

FTA

FEDERAL TRANSIT ADMINISTRATION

City of Detroit Department of Transportation (DDOT) Title VI Review

Final Report
October 2020



U.S. Department of Transportation
Federal Transit Administration

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Executive Summary

Objective and Methodology – This report details the results of a specialized review of the City of Detroit, Department of Transportation’s (DDOT) Title VI program implementation. The specialized review examined this agency’s Title VI program procedures, management structures, actions, and documentation. Documents and information were collected from the Federal Transit Administration (FTA) and DDOT. In addition, the following entities were interviewed as part of this review: DDOT officials, DDOT staff, and community stakeholders. The specialized review included interviews, assessments of data collection systems, and review of program and contract documents.

DDOT’s Title VI Program includes the following positive program elements:

Positive Program Elements

- DDOT has created a Compliance Department that oversees responsibilities across various departments related to the implementation of DDOT’s Title VI Program.
- DDOT has started the planning process for the development of the 2020 Title VI Program submission to FTA.
- DDOT has implemented its program to monitor service standards and policies.

The Program has the following deficiencies:

Deficiencies

- DDOT has not sought out and considered the viewpoints of minority, low-income, and LEP populations in the course of conducting its public outreach activities.
- DDOT’s Limited English Proficiency (LEP) four-factor analysis did not adequately address the nature and importance of program, activity, or service to people’s lives (Factor 3). In addition, DDOT has not trained its transit equipment operators on what procedures to follow when encountering an LEP person.
- DDOT did not provide a description of the efforts made to encourage the participation of minorities on transit-related, non-elected planning, advisory, committee, or similar body.
- DDOT has not implemented the process described in its 2018 Title VI Program for performing service equity analyses for major service changes. In addition, evidence was not provided that the major service change, disparate impact, and disproportionate burden policies received public comment prior to being instituted.

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1. General Information

This chapter provides basic information concerning this specialized review of the City of Detroit Department of Transportation (DDOT). Information on DDOT, the review team, and the dates of the review are presented below.

Grant Recipient:	City of Detroit Department of Transportation (DDOT)
City/State:	Detroit, MI
Recipient Number:	2107
Executive Official:	Mikel Oglesby
On-site Liaison:	Alicia Miller, Compliance Manager
Report Prepared By:	Milligan & Company, LLC
Dates of On-site Visit:	January 22-24, 2020
Review Team Members:	Francisco Morales, Kristin Tighe, Habibatou Atta

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2. Jurisdiction and Authorities

The Federal Transit Administration (FTA) Office of Civil Rights is authorized by the Secretary of Transportation to conduct civil rights specialized reviews. DDOT is a recipient of FTA funding assistance and is therefore subject to the Title VI compliance conditions associated with the use of these funds pursuant to the following:

- Title VI of the Civil Rights Act of 1964 (42 U.S.C. Section 2000d)
- Federal Transit Laws, as amended (49 U.S.C. Chapter 53 et seq.)
- Uniform Relocation Assistance and Real Property Acquisition Policies Act of 1970, as amended (42 U.S.C. 4601, et seq.)
- Department of Justice regulation, 28 CFR part 42, Subpart F, “Coordination of Enforcement of Nondiscrimination in Federally-Assisted Programs” (December 1, 1976, unless otherwise noted)
- DOT regulation, 49 CFR part 21, “Nondiscrimination in Federally-Assisted Programs of the Department of Transportation—Effectuation of Title VI of the Civil Rights Act of 1964”
- FTA Circular 4702.1B “Title VI Requirements and Guidelines for Federal Transit Administration Recipients”
- FTA Circular 4703.1 “Environmental Justice Policy Guidance for Federal Transit Administration Recipients”
- DOT Policy Guidance Concerning Recipients’ Responsibilities to Limited English Proficient Persons (December 14, 2005)
- Executive Order 13166: “Improving Access to Services for Persons with Limited English Proficiency”
- Section 12 of FTA’s Master Agreement 26 (October 1, 2019)

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3. Purpose and Objectives

3.1 Purpose

The Federal Transit Administration (FTA) Office of Civil Rights periodically conducts discretionary reviews of grant recipients and subrecipients to determine whether they are honoring their commitments, as represented by certification, to comply with the requirements of 49 U.S.C. 5332. In keeping with its regulations and guidelines, FTA determined that a specialized review of DDOT's Title VI Program was necessary.

The Office of Civil Rights authorized Milligan & Company, LLC to conduct the Title VI specialized review of DDOT. The primary purpose of this specialized review was to determine the extent to which DDOT has met its General Reporting and Program-Specific Requirements and Guidelines, in accordance with FTA Circular 4702.1B, "Title VI Requirements and Guidelines for Federal Transit Administration Recipients." Members of the specialized review team also discussed with DDOT the requirements of the DOT Policy Guidance Concerning Recipients' Responsibilities to Limited English Proficient (LEP) Persons. The specialized review had a further purpose to provide technical assistance and to make recommendations regarding corrective actions, as deemed necessary and appropriate. The specialized review was not an investigation to determine the merit of any specific discrimination complaints filed against DDOT.

3.2 Objectives

The objectives of FTA's Title VI Program, as set forth in FTA Circular 4702.1B, dated October 1, 2012, "Title VI Requirements and Guidelines for Federal Transit Administration Recipients" are to:

- Ensure that the level and quality of public transportation service is provided in a nondiscriminatory manner;
- Promote full and fair participation in public transportation decision-making without regard to race, color, or national origin; and
- Ensure meaningful access to transit-related programs and activities by persons with limited English proficiency.

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4. Introduction to the City of Detroit Department of Transportation

The City of Detroit Department of Transportation (DDOT) provides service in the City of Detroit and destinations beyond the City limits in Wayne and Oakland counties. All fixed-route service is operated in-house. DDOT's MetroLift ADA complementary paratransit service is provided by a contractor, Transdev, and subcontractors: Detroit Checker Cab Company, Comfort and Care Transportation, Delray United, Lakeside Division Inc., Moe Transportation, Odyssey Transportation, People's Transit, and Wrightway Transportation. Paratransit trips are scheduled by Transdev staff. DDOT's service area population is 679,865.

4.1 Introduction to the City of Detroit Department of Transportation and Organizational Structure

DDOT directly operates a network of 43 fixed routes with a fleet of 288 FTA-funded buses. The current peak requirement is 231 vehicles. MetroLift paratransit service is operated using contractor-owned equipment. No FTA-funded equipment is used in MetroLift service. Both fixed-route and paratransit service are operated 24 hours a day.

On May 1, 2019, DDOT implemented a new fare structure named Dart, as a new way to pay for transit. The basic adult fare for DDOT service is \$2.00 for a 4-hour unlimited rides on DDOT, the Suburban Mobility Authority For Regional Transportation (SMART), and QLINE. The reduced fare is 50¢ for senior citizens, persons with disabilities, Medicare cardholders, and students. Students who have a DDOT identification card or a school issued identification card can ride at the reduced fare rate during all hours of service. In July 2019, DDOT implemented the Dart App, a mobile fare payment system using smartphone technology.

DDOT operates four administrative, operations, and maintenance facilities, a transit center, and a transit hub as noted below. All facilities contain FTA interest.

ADMINISTRATIVE, OPERATIONS, AND MAINTENANCE	
Central and Administrative	1301 E Warren, Detroit MI 48207
Gilbert Garage (Bus Operations and Maintenance)	5600 Wabash, Detroit MI 48208
Coolidge Garage (Currently not in service)	14044 Schaefer, Detroit MI 48208
Shoemaker Garage (Bus Operations and Maintenance)	5149 St. Jean, Detroit MI 48213
TRANSIT CENTER	
Rosa Parks Transit Center	360 Michigan, Detroit MI 48226
TRANSIT HUB	
State Fair Transfer Hub	20110 Woodward, Detroit MI 48203

Per the 2013-2017 American Community Survey (ACS) 5-Year estimates, the population of the City of Detroit was 679,865. The median household income in the City of Detroit is approximately \$27,838, with 32.7 percent of families below the poverty level. The City of Detroit is predominately Black or African American and the total minority population is 88.5 percent, of which 7.6 percent is Latino or Hispanic as detailed Table 4.1.

Table 4.1 2013-2017 City of Detroit by Race

Race	Percentage of Population
White	14.1%
Black or African American	79.1%
Asian	1.5%
American Indian and Alaska Native	0.3%
Native Hawaiian and Other Pacific Islander	0.0%
Some other race	3.0%
Hispanic or Latino	7.6%

Projects Underway

- DDOT continues to prioritize the replacement of its aging fixedroute fleet. In 2020, DDOT is purchasing 26 replacement buses from New Flyer.
- DDOT is currently working with a marketing firm to install and maintain 59 new bus shelters that include advertising panels, which will generate revenue for maintenance, and new shelters. So far, nine shelters have been installed.

Organizational Structure

DDOT created a Compliance Department in 2017 to oversee compliance in the following areas: Disadvantaged Business Enterprise (DBE), Equal Employment Opportunity (EEO), Drug and Alcohol Program, and Title VI. DDOT's Compliance Manager is responsible for the administration of the Title VI Program and is the designated Title VI Coordinator. The Compliance Manager reports to the Administration and Paratransit Manager, who then reports directly to the DDOT Director. As of January 2020, the Compliance Department includes the following staff and assignments.

- Compliance Manager: Disadvantaged Business Enterprise Liaison Officer (DBELO), EEO, Drug and Alcohol Program Manager, and Title VI Coordinator
- Regulatory Compliance Officer: DBE and EEO
- Regulatory Compliance Officer: DBE and Drug and Alcohol Program
- Regulatory Compliance Officer: Drug and Alcohol Program Designated Employer Representative (DER) and Title VI
- Regulatory Compliance Officer: Americans with Disabilities Act (ADA) Coordinator and Title VI
- Regulatory Compliance Officer: ADA and ADA Complementary Paratransit Coordinator

In addition, the Compliance Manager is supported by the following departments in carrying out the Title VI Program.

- Planning and Scheduling: Developing service and fare change equity analyses, demographic maps, and service standards
- Marketing: Conducting public outreach
- Customer service: Performing intake interviews for informal complaints
- Transit Operations: Performing service monitoring

5. Scope and Methodology

5.1 Scope

The Title VI specialized review of DDOT examined the following requirements and guidelines as specified in FTA Circular 4702.1B:

General Reporting Requirements and Guidelines – All applicants, recipients and subrecipients shall maintain and submit the following:

- Annual Title VI Certification and Assurance
- Title VI Complaint Procedures
- Record of Title VI Investigations, Complaints, and Lawsuits
- Language Access to LEP Persons
- Notice to Beneficiaries of Protection under Title VI
- Monitoring Subrecipients
- Title VI Program
- Determination of Site or Facilities Location
- Minority Representation on Planning or Advisory Bodies
- Inclusive Public Participation

Requirements and Guidelines for Fixed Route Transit Providers – All providers of fixed route public transportation that receive Federal financial assistance shall also submit the following:

- System wide Service Standards and Policies

Requirements and Guidelines for Fixed Route Transit Providers that Operate 50 or More Fixed Route Vehicles in Peak Service and are Located in a UZA of 200,000 or More in Population:

- Demographic Data
- Evaluation of Service and Fare Changes
- Monitoring of Transit Service

5.2 Methodology

Initial interviews were conducted with the FTA Headquarters Civil Rights staff and the FTA Region 5 Civil Rights Officer to discuss specific Title VI issues and concerns regarding DDOT. An agenda letter covering the specialized review was sent to DDOT advising it of the site visit and indicating additional information that would be needed and issues that would be discussed. The review team focused on the General Reporting Requirements and Guidelines that are contained in FTA Title VI Circular 4702.1B that became effective on October 12, 2012. The General Reporting Requirements and Guidelines included implementation of the Limited English Proficiency (LEP) Executive Orders.

DDOT was requested to provide the following documents in advance of the site visit:

- Current Title VI Program.
- DDOT's organization chart.
- Any service and fare equity analyses conducted over the past three (3) years.
- A list of any siting, locating, and/or constructing of facilities, and any associated Title VI

equity analyses within the last three (3) years.

- Current Title VI complaint/lawsuit or investigation list.
- Summary of public outreach efforts and events since the last Title VI Program submission, including any language efforts/activities to ensure limited English proficient persons are able to meaningfully participate and contribute during the held public outreach efforts and events.
- List of any monitoring or technical assistance provided to subrecipient(s).
- Summary of subrecipient(s) and their respective Title VI Program status.
- Names, titles, telephone numbers, and email addresses of interested parties (external organizations) with which DDOT has interacted on Title VI issues.
- Other pertinent information determined by DDOT staff to be pertinent and demonstrative of its Title VI compliance efforts.

DDOT assembled the documents prior to the site visit and provided them to the review team for advance review. A detailed schedule for the three-day site visit was developed.

The site visit to DDOT occurred on January 22-24, 2020. The review began with an Entrance Conference, held at 9:00 a.m. on Wednesday, January 22, 2020 at the DDOT Central and Administrative offices located at 1301 E. Warren Street in Detroit. The following people attended the meeting:

Federal Transit Administration	
Marjorie Hughes	Regional Civil Rights Officer, Region 5 (by phone)
Shavon Nelson	Equal Opportunity Specialist (by phone)
Susan Webber	Community Planner, Region 5 (by phone)

City of Detroit Department of Transportation	
Angelica Jones	Interim Director
Alicia Miller	Compliance Manager
Gabriele Honey	Regulatory Compliance Officer / DER
Pamela King	Compliance Officer / ADA Coordinator
Neil Greenberg	Service Development & Scheduling
Elias Fischer	Grants Administrator
Josh Reid	Executive Manager of Administration
Zaundra Wimberley	Deputy Director of Operations
Larry Smith	Assistant Director of Operations
Deanna Donahoo	Program Analyst – Grants
Jennifer Frye	Marketing Manager

Milligan & Company, LLC	
Sandra Swiacki	Project Director (by phone)
Francisco Morales	Lead Reviewer
Habibatu Atta	Reviewer
Kristin Tighe	Reviewer

Following the Entrance Conference, the review team met with the Compliance Manager and other DDOT staff responsible for Title VI compliance. During this meeting, discussions focused on a detailed examination of documents submitted in advance of the site visit and documents provided at the site visit by DDOT. The review team then met with DDOT staff from the Transit Operations, Planning and Scheduling, and Marketing departments to discuss how DDOT incorporated FTA Title VI requirements into its public transportation program.

The Exit Conference took place at 1:00 p.m. at the DDOT Central and Administrative offices. Attending the conference were:

Federal Transit Administration	
Shavon Nelson	Equal Opportunity Specialist (by phone)
Susan Webber	Community Planner, Region 5 (by phone)

City of Detroit Department of Transportation	
Angelica Jones	Interim Director
Alicia Miller	Compliance Manager
Gabriele Honey	Regulatory Compliance Officer / DER
Pamela King	Compliance Officer / ADA Coordinator
Neil Greenberg	Service Development & Scheduling
Elias Fischer	Grants Administrator
Josh Reid	Executive Manager of Administration
Zaundra Wimberley	Deputy Director of Operations
Larry Smith	Assistant Director of Operations
Deanna Donahoo	Program Analyst – Grants
Jennifer Frye	Marketing Manager
Mikki Taylor-Hendrix	Manager I – Ambassador Team/Scheduling and Service Development
Brian Fisher	Compliance
Geena Schofield	Assistant Manager Scheduling
Larry Lockett	Maintenance Department

Milligan & Company, LLC	
Sandra Swiacki	Project Director (by phone)
Francisco Morales	Lead Reviewer
Habibatu Atta	Reviewer
Kristin Tighe	Reviewer

DDOT was provided with a draft copy of the report for review and response. No comments to the draft report were provided.

5.3 Stakeholder Interviews

The review team contacted five organizations serving the City of Detroit. The purpose of this activity was to invite agencies to participate in stakeholder interviews to determine the level of public outreach, whether any discrimination complaints had been filed with the transit agency, and identify practices that would require further attention and analysis during the review.

The following local organizations were contacted to participate in the stakeholder interviews:

- Detroit Equity Action Lab
- Detroit People Platform
- Latin Americans for Social and Economic Development
- Motor City Freedom Riders
- Transit Riders Union

The representatives were asked questions regarding:

- Knowledge of DDOT's Title VI program
- Right to file discrimination complaints
- DDOT's public engagement efforts
- DDOT's interaction with LEP communities

Representatives from three of the five agencies responded and agreed to participate. All of the respondents stated that their relationship with DDOT had greatly improved over the years and were notified of funding opportunities. Two of the agencies were aware of DDOT's Title VI program. All three agencies also indicated that there have not been any complaints brought to their attention by their constituents. All three agencies indicated that they were notified of public participation activities conducted by DDOT via social media. However, two agencies suggested that DDOT should also distribute and post paper notifications in shelters and on buses, as many individuals who fall within the Title VI classes may not have access to a computer or the internet. All three agencies have noted an improvement from DDOT in this area and hopes that they continue to progress and engage even more with their organizations and the community.

6. General Reporting Requirements Findings and Advisory Comments

6.1 Annual Title VI Certification and Assurance

Requirement

FTA recipients must submit an annual Title VI certification and assurance as part of the Annual Certifications and Assurances submission to FTA in the FTA Web-based Transit Award Management System (TrAMS) grants management system. (49 CFR § 21.7(a) and FTA C 4702.1B, Chap. III-1, Sec. 2).

Discussion

During this review, no deficiencies were found with this requirement. DDOT submitted its annual Title VI certification and assurance as part of its Annual Certifications and Assurances submission to FTA during the review period. The fiscal year (FY) 2019 Affirmation was executed by DDOT's Interim Transportation Director and countersigned by DDOT's Legal Counsel.

6.2 Submit Title VI Program

Requirement

All direct and primary recipients must 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 officials responsible for policy decisions prior to submission. (FTA C 4702.1B, Chap. III-1, Sec. 4).

Discussion

During this review, no deficiencies were found with this requirement. DDOT's Title VI Program was due to FTA on November 1, 2017, but was not filed with FTA until February 19, 2018. The Title VI Program is currently under review by FTA. The Title VI Program included the required elements as listed in Table 6.2. DDOT's next Title VI Program is due to FTA on October 1, 2020. DDOT is currently in the planning process to ensure that the next Title VI Program is submitted timely.

Table 6.2 – Title VI Program Reporting Requirements and Guidelines

General Reporting Requirements/Guidelines (per FTA Circular 4702.1B)	Included in Program Submittal
Copy of agency's notice to public that indicates it complies with Title VI and includes instructions to public on how to file discrimination complaint.	Yes

General Reporting Requirements/Guidelines (per FTA Circular 4702.1B)	Included in Program Submittal
Copy of agency's instructions to the public regarding how to file a Title VI complaint, including a copy of the complaint form.	Yes
List of any Title VI investigations, complaints, or lawsuits filed with agency since time of last submission. Should include only those investigations, complaints, or lawsuits that pertain to agency submitting report, not necessarily larger agency or department of which entity is a part.	Yes
A public participation plan that includes an outreach plan to engage minority and LEP populations and involvement activities undertaken since last submission.	Yes
Copy of agency's plan for providing language assistance to persons with limited English proficiency, was based on DOT LEP Guidance.	Yes
Copy of the agency's table depicting the racial breakdown of the transit-related, non-elected, planning and advisory bodies, and a description of efforts made to encourage the participation of minorities on such committees.	Yes
List of any subrecipients and when their Title VI Program is due. Also included is how the primary recipient stores the submitted Title VI Programs, and a summary of the efforts undertaken to ensure subrecipients comply with their Title VI obligations.	N/A
Copy of any conducted Title VI equity analyses related to the siting or location of facilities.	Yes
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.	Yes

6.3 Notice to Beneficiaries of Protection under Title VI

Requirement

FTA recipients must provide information to the public regarding their Title VI obligations and apprise members of the public of the protections against discrimination afforded to them by Title VI. At a minimum, recipients must disseminate this information to the public through measures including a posting on its Web site, in public areas of the agency's office, and in stations, at stops, and on transit vehicles. Furthermore, notices will detail a recipient's Title VI obligations into languages other than English, as needed and consistent with the DOT LEP Guidance and the recipient's LAP. (FTA C 4702.1B, Chap. III-4, Sec. 5).

Discussion

During this review, no deficiencies were found with this requirement. DDOT's Title VI notice includes the required elements as listed in Table 6.3. The Title VI program states that the notice

will be posted at the following locations: DDOT's Web site, DDOT's vehicles, and the following facilities: Administrative and Central Offices, Rosa Parks Transit Center, Gilbert Garage and Terminal, and Shoemaker Garage and Terminal.

During the site visit, the review team confirmed the posting of DDOT's Title VI notice on DDOT's Web site, on six DDOT vehicles, and at the Central and Administrative Offices, Rosa Parks Transit Center, and Gilbert Garage and Terminal, as stated in its program. The requirement for the translation of vital documents for persons with limited English proficiency is discussed in Section 6.7 of this report.

Table 6.3 – DDOT's Notice to Beneficiaries of Protection under Title VI

Elements Required (per FTA Circular 4702.1B)	Included in Draft Policy
Statement that agency operates programs without regard to race, color, and national origin.	Yes
Description of procedures that members of the public should follow to request additional information on recipient's nondiscrimination obligations.	Yes
Description of procedures that members of the public should follow to file a discrimination complaint against recipient.	Yes
Notice translated into languages other than English	Yes

6.4 Title VI Complaint Procedures and Complaint Form

Requirement

FTA recipients and subrecipients must 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 upon request. 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 C 4702.1B, Chap. III-5, Sec. 6).

Discussion

During this review, no deficiencies were found with this requirement. DDOT's Title VI Program includes a Title VI complaint form and procedures for investigating and tracking Title VI complaints. During the site visit, the review team confirmed that DDOT is using the same complaint form included in its Title VI Program. In addition, the Title VI-specific complaint form and process for filing a complaint are available on DDOT's Web site, as described in its program. The Title VI complaint form and procedures are available on DDOT's Web site in English, Arabic, and Spanish. Additionally, customers can file a complaint over the phone by calling DDOT customer service, or in person at DDOT's Office.

6.5 Record of Title VI Investigations, Complaints, and Lawsuits

Requirement

FTA recipients must prepare and maintain a list of any active investigations (conducted by entities other than FTA), lawsuits, or complaints naming the recipients that allege discrimination on the basis of race, color, or national origin. This list must 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 to the investigation, lawsuit, or complaint. (FTA C 4702.1B, Chap. III-5, Sec. 7).

Discussion

During this review, no deficiencies were found with this requirement. DDOT maintains a list of Title VI-related complaints and lawsuits that includes: 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 DDOT in response to the investigation, lawsuit, or complaint.

During the review period, DDOT had two Title VI complaints that were filed in 2017. DDOT investigated the complaints in accordance with its Title VI complaint procedures and included the required information in its record of Title VI investigation, complaints, and lawsuits. The DDOT investigation found no Title VI basis for the complaints. The substance of one of the complaints was the basis of a lawsuit against DDOT filed in 2017, which was dismissed in 2019.

6.6 Inclusive Public Participation

Requirement

FTA recipients must integrate the content and considerations of Title VI, the Executive Order on LEP, and the DOT LEP Guidance into their public participation plan. This includes seeking out and considering the viewpoints of minority, low-income, and LEP populations in the course of conducting public outreach and involvement activities. While what efforts are made are generally at the discretion of the agency, efforts to include minority and LEP populations in public participation activities can include both comprehensive measures, as well as targeted measures to address specific barriers that may prevent minority and LEP persons for effectively participating in a recipient's decision-making process. (FTA C 4702.1B, Chap. III-5, Sec. 8).

Discussion

During this review, deficiencies were found with this requirement. DDOT's 2018 Title VI Program includes a Public Participation and Involvement Plan (PPP). DDOT's PPP states that it is a priority to increase the diversity and number of participants through building new relationships with organizations and communities that serve under-represented populations.

During the site visit, DDOT provided a list of public outreach activities it conducted since March 2019. DDOT did not provide evidence that it sought out and considered the viewpoints of minority, low-income, and LEP populations in the course of conducting the public outreach. Information was also not provided that DDOT has built new relationships with organizations and communities that serve these under-represented populations.

In addition, the PPP states that it shall be developed in consultation with all stakeholders and interested parties. DDOT did not provide documentation that this was implemented.

Corrective Actions and Schedule

Within 60 days of the issuance of the final report, DDOT must submit the following to the FTA Office of Civil Rights:

- A public outreach plan that incorporates outreach efforts for minority, low-income, and LEP populations.
- A plan to consult with stakeholders and interested parties in the development of the public outreach plan.

6.7 Language Access to LEP Persons

Requirement

FTA recipients must take responsible steps to ensure meaningful access to benefits, services, information, and other important portions of its programs and activities for individuals who are Limited English Proficient (LEP). Language access to LEP persons is not limited to only fixed-route services, but will also include paratransit service and any other demand response services the recipient makes available to the public. Recipients must use the information obtained in the Four-Factor Analysis to determine the specific language services that are appropriate to provide. (FTA C 4702.1B, Chap. III-6, Sec. 9).

Discussion

During this review, deficiencies were found with this requirement. Compliance with the required Title VI language access elements are listed in Table 6.7 below. Deficiencies were noted in this area because DDOT did not adequately develop Factor 3 in its four-factor analysis and it did not perform training as described in the 2018 Title VI Program.

DDOT's Four-Factor Analysis

DDOT's 2018 Title VI Program included a four-factor analysis. Per FTA Circular 4702.1B Chapter III-6, Sec. 9(a)(3), Factor 3 of the analysis shall describe the nature and importance of the program, activity, or service provided by the program to people's lives. The Circular states that agencies should have a methodology to be informed about what local LEP population considers to be an essential service, as well as the most effective means to provide language assistance. For Factor 3, DDOT included a list of available language assistance resources but did not address the importance of DDOT's service to the LEP community. During the site visit, DDOT did not provide evidence that it performed outreach to LEP populations on what the LEP population considers to be an essential service relating to its transit program.

Implementation of Training

DDOT's 2018 Title VI Program states that LEP training will be provided to the following DDOT employees:

- Transit Equipment Operators who have the greatest potential to interact with LEP persons through daily interaction with passengers.

- Customer Service Representatives who are also likely to come into contact with LEP persons by telephone or by direct contact with passengers.

The Program states the training is performed during initial training and orientation and includes procedures for employees to follow when encountering LEP persons.

During the site visit, DDOT did not provide evidence that it has trained its transit equipment operators on what procedures to follow when encountering an LEP person, DDOT's Title VI program, or the available language assistance measures.

Table 6.7 – LEP Four-Factor Analysis and Language Assistance Plan

Elements Required (per FTA C. 4702.1B)	Included in Plan	Notes/Comments
Part A – Results of Four-Factor Analysis		
Demography – Number or proportion of LEP persons eligible to be served or likely to be encountered	Yes	DDOT used 2011-2015 American Community Survey (ACS) data to perform the analysis.
Frequency of contact – Frequency with which LEP individuals come into contact with program	Yes	Information is gathered from cashiers, customer service representatives, marketing/community engagement staff, office staff, security guards, dispatchers, and drivers.
Importance – Nature and importance of program, activity, or service to people's lives	No	Includes description of services, but no information on how outreach is performed to gather information on what the LEP population considers to be an essential service.
Resources – Resources available and costs of outreach	Yes	Funds are allocated annually for the translation of documents. Interpretation/translation services are available if needed.
Part B – Develop Language Assistance Plan		
Identification of LEP persons	Yes	Vital documents are translated into Spanish and Arabic and are available in other languages upon request.
Language assistance measures	Yes	Translation of vital documents into Spanish and Arabic, translation services by phone, and interpretation services.
Identify Vital Documents/Prioritization of Vital Documents	Yes	Identified as the Title VI notice, complaint form and procedures, and public notices.
Provide notice to LEP persons of availability of services	Yes	The Title VI Notice includes information on how to receive language assistance.

Elements Required (per FTA C. 4702.1B)	Included in Plan	Notes/Comments
Monitors, evaluates, and updates LAP	Yes	A full review of the LAP will be performed every three years and updates will be made as necessary.
Training of staff to provide timely and reasonable language assistance to LEP population	No	Training has not been performed for transit equipment operators as described in the Title VI Program.

Corrective Actions and Schedule

Within 60 days of the issuance of the final report, DDOT must submit to the FTA Office of Civil Rights the following:

- A process to be used to fully develop Factor 3 of the four-factor analysis relating to the nature and importance of the program, activity, or service to people's lives.
- A process and timeline for conducting Title VI training for customer-facing transit equipment operators, including training materials as well as documentation of any training that has been completed with staff

6.8 Minority Representation on Planning or Advisory Bodies

Requirement

FTA recipients may not deny an individual the opportunity to participate as a member of a transit-related, non-elected planning, advisory, committee, or similar body, on the basis of race, color, or national origin. FTA recipients must provide a table depicting the racial breakdown of the membership of those committees, and a description of the efforts made to encourage the participation of minorities on such committees. (FTA C 4702.1B, Chap. III-9, Sec. 10).

Discussion

During this review, deficiencies were found with this requirement. During the site visit, DDOT provided the racial breakdown of its three non-elected committees which are included in the table below.

Table 6.8 – DDOT Advisory Bodies Membership as of January 2020

Name	Caucasian	Latino	Black	Asian American	Native American	Other	Total
Population*	10%	8%	80%	1%	0%	1%	100%
Advisory Commission	67%	0%	33%	0%	0%	0%	100%
Paratransit Appeal Board	25%	0%	75%	0%	0%	0%	100%
Local Advisory Council	0%	0%	100%	0%	0%	0%	100%

*Per 2016 American Community Survey (ACS) data for DDOT's service area by census block group.

DDOT's 2018 Title VI Program did not include a description of the efforts made to encourage the participation of minorities on transit-related, non-elected planning, advisory, committee, or similar body. During the site visit, DDOT did not provide evidence that it has conducted efforts to encourage participation of minorities on its transit-related committees.

Corrective Actions and Schedule

Within 60 days of the issuance of the final report, DDOT must submit to the FTA Office of Civil Rights a description of efforts that will be made to encourage the participation of minorities on transit-related non-elected planning or advisory committees.

6.9 Monitoring Subrecipients and Providing Assistance to Subrecipients

Requirement

Primary recipients must assist their subrecipients in complying with DOT's Title VI regulations, including the general reporting requirements. Primary recipients must provide to the subrecipients, at a minimum, the documents required by FTA C 4702.1B, Chap. III-10, and Sec. 11.

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. This includes documenting a process for ensuring all subrecipients are complying with its Title VI Program requirements, and collecting and reviewing the Title VI Programs of subrecipients. (FTA C 4702.1B, Chap. III-10, Sec. 12).

Discussion

During this review, this requirement was not applicable. DDOT did not have any subrecipients during the review period.

6.10 Determination of Site or Location of Facilities

Requirement

FTA recipients must 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. A recipient must also engage in outreach to persons potentially impacted by the siting of facilities. The analysis must compare the equity impacts of various siting alternatives, and must occur before the selection of the preferred site. (FTA C 4702.1B, Chap. III-11, Sec. 13).

Discussion

During this review, no deficiencies were found with this requirement. DDOT did not locate or site any projects during the review period. DDOT does not have plans for any new facilities in the next three years. DDOT plans to renovate an existing garage that will be used for the same purpose and at the same location. As a result, this does not trigger the performance of a Title VI equity analysis.

7. Transit Providers Findings and Advisory Comments

7.1 System wide Service Standards and Policies

Requirement

FTA recipients that provide fixed route service shall set service standards and policies for each specific fixed route mode of service they provide. Fixed route modes of service include but are not limited to, local bus, express bus, commuter bus, bus rapid transit, light rail, subway, commuter rail, passenger ferry, etc. These standards and policies must address how service is distributed across the transit system, and must ensure that the manner of the distribution affords users access to these assets. (FTA C 4702.1B, Chap. IV-4, Sec. 4).

Discussion

During this review, no deficiencies were found with this requirement. The 2018 Title VI Program includes service standards and policies for its fixed route service for the following categories:

- Vehicle load: The standard load factor for bus service is 1.25, not to exceed 1.50 on a regular basis.
- Vehicle headway: Weekday morning and afternoon peak period: every 45 minutes or less; Weekday off-peak and Weekends: every 75 minutes or less.
- On-time performance: On-target: 85 percent or better; Needs improvement: 75 to 84 percent; Fail: below 75 percent.
- Service availability: Service area residents within 1/4 mile of a bus stop: 80 percent; Service area residents within 1/2 mile of a bus stop with Weekday all-day service: 95 percent.

Additionally, the 2018 Title VI Program includes DDOT's service standards and policies related to:

- Vehicle assignment: DDOT does not assign specific vehicles or vehicle types to specific routes.
- Seating: DDOT does not have a bench or a seating program, since benches only exist as part of shelters.
- Bus shelters: Bus stops with higher levels of service will be given higher priority for shelters. Additional considerations include: the stability of a route within a service network, site dimensions and pavement characteristics, position on route, transfer points, stops shared by multiple routes, proximity to major destinations, distribution of shelters on route; legacy shelters, and shelter requests from customers and the community.
- Provision of information: Maps and digital displays are provided at two transit hubs.
- Escalators and elevators: DDOT has one elevator located at a downtown bus station, which is not necessary to access transit service; it is only needed for occasional events on the second floor of the building.
- Waste receptacles: DDOT places waste receptacles at high-ridership bus stops.

7.2 Demographic Data

Requirement

FTA recipients that provide fixed route transit and operate 50 or more vehicles in peak service and are located in a UZA of 200,000 or more in population must collect and analyze racial and ethnic data, as described in FTA C 4702.1B, Chap. IV-7, Part 5, to determine the extent to which members of minority groups are beneficiaries of programs receiving Federal financial assistance from FTA.

Discussion

During this review, no deficiencies were found with this requirement. DDOT used the 2011-2015 ACS 5-year estimates to identify and analyze the minority and low-income populations in its service area. During the site visit, DDOT provided the review team with the required demographic data and map elements outlined in Table 7.2.

Table 7.2 – DDOT Demographic Data Practices

Elements Required for Demographic Data (per FTA Circular 4702.1B)	Included in Submittals
Base map of agency's service area that includes each Census tract or traffic analysis zone (TAZ), major streets, etc., fixed transit facilities, and major activity centers or transit trip generators, and major streets and highways. This map shall overlay Census tract, block or block group data depicting minority populations with fixed transit facilities.	Yes
A map that highlights those transit facilities that were recently replaced, improved, or are scheduled (projects identified in planning documents) for an update in the next five years.	Yes
Demographic map that plots information listed in FTA C 4702.1B, Chap. IV-7, Part 5(a)(1) and also shades those Census tracts, blocks, block groups, TAZs, or other geographic zones where percentage of the total minority and low-income population residing in these areas exceeds the average percentage of minority and low-income population for service area as a whole.	Yes
A GIS or alternative map overlaying minority populations with fixed transit facilities, such as bus shelters, transit stations, and fixed guideways.	Yes
Chart for each Census tract or TAZ that shows actual numbers and percentages for each minority group within zone or tract.	Yes
Information on the race, color, national, origin, English proficiency, language spoken at home, household income, and travel patterns, for their riders using customer surveys, and fare usage by fare types for riders via a survey.	Yes

7.3 Monitoring Transit Service

Requirement

FTA recipients must monitor the performance of their transit service relative to their system-wide service standards and service policies not less than every three years. Periodic service monitoring activities must be undertaken to compare the level and quality of service provided to predominantly minority areas with service provided in other areas to ensure that the end result of policies and decision-making is equitable service. If recipient monitoring determines that prior decisions have resulted in disparate impacts, it must take corrective action to remedy the disparities to the greatest extent possible, and discuss in the Title VI Program these disparate impacts and actions taken to remedy the disparities. (FTA C 4702.1B, Chap. IV-9, Sec. 6).

Discussion

During this review, no deficiencies were found with this requirement. DDOT's 2018 Title VI Program states that DDOT will monitor its transit service annually. DDOT provided documentation that it performed the required analysis in October 2018 and October 2019. The analysis applied the service standards and policies included in the 2018 Title VI Program and compared the performance of non-minority vs. minority routes. The analysis in October 2018 and 2019 determined that each service standard was met and that there was no disparate impact in performance between the non-minority and minority routes sampled. The monitoring information provided included the elements outlined in Table 7.3.

Table 7.3 – Monitoring

Elements Required (per FTA Circular 4702.1B.)	Included in Submittals
a. Transit providers shall use the minority transit route definition to implement this monitoring program. Transit providers shall select a sample of minority and non-minority routes from all modes of service provided. The sample shall include routes that provide service to predominantly minority areas and non-minority areas. Transit providers should bear in mind that the greater the sample size, the more reliable the results.	Yes
b. Transit providers shall assess the performance of each minority and non-minority route in the sample for each of the transit provider's service standards and service policies.	Yes
c. Transit providers shall compare the transit service observed in the assessment to the transit provider's established service policies and standards.	Yes
d. For cases in which the observed service for any route exceeds or fails to meet the standard or policy, depending on the metric measured, the transit provider shall analyze why the discrepancies exist, and take steps to reduce the potential effects.	N/A

Elements Required (per FTA Circular 4702.1B.)	Included in Submittals
e. Transit providers shall evaluate their transit amenities policy to ensure amenities are being distributed throughout the transit system in an equitable manner.	Yes
f. Transit providers shall develop a policy or procedure to determine whether disparate impacts exist on the basis of race, color, or national origin, and apply that policy or procedure to the results of the monitoring activities.	Yes
g. Transit providers shall brief and obtain approval from the transit providers' policy-making officials, generally the board of directors or appropriate government entity responsible for policy decisions regarding the results of the monitoring program.	Yes

7.4 Evaluation of Service and Fare Changes

Requirement

FTA recipients that provide fixed route transit service and operate 50 vehicles or more during peak service and operate within a UZA of 200,000 persons are required to prepare and submit service and fare equity analyses. FTA recipients must develop written procedures to evaluate, prior to implementation, any and all fare changes and all major service changes and new fixed guideways capital projects service changes, to determine whether those changes have a discriminatory impact. (FTA C 4702.1B, Chap. IV-10, Sec. 7).

Discussion

During this review, deficiencies were found with this requirement. DDOT's 2018 Title VI Program includes written procedures defining a major service change as the addition or reduction of revenue hours or revenue miles of more than 25 percent on any one route. DDOT will determine if there is a disparate impact or disproportionate burden if 25 percent or more of the affected route falls in census block groups with minority/low-income populations higher than the DDOT service area average.

During this review, the following major service change equity analyses were reviewed:

- January 2019 Service Change
- June 2019 Service Change
- November 2019 Service Change

For the above service changes, DDOT did not follow the methodology included in its program. DDOT did not analyze if each route falls into a census block groups with 25 percent or more minority/low-income populations higher than the DDOT service area average. Each analysis involved major service changes to multiple routes and the analysis was performed in the aggregate instead of by individual route as stated in the 2018 Title VI Program. As a result, DDOT did not compare the impacts by route against the DDOT service average. According to DDOT, the procedure for calculating major service changes had been modified to an aggregate

method. DDOT plans to review all of its routes system-wide in an effort to provide improved service. Documentation of the revised major service change policy was not provided.

In addition, DDOT did not provide evidence that its major service change and disparate impact policies and disproportionate burden policies received public participation, as required by FTA Circular 4702.1B, Chap. IV-10, Sec. 7(a)(1)(d) and 7(a)(2)(d).

The reviewers also reviewed a May 2019 Fare Change equity analysis which was performed in accordance with both DDOT's 2018 Title VI Program and FTA Circular 4702.1B, Chap. IV-10, Sec. 7(b).

Table 7.4 – Evaluation of Service and Fare Changes

Elements Required (per FTA Circular 4702.1B) ¹	Included in Submittals
1. Assess effects of proposed fare or service change on minority and low-income populations.	
a. A transit provider must undertake an analysis for any type of fare change. As for service changes, an analysis is required if the identified service change triggers the major service change policy the agency developed or is a new fixed guideway system.	Yes
b. The transit provider shall describe the dataset(s) used in the equity analysis and the techniques/technology involved in collecting the data.	Yes
c. The transit provider shall define and analyze adverse effects related to the fare change or the major service change. Transit providers shall consider the degree of adverse effects, and analyze those effects, when planning their service changes.	Yes
d. The transit provider will assess the level of adverse effects borne by minority populations compared to non-minority populations and determine whether the difference is statistically significant and exceeds the disparate impact policy threshold the agency previously developed. The difference is calculated on an absolute change, as well as the percent change.	No
e. The transit provider shall engage the public to discuss the proposed changes and listen to the opinions expressed on the proposed changes.	Yes
f. If no disparate impact found, then the analysis concludes.	Yes

¹ This formatting is followed when conducting a disproportionate burden analysis on low-income populations related to any fare change and major service change as well. The difference is that a transit provider will apply the disproportionate burden policy, instead of the disparate impact policy, apply the low-income population threshold, and if there is a disproportionate burden, will take steps to avoid, minimize, or mitigate impacts where practicable.

2. Assess alternatives available for people affected by fare increase of major service change, if a disparate impact is found	
a. If a potential disparate impact is found, the transit provider must analyze alternatives in order to avoid, minimize, or mitigate potential disparate impacts. The alternatives will be analyzed to determine whether the modifications remove the potential disparate impacts of the changes.	N/A
b. If a transit provider chooses not to alter the proposed service changes, or if the transit provider finds even after the revisions, that minority riders will continue to bear a disproportionate share of the proposed service change, the transit provider may implement the service change <i>only</i> if: <ul style="list-style-type: none"> • the transit provider has a substantial legitimate justification for the proposed service change, and • the transit provider can show that there are no alternatives that would have a less disparate impact on minority riders but would still accomplish the transit provider's legitimate program goals. 	N/A

Corrective Actions and Schedule

Within 60 days of the issuance of the final report, DDOT must submit to the FTA Office of Civil Rights the following:

- Revised written procedures that accurately reflect DDOT's current methodology for conducting major service change equity analyses.
- Documentation of public comments received on DDOT's revised major service change definition as well as DDOT's disparate impact and disproportionate burden thresholds.

8. Summary of Findings/Corrective Actions

Item	Title VI Requirements	Review Finding	Deficiency(s)	Corrective Action(s)	Response Days/*
1.	Annual Title VI Certification and Assurance	ND	-	-	-
2.	Submit Title VI Program	ND	-	-	-
3.	Notice to Beneficiaries of Protection Under Title VI	ND	-	-	-
4.	Title VI Complaint Procedures and Complaint Form	ND	-	-	-
5.	List of Title VI Investigations, Complaints and Lawsuits	ND	-	-	-
6.	Inclusive Public Participation	D	<p>DDOT has not implemented the public outreach efforts listed in its Public Participation Plan.</p> <p>With the exception of service/fare changes, the community outreach performed does not take into consideration minority and LEP populations.</p>	<p>Submit to the FTA Office of Civil Rights:</p> <ul style="list-style-type: none"> • A public outreach plan that incorporates outreach efforts for minority, low-income, and LEP populations. • A plan to consult with stakeholders and interested parties in the development of the public outreach plan. 	<p>Within 60 days of the issuance of the final report</p>

Item	Title VI Requirements	Review Finding	Deficiency(s)	Corrective Action(s)	Response Days/*
7.	Language Access to LEP Persons	D	DDOT is not conducting LEP training for bus operators as described in the Title VI program.	Submit to the FTA Office of Civil Rights: <ul style="list-style-type: none"> • A process to be used to fully develop Factor 3 of the four-factor analysis relating to the nature and importance of the program, activity, or service to people’s lives. • A process and timeline for conducting Title VI training for customer-facing transit equipment operators, including training materials and documentation for any training now completed 	Within 60 days of the issuance of the final report
8.	Minority Representation on Planning or Advisory Bodies	D	No description provided in the Title VI program of the efforts made to encourage the participation of minorities on such committees.	Submit to the FTA Office of Civil Rights a description of efforts that will be made to encourage the participation of minorities on transit-related non-elected planning or advisory committees.	Within 60 days of the issuance of the final report

Item	Title VI Requirements	Review Finding	Deficiency(s)	Corrective Action(s)	Response Days/*
9.	Monitoring Subrecipients and providing assistance to Subrecipients	NA	-	-	-
10	Determination of Site or Locations	ND	-	-	-
Fixed Route Transit Provider Requirements (Chapter 4)					
1.	System wide Service Standards/Policies	ND	-	-	-
2.	Demographic Data	ND	-	-	-
3.	Monitoring Transit System	ND	-	-	-
4.	Evaluation of Fare/Service Changes	D	<p>No documentation provided that the Disparate Impact or Disproportionate Burden thresholds being used received public comment.</p> <p>Equity analysis process being used is not the process described in the 2018 Title VI program.</p>	<p>Submit to the FTA Office of Civil Rights:</p> <ul style="list-style-type: none"> • Revised written procedures that accurately reflect DDOT's current methodology for conducting major service change equity analyses. • Documentation of public comments received on DDOT's major service change definition as well as DDOT's disparate impact and disproportionate burden thresholds. 	<p>Within 60 days of the issuance of the final report.</p>

Findings at the time of the site visit: ND = No Deficiencies Found; D = Deficiency; NA = Not Applicable; AC = Advisory Comment, *Within the date of the Final Transmittal

Attachment A: FTA Notification Letter to the City of Detroit Department of Transportation



U.S. Department
of Transportation
Federal Transit
Administration

Headquarters

East Building, 5th Floor, TCR
1200 New Jersey Avenue, SE
Washington, DC 20590

November 19, 2019

Angelica Jones
Interim Director
Department of Transportation
City of Detroit
1301 E. Warren Avenue
Detroit, MI 48207

Dear Ms. Jones:

The Federal Transit Administration (FTA) Office of Civil Rights is responsible for ensuring compliance with 49 CFR Part 21, “Nondiscrimination in Federally-Assisted Programs of the Department of Transportation—Effectuation of Title VI of the Civil Rights Act of 1964” (Title VI) by its grant recipients and subrecipients. As part of its ongoing oversight efforts, the FTA Office of Civil Rights conducts a number of on-site Title VI specialized reviews of these grant recipients. The City of Detroit Department of Transportation (DDOT) has been selected for such a review to take place January 22 – January 24, 2020.

The purpose of this review will be to determine whether DDOT is meeting its obligations, as represented by certification to FTA, to comply with all applicable provisions of 49 CFR Part 21 and FTA Title VI Circular 4702.1B.

The review process includes data collection before the on-site visit, an opening conference, an on-site review of Title VI program implementation (including, but not limited to discussions to clarify items and matters previously reviewed and interviews with staff), interviews with external interested parties, and an exit conference. FTA has engaged the services of Milligan and Company LLC, of Philadelphia, PA, to conduct this specialized review. Representatives of Milligan and FTA will participate in the opening and exit conferences, with FTA participating by telephone.

We request an opening conference at 9:00 am, on Wednesday January 22, 2020 to introduce the Milligan team and FTA representatives to DDOT. Attendees should include you and other key staff. During the opening conference, the review team members will present an overview of the on-site activities.

Because review team members will spend considerable time on site during the week, please provide them with temporary identification and a workspace within or near your offices for the duration of their visit. Please let us know if you will designate a member of your staff to serve as DDOT’s liaison with the review team and to coordinate the on-site review and address questions that may arise during the visit.

So that we may properly prepare for the site visit, we request that you provide the information described in the enclosure, which consists of items that the review team must receive within

30 calendar days of the date of this letter. Please forward these materials, via email, to the following contact person:

Kristin Tighe
Milligan & Company LLC
105 N. 22nd Street
Philadelphia, PA 19103
215-496-9100 x5146
kszwajkowski@milligancpa.com

You also have the option of sending the documents via Milligan's secure file transfer protocol (FTP) site. Your reviewer will reach out to you concerning the use of the FTP site. Please be prepared to designate a point of contact for your agency, for which user access should be provided.

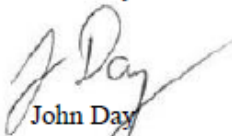
FTA requests your attendance at an exit conference scheduled for 1:00 pm, on Friday, January 24, 2020. The exit conference will afford an opportunity for the reviewers to discuss their observations with you and your agency. We request that you and other key staff attend the exit conference.

The FTA Office of Civil Rights will make findings and will provide a Draft Report. You will have an opportunity to correct any factual inconsistencies before FTA finalizes the report. The draft and final report, when issued to DDOT will be considered a public document subject to release under the Freedom of Information Act, upon request.

DDOT representatives are welcome to accompany the review team during the on-site activities, if you so choose. If you have any questions or concerns before the opening conference, please contact Shavon Nelson at (202) 366-0635 or via email at shavon.nelson@dot.gov.

Thank you in advance for your assistance and cooperation as we undertake this process. We look forward to working with your staff.

Sincerely,



John Day
Program Manager
FTA Office of Civil Rights

Enclosure

cc: Kelley Brookins, Regional Administrator, FTA Region 5
Selene Faer Dalton-Kumins, Associate Administrator, FTA Office of Civil Rights

Enclosure

The following information must be submitted to Milligan within 30 calendar days from the date of this letter:

1. Current Title VI program (which should include the DDOT organization chart).
2. Any conducted service and fare equity analyses over the past three (3) years.
3. A list of any siting, locating, and/or constructing of facilities, and any associated Title VI equity analyses within the last three (3) years.
4. Current Title VI complaint/lawsuit or investigation list.
5. Summary of public outreach efforts/events since the last Title VI program submission, including any language efforts/activities to ensure limited English persons are able to meaningfully participate and contribute during the held public outreach efforts/events.
6. List of any monitoring or technical assistance provided to subrecipient(s).
7. Summary of subrecipient(s) and their respective Title VI program status.
8. Names, titles, telephone numbers, and email addresses of interested parties (external organizations) with which DDOT has interacted on Title VI issues.
9. Other pertinent information determined by DDOT staff to be pertinent and demonstrative of its Title VI compliance efforts.



U.S. Department
of Transportation
**Federal Transit
Administration**

Headquarters

5th Floor – East Bldg., TCR
1200 New Jersey Avenue, SE
Washington, DC 20590

October 23, 2020

Mikel Oglesby
Executive Director
Department of Transportation
City of Detroit
1301 E. Warren Avenue
Detroit, MI 48207

RE: City of Detroit DOT Title VI Compliance Review Final Report

Dear Mr. Oglesby:

This letter concerns the Federal Transit Administration's (FTA) Title VI Review of the City of Detroit Department of Transportation (DDOT) conducted from January 22-24, 2020. Enclosed is a copy of the Final Report, which will be posted on FTA's website on our Title VI page.

The FTA Office of Civil Rights is responsible for ensuring compliance with 49 CFR Part 21, "Nondiscrimination in Federally-Assisted Programs of the Department of Transportation—Effectuation of Title VI of the Civil Rights Act of 1964" by its grant recipients and subrecipients. As part of our ongoing oversight efforts, FTA conducts a number of onsite reviews to ensure compliance with Title VI and the applicable departmental regulations. FTA uses the findings from these reviews to provide direction and technical assistance to transit agencies in order to achieve compliance with Title VI.

Unless otherwise noted, all corrective actions identified in the Final Report must be undertaken within 60 days of the date of this letter. Once we have reviewed your submissions, we will either request clarification or additional corrective action, or will close out the findings if your response sufficiently addresses the Title VI requirements. Please email your responses to Shavon Nelson at shavon.nelson@dot.gov.

We appreciate the cooperation and assistance that you and your staff have provided us during this review, and we are confident DDOT will take steps to correct the deficiencies. If you have any questions about this matter, please contact me at 202-366-1671 or via email at john.day@dot.gov.

Sincerely,

John R. Day
Program Manager
FTA Office of Civil Rights

cc: Kelley Brookins, Regional Administrator, FTA Region V
Marjorie Hughes, Regional Civil Rights Officer, FTA Region V