



State of Minnesota
Department of Transportation

Office of Transit and Active Transportation
Title VI Program: FTA

April 2018

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Minnesota Department of Transportation
Title VI Program – FTA
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The following Title VI Program is prepared as required by Title 49 CFR Section 21.9(b) and FTA Circular 4702.1B. Chapters III and V of the Circular provide guidance for its contents. This Program applies to Title VI responsibilities in rural areas outside of the eight designated metropolitan areas in Minnesota (Minneapolis-St. Paul; Duluth; East Grand Forks; La Crescent; Mankato; Moorhead; Rochester; St. Cloud).

GENERAL REQUIREMENTS OF ALL RECIPIENTS

1. Copy of Recipient's Title VI Notice to the Public

Requirement: 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.

MnDOT's *Public Notice of Rights Under Title VI* is attached as **Appendix A**. The notice is posted within public entrances at the information centers in the MnDOT Central Office and district office locations throughout the state. It can also be found on MnDOT's public website, located here: <http://www.dot.state.mn.us/civilrights/titlevi.html>.

2. Instructions to Public on How to File a Complaint and Complaint Form

Requirement: 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.

MnDOT's Title VI discrimination complaint procedures and a copy of the *Title VI and Other Discrimination Complaint Form* are attached as **Appendix B**.

3. List of Public Transportation-Related Title VI Investigations, Complaints, or Lawsuits

Requirement: A list of any public transportation-related Title VI investigations, complaints, or lawsuits filed with the recipient since the time of the last submission. 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.

MnDOT has had no complaints in which MnDOT is named as the respondent, has not been required to conduct any investigations into complaints in which MnDOT was named as the respondent, nor been party to any lawsuit pertaining to allegations of discrimination on the basis of race, color, and/or national origin in transit-related activities in the past three years.

MnDOT has been notified of one complaint of alleged discrimination on the basis of race, color, and/or national origin against a rural public transit system in 2017. This sub-recipient complaint has been investigated and closed by the sub-recipient transit line.

See **Appendix C** for a list all public transportation-related Title VI investigations, complaints, or lawsuits since the last submission.

4. Public Participation Plan

Requirement: 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.

Public Participation Method

MnDOT utilizes a model for public participation based upon the *International Association for Public Participation* that identifies a five-pronged approach to public involvement. Each project or plan determines which approach is most appropriate for the stakeholders and outcome of the project. The five prongs are outlined below.

1-Informing: MnDOT informs by providing the public with balanced and objective information to assist the public in understanding the problem, alternatives, opportunities and/or solutions. MnDOT's promise to the public is to keep the public informed. Example techniques are using fact sheets, websites and open houses.

2-Consulting: MnDOT consults by obtaining public feedback on analyses, alternatives and/or decisions. MnDOT's promise to the public is to keep the public informed, listen to and acknowledge concerns and aspirations, and provide feedback on how public input influenced the decision. Example techniques are public comment sessions, focus groups, surveys and public meetings.

3-Involving (this was used in the development of the Greater Minnesota Transit Investment Plan): MnDOT involves by working directly with the public throughout the process to ensure that public concerns and aspirations are consistently understood and considered. MnDOT's promise to the public is to work with the public to ensure that their concerns and aspirations are directly reflected in the alternatives developed and provide feedback on how public input influenced the decision. Example techniques are workshops and deliberative polling.

4-Collaborating: MnDOT collaborates by partnering with the public in each aspect of the decision, including the development of alternatives and the identification of the preferred solution. MnDOT's promise to the public is to look to the public for advice and innovation in formulating solutions and incorporating the public's advice and recommendations into the decisions to the maximum extent possible. Example techniques are citizen advisory committees, consensus building and participatory decision-making.

5-Empowering: MnDOT empowers through placing final decision-making in the hands of the public. MnDOT’s promise to the public is to implement what the public decides. Example techniques are citizen juries, ballots, and delegated decision-making.

**adapted from [International Association for Public Participation](#), ©2007*

Tailored Public Participation Outreach

In 2011, MnDOT developed a Collaborative Vision for all planning efforts known as “[Minnesota Go](#)”. MnDOT’s vision is that the multimodal transportation system maximizes the health of the people, the environment and our economy. Through the vision, MnDOT has elevated the role of public participation in its modal plans. Recent guidance has directed MnDOT Offices to develop individualized public outreach plans, which, in addition to meeting the requirements for Public Participation Plans, allows MnDOT to target specific hard-to-reach populations which may inadvertently be omitted from the planning process without additional efforts. It also allows MnDOT to tailor the outreach efforts to the scope and the breadth of the plan that is being developed.

An example of individualized public outreach efforts is the [Public Participation Plan](#) developed for the 20-year Greater Minnesota Transit Investment Plan (GMTIP) 2017-2037. Individualized Public Participation Plans were also developed for the Statewide Multimodal Transportation Plan and the Minnesota State Highway Investment Plan and are [available online](#).

MnDOT believes that the results that were gathered through the GMTIP were particularly useful in providing access to minority and LEP populations as demonstrated in the Results section below. MnDOT hired a consultant team to lead the public outreach and engagement efforts for the GMTIP. Gathering input from minority populations and communities was a key element of the plan. Building on lessons learned from previous projects, MnDOT’s approach was to connect with community organizations and leaders to better understand the unique opportunities in each community. MnDOT communication staff had previously developed a list of key contacts and community leaders who could assist MnDOT. The consultant team’s first task was to contact the organizations to schedule meetings; however, the contact list proved to be outdated and not representative of communities in Greater Minnesota. Understanding that the planned approach to connect with communities would not be successful, Office of Transit and Active Transportation planners made several changes and shifted to a smaller, more targeted approach to connect with minority communities. Specifically, planners coordinated with local human service organizations to develop web-based and paper surveys for specific communities such as older Hmong adults who live in an assisted living center.

Although the number of respondents from minority populations was smaller than projected in the beginning planning stages, the information gathered from the sampled minority communities is significant as it confirms the messages and priorities of all communities, including longer transit service hours and connecting to larger communities for shopping and medical needs.

Results of the 2017 Greater Minnesota Transit Investment Plan Public Participation and Stakeholder Engagement Processes

The following information highlights applicable sections from GMTIP’s full [Public Participation Plan](#) (see [Chapter 5](#) of the GMTIP for community input highlights).

Public transportation serves the public. Gathering input from existing and potential riders ensures that transit meets what the community wants. Understanding customer expectations and creating service to match those needs will increase ridership. Outreach to gather input from existing and potential riders was comprehensive and took several forms, totaling 6,378 responses outlined in detail below.

Table 1: Summary of Outreach Participants

Survey Instrument	Total Responses
Onboard Survey	5,297
Online Community Survey	341
Wikimapping Tool	341
Hard to Reach Population Survey	399
Total	6,378

On-Board Survey with Existing Transit Riders

MnDOT distributed surveys to transit providers operating across Greater Minnesota. The surveys were administered on board transit vehicles to users of more than 40 systems across the state, from rural dial-a-ride services to large fixed-route systems in urbanized cities. Riders responded to questions related to transit use, including mode of access, frequency of use, trip purpose and desired improvements. Surveys were distributed during one calendar week, with most systems conducting their surveys during the week of Nov. 2, 2015. Participants were assisted in a variety of ways including: bus drivers helping to fill out forms for those requiring help writing, working with caretakers to facilitate completion in group homes, and sending forms home with children to receive help from a parent or guardian.

Full report available in: [GMTIP Technical Memo #10: Transit User Preferences and Travel Patterns](#)

Online Survey Gathering Priorities for Transit and Travel Behavior

The online survey included two components: (1) a needs assessment asking about travel patterns and why transit is or is not a good option, and (2) a game-like component that asked people to prioritize transit service improvements based on cost and potential community benefits. A planning game—titled “Design Your Own Transit System”—used a game interface to identify service priorities by asking people to select transit service improvement strategies from a variety of choices.

To reach out to populations typically underrepresented in community engagement, the survey was translated into Somali, Hmong and Spanish, as well as into an ADA-compatible format. One response was received for the non-English survey and seven responses were received for the ADA-compatible survey. MnDOT promoted the survey via social media and purchased additional advertising on Facebook. A total of 341 responses were collected for this exercise.

Full report available in: [GMTIP Technical Memo #11: Non-User Service Priorities](#)

Origin and Destination Survey to Understand Common Trip Patterns

An interactive online mapping tool was developed to better understand travel patterns of current transit users and non-transit users. Information collected through this tool can help quantify the need for public

transportation within and across communities. Analyzing destinations and travel patterns helps transit agencies and communities identify where additional or enhanced transit service is desired and where there is a need for further study and outreach on existing service.

Full report available in: [GMTIP Technical Memo #12: Existing and Desired Travel Patterns](#)

“Hard to Reach” Survey Targeted at Traditionally Underrepresented Demographics or Communities

MnDOT placed a high priority on connecting with and receiving input from a diverse set of Minnesota residents, including seniors, low-income populations, persons with housing instability, individuals with disabilities, veterans and New Americans. Collectively, outreach to these “hard to reach” population groups was conducted with paper surveys (since internet access is often limited for certain population groups), in-person presentations and stakeholder discussions.

MnDOT developed a paper survey with pre-paid postage to provide an alternative opportunity to participate in the GMTIP update for populations with limited internet access and/or computer skills. Several human service organizations across Greater Minnesota were contacted directly to assist in distributing the paper survey. These project partners were asked to give the surveys to clients during appointments, at meetings and at each organization’s front desk.

MnDOT also developed an online version of the survey as another way to collect information, particularly with college students. The survey link was shared with the organizations and through email and social media outlets.

Full report available in: [GMTIP Technical Memo: Hard to Reach Populations Survey](#)

Consultation with Resource Agencies

As part of the planning effort, the project team consulted with resource agencies to provide information and hold discussions with agencies that will be impacted by the GMTIP. Specifically, presentations and topic conversations were held through the planning process as part of the [Minnesota Council on Transportation Access \(MCOTA\)](#). MCOTA was established by the Minnesota Legislature in 2010 to “study, evaluate, oversee and make recommendations to improve the coordination, availability, accessibility, efficiency, cost-effectiveness, and safety of transportation services provided to the transit public.”

Members of MCOTA included:

- Minnesota Department of Employment and Economic Development
- Metropolitan Council
- Minnesota Department of Human Resources – Board on Aging
- Minnesota Council on Disabilities
- Minnesota Department of Veterans Affairs
- Minnesota Department of Health
- Minnesota Public Transit Association
- Minnesota Department of Education

Traditional Transportation Partners

Throughout the planning process, the project leaders worked and collaborated with different stakeholder groups and organizations. The goal of the public engagement was to bring information to groups early

and often in the process. Project leaders presented on plan components at regularly scheduled meetings with key organizations including the Metropolitan Planning Organizations, regional development organizations and the area transportation partners. Project leads also conducted a series of webinars with the public transit providers on the results of the public outreach campaign, performance standards, investment priorities and the strategies.

Tribal Governments

There are 12 federally recognized tribes in Minnesota. Each tribe is a separate sovereign nation and has an independent relationship with the United States and the State of Minnesota. This unique relationship is recognized in federal requirements, [Governor's Executive Order 13-10](#), and MnDOT Policy AD005, *Minnesota Tribal Nations Government-to-Government relationship with MnDOT: Providing for Consultation, Coordination and Cooperation*.

Federal requirements note that plans should be developed in consultation with tribal governments. Consultation is defined as “one or more parties confer with the other identified parties in accordance with an established process and, prior to taking action(s), considers the views of the other parties and periodically informs them of action(s) taken.” See [23 CFR 450.104](#). The Governor’s Executive Order notes that state agencies will work directly with tribes when developing or implementing policies or programs that directly affect Indian tribes and their members.

MnDOT’s Office of Transit and Active Transportation worked with multiple tribal nations throughout the planning process. Staff received input on the plan from tribal leaders through guided discussions. Staff also met with and worked with three tribes in Greater Minnesota. During these events, staff used a participatory mapping exercise to understand the regional travel demand of tribal members in addition to distributing the “hard to reach” paper survey. The purpose was to involve the tribal community in the planning process and understand the unique needs of the tribal members.

In summary:

- Staff met with Grand Portage Tribe planning staff and presented highlights of the planning process. Approximately 50 Elderly Nutrition Program staff at Grand Portage completed the paper survey in spring 2016.
- Staff participated in the Mille Lacs Tribe Band meeting in fall 2015. Approximately 200 tribal members attended the meeting. The GMTIP was briefly presented followed by two exercises to gather input from the tribal members. First, a participatory mapping exercise was held, where participants used dots on tabletop maps to identify their regional travel destinations. This helped MnDOT understand that people were crossing boundaries to access other trade centers. Second, the staff distributed and collected the “hard to reach” paper survey.
- Staff participated in Winterfest on the Leech Lake Reservation in 2016. Approximately 250 people attended the community event. Staff used the regional mapping exercise to capture travel destinations and the “hard to reach” paper survey for priorities.

Environmental Justice

Throughout the planning process, MnDOT staff collected demographic data to identify minority populations, low-income populations and those with limited English proficiency in order to ensure minority populations are not disproportionately and adversely affected. A full demographic analysis of minority populations including other “vulnerable populations” was developed and documented in [GMTIP](#)

[Technical Memo #3: Environmental Justice Analysis](#). The primary tool for collecting input was through the following surveys:

- The On-Board Survey: Results showed a higher number of minority populations ride transit in Greater Minnesota. Specifically, minority populations are over-represented in ridership compared with local community demographics. A full report of the on-board survey results is available in the [GMTIP Technical Memo #10: Transit User Preferences and Travel Patterns](#).
- The “Hard to Reach” Population Survey: MnDOT understood that access to internet and the ability to complete the online engagement tools was a barrier to collecting information. MnDOT distributed a paper survey through human service organizations and in three tribal communities. Results of the survey showed that participants were older, an average of age 65; reported higher percentages of disabilities; and had less access to a vehicle. The full analysis is available in the [GMTIP Technical Memo: Hard to Reach Populations Survey](#).

5. Language Assistance Plan for Persons with Limited English Proficiency

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

The FFY 2018 Title VI Implementation Plan that was submitted to FHWA is attached as **Appendix E**. Pages 19 through 28 of Appendix E contains information about MnDOT’s LEP Commitment and the required Four Factor Analysis.

6. Transit-Related Non-Elected Boards, Councils and Committees

Requirement: 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.

MnDOT’s Office of Transit and Active Transportation has established two 10-person standing advisory committees: the Greater Minnesota Public Transit Advisory Committee and the Minnesota Rural Transit Assistance Program (RTAP) Advisory Committee. MnDOT selects committee members from non-elected transportation provider officials in Greater Minnesota. Members are selected based on the location, size, nature of the transit system service, and willingness to serve. While each official is expected to represent all persons in their community, including low-income and minority populations, the current racial makeup is 100% White.

MnDOT is exploring ways to increase racial diversity on these committees, especially as rural transit users in Minnesota become more racially diverse.

MnDOT also organizes ad-hoc selection committees to evaluate applications for funding of the Enhanced Mobility of Seniors and Individuals with Disabilities (Section 5310) Program. Membership is chosen from interested parties, including MnDOT staff, who are knowledgeable about transit program goals and who understand and are dedicated to the needs of the individuals served. The one African American member of this committee is from the MnDOT Office of Transit and Active Transportation.

Table 2: Racial Breakdown of Committees, Councils, and Boards CY 2017

Body	Caucasian	Hispanic/ Latino	African American	Asian American	Native American
Greater Minnesota Public Transit Advisory Committee	100%	0%	0%	0%	0%
Minnesota RTAP Advisory Committee	100%	0%	0%	0%	0%
2017 Enhanced Mobility of Seniors and Individuals with Disabilities Statewide Project Selection Committee	90%	0%	10%	0%	0%

7. Description of Sub-Recipient Oversight

Requirement: Primary recipients shall include a narrative or description of efforts the primary recipient uses to ensure sub-recipients are complying with Title VI, as well as a schedule of sub-recipient Title VI program submissions.

Through annual grant agreements, sub-recipients agree to comply with all applicable civil rights statutes and regulations. These include Title VI of the Civil Rights Act, the Equal Employment Opportunity Act, and the Americans with Disabilities Act. Each sub-recipient must have a signed DOT Title VI Assurance and FTA Civil Rights Assurance on file with MnDOT prior to signing any funding agreement.

Sub-recipients review their Title VI plans annually and submit them electronically with their annual management plan applications for funding. MnDOT monitors the annual submissions for changes from previous plans and provides comments, as applicable.

MnDOT routinely monitors compliance with Title VI during annual on-site visits with rural transit systems that receive operating and capital assistance. The Annual Checklist used during the monitoring visits includes information on the following items:

- Public Notification:** Sub-recipients are instructed to notify the public of their rights under Title VI. Notification takes place through notices posted in vehicles and in transit facilities, in printed publicity materials, and on websites. District Transit Project Managers verify the presence of public notification on the Annual Checklist.
- Complaint Monitoring:** MnDOT’s compliance with Title VI also takes place through monitoring of any complaints that have been made to the sub-recipient, or in some cases, to the MnDOT Office of Civil Rights. When a complaint is deemed a civil rights issue it is referred to the MnDOT Title VI Coordinator.
- LEP Plans:** Each sub-recipient is required to develop a Language Assistance Plan appropriate to the area where the transit system operates. The Language Assistance Plan describes the measures the sub-recipient uses or could use to address the needs of the LEP persons, consistent with the guidance set forth by USDOT.

MnDOT’s sub-recipients are most likely to have direct contact with LEP persons as they deliver transit-related services in Greater Minnesota. MnDOT has assisted each of the sub-recipients with

the Four Factor Analysis, based on the 2010 census, to determine the individual level of language assistance that could be needed in each sub-recipient service area. MnDOT also helps sub-recipients update census tracts and language data. Copies of all sub-recipients LEP plans are on file at the MnDOT Central Office.

- **Public Participation and Outreach:** MnDOT Transit Project Managers are located in the MnDOT Districts throughout the state and discuss opportunities for public participation and outreach with local providers during the review of the Annual Checklist. Most transit systems have Transportation Advisory Committees (TACs) consisting of seniors, individuals with disabilities, general users, and organizations working with people who are transit dependent. County committees and city councils also address transit issues periodically.

MnDOT ensures that each sub-recipient has written and submitted a Title VI Plan. MnDOT reviews each plan for completeness and advises sub-recipients when changes are needed. MnDOT also provided Title VI training to sub-recipients at each annual spring workshop from 2013 through 2017.

MnDOT continues to monitor the Title VI and Limited English Proficiency Plans of Metropolitan Planning Organizations that receive planning assistance through MnDOT, which are updated every three years. The updated plans are on file at the MnDOT Central Office.

8. Facility Construction – Title VI Equity Analysis

Requirement: 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.

MnDOT has not constructed a facility; however, MnDOT provided funds to one sub-recipient that is in the process of constructing an administrative facility in a rural agricultural area. The facility is to be constructed on the same land as the existing transit facility building in a rural area that has no impact on any population, therefore a Title VI equity analysis was not conducted.

REQUIREMENTS FOR STATE DEPARTMENTS OF TRANSPORTATION

9. Demographic Profile of State

Requirement: A demographic profile of the State that includes identification of the locations of minority populations in the aggregate.

Table 3: Minority Populations in the Aggregate

Geography	Total Population	White Alone	Black Alone	Hispanic/Latino	Asian Alone	American Indian/Alaska Native	Native Hawaiian/Pacific Islander	Other Alone	Two or More
United States	311,536,594	63.3%	12.2%	16.6%	4.8%	0.7%	0.2%	0.2%	2.1%
Minnesota	5,347,740	82.6%	5.1%	4.8%	4.1%	1%	0%	0.1%	2.2%
Greater Minnesota	2,458,193	90.6%	1.5%	3.5%	1.3%	1.5%	0%	0.1%	1.5%

Source: ACS 5-YR. Estimates 2013

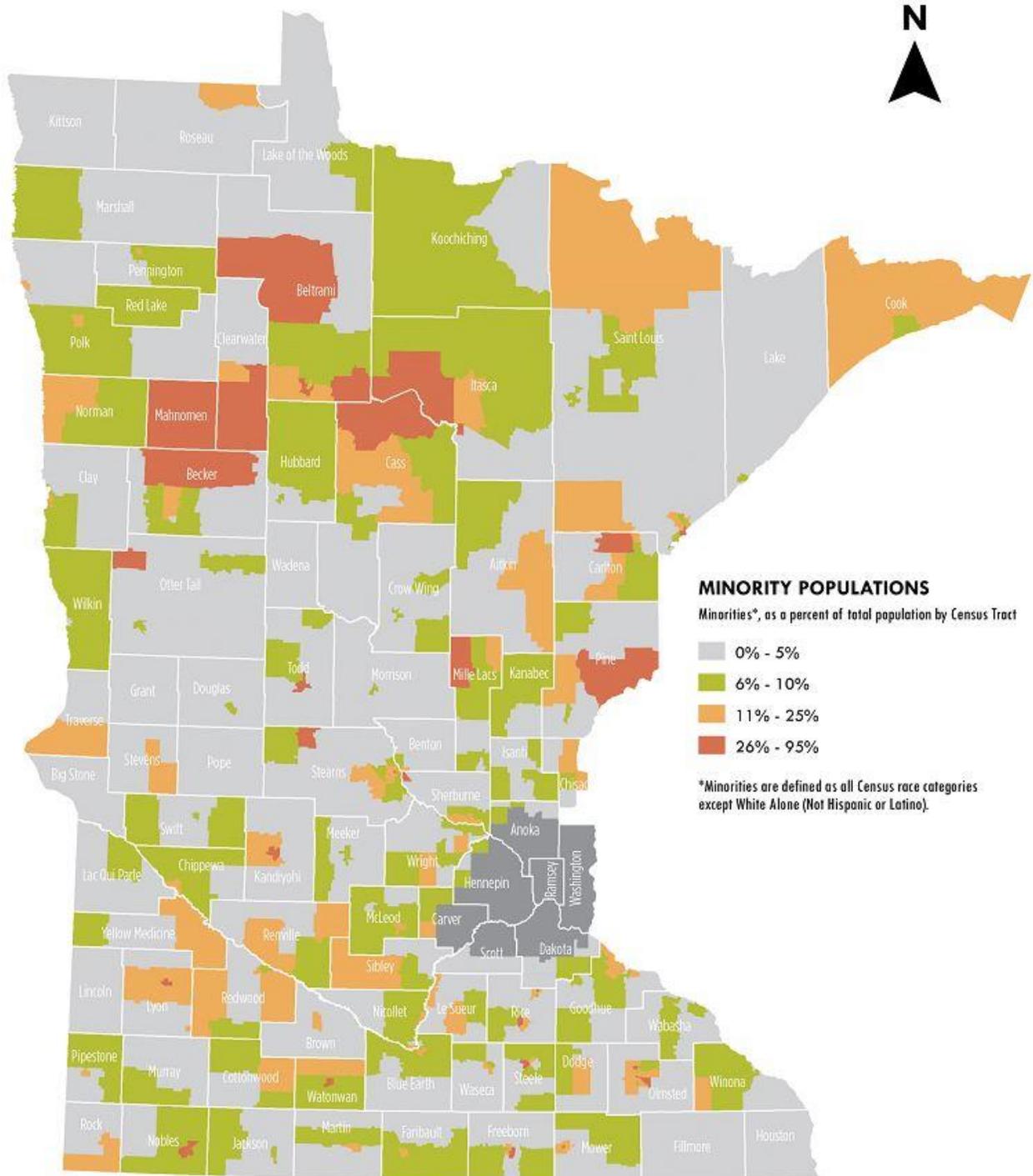
10. Demographic Maps of Percent Minority/Non-Minority Populations and Analysis of the Impact of the Distribution of Funding

Requirement: Demographic maps that overlay the percent minority and non-minority populations as identified by Census or American Community Survey data at census tract or block group level, and charts that analyze the impacts of the distribution of State and Federal funds in the aggregate for public transportation purposes, including Federal funds managed by the State as a designated recipient.

The information for this requirement is from the Greater Minnesota Transit Investment Plan (GMTIP). The GMTIP was most recently updated in June 2017.

Statewide: Minority Populations in Greater Minnesota

Figure 1: Minority Populations in Greater Minnesota (does not include Twin Cities Metropolitan Area)



Districts: Minority Population Maps in Greater Minnesota

The following information highlights applicable sections of [GMTIP Technical Memo #3 – Environmental Justice Analysis](#). For this analysis, minority populations are defined as all Census race categories except White Alone (Not Hispanic or Latino).

To view each district's minority population map, see the figures in **Appendix D**. Below is an overview of the data within the maps.

District 1: Minority populations above 10% are dispersed across the district. Areas with the highest shares of minority populations (above 25%) include northern Carlton County, central Pine County and central Duluth. Central Pine County and central Duluth register as areas with moderate transit dependency. See *Figure 1 in Appendix D*.

District 2: The eastern half of District 2, which includes Beltrami, Cass, Clearwater and Itasca Counties, contains census tracts that demonstrate high shares of minority populations (above 25%). These tracts, which register as areas with moderate transit dependency, generally correspond to the locations of tribal lands. See *Figure 2 in Appendix D*.

District 3: Contains areas with high shares of minority populations in rural areas such as northwestern Mille Lacs County and central Todd County in addition to clusters of moderate to high shares of minority populations in and around the City of Saint Cloud. Some areas, which exhibit rates of minority populations above 25%, such as northwestern Mille Lacs County, are the locations of tribal lands. Areas that exhibit higher minority populations in District 3 show corresponding rates of moderate transit dependency; however, this is not exclusive to these areas. See *Figure 3 in Appendix D*.

District 4: Census tracts with high shares of minority populations (above 25%) exist in the northern most portion of District 4 in Becker County, Mahnommen County and the City of Pelican Rapids. Areas with the highest shares of minority populations correspond to census tracts with moderate levels of transit dependency. See *Figure 4 in Appendix D*.

District 6: Minority populations above 25% in District 6 primarily exist in major centers of population such as Rochester, Albert Lea, Faribault and Owatonna. These communities, along with others such as Austin and Red Wing are encompassed by census tracts with minority populations above 10%. Areas with the highest shares of minority populations in District 6 correspond to census tracts with moderate to high levels of transit dependency. See *Figure 5 in Appendix D*.

District 7: Minority populations above 10% are dispersed across the district. Areas with the highest shares of minority populations (above 25%) exist in the Cities of Saint James and Worthington. Worthington has moderate levels of transit dependency; however, the areas in the District with the highest levels of transit dependency, located in central Mankato, are census tracts with low to moderate shares of minority populations. See *Figure 6 in Appendix D*.

District 8: Census tracts with the highest shares of minority populations in District 8 exist in the Cities of Marshall and Willmar. Census tracts in the City of Willmar with minority populations of higher than 25% have correspondingly high levels of transit dependency. Counties with large census tracts with moderate minority populations (11%-25%) include Kandiyohi, Lyon, Redwood, Renville and Yellow Medicine. See *Figure 7 in Appendix D*.

Minority Populations and Funding Distribution

Table 4: Minority Populations in Transit Service System Area and 2016 Funding Allocations

MnDOT District	Transit System	Total Pop. of Service Area	# Minority in Service Area	% Minority in Service Area	% Minority in Gr. MN	Total Federal & State Grant Funding	% Federal & State Grant Funding
1	Arrowhead Transit	348,300	33625	9.7%	14.8%	\$5,599,800	17.1%
4	Becker County Transit	33,138	5285	15.9%	2.3%	\$314,500	1.0%
3	Brainerd/Crow Wing Public Transit	91,567	7903	8.6%	3.5%	\$760,051	2.3%
7	Brown County Heartland Express	25,391	856	3.4%	0.4%	\$567,056	1.7%
8	Central Community Transit	80,744	6567	8.1%	2.9%	\$2,289,552	7.0%
3	Chisago-Isanti Heartland Express	99,188	7625	7.7%	3.4%	\$933,300	2.9%
7	Community Transit	86,956	7754	8.9%	3.4%	\$2,159,000	6.6%
2	Fosston Transit	1,624	162	10.0%	0.1%	\$64,263	0.2%
8	Granite Falls Heartland Express	2,471	453	18.3%	0.2%	\$96,800	0.3%
2	Hibbing Area Transit	16,284	1060	6.5%	0.5%	\$227,807	0.7%
2	Hubbard County Heartland Express	20,574	1522	7.4%	0.7%	\$348,997	1.1%
7	Minnesota River Valley Transit	15,512	1731	11.2%	0.8%	\$414,574	1.3%
4	Morris Transit	5,349	622	11.6%	0.3%	\$311,034	1.0%
2	Paul Bunyan Transit	64,998	14795	22.8%	6.5%	\$1,086,203	3.3%
8	Prairie Five Rides	43,928	2786	6.3%	1.2%	\$1,251,447	3.8%
7	Prairie Lakes Transit	34,580	1177	3.4%	0.5%	\$702,679	2.1%
7	Prairieland Transit	21,687	4517	20.8%	2.0%	\$283,055	0.9%
4	Rainbow Rider Transit	91,195	4504	4.9%	2.0%	\$1,904,946	5.8%
7	Rock County	9,563	416	4.4%	0.2%	\$255,000	0.8%
6	Rolling Hills Transit	259,894	30712	11.8%	13.5%	\$793,650	2.4%
6	Southern MN Area Rural Transit (SMART)	125,723	10771	8.6%	4.7%	\$1,458,835	4.5%
6	Three Rivers Hiawathaland Transit	132,644	11279	8.5%	5.0%	\$1,893,800	5.8%
3	Timber Trails Public Transit	41,812	3597	8.6%	1.6%	\$690,200	2.1%
8	Trailblazer Transit	179,758	12140	6.8%	5.3%	\$2,606,533	8.0%
4	Transit Alternatives	124,916	9407	7.5%	4.1%	\$1,196,846	3.7%
3	Tri-CAP Transit Connection	315,179	27904	8.9%	12.3%	\$1,554,650	4.8%
2	Tri-Valley Heartland Express	84,591	10323	12.2%	4.5%	\$1,833,751	5.6%
3	Wadena County Friendly Rider	13,759	614	4.5%	0.3%	\$361,250	1.1%
7	Watonwan County Take Me There	11,054	753	6.8%	0.3%	\$227,800	0.7%
6	Winona Transit Service	27,437	1931	7.0%	0.8%	\$501,579	1.5%
	Total					\$32,688,956	100.0%

Figure 2: Greater Minnesota Transit Funding by Transit System

Incorporates data from Table 4 to depict the relationship between the percent of statewide minorities within each transit system boundary in relationship to that system's percent of state and federal funding.

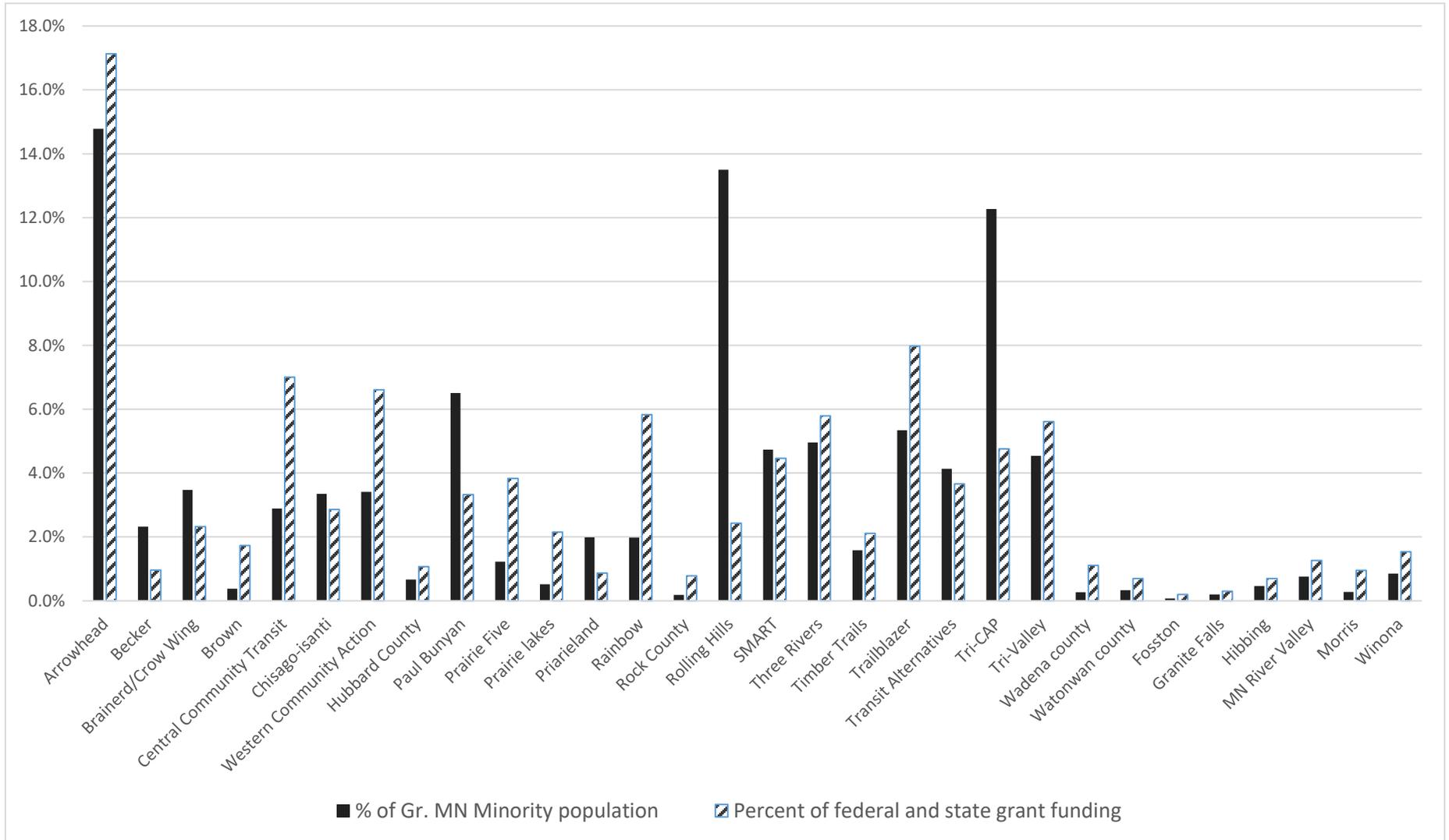
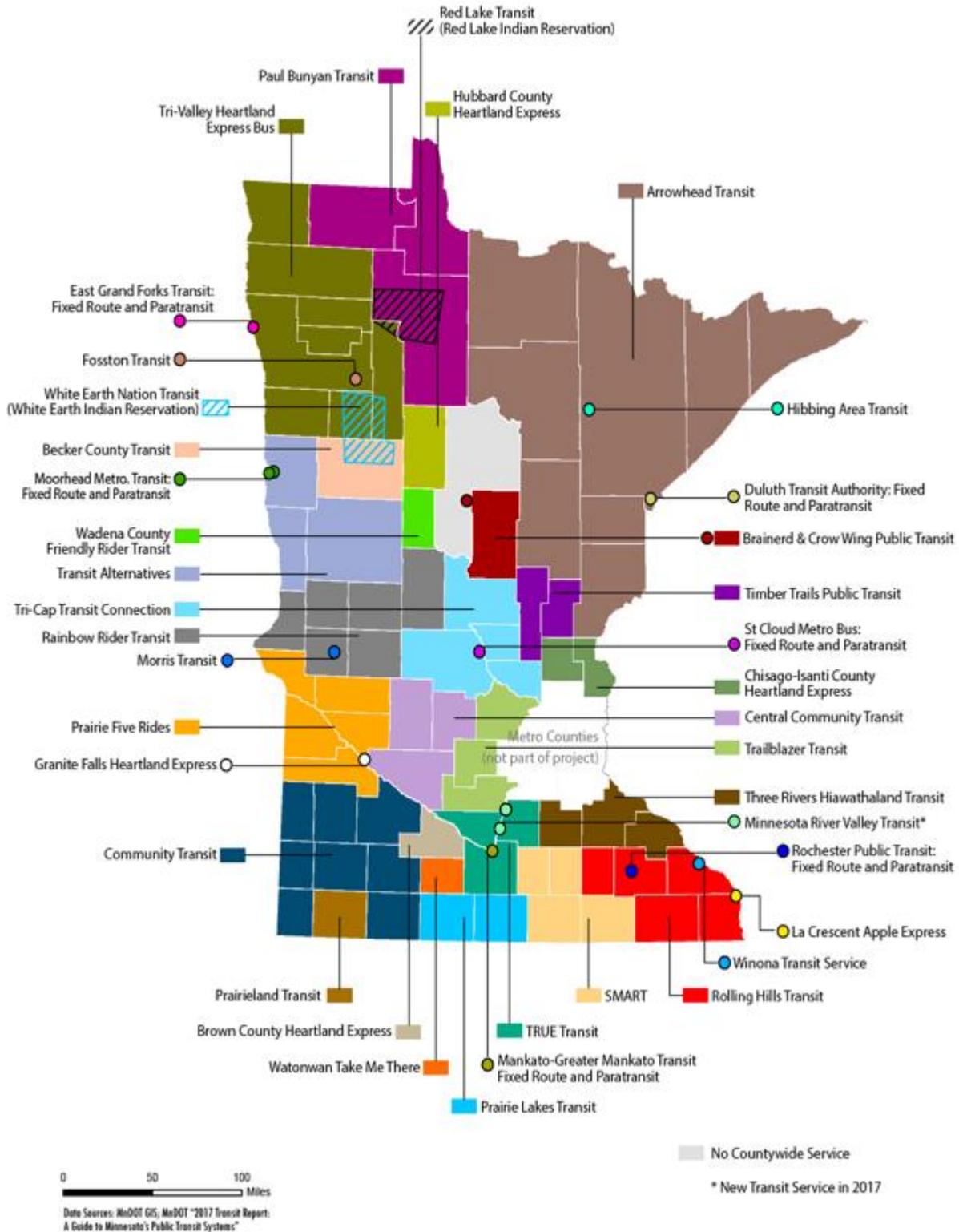


Figure 3: Greater Minnesota Public Transit System Location Map

Greater Minnesota Public Transit Systems



11. Analysis of Disparate Impacts

Requirement: An analysis of impacts identified in Requirement #10 that identifies any disparate impacts on the basis of race, color, or national origin, and, if so, determines whether there is a substantial legitimate justification for the policy that resulted in the disparate impacts, and if there are alternatives that could be employed that would have a less discriminatory impact.

The data in [Requirement #10](#) shows that six transit systems have a considerably lower level of funding compared to their minority population. MnDOT's analysis of the impacts of the distribution of funding has not led to the identification of any disparate impacts on the basis of race, color or national origin for Greater Minnesota transit. The analysis is outlined below for these six transit systems.

Analysis of Figure 2: Greater Minnesota Transit Funding by Transit System (within #10 above)

Becker County and Paul Bunyan Transit Systems

The demographics are skewed by the tribal communities in the service areas. The tribes are served by Tribal transit systems and are direct recipients from FTA.

PrairieLand Transit

PrairieLand transit serves Nobles County, a very rural region located in the southwestern corner of the state. The county seat is home to a high proportion of minority residents compared to the surrounding communities and counties. To reduce costs, PrairieLand Transit coordinates extensively with the neighboring multi-county transit system. The graph shows a gap between the demographics and financial investment; however, the graph does not accurately represent the actual transit demand in the communities.

Crow Wing County

This transit system has a slightly higher cost per ride than other systems due to the geographic challenges of the service area. The system also adds service during the summer months to move employees for the multiple lake resorts.

Rolling Hills

Serves multiple counties in southeastern Minnesota. In 2015, the system expanded into Olmstead County, providing new service to a number of communities, including St. Charles, Bryon and Stewartville.

Tri-CAP Transit

Serves multiple counties in central Minnesota. In 2015, Tri-CAP merged with Sherburne County transit and extra funds were distributed to cover the transition.

12. Statewide Planning Process – Identification of Minority Needs

Requirement: A description of the statewide transportation planning process that identifies the transportation needs of minority populations.

MnDOT conducts both quantitative and qualitative analyses in order to gain an understanding of the transportation needs of minority populations.

Quantitative Analysis

MnDOT updates the Greater Minnesota Transit Investment Plan every four years. The update includes an analysis of the demographic profile using the most recent census information and demographic information from the Minnesota State Demographer's Office to determine the number and locations of minority populations in Greater Minnesota. In addition, each transit system is required to conduct annual surveys of its community to understand the magnitude and locations of specific transit needs of minority populations.

Qualitative Analysis

Transit systems analyze information gathered from riders ride requests, trip denials, and complaints to develop the overall unmet service needs of the community. The annual application to MnDOT includes requests for funding for existing services and requests for funding for unmet needs. MnDOT uses the unmet needs information to inform long-range planning and investment decisions. In addition, MnDOT uses this information to determine trends and movement of people and new employment and educational facilities that may impact unmet needs.

For more information about the identification of the transportation needs of minority populations and the outreach that was conducted to engage these populations, see the information included in [Requirement #4](#) of this Plan.

13. Pass Through of Financial Assistance to Sub-Recipients in Non-Discriminatory Manner

Requirement: A description of the procedures the State uses to pass through FTA financial assistance to sub-recipients in a non-discriminatory manner.

Section 5311 – Formula Grants For Rural Areas

All applications are treated equally and reviewed using the same procedure. MnDOT assembles an evaluation team consisting of Office of Transit and Active Transportation Program staff and District Transit Project Managers to review each application. This team evaluates all applicants' service plans, performance measures, level of access provided, and the availability of funds to decide funding for each sub-recipient.

Tribal governments may make an application for Section 5311 funding through the standard Office of Transit and Active Transportation Annual Management Plan Application and receive an award notification from the Office of Transit and Active Transportation. At that time, the tribal sub-recipient chooses to

receive funds as a sub-recipient of the State or to apply directly to the FTA for Section 5311 funds. Tribes who choose to have Section 5311 funding administered through the state follow the same processes and performance considerations as all other Section 5311 applicants. Tribes who choose to become direct recipients are overseen by the FTA, but the State will provide equivalent technical assistance upon request.

Section 5310 - Enhanced Mobility of Seniors and Individual with Disabilities

Agencies that meet the criteria for providing Enhanced Mobility of Seniors and Individual with Disabilities may complete an application for Section 5310 funding through the standard Office of Transit and Active Transportation Annual Section 5310 Application process. Each agency that proposes eligible projects is given a fair and timely opportunity to apply for Section 5310 funds. Eligible applicants must notify all public and private transportation providers in their area that they are applying for a Section 5310 grant for a vehicle and invite comments or counter proposals to their proposed service. Each project is evaluated by the Statewide 5310 Committee, which scores and ranks each eligible project. Available 5310 funds are awarded to agencies based on the annual project ranking. Standard and alternate notification procedures are shown in the Section 5310 Application.

14. Procedures to Provide Assistance to Potential Sub-Recipients Applying for Funding

Requirement: A description of the procedures the State uses to provide assistance to potential sub-recipients applying for funding, including its efforts to assist applicants that would serve predominantly minority populations.

Approximately four months before MnDOT submits the program of projects to the FTA, the MnDOT Office of Transit and Active Transportation posts applications with explanatory material for any interested party on its website. MnDOT also hosts workshops throughout Greater Minnesota to help applicants complete the applications. Workshop topics may include an overview of funding, technical instructions, federal and state regulatory updates, deadlines and other topics pertinent to the application process. MnDOT staff then reviews each application for content and compliance with all requirements approximately one month before the program of projects is submitted. MnDOT District Transit Program Managers are available to provide additional help if needed by any applicant throughout the process.