U.S. Census data and transit rider data.

What is Fair?: Determination of adverse impact is based on the federal standard described in Uniform Guidelines published by the Equal Employment Opportunity Commission (EEOC) known as the "four-fifths" rule. This standard requires benefits to accrue to protected populations at a rate at least four fifths (4/5) (or eighty percent) of the rate of unprotected populations. Likewise, adverse effects must be borne by unprotected populations at a rate at least four fifths (4/5) (or eighty percent) of the rate for protected populations.

Stated another way, the maximum acceptable difference (positive or negative) in level of benefit between protected and unprotected populations is [20%]. For changes in transit service or transit fare rates, this standard applies as follows for minority and low-income populations.

Disparate impact on minority populations: If the impact of a major service change proposal or any fare change proposal requires a minority population to receive benefits [twenty percent (20%)] less or to bear adverse effects [twenty percent (20%)] more than those benefits or adverse effects received or borne by the non-minority population, that impact will be considered a disparate impact.

Disproportionate burden on low income populations: If the impact of a major service change proposal or any fare change proposal requires a low-income population to receive benefits [twenty percent (20%)] less or to bear adverse effects [twenty percent (20%)] more than those benefits or adverse effects received or borne by the non-low-income population, that impact will be considered a disparate impact.

**Template for Service and Fare Equity Analysis  
is presented in detail  
in FTA Circular 4702.1B Appendix K.**



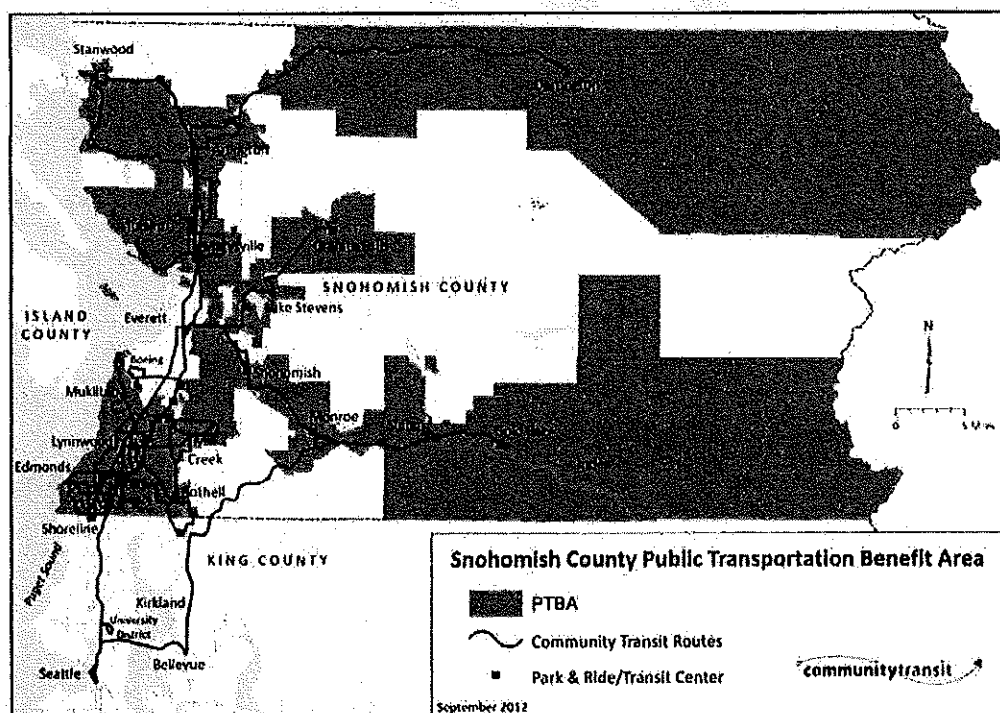
## Attachment 1

### Agency Information

Community Transit is a special purpose municipal corporation providing public transportation services. Snohomish County voters created Community Transit in 1976 when they approved a sales tax to support a public transportation benefit area authority which now encompasses most of urbanized Snohomish County excluding the City of Everett, Washington.

Community Transit began operations on October 4, 1976. Community Transit's original service area consisted of the communities of Edmonds, Lynnwood, Marysville, Mountlake Terrace, Brier, Snohomish, and Woodway. Subsequent annexations added Lake Stevens, Monroe, Granite Falls, Mukilteo, Stanwood, Sultan, Arlington, Gold Bar, Index, Darrington, Mill Creek, the Snohomish County portion of Bothell, Silver Firs and the Tulalip Indian Reservation to the service area.

Community Transit now serves 524,954 residents [SOURCE \_\_\_\_\_], about 73 percent of Snohomish County's population. The remainder of the county's population resides in the City of Everett and in less populated areas of north and east Snohomish County.



Community Transit's governing body is a Board of Directors consisting of nine voting members as follows: two members of the Snohomish County Council, two elected officials from cities Community Transit serves with populations 30,000 or more, three elected officials from cities Community Transit serves with populations between 10,000 and 30,000, and two elected officials from cities Community Transit serves with populations of less than 10,000. Terms of office are as follows: \_\_\_\_\_.

**Attachment 2**

**ALM Hopewell Center TITLE VI/ADA COMPLAINT FORM**

“No person in the United States shall, on the basis 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.”

If you feel that you have been discriminated against in the provision of transportation services, please provide the following information to assist us in processing your complaint. Should you require any assistance in completing this form or need information in alternate formats, please let us know.

Please mail or return this form to:

Teresa Brandon  
4236 Lindell Blvd, Suite 200  
St. Louis, MO 63108  
(314) 531-1770 x 2012

PLEASE PRINT

<b>1. Complainant's Name:</b>		
a. Address:		
b. City:	State:	Zip Code:
c. Telephone (include area code): Home ( ) or Cell ( )		Work
( ) -		( ) -
d. Electronic mail (e-mail) address:		
Do you prefer to be contacted by this e-mail address? ( ) YES ( ) NO		
2. Accessible Format of Form Needed? ( ) YES specify: _____ ( ) NO		
3. Are you filing this complaint on your own behalf? ( ) YES If YES, please go to question 7. ( ) NO If no, please go to question 4		
4. If you answered NO to question 3 above, please provide your name and address.		
a. Name of Person Filing Complaint:		
b. Address:		
c. City:	State:	Zipcode:
d. Telephone (include area code): Home ( ) or Cell ( )		Work
( ) -		( ) -
e. Electronic mail (e-mail) address:		
Do you prefer to be contacted by this e-mail address? ( ) YES ( ) NO		
5. What is your relationship to the person for whom you are filing the complaint?		
6. Please confirm that you have obtained the permission of the aggrieved party if you are filing on behalf of a third party. ( ) YES, I have permission. ( ) NO, I do not have permission.		
7. I believe that the discrimination I experienced was based on (check all that apply):		
( ) Race ( ) Color ( ) National Origin (classes protected by Title VI)		
( ) Disability (class protected by ADA)		
( ) Other (please specify)		

continued

TITLE VI COMPLAINT FORM – PAGE 2

8. Date of Alleged Discrimination (Month, Day, Year):		
9. Where did the Alleged Discrimination take place?		
10. Explain as clearly as possible what happened and why you believe that you were discriminated against. Describe all of the persons that were involved. Include the name and contact information of the person(s) who discriminated against you (if known). <i>Use the back of this form or separate pages if additional space is required.</i>		
11. Please list any and all witnesses' names and phone numbers/contact information. <i>Use the back of this form or separate pages if additional space is required.</i>		
12. What type of corrective action would you like to see taken?		
13. Have you filed a complaint with any other Federal, State, or local agency, or with any Federal or State court? ( ) YES If yes, check all that apply. ( ) NO a. ( ) Federal Agency (List agency's name) b. ( ) Federal Court (Please provide location) c. ( ) State Court d. ( ) State Agency (Specify Agency) e. ( ) County Court (Specify Court and County) f. ( ) Local Agency (Specify Agency)		
14. If YES to question 14 above, please provide information about a contact person at the agency/court where the complaint was filed.		
Name:	Title:	
Agency:	Telephone: ( ) -	
Address:		
City:	State:	Zip Code:

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

Signature and date is required:

\_\_\_\_\_  
Signature

\_\_\_\_\_  
Date

If you completed Questions 4, 5 and 6, your signature and date is required:

\_\_\_\_\_  
Signature

\_\_\_\_\_  
Date