

City Manager's Office
TO THE CITY MANAGER FOR SIGNATURE

Date 4 / 12 /2022

From: TRANSPORTATION AND ENVIRONMENTAL SERVICES (Department)

YON LAMBERT/MEGAN OLEYNIK (Name)

Reviewed and approved by Department Head Lalit sharma (for Yon Lambert) (Initials)
Lalit sharma (for Yon Lambert) (Apr 12, 2022 16:54 EDT)

Reviewed by Assistant Director Tarrence Moore
Tarrence Moore (Apr 12, 2022 12:54 EDT)

If applicable, authorized by City Council: _____ (Date)

If has fiscal impact, reviewed by: _____ (OMB)

When signed, return to: Sherry.clarke@alexandriava.gov Ext. 4025 (Name)

Signature Required: ☒ City Manager ☐ Deputy City Manager (Extension)

Explanation/Comments:

> Title VI Program Assurances submission for VDOT/USDOT

> Each sub-recipient of Federal transportation funds is required to submit a signed copy of the United States Department of Transportation (USDOT) Standard Title VI/Nondiscrimination Assurances (USDOT Order 1050.2A) Title VI/Nondiscrimination Assurance form to the Department annually. The attached forms outline the requirements and assurances each locality is agreeing to when accepting Federal financial assistance.

> BACKGROUND INCLUDES:

- Final Draft of The City of Alexandria's Federal Transit Administration (FTA) Title VI Program
- Program Letter to LPAs

> Please sign page three of the TITLE VI / NONDISCRIMINATION ASSURANCE agreement

> DUE DATE 4/15/22

Signature Item

Signature Item



CITY OF ALEXANDRIA, VA
TITLE VI / NONDISCRIMINATION ASSURANCE
(DOT Order No. 1050.2A)

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

Statutory/Regulatory Authorities

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

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

General Assurance

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

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

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

Specific Assurances

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

1. The Recipient agrees that each "activity," "facility," or "program," as defined in §§ 21.23 (b) and 21.23 (e) of 49 C.F.R. § 21 will be (with regard to an "activity") facilitated, or will be (with regard to a "facility") operated, or will be (with regard to a "program")

conducted in compliance with all requirements imposed by, or pursuant to the Acts and the Regulations.

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

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

3. The Recipient will insert the clauses of Appendix A and E of this Assurance in every contract or agreement subject to the Acts and the Regulations.
4. The Recipient will insert the clauses of Appendix B of this Assurance, as a covenant running with the land, in any deed from the United States effecting or recording a transfer of real property, structures, use, or improvements thereon or interest therein to a Recipient.
5. That where the Recipient receives Federal financial assistance to construct a facility, or part of a facility, the Assurance will extend to the entire facility and facilities operated in connection therewith.
6. That where the Recipient receives Federal financial assistance in the form, or for the acquisition of real property or an interest in real property, the Assurance will extend to rights to space on, over, or under such property.
7. That the Recipient will include the clauses set forth in Appendix C and Appendix D of this Assurance, as a covenant running with the land, in any future deeds, leases, licenses, permits, or similar instruments entered into by the Recipient with other parties:
 - a. for the subsequent transfer of real property acquired or improved under the applicable activity, project, or program; and
 - b. for the construction or use of, or access to, space on, over, or under real property acquired or improved under the applicable activity, project, or program.
8. That this Assurance obligates the Recipient for the period during which Federal financial assistance is extended to the program, except where the Federal financial assistance is to provide, or is in the form of, personal property, or real property, or interest therein, or structures or improvements thereon, in which case the Assurance obligates the Recipient, or any transferee for the longer of the following periods:
 - a. the period during which the property is used for a purpose for which the Federal financial assistance is extended, or for another purpose involving the provision of similar services or benefits; or

- b. the period during which the Recipient retains ownership or possession of the property.
9. The Recipient will provide for such methods of administration for the program as are found by the Secretary of Transportation or the official to whom he/she delegates specific authority to give reasonable guarantee that it, other recipients, sub-recipients, sub-grantees, contractors, subcontractors, consultants, transferees, successors in interest, and other participants of Federal financial assistance under such program will comply with all requirements imposed or pursuant to the Acts, the Regulations, and this Assurance.
10. The Recipient agrees that the United States has a right to seek judicial enforcement with regard to any matter arising under the Acts, the Regulations, and this Assurance.

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

The City of Alexandria, VA gives this ASSURANCE in consideration of and for obtaining any Federal grants, loans, contracts, agreements, property, and/or discounts, or other Federal-aid and Federal financial assistance extended after the date hereof to the recipients by the U.S. Department of Transportation under the *Federal-Aid Highway Program*. This ASSURANCE is binding on the *Commonwealth of Virginia*, other recipients, sub-recipients, sub-grantees, contractors, subcontractors and their subcontractors, transferees, successors in interest, and any other participants in the *Federal-Aid Highway Program*.

City of Alexandria, VA

by _____

James F. Parajon, City Manager

DATED _____

Christina Zechman Brown

Deputy City Attorney
Approved as to Form

APPENDIX A
Contractor/ Consultant/Supplier Agreement: U.S. DOT 1050.2A -- Appendix A

During the performance of this contract, the contractor, for itself, its assignees, and successors in interest (hereinafter referred to as the "contractor") agrees as follows:

1. Compliance with Regulations: The contractor (hereinafter includes consultants) will comply with the Acts and the Regulations relative to Nondiscrimination in Federally-assisted programs of the U.S. Department of Transportation, the Federal Highway Administration, as they may be amended from time to time, which are herein incorporated by reference and made a part of this contract.
2. Nondiscrimination: The contractor, with regard to the work performed by it during the contract, will not discriminate on the grounds of race, color, or national origin in the selection and retention of subcontractors, including procurements of materials and leases of equipment. The contractor will not participate directly or indirectly in the discrimination prohibited by the Acts and the Regulations, including employment practices when the contract covers any activity, project, or program set forth in Appendix B of 49 CFR Part 21.
3. Solicitations for Subcontracts, Including Procurements of Materials and Equipment: In all solicitations, either by competitive bidding, or negotiation made by the contractor for work to be performed under a subcontract, including procurements of materials, or leases of equipment, each potential subcontractor or supplier will be notified by the contractor of the contractor's obligations under this contract and the Acts and the Regulations relative to Nondiscrimination on the grounds of race, color, or national origin.
4. Information and Reports: The contractor will provide all information and reports required by the Acts, the Regulations, and directives issued pursuant thereto and will permit access to its books, records, accounts, other sources of information, and its facilities as may be determined by the Recipient or the Federal Highway Administration to be pertinent to ascertain compliance with such Acts, Regulations, and instructions. Where any information required of a contractor is in the exclusive possession of another who fails or refuses to furnish the information, the contractor will so certify to the Recipient or the Federal Highway Administration, as appropriate, and will set forth what efforts it has made to obtain the information.
5. Sanctions for Noncompliance: In the event of a contractor's noncompliance with the Non-discrimination provisions of this contract, the Recipient will impose such contract sanctions as it or the Federal Highway Administration may determine to be appropriate, including, but not limited to:
 - a. withholding payments to the contractor under the contract until the contractor complies; and/or
 - b. cancelling, terminating, or suspending a contract, in whole or in part.

6. Incorporation of Provisions: The contractor will include the provisions of paragraphs one through six in every subcontract, including procurements of materials and leases of equipment, unless exempt by the Acts, the Regulations and directives issued pursuant thereto. The contractor will take action with respect to any subcontract or procurement as the Recipient or the Federal Highway Administration may direct as a means of enforcing such provisions including sanctions for noncompliance. Provided, that if the contractor becomes involved in, or is threatened with litigation by a subcontractor, or supplier because of such direction, the contractor may request the Recipient to enter into any litigation to protect the interests of the Recipient. In addition, the contractor may request the United States to enter into the litigation to protect the interests of the United States.

APPENDIX B
CLAUSES FOR DEEDS TRANSFERRING UNITED STATES PROPERTY

The following clauses will be included in deeds effecting or recording the transfer of real property, structures, or improvements thereon, or granting interest therein from the United States pursuant to the provisions of Assurance 4:

NOW, THEREFORE, the U.S. Department of Transportation as authorized by law and upon the condition that the City of Alexandria, VA will accept title to the lands and maintain the project constructed thereon in accordance with the Virginia General Assembly, the Regulations for the Administration of the Federal-Aid Highway Program and the policies and procedures prescribed by the *Federal Highway Administration* of the U.S. Department of Transportation in accordance and in compliance with all requirements imposed by Title 49, Code of Federal Regulations, U.S. Department of Transportation, Subtitle A, Office of the Secretary, Part 21, Nondiscrimination in Federally-assisted programs of the U.S. Department of Transportation pertaining to and effectuating the provisions of Title VI of the Civil Rights Act of 1964 (78 Stat. 252; 42 U.S.C. § 2000d to 2000d-4), does hereby remise, release, quitclaim and convey unto the City of Alexandria, VA all the right, title and interest of the U.S. Department of Transportation in and to said lands described in Exhibit A attached hereto and made a part hereof.

(HABENDUM CLAUSE)

TO HAVE AND TO HOLD said lands and interests therein unto the City of Alexandria, VA and its successors forever, subject, however, to the covenants, conditions, restrictions and reservations herein contained as follows, which will remain in effect for the period during which the real property or structures are used for a purpose for which Federal financial assistance is extended or for another purpose involving the provision of similar services or benefits and will be binding on the City of Alexandria, VA, its successors and assigns.

The City of Alexandria, VA in consideration of the conveyance of said lands and interests in lands, does hereby covenant and agree as a covenant running with the land for itself, its successors and assigns, that (1) no person will on the grounds of race, color, or national origin, be excluded from participation in, be denied the benefits of, or be otherwise subjected to discrimination with regard to any facility located wholly or in part on, over, or under such lands hereby conveyed [,] [and]* (2) that the City of Alexandria, VA will use the lands and interests in lands and interests in lands so conveyed, in compliance with all requirements imposed by or pursuant to Title 49, Code of Federal Regulations, U.S. Department of Transportation, Subtitle A, Office of the Secretary, Part 21, Nondiscrimination in Federally-assisted programs of the U.S. Department of Transportation, Effectuation of Title VI of the Civil Rights Act of 1964, and as said Regulations and Acts may be amended[, and (3) that in the event of breach of any of the above-mentioned non-discrimination conditions, the Department will have a right to enter or re-enter said lands and facilities on said land, and that above described land and facilities will thereon revert to and vest in and become the absolute property of the U.S. Department of Transportation and its assigns as such interest existed prior to this instruction].*

(*Reverter clause and related language to be used only when it is determined that such a clause is necessary in order to make clear the purpose of Title VI.)

APPENDIX C
CLAUSES FOR TRANSFER OF REAL PROPERTY ACQUIRED OR IMPROVED UNDER
THE ACTIVITY, FACILITY, OR PROGRAM

The following clauses will be included in deeds, licenses, leases, permits, or similar instruments entered into by the City of Alexandria, VA pursuant to the provisions of Assurance 7(a):

- A. The (grantee, lessee, permittee, etc. as appropriate) for himself/herself, his/her heirs, personal representatives, successors in interest, and assigns, as a part of the consideration hereof, does hereby covenant and agree [in the case of deeds and leases add "as a covenant running with the land"] that:
 - 1. In the event facilities are constructed, maintained, or otherwise operated on the property described in this (deed, license, lease, permit, etc.) for a purpose for which a U.S. Department of Transportation activity, facility, or program is extended or for another purpose involving the provision of similar services or benefits, the (grantee, licensee, lessee, permittee, etc.) will maintain and operate such facilities and services in compliance with all requirements imposed by the Acts and Regulations (as may be amended) such that no person on the grounds of race, color, or national origin, will be excluded from participation in, denied the benefits of, or be otherwise subjected to discrimination in the use of said facilities.
- B. With respect to licenses, leases, permits, etc., in the event of breach of any of the above Nondiscrimination covenants, the City of Alexandria, VA will have the right to terminate the (lease, license, permit, etc.) and to enter, re-enter, and repossess said lands and facilities thereon, and hold the same as if the (lease, license, permit, etc.) had never been made or issued.*
- C. With respect to a deed, in the event of breach of any of the above Nondiscrimination covenants, the City of Alexandria, VA will have the right to enter or re-enter the lands and facilities thereon, and the above described lands and facilities will there upon revert to and vest in and become the absolute property of the City of Alexandria, VA and its assigns.*

(*Reverter clause and related language to be used only when it is determined that such a clause is necessary to make clear the purpose of Title VI.)

APPENDIX D
CLAUSES FOR CONSTRUCTION/USE/ACCESS TO REAL PROPERTY ACQUIRED UNDER
THE ACTIVITY, FACILITY OR PROGRAM

The following clauses will be included in deeds, licenses, permits, or similar instruments/agreements entered into by the City of Alexandria, VA pursuant to the provisions of Assurance 7(b):

- A. The (grantee, licensee, permittee, etc., as appropriate) for himself/herself, his/her heirs, personal representatives, successors in interest, and assigns, as a part of the consideration hereof, does hereby covenant and agree (in the case of deeds and leases add, "as a covenant running with the land") that (1) no person on the ground of race, color, or national origin, will be excluded from participation in, denied the benefits of, or be otherwise subjected to discrimination in the use of said facilities, (2) that in the construction of any improvements on, over, or under such land, and the furnishing of services thereon, no person on the ground of race, color, or national origin, will be excluded from participation in, denied the benefits of, or otherwise be subjected to discrimination, (3) that the (grantee, licensee, lessee, permittee, etc.) will use the premises in compliance with all other requirements imposed by or pursuant to the Acts and Regulations, as amended, set forth in this Assurance.
- B. With respect to (licenses, leases, permits, etc.), in the event of breach of any of the above Nondiscrimination covenants, the City of Alexandria, VA will have the right to terminate the (license, permit, etc., as appropriate) and to enter or re-enter and repossess said land and the facilities thereon, and hold the same as if said (license, permit, etc., as appropriate) had never been made or issued.*
- C. With respect to deeds, in the event of breach of any of the above Non-discrimination covenants, the City of Alexandria, VA will there upon revert to and vest in and become the absolute property of the City of Alexandria, VA and its assigns.*

(*Reverter clause and related language to be used only when it is determined that such a clause is necessary to make clear the purpose of Title VI.)

APPENDIX E
Contractor/ Consultant/Supplier Agreements: U.S. DOT 1050.2A -- Appendix E

During the performance of this contract, the contractor, for itself, its assignees, and successors in interest (hereinafter referred to as the “contractor”) agrees to comply with the following non-discrimination statutes and authorities; including but not limited to:

Pertinent Nondiscrimination Authorities:

- Title VI of the Civil Rights Act of 1964 (42 U.S.C. § 2000d *et seq.*, 78 stat. 252), (prohibits discrimination on the basis of race, color, national origin); and 49 CFR Part 21;
- The Uniform Relocation Assistance and Real Property Acquisition Policies Act of 1970, (42 U.S.C. § 4601), (prohibits unfair treatment of persons displaced or whose property has been acquired because of Federal or Federal-aid programs and projects);
- Federal-Aid Highway Act of 1973, (23 U.S.C. § 324 *et seq.*), (prohibits discrimination on the basis of sex);
- Section 504 of the Rehabilitation Act of 1973, (29 U.S.C. § 794 *et seq.*), as amended, (prohibits discrimination on the basis of disability); and 49 CFR Part 27;
- The Age Discrimination Act of 1975, as amended, (42 U.S.C. § 6101 *et seq.*), (prohibits discrimination on the basis of age);
- Airport and Airway Improvement Act of 1982, (49 USC § 471, Section 47123), as amended, (prohibits discrimination based on race, creed, color, national origin, or sex);
- The Civil Rights Restoration Act of 1987, (PL 100-209), (Broadened the scope, coverage and applicability of Title VI of the Civil Rights Act of 1964, The Age Discrimination Act of 1975 and Section 504 of the Rehabilitation Act of 1973, by expanding the definition of the terms “programs or activities” to include all of the programs or activities of the Federal-aid recipients, sub-recipients and contractors, whether such programs or activities are Federally funded or not);
- Titles II and III of the Americans with Disabilities Act, which prohibit discrimination on the basis of disability in the operation of public entities, public and private transportation systems, places of public accommodation, and certain testing entities (42 U.S.C. §§ 12131 -- 12189) as implemented by Department of Transportation regulations at 49 C.F.R. parts 37 and 38;
- The Federal Aviation Administration’s Non-discrimination statute (49 U.S.C. § 47123) (prohibits discrimination on the basis of race, color, national origin, and sex);
- Executive Order 12898, Federal Actions to Address Environmental Justice in Minority Populations and Low-Income Populations, which ensures non-discrimination against minority populations by discouraging programs, policies, and activities with disproportionately high and adverse human health or environmental effects on minority and low-income populations;
- Executive Order 13166, Improving Access to Services for Persons with Limited English Proficiency, and resulting agency guidance, national origin discrimination includes discrimination because of limited English proficiency (LEP). To ensure compliance with Title VI, you must take reasonable steps to ensure that LEP persons have meaningful access to your programs (70 Fed. Reg. at 74087 to 74100);
- Title IX of the Education Amendments of 1972, as amended, which prohibits you from discriminating because of sex in education programs or activities (20 U.S.C. 1681 *et seq.*).

The City of Alexandria's Federal Transit Administration (FTA) Title VI Program



Revised by City of Alexandria & DASH Staff

February 2022

Title VI Notice:

"The City of Alexandria fully complies with Title VI of the Civil Rights Act of 1964 and related statutes and regulations in all programs and activities. For more information, or to file a Title VI related complaint, see <https://www.alexandriava.gov/HumanRights> and www.dashbus.com/titlevi or call (703) 746-3140.

Para información en español, llame al (703) 746-3140.

The City of Alexandria's Federal Transit Administration (FTA)

Title VI Program

The City of Alexandria (the "City") is an independent City in the Commonwealth of Virginia which was founded in 1749. The City receives Federal Transit Administration ("FTA") funds as a sub-recipient of the Northern Virginia Transportation Commission ("NVTC"). The City is applying for FTA funds as a direct recipient, and the Alexandria Transit Company (ATC) will be a sub-recipient.

The City has established an FTA Title VI Program to comply with the US Department of Transportation ("DOT") Title VI regulations (49 CFR part 21) and to integrate into their programs and activities considerations expressed in the DOT Policy Guidance Concerning Recipients' Responsibilities to Limited English Proficiency ("LEP") Persons (70 FR 74087, December 14, 2005).

On October 1, 2012, FTA issued Circular 4702.1B which supersedes Circular 4702.1A and requires recipients to have their own Title VI program. The Title VI program shall follow all the requirements of Chapter III-3 of the Circular and must be approved by the recipient's board of directors or appropriate governing entity or official(s) responsible for policy decisions. Sub-recipients shall submit a Title VI Program to the primary recipient from whom they receive funding to assist the primary recipient in its compliance efforts.

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APPENDICES

- A. Title VI Notice to the General Public
- B. Instructions for Filing a Title VI Complaint & Complaint Form
- C. Demographic Maps – Languages
- D. Demographic Maps – Ethnicity
- E. City of Alexandria’s Language Assistance Plan (LAP)
- F. DASH (ATC) Board of Directors Memorandum for Approval of Title VI Policies
 - Attachment A – DASH Title VI Service Standards & Policies,
 - Attachment B – DASH Title VI Service Equity Analysis Policy
 - Attachment C - DASH Service Standards Monitoring Results Memorandum

Title VI Program Checklist

Checklist for All Grantees

Requirement	Section
General Requirements	
Requirement to Provide Title VI Assurances	Section 1
Title VI Notice to the Public, including list of locations where notice is posted (English and Spanish)	Appendix A
Title VI Complaint Procedures	Appendix B
Title VI Complaint Form (English and Spanish)	Appendix B
List of Title VI Investigations, Complaints, or Lawsuits	Section 4
Public Participation Plan and Summary of Outreach Efforts	Section 5
Plan for Meaningful LEP Access	Section 6
Non-Elected Committee Racial Composition	Section 7
Sub Recipient Compliance and Monitoring Procedures	N/A*
Facility-Related Title VI Equity Analysis	N/A*
Board Approval of Title VI Program	Appendix F

Source: Federal Transit Administration (FTA) Circular 4702, Appendix A.

*The City has no FTA subrecipients. There is no new facility construction to report for this Title VI Program update.

Checklist for Fixed Route Transit Providers

Requirement	Section
Service Standards	
Vehicle Load	Appendix F (Attachment A)
Vehicle Headway	Appendix F (Attachment A)
On-Time Performance	Appendix F (Attachment A)
Service Availability	Appendix F (Attachment A)
Service Policies	
Transit Amenities	Appendix F (Attachment A)
Vehicle Assignment	Appendix F (Attachment A)
Major Service Modification Policy	Appendix F (Attachment B)
Requirements for Agencies that Operate Over 50 Fixed-Route Vehicles in Peak Service	
Demographic Profiles and Data	Section 8, Appendix C and D, Appendix F (Attachment C)
Monitoring Program	Appendix F (Attachment C)
Major Service Change – Public Engagement Process	Appendix F (Board Memo)
Service and/or Fare Equity Analyses	N/A*

Source: Federal Transit Administration (FTA) Circular 4702, Appendix A.

*There are no major service or fare changes to report for this Title VI Program update.

1.0 Annual Assurance to MWCOG/NVTC that the City of Alexandria is Complying with Title VI of the Civil Rights Act of 1964

Assurance of Compliance

The City of Alexandria complies with Title VI of the Civil Rights Act of 1964, as amended. The City's Human Rights Code prohibits discrimination against any person in housing, employment, public accommodations, city contracts, health and social services, credit and education, based on race, color, national origin, sex, religion, ancestry, marital status, familial status, age, disability, sexual orientation, gender identity or transgender status.

Title VI Assurance

In accordance with 49 CFR Section 21.7, every application for financial assistance from the Federal Transit Administration (FTA) must be accompanied by an assurance that the applicant will carry out the program in compliance with Title VI of the Civil Rights Act of 1964. The City of Alexandria will fulfill this requirement by submitting the annual assurance to FTA prior to receiving FTA funds. The City of Alexandria provides this assurance in consideration of, and for the purpose of, obtaining FTA grants, loans, contracts, property, discounts or other FTA financial assistance.

2.0 Notice to the Public Regarding Title VI Obligations

The City of Alexandria will provide notice to the public regarding its Title VI obligations and the protections available to the public. The notice is included in Appendix A. It states in English and Spanish that the City operates its programs without regard to race, color, and national origin. It informs the public how to request additional information on the City of Alexandria's Title VI obligations. It directs the public to a copy of the City's procedures for filing, receiving, and tracking complaints. The notice also includes the Title VI complaint form (see Appendix B for Title VI complaint procedure and form). The notice states further that the City will translate it into other languages on request.

This notice will be posted in or proximate to large facilities having many transit patrons, such as City Hall, the City's libraries, and such major transit facilities as the King St-Old Town Metrorail station, and on the City's website.

3.0 Investigations of Alleged Discrimination

The City of Alexandria Office of Human Rights investigates any allegations of discrimination in the City. The City of Alexandria will record any Title VI investigations, complaints, or lawsuits. Complaints may be received from the public by the sub-recipient, by the City via 311, the City's Office of Human Rights website intake form, the City Manager's Office, or the City Attorney's Office. All complaints will be referred to the Title VI Coordinator. The Title VI Coordinator will maintain a list, which shall include the date of the investigation, lawsuit, or complaint filed; a summary of the allegation(s); the status of the investigation, lawsuit, or complaint; and actions taken by the City of Alexandria in response to the investigation, lawsuit, or complaint. The City will encourage use of the complaint form attached in Appendix B.

4.0 Recent Title VI Investigations, Complaints, and Lawsuits

The City of Alexandria has had no Title VI complaints since its last submittal in 2019. No Title VI complaints had been filed prior to 2019.

5.0 Public Participation Plan

The City of Alexandria, and Alexandria Transit Company (ATC), which operate DASH bus service, believe public participation is an integral part of transportation planning and decision making. The City of Alexandria provides minority, low-income, and LEP populations to access and opportunities for public participation in transportation decisions. By providing such access, the City of Alexandria offers an inclusive, representative, and equal opportunity for two-way communication resulting in appropriate action that reflects public involvement. The City of

Alexandria's Department of Transportation & Environmental Services has and will continue to coordinate with the City of Alexandria's Office of Communications and Public Information and the City of Alexandria's Office of Human Rights and other organizations to implement strategies to reach out to members in affected minority, low-income, and LEP communities on proposed transportation decisions. The Alexandria Transit Company (ATC) also adheres to these same principles and practices with regards to its public engagement and communication towards the marginalized communities listed above.

The City and ATC both employ a wide variety of means to involve citizens in transportation planning. Examples are the following:

- Meeting with groups who have expressed interest in different projects, such as presentations to civic associations to provide information and solicit feedback on specific projects. This includes attending regularly-scheduled meetings with community groups that specifically serve underrepresented populations or neighborhoods with high percentages of such individuals. Examples include Casa Chirilagua, Ethiopian Development Council, West End Civic Association, the Alexandria Commission on Persons with Disabilities, and the Alexandria Commission for Women.
- Holding project-specific public meetings to solicit input. In areas of the City with large populations of LEP people, the city provides written materials in appropriate languages, such as Spanish and Amharic, and tries to have translators present at these meetings.
- Providing printed materials, posters and flyers in both English, Spanish and Amharic, depending on the communities that are impacted by the subject proposal, project, or service/policy change. DASH and ATC-related posters and flyers are often installed at bus stops, transit centers, Metrorail stations, and onboard buses for maximum visibility
- Performing pop-up meetings at locations and times where large numbers of minority, low-income and LEP individuals who could be affected by a transportation project are likely to be present. For ATC, this often includes conducting such events at DASH bus stops, transit centers, Metrorail stations and onboard buses during peak hours when larger

numbers of patrons will be present, and off-peak times or weekends when a higher percentage of low income, minority and LEP passengers are using the system.

- Employing the City’s general website, the City’s GoAlex website, and the DASH website to provide announcements of public meetings and to provide information to the general public about issues which were raised at the meetings. For major projects and initiatives, the City and ATC web sites may also include information translated into Spanish or Amharic, as was done for recent city projects like the Alexandria Transit Vision Plan and New DASH Network.
- The City and ATC announce meetings using the eNews service, which reach thousands of subscribers who have opted into receiving transportation-related updates.
- Before transportation surveys are administered, ensuring that all people affected by the action who may have Limited English Proficiency, have surveys available in their native language. In the past, we have printed transportation surveys in Spanish and Amharic, which is the native language of a significant percentage of city residents, particularly in West Alexandria. This will be done by pulling down corridor level demographic information, prior to the survey being administered to ensure that it is in the appropriate language. We also provide people with disabilities with opportunities to fill out surveys. For example, when we conducted one of the Alexandria Transit Vision surveys, we put a Section 508 compliant survey on the webpage for with those with visual impediments and ensure that web materials may be viewed with a screen reader.
- In corridors with a large LEP population, translators will be available at all public meetings and any written materials which will be distributed at the meeting will be available in the second predominant language as well as English.
- Releasing news releases on important meetings which may be are picked up by the Washington Post and local newspapers.
- Providing information to Spanish-speaking media outlets, including El Tiempo Latino newspaper and website, and Telemundo and Univision television stations, as appropriate.
- Distributing information monthly about transportation issues on the City’s GoAlex website.

- In some cases, distributing paper flyers to the houses and/or businesses in the travel corridors being analyzed.
- Using ad hoc committees of citizens and elected officials to assist staff in gauging transportation decisions
- City Council meetings are held regularly throughout the year and include opportunities for public comment
- Transportation Commission meetings are held once per month and include a public comment period during which members of the public are able to provide testimony to the Commission.
- ATC Board of Directors meetings are held once per month except during July and August and include a public comment period at the beginning of each meeting for any members of the public who wish to address the Board of Directors on issues relating to DASH.
- DASH Advisory Committee meetings are held on a quarterly basis. The DAC is comprised of no more than 13 members who are selected by DASH staff to represent a diverse cross section of DASH users and stakeholders.
- Web proceedings from City Council, Transportation Commission and DASH Board of Director meetings.
- Sometimes providing information on the local cable television station.
- Information is distributed through City and DASH social media platforms, including Twitter, Facebook and occasionally LinkedIn and Instagram.

6.0 A Plan for Meaningful Access for Persons with Limited English Proficiency (LEP)

Four Factor Analysis

The City of Alexandria has performed a USDOT Four-Factor analysis of its program to encourage people with Limited English Proficiency (LEP) to become more involved in the process of planning transportation services.

This analysis consists of these four factors:

1. The number or proportion of LEP persons eligible to be served or likely to be encountered by a program, activity, or service of the grantee;
2. The frequency with which LEP individuals come into contact with the City of Alexandria's plans, programs, and activities;
3. The nature and importance of the program, activity, or service provided by the City of Alexandria to the LEP population; and
4. The resources available to the City of Alexandria and overall cost to provide LEP assistance.

Factor 1. The number or proportion of LEP persons eligible to be served or likely to be encountered by a program, activity, or service of the grantee;

To get the total number of LEP people in the city the results of the 2015-2019 Public Use Microdata Sample (PUMS) conducted by the U.S. Census were used. According to these figures, approximately two-thirds of Alexandria residents (67%) speak English only. The most common language other than English is Spanish, which is the primary language of 21,112 residents (14% of the population). Other Indo-European languages are used by 9,172 residents (6% of the population). Asian and Pacific Islanders languages are spoken at home by 4,980 residents (3% of the population), People speaking other languages, such as Amharic or Arabic, constitute 10% of the City's population (13,841 residents).

Attached in (Appendix C) the census tract maps that indicate where the major groups of languages most spoken at home other than English are located. Attached in (Appendix D) are maps which indicate the percentage of Black or African American people and the percentage of Hispanics in each census tract in the City.

The City also reviewed another piece of data from the American Community Survey and it indicated for those households where English was not spoken at home, respondents answered whether they could speak English less than very well. For those speaking Spanish in the City, 10,065 residents (52% of those speaking Spanish at home) stated that they can speak English less

than very well. In attempting to gauge the LEP population, it was suggested that the level of literacy of the population should be gauged. Doing a cross-tabulation of ability to speak English well and levels of education would provide the best information.

Based on this data, the City developed a public outreach plan that included methods to actively solicit the input of LEP people.

Factor 2: The frequency with which LEP individuals come into contact with the City of Alexandria's FTA-related plans, programs, and activities.

The City has provided translation services and appointed representatives of non-English speaking groups to commissions; however it has not documented previously how many LEP individuals actually interface with the City. The City will make an effort to document the number of LEP people who wish to be involved in the transportation planning process and how these people became involved in the process. The City's FY23 on board survey will include LEP related questions to help us better understand the community's needs.

Factor 3: The nature and importance of the program, activity, or service provided by the City of Alexandria to the LEP population

The transit programs and services which are assisted by the City's Department of Transportation and Environmental Services and operated by the Alexandria Transit Company (ATC) are of critical importance to many in the LEP community. These public transit services oftentimes represent the only means of transportation to members of this community, which enable them to find and keep jobs, to access educational, shopping and social opportunities, and to take advantage of the many benefits provided for citizens of Alexandria. The City's Transportation Demand Management program, GoAlex regularly engages with the Limited English Proficiency population at several multi-cultural events that are held in the City. Examples include the Alexandria Chiriluagua Festival and the Cambodian Festival. The City will continue to reach out to this important group in providing transit services and facilities which can improve their travel experience.

The City will make an effort to ensure that important projects which will affect LEP populations are identified and will increase its efforts to get these people involved in the transportation planning process.

Factor 4: The resources available to the City of Alexandria and overall costs to provide LEP assistance.

The City developed a Language Assistance Plan in 2003, which was updated in 2008. The City is currently undergoing another update to this plan in line with the City’s Race and Social Equity Initiative, All Alexandria, which was formulated in 2020. The City has historically provided an extensive amount of resources for interpretive services. The City budgets about \$75,000 annually for translation services. Additionally, project budgets often include additional funding for translation services, such as for the Alexandria Mobility Plan, the update to the City’s Transportation Master Plan, the Alexandria Transit Vision Plan, and Duke Street in Motion, to reimagine transit on the Duke Street Corridor.

The 2008 plan, which indicates all of the resources which the City had available to those who have Limited English Proficiency can be found in Appendix E.

7.0 Analysis of Non-Elected Transportation Boards and Commission Appointed by Alexandria

The City of Alexandria has had three city commissions or advisory groups which deal with transit issues. These are the Transportation Commission, the Potomac Yard Metrorail Implementation Work Group, and the Alexandria Transit Company Board of Directors. ATC has also established the DASH Advisory Committee (DAC), which allows DASH riders to provide input and additional perspectives on key issues to DASH leadership. The following table illustrates the composition of these groups:

Table of the Composition of Transit-Related Citizen Groups

Name of Group	No. of Caucasians	No. of African-Americans	No. of Hispanics	No. of Asians/Pacific Islanders	Other	Total
Transportation Commission	9	1	1	0	0	11
Potomac Yard Metrorail Implementation Work Group	12	1	1	0	0	14
Alexandria Transit Company Board of Directors	7	3	0	0	0	10
DASH Advisory Committee (DAC)	4	1	0	1	3	9

The Transportation Commission helps the City Council develop transportation policies consistent with the City’s transportation master plan, the Alexandria Mobility Plan. As of February 2022, the Transportation Commission has one African-American representative. Two additional African American representatives recently resigned, one to join City Council. The Transportation Commission has one Hispanic representative who serves as Chair. There are a total of eleven people on the Commission, whose members are appointed by other City commissions and the City Council. Its meetings are publicized via various City media channels and has had considerable representation from audience members. Staff is considering various creative ways to try to encourage more diverse applicants for the Commission.

Commissioners have been strong advocates for ensuring all, but particularly project level, public outreach efforts solicit a diversity of opinions from a diversity of backgrounds that represent the City as a whole. For the Alexandria Mobility Plan outreach, which was guided by

Commissioners, staff translated materials into Spanish and Amharic and had Spanish and Amharic translators at pop-up events in locations of the City with significant Spanish and Amharic speaking populations. Focus groups were also conducted in Spanish and staff and translators managed a table at a Spanish public meeting for the Arlandria neighborhood.

In the development of the Potomac Yard Metrorail Station, citizen work groups have provided an important forum for community and stakeholder input. A Metrorail Station Feasibility Work Group was established in 2008 and met through 2010. In 2011, the Potomac Yard Metrorail Station Feasibility Work Group was re-convened as the Potomac Yard Metrorail Implementation Work Group (PYMIG) to ensure a thorough technical analysis of a potential new Metrorail station. In September 2015, City Council revised PYMIG's responsibilities and composition to enable PYMIG to function as a forum for the public outreach process through station opening and allow the group to consider the variety of issues that will arise as the project moves into design and construction. The group includes two members of City Council, one of whom is Hispanic, four representatives from other City commissions, one business representative, and four community representatives, one of whom is African-American.

The Alexandria Transit Company is governed by a ten-member Board of Directors that is elected annually by the Alexandria City Council, acting in the capacity of the sole stockholders. Board members include residents and appointed City staff. Three members of the ATC Board are African-Americans and the City has worked to actively recruit Board members from diverse backgrounds and different parts of the City to bring different perspectives to the group.

The DASH Advisory Committee (DAC) was formed in 2020 as a group comprised of DASH users and members of the Alexandria community with their diverse backgrounds. The group was established to solicit more detailed input from DASH customers on a wide variety of issues. The group also serves as DASH ambassadors to the community during outreach programs. The Committee serves at the discretion of the DASH General Manager/CEO and may provide letters of support to DASH leadership on key issues. The DAC consists of 9 to 13 members who serve two-year terms. The group currently consists of nine members who were selected by DASH staff to provide a diverse set of backgrounds that could help bring different perspectives to the

table. The group currently includes four Caucasians, one African American (Chairman), one Asian/Pacific Islander and three other individuals who did not disclose their race or ethnicity. One member is visually impaired and others have identified family members or friends with disabilities other mobility impairments that necessitate the use of transit.

The City will renew its efforts to identify both members of minority groups and people with LEP who will be affected by major City actions. These people will be strongly considered for appointment to the community service boards which provide the City with policy guidance regarding some of these major transportation issues. The City will review the make-up of these boards and ensure that such representation is provided on these Boards, as vacancies become available.

8.0 Requirement to Collect Demographic Data

The Alexandria Transit Company (ATC) operates DASH service and is required to conduct regular onboard surveys that measure demographic data of DASH riders. The next survey of DASH ridership is planned for Fall 2022. Additional maps that compare the distribution of bus service and passenger amenities to the demographic patterns of the City of Alexandria are included as part of the Title VI Service Monitoring policy document. Maps depicting the linguistic and racial demographics of the City of Alexandria are included in Appendices C and D.

The City of Alexandria has also performed demographic analyses during the planning stages of FTA Funded Projects in Alexandria and projects for which the City is applying for federal funding, including the Crystal City-Potomac Yard Transitway (completed), the Potomac Yard Metrorail Station, the West End Transitway, and the King Street Old Town Metrorail Access Improvements. This demographic analysis helped to guide outreach strategies by identifying populations who might require additional outreach.

Appendix A

Notice to the General Public

In order to comply with 49 CFR Section 21.9(d), the City of Alexandria shall 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. The paragraph below will be inserted into all significant publications that are distributed to the public. The text will be placed permanently on the City's website: <http://alexandriava.gov>.

“The City of Alexandria fully complies with Title VI of the Civil Rights Act of 1964 and related statutes and regulations in all programs and activities. For more information, or to file a Title VI related complaint, see <https://www.alexandriava.gov/HumanRights> and www.dashbus.com/titlevi or call (703) 746-3140. Para información en español, llame al (703) 746-3140.”

Apéndice A

Aviso al Público en General

A los fines de cumplir con la Sección 21.9(d) del 49 CRF, la Ciudad de Alexandria le proporcionará al público información relacionada con las obligaciones de esta ciudad con respecto al Título VI y hará saber a todos las protecciones anti-discriminatorias que les brinda esta ley. El párrafo citado a continuación va a ser insertado en todas las publicaciones importantes que se distribuyen al público. Dicho texto también ocupará un lugar permanente en el sitio Web de la ciudad en: <http://alexandriava.gov>.

“La Ciudad de Alexandria cumple a plenitud con las disposiciones del Título VI de la Ley de Derechos Civiles de 1964 y los estatutos y regulaciones afines en todos los programas y actividades. Para más información, o para presentar una queja relacionada con el Título VI, visite: <https://www.alexandriava.gov/HumanRights> y www.dashbus.com/titlevi o llame al (703) 746-3140. Para información en español, llame al (703) 746-3140.”

Appendix B

INSTRUCTIONS FOR FILING A COMPLAINT AND COMPLAINT FORM

Procedures

1. Any person who believes that he, she, they, individually, as a member of any protected class, or in connection with any disadvantaged business enterprise (DBE), has been subjected to discrimination prohibited by Title VI of the Civil Rights Act of 1964, as amended, may file a complaint with the City of Alexandria and/or the Alexandria Transit Company (ATC), which operate DASH bus service. A complaint may also be filed by a representative on behalf of such a person. All complaints will be referred to the City of Alexandria Title VI Coordinator for review and action.
2. The complainant must file the complaint no later than 180 days after:
 - a) The date of the alleged act of discrimination; or
 - b) Where there has been a continuing course of conduct, the date on which that conduct was discontinued. In either case, the recipient or their designee may extend the time for filing or waive the time limit, specifying in writing the reason for so doing.
3. Complaints shall be in writing and shall be signed by the complainant and/or the complainant's representative. Complaints should set forth as fully as possible the facts and circumstances surrounding the claimed discrimination. If a person makes a verbal complaint of discrimination to an officer or employee of the recipient, the person shall be interviewed by the Title VI Coordinator. If necessary, the Title VI Coordinator will assist the person in putting the complaint in writing and submit the written version of the complaint to the person for signature.
4. Within 10 days, the Title VI Coordinator will review the complaint to determine whether the City of Alexandria has jurisdiction and shall acknowledge receipt of the allegation in writing, inform the complainant of action taken or proposed action to process the complaint, advise the respondent of their rights under Title VI and related statutes, and advise the complainant of other avenues of redress available, such as:

Alexandria Office of Human Rights
123 N Pitt St, Suite 230
Alexandria, VA 22314

US Department of Transportation,
Federal Transit Administration's
Office of Civil Rights, 1200 New
Jersey Avenue, 5th Floor,
Washington, DC 20590

5. Within 10 days, a letter will be sent to the appropriate state and federal transportation authorities, including the following information
 - Name, address, email address and phone number of the complainant
 - Name, address, email address and phone number of the respondent
 - Basis of complaint
 - Date of alleged discriminatory act(s)
 - Date of complaint received by the recipient
 - A statement of the complaint
 - Other agencies (state, local or federal) where the complaint has been filed
 - An explanation of the actions the recipient has taken or proposed to resolve the issue identified in the complaint
6. Within 60 days, the Title VI Coordinator will conduct and complete an investigation of the allegation and, based on the information obtained, will issue a recommendation for action in a report of findings to the City Attorney, City Manager and DASH CEO/General Manager. If more information is needed to resolve the case, the Title VI Coordinator may contact the complainant. The complainant has 30 business days from the date of the letter to send requested information to the Title VI Coordinator. If the Title VI Coordinator is not contacted by the complainant or does not receive the additional information within 60 business days, the Title VI Coordinator can administratively close the case. A case can be administratively closed also if the complainant no longer wishes to pursue their case. The complaint should be resolved by informal means whenever possible. Such informal attempts and their results will be summarized in the report of findings.
7. Within 90 days of receipt of the complaint, the Title VI Coordinator will notify the complainant in writing of the final decision reached, including the proposed disposition of the matter. The notification will advise the complainant of his/her/their appeal rights.
8. If a discrimination complaint that originated with the City or DASH is turned over to and investigated by a state or federal transportation organization or another agency, the Title VI Coordinator will monitor the investigation and notify the complainant of updates.
9. In accordance with federal law, the City will require that applicants for federal assistance notify the City of any lawsuits filed against the applicant or sub-recipients of federal assistance or alleging discrimination and a statement as to whether the applicant has been found in noncompliance with any relevant civil rights requirements.
10. Pursuant to the Virginia Public Records Act (VPRA) § 42.1-76 et seq., the City will retain Discrimination Complaint Forms and a log of all complaints filed with or

investigated by the City. All complaints will be included in future updates of the City's FTA Title VI Program.

11. Records of complaints and related data will be made available by request in accordance with the Virginia Freedom of Information Act.

The City of Alexandria has had no Title VI investigations or lawsuits and did not receive any Title VI complaints between 2016 and 2021. If the City were to receive any complaints or be subject to a lawsuit or investigation, it would use the following logs for tracking purposes.

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Title VI Complaint Form

Title VI Coordinator – City of Alexandria
Philippe Simon / philippe.simon@alexandriava.gov / 703-298-9071

Section 1:

Name:

Address:

Phone:

Email:

Accessible Format Requirements (check all that apply)?

Large Print

Audio

TDD

Other

Section 2:

Are you filing the complaint on your own behalf? Yes/No

If you answered “Yes, go to Section 3.”

If you answered “No,” please identify the person for whom you are filing a complaint.

Name:

Relationship:

Please explain why you have filed for a third party:

Please confirm you have obtained the permission of the third party. Yes/No

Section 3:

I believe the discrimination I experienced was based on (check all that apply):

Race

Color

National Origin

Date of Alleged Discrimination (MM/DD/YEAR):

Explain what happened and why you believe you were discriminated against. Include the names and contact information of person(s) involved, both those who discriminated against you (if known) and witnesses. If more space is needed, please use the back of this form.

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Section 4:

Have you previously filed a Title VI complaint with the City of Alexandria? Yes/No

Section 5:

Have you filed this complaint with any other Agency or Court? Yes/No

If you answered “Yes,” please provide detailed information:

Agency/Court:
Contact Name/Title:
Address:
Phone:
Email:

Section 6:

Agency the complaint is against:

Contact Name/Title:

Phone:

Email:

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

Signature *(required)*

Date *(required)*

To download the Complaint Form please click on this link: <https://www.dashbus.com/titlevi/>

Please submit this form in person at the address below, or electronically at
philippe.simon@alexandriava.gov

City of Alexandria – Office of Human Rights
301 King Street
Alexandria, VA 22314

City of Alexandria - Title VI Complaint Log

Complaint Log

Complainant Name	Date	Summary (include basis: race, color or national origin)	Status	Actions Taken

Investigation Log

Investigations	Date	Summary (include basis: race, color or national origin)	Status	Actions Taken

Apéndice B

INSTRUCCIONES PARA PRESENTAR UNA QUEJA Y FORMULARIO DE QUEJA

Procedimientos

1. Toda persona que crea que en forma individual, como miembro de alguna clase protegida, o debido a su relación con cualquier empresa comercial desfavorecida (DBE) ha sido objeto de un acto discriminatorio prohibido por el Título VI de la Ley de Derechos Civiles de 1964, con sus modificaciones, podrá presentar una queja a la Ciudad de Alexandria y/o a la Compañía de Tránsito de Alexandria (ATC) que opera el servicio de autobús DASH. Un representante también podrá presentar una queja en nombre de dicha persona. Todas las quejas serán remitidas al Coordinador del Título VI de la Ciudad de Alexandria para que las evalúe y adopte las medidas necesarias.
2. El demandante debe presentar la queja dentro de los 180 días siguientes a:
 - a) La fecha del presunto acto discriminatorio; o
 - b) Cuando haya habido una línea de conducta continua, la fecha en que se discontinuó esa conducta. En cualquiera de los casos, el destinatario o la persona por él designada puede extender el momento de presentación o eliminar el límite de tiempo, y deberá especificar por escrito el motivo de ello.
3. Las quejas deberán presentarse por escrito y estar firmadas por el demandante y/o el representante del demandante. Las quejas deben indicar de la manera más completa posible los hechos y las circunstancias en torno a la discriminación alegada. Si una persona expresa una queja verbal de discriminación a un funcionario o empleado del demandado, la persona será entrevistada por el Coordinador del Título VI. De ser necesario, el Coordinador del Título VI ayudará a la persona a presentar la queja por escrito y enviará la versión escrita de la queja a la persona para su firma.
4. Dentro de los 10 días, el Coordinador del Título VI revisará la queja para determinar si la Ciudad de Alexandria tiene jurisdicción y acusará recibo del alegato por escrito, informará al demandante sobre la medida tomada o la medida propuesta para procesar la queja, notificará al demandado sobre sus derechos en virtud del Título VI y estatutos relacionados, y notificará al demandante sobre otros medios de reparación disponibles, tales como:

Alexandria Office of Human Rights (Departamento de Derechos Humanos de Alexandria)
123 N Pitt St, Suite 230
Alexandria, VA 22314

US Department of Transportation (Departamento de Transporte de EE. UU.)
Federal Transit Administration's Office of Civil Rights (Oficina de Derechos Civiles de la Administración Federal de Tránsito)
1200 New Jersey Avenue, 5th Floor
Washington, DC 20590

5. Dentro de los 10 días, se enviará una carta a las autoridades de transporte estatales y federales correspondientes con la siguiente información:
 - Nombre, dirección, correo electrónico y número de teléfono del demandante
 - Nombre, dirección, correo electrónico y número de teléfono del demandado
 - Base de la queja
 - Fecha del presunto acto discriminatorio
 - Fecha en que el destinatario recibió la queja
 - Una declaración de la queja
 - Otras agencias (estatales, locales o federales) donde se haya presentado la queja
 - Una explicación de las medidas que ha tomado o propuesto el destinatario para resolver el problema identificado en la queja
6. Dentro de los 60 días, el Coordinador del Título VI realizará una investigación del alegato y, en función de la información obtenida, enviará una recomendación de acción en un informe de conclusiones al Procurador de la Ciudad, el Administrador de la Ciudad y el Director Ejecutivo/Gerente General de DASH. Si se necesita más información para resolver el caso, el Coordinador del Título VI puede comunicarse con el demandante. El demandante tiene 30 días calendario a partir de la fecha de la carta para enviar la información solicitada al Coordinador del Título VI. Si el Coordinador del Título VI no es contactado por el demandante o no recibe la información adicional en un plazo de 60 días calendario, el Coordinador del Título VI puede cerrar el caso. Un caso también puede cerrarse en forma administrativa si el demandante ya no desea continuar con el caso. La queja debe resolverse por medios informales cuando sea posible. Dichos intentos informales y sus resultados se resumirán en el informe de conclusiones.
7. Dentro de los 90 días de haber recibido la queja, el Coordinador del Título VI notificará al demandante por escrito la decisión final alcanzada, que incluye la resolución propuesta del problema. La notificación informará al demandante sus derechos de apelar.
8. Si se entrega una queja de discriminación que se originó en la Ciudad o en DASH a una organización de transporte estatal o federal u otra agencia y es investigada por esta

organización o agencia, el Coordinador del Título VI supervisará la investigación y notificará las novedades al demandante.

9. De acuerdo con las leyes federales, la Ciudad exigirá que los solicitantes de ayuda federal notifiquen a la Ciudad sobre cualquier demanda presentada contra el solicitante o los beneficiarios secundarios de ayuda federal o de presunta discriminación y una declaración referente a si se ha determinado que el solicitante no ha cumplido con algún requisito de derechos civiles relevante.
10. Conforme a la Ley de Registros Públicos de Virginia (VPRA) § 42.1-76 et seq., la Ciudad conservará Formularios de Queja por Discriminación y un registro de todas las quejas presentadas a la Ciudad o que están siendo investigadas por ella. Todas las quejas se incluirán en futuras actualizaciones del Programa del Título VI de la FTA de la Ciudad.
11. Los registros de quejas y datos relacionados estarán disponibles a pedido según la Ley de Libertad de Información de Virginia.

La Ciudad de Alexandria no ha tenido investigaciones ni demandas sobre el Título VI, y no recibió ninguna queja sobre el Título VI entre 2016 y 2021. Si la Ciudad recibiera alguna queja o fuera objeto de una demanda o investigación, utilizará los siguientes registros con fines de seguimiento.

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Formulario de Quejas sobre el Título VI

Coordinador del Título VI – Ciudad de Alexandria
Philippe Simon / philippe.simon@alexandriava.gov / 703-298-9071

Sección 1:

Nombre:

Dirección:

Teléfono:

Correo electrónico:

¿Requisitos de formato accesible? (marcar todos los que correspondan)

Letra de imprenta grande
telefónico para sordos (TDD)

Cinta de audio
Otro

Dispositivo

Sección 2:

¿Está usted presentando esta queja en su propio nombre? Sí/No

Si respondió “Sí”, pase a la Sección 3.

Si respondió “No”, identifique la persona por quien usted está presentando la queja.

Nombre:

Relación:

Por favor explique por qué está presentando la queja a nombre de un tercero:

Confirme que ha obtenido el permiso del tercero. Sí/No

Sección 3:

Considero que la discriminación que sufrí estuvo basada en (marcar todo lo que corresponda):

Raza

Color

Origen nacional

Fecha de la presunta discriminación (MM/DD/AÑO):

Explique lo que sucedió y por qué considera que fue discriminado(a). Incluya los nombres y la información de contacto de las personas involucradas, tanto de las que lo(a) discriminaron (si las conoce) como de los testigos. Si necesita más espacio, use el reverso de este formulario.

Sección 4:

¿Ha presentado anteriormente una queja sobre el Título VI a la Ciudad de Alexandria?
Sí/No

Sección 5:

¿Ha presentado esta queja ante cualquier otra agencia o tribunal? Sí/No

Si respondió “Sí”, proporcione información detallada:

Agencia/tribunal:
Nombre/Cargo del contacto:
Dirección:
Teléfono:
Correo electrónico:

Sección 6:

Agencia contra la cual se presenta la queja:

Nombre/Cargo del contacto:

Teléfono:

Correo electrónico:

Puede adjuntar cualquier material escrito u otra información que considere que es relevante para su queja.

Firma (*obligatoria*)

Fecha (*obligatoria*)

Para descargar el Formulario de Queja, haga clic en este enlace: [https://
www.dashbus.com/titlevi/](https://www.dashbus.com/titlevi/)

Envíe este formulario en persona a la siguiente dirección, o en forma electrónica a philippe.simon@alexandriava.gov

City of Alexandria – Office of Human Rights
301 King Street
Alexandria, VA 22314

Appendix C

Demographic Maps – Languages Spoken at Home Other Than English

Largest Groups of Languages Spoken at Home Other than English in Alexandria

Languages other than English Spoken at Home in Alexandria

2015-2019 American Community Survey (ACS) data indicate the number of residents ages five and older who speak languages other than English at home.¹ Specific languages are reported at the state level whereas four language categories reported at sub-state geographies:

- | | |
|---|--|
| 1. Spanish (including Spanish Creole) | 3. Asian and Pacific Island Languages |
| 2. Other Indo-European languages | <ul style="list-style-type: none">• Chinese• Japanese• Mon-Khmer (Cambodian)• Hmong• Thai• Laotian• Vietnamese• Tagalog• Other Asian or Pacific Island languages |
| <ul style="list-style-type: none">• French• French Creole• Italian• Portuguese• Creole• German• Yiddish• Scandanavian Languages• Greek• Russian• Polish• Serbo-Croatian• Armenian• Persian• Gujarati• Hindi• Urdu• Other Indo-European languages | 4. Other languages |
| | <ul style="list-style-type: none">• Navajo• Hungarian• Arabic• Hebrew• African languages• Other and unspecified language |

Table 1 shows City-wide estimates for the number of residents age 5 and older who speak languages in each of these categories. Figures 1-4 show the share of residents age five and older who speak languages in each of these categories, by Census Tract.

¹ Residents who speak another language at home may be proficient in English. Separate statistics are available to identify residents who have Limited English Proficiency (LEP) if needed.

Table C1. Alexandria residents over age 5, by language spoken at home

Language	Estimate	Margin of error	Share of the population
Spanish	21,112	+/- 677	14 percent
Other Indo-European Languages	9,172	+/- 993	6 percent
Asian and Pacific Island Languages	4,980	+/- 571	3 percent
Other languages	13,841	+/- 1,445	10 percent

Source: 2015-2019 ACS 5-year estimates

Public Use Microdata Sample reports ACS data by individual and household and can be used to identify more detailed statistics at the City-level. Table 2 shows City-wide estimates for the top five languages, other than English, spoken at home.

Table C2. Alexandria residents over age 5, top 5 languages

Language	Estimate	Limited English Proficiency	% of City Pop	% Limited English Proficiency
Spanish	21,160	10,065	13%	48%
Ethiopian Languages	8,726	2,945	6%	34%
Arabic	3,462	1,241	2%	36%
French Languages	2,781	236	2%	8%
Indo-Aryan Languages	2,017	524	1%	26%
Iranian Languages	1,641	798	1%	49%
Niger-Congo Languages	1,485	211	1%	14%
Chinese Languages	1,380	440	1%	32%
Filipino Languages	1,128	68	1%	6%
Korean	835	393	1%	47%

Source: 2015-2019 Public Use Microdata Sample (PUMS) 5-year estimates

Figure C1. Residents age 5 and older who speak Spanish at home



Figure C2. Residents age 5 and older who speak an Indo-European language other than Spanish at home

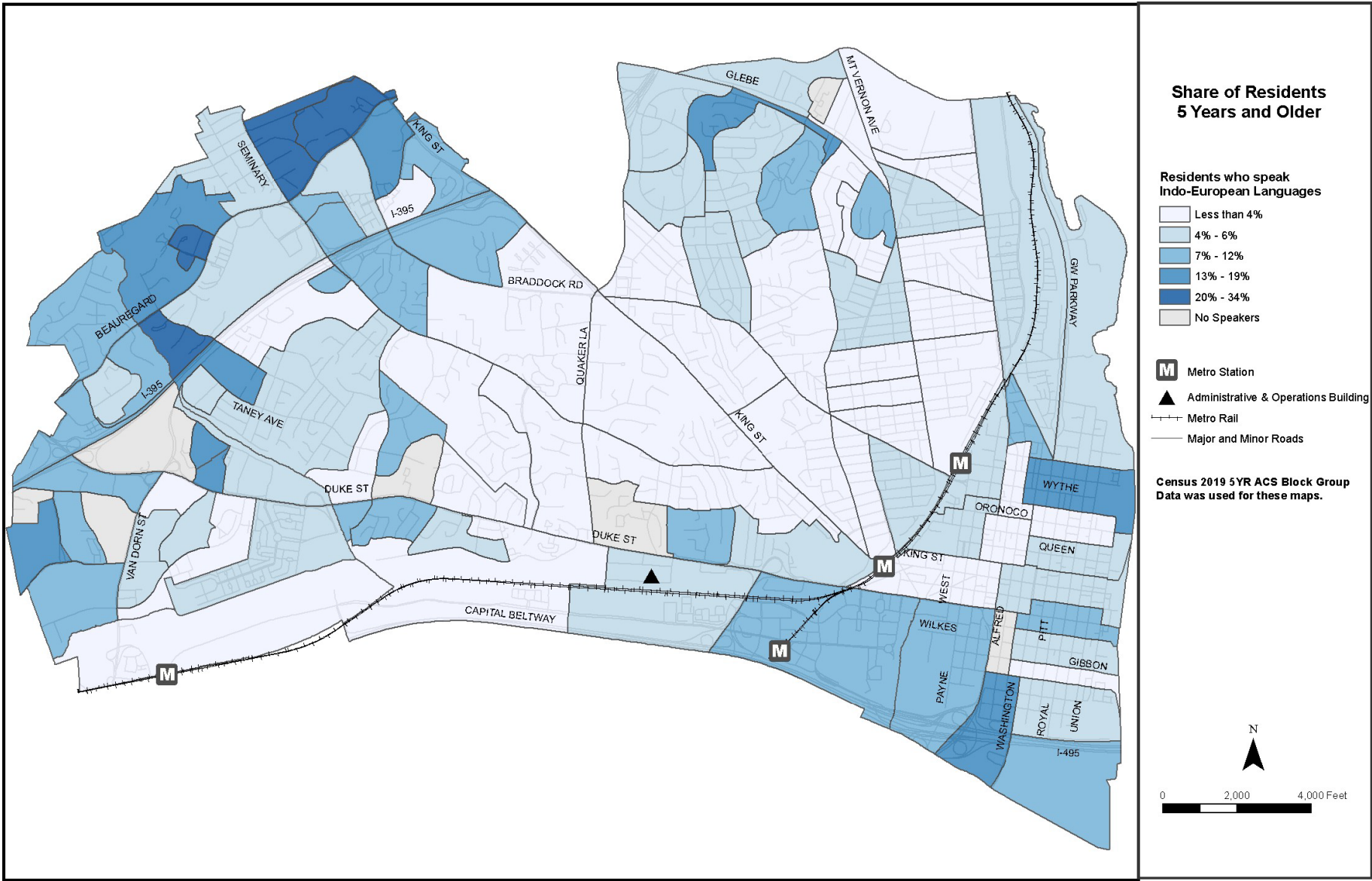
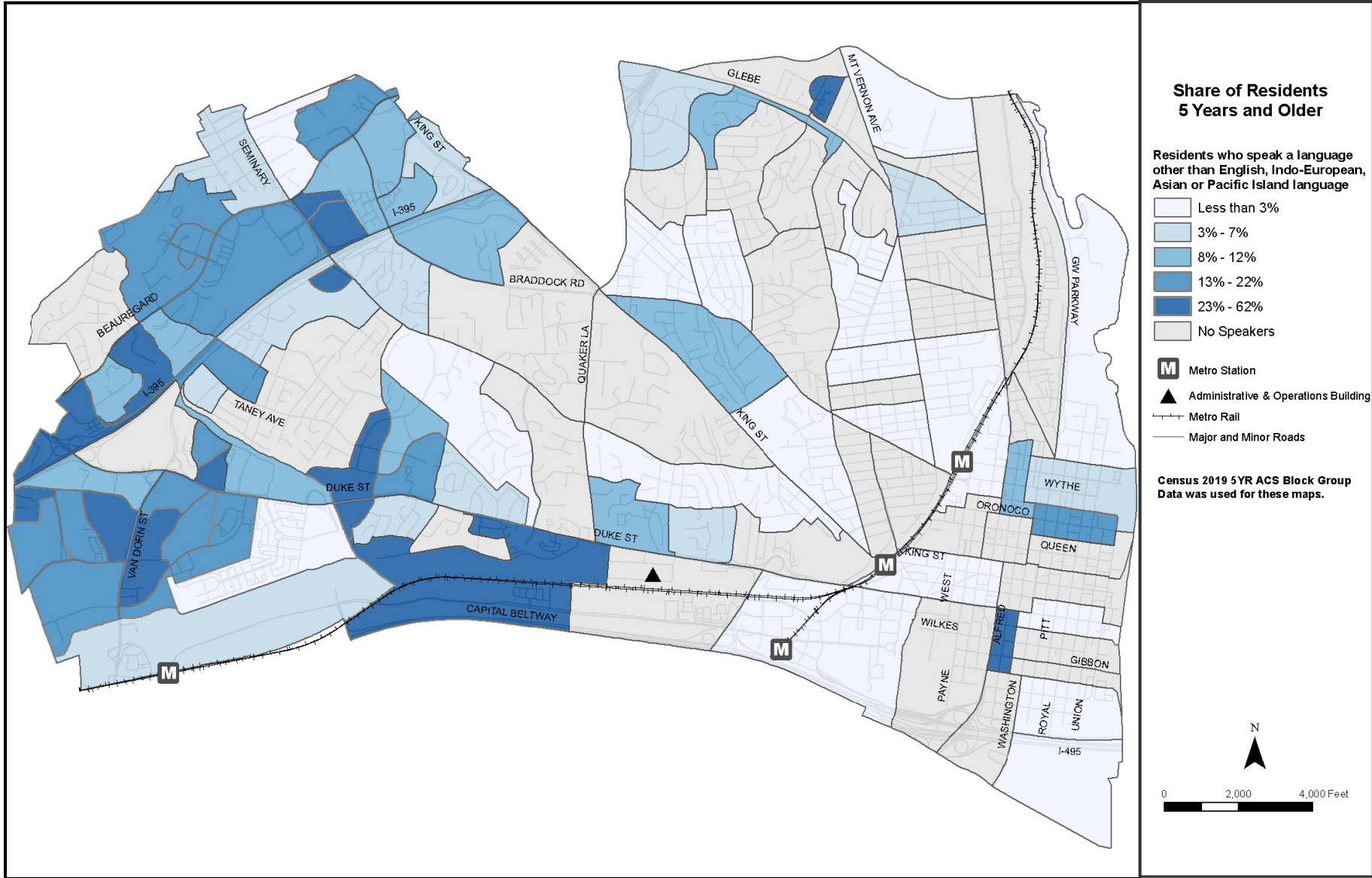


Figure C3. Residents age 5 and older who speak an Asian or Pacific Island language at home



Figure C4. Residents aged 5 and older who speak a language other than English, Indo-European, Asian or Pacific Island languages at home



Appendix D

Demographic Maps - Percentages of Ethnic Groups by Census Tracts in Alexandria

Race and Ethnicity

About 22 percent of Alexandria's residents identify as non-Hispanic Black or African American, and nearly 17 percent identify as Hispanic of any race.

Figures D1 and D2 shows these statistics at the Census Tract-level, respectively.

Figure D1. Share of residents who are non-Hispanic Black or African American

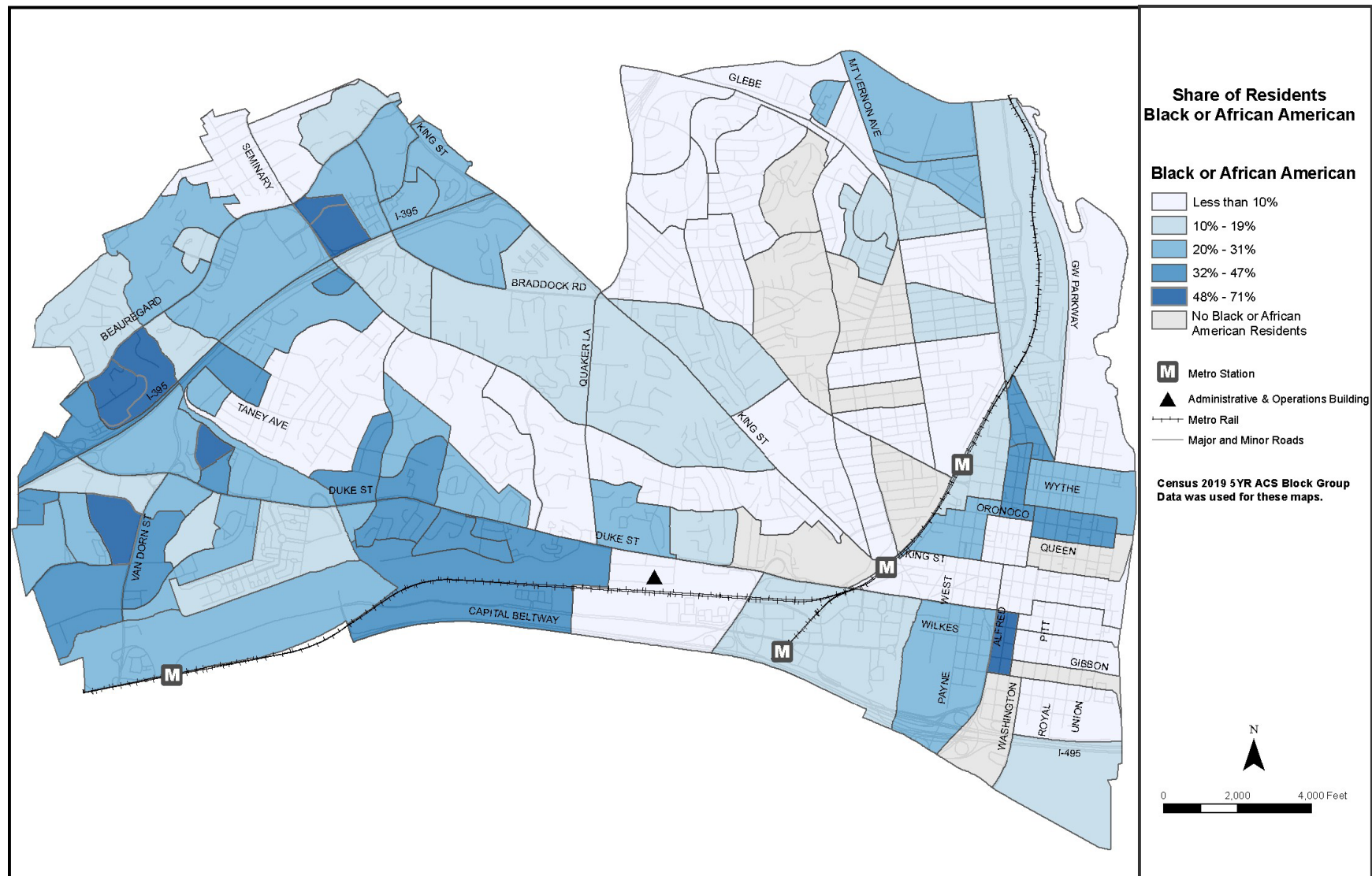


Figure D2. Share of residents who are Hispanic (of any race)



Appendix E

The City of Alexandria's Language Access Policy

- Policy:** All City departments, including the Alexandria Transit Company (ATC) will ensure that Persons with Limited English Proficiency (LEP) receive the language assistance necessary to allow access to services through individual department language assistance plans.
- Title:** Title VI of the Civil Rights Act of 1964; Policy on the Prohibition against National Origin Discrimination as it Affects Persons with Limited English Proficiency
- Staff:** The City of Alexandria has people in different departments facilitating this plan, with one person in the Communications and public Information/Community Relations coordinating all LEP services provided by the City. ATC/DASH also have two individuals in the Department of Planning & Marketing that help support LEP-related efforts in outreach and communications.

1.0 CITY'S LANGUAGE ASSISTANCE PLAN

A. Persons covered by this plan

This plan was developed to serve all City of Alexandria residents who do not speak, read, write or understand English or who do on a limited basis. A city resident has Limited English Proficiency (LEP) when he/she is not able to speak, read, write or understand the English language to the extent that allows him/her to interact effectively with English-speaking City staff.

B. City of Alexandria Commitment to Program Access

No person will be denied access to City information, programs or services because he/she does not speak English or communicates in English on a limited basis. City staff will provide effective communication with Limited English Proficiency (LEP) residents and staff by making appropriate language assistance services available when city residents need these services. The City of Alexandria will provide its resident's access to City information, programs and services in a timely manner at no cost to the resident.

C. Affirmative Offer of Language Assistance

City staff will initiate an offer for language assistance services to residents who have difficulty communicating in English. In many offices, bilingual City employees are available to assist LEP people. If a person is not available, the Language Line can also be used to provide interpretive services to LEP people.

In addition, when residents ask for language assistance, staff must offer free interpretation services in a language they understand, in a way that **preserves confidentiality**, and in a timely manner. Whenever possible, staffs are encouraged to follow the Limited English Proficiency (LEP) person's preferences.

1.0 USING AN INTERPRETER

A. General Requirements

- **Document Use of Language Assistance Services**

Staff must always document in the Limited English Proficiency (LEP) person's file, keeping appropriate records when an interpreter is used or when a Limited English Proficiency (LEP) person makes use of another form of language assistance. Accurate documentation is especially important for direct service staff. If the Limited English Proficiency (LEP) person has been offered free interpretive services and chooses to utilize their own interpreter, i.e. friend, family member or community member, the Limited English Proficiency (LEP) person must sign a waiver indicating that they are giving up their right to free interpreter services. The waiver will be in effect for the time period indicated on the form (to be determined jointly between the staff person and the Limited English Proficiency (LEP) person but will not exceed the period of one year. **Staff should never require, suggest, or encourage a Limited English Proficiency (LEP) person to use family members or friends as interpreters.**

- **Do Not Use Minor Children**

At no time will anyone under 18 years of age, including friends, family members or children, be utilized to provide interpretive services.

- **In-Person Interpreter Services**

If an interpreter is needed in-person, rather than over the telephone, staff will make every reasonable effort to have an interpreter available at a time and place that is convenient for both the interpreter and the Limited English Proficiency (LEP) person. Staff may arrange for in-person interpreting by contacting City-approved Language Assistance Services vendors directly.

- **Limited English Proficiency (LEP) person cannot read or write in their own language**

When confronted with a situation in which the Limited English Proficiency (LEP) person is illiterate – cannot read or write in his or her own language – the staff person, with assistance from an interpreter, will assist the Limited English Proficiency (LEP) individual in the completion of necessary forms and documents. Preferably, an in-person interpreter will be used. However, if that is not possible, a contracted Language Assistance Services interpreter will be utilized.

2.0 INTERPRETER RESOURCES (by Order of Preference)

As much as possible, staff should use interpreter services in the following order of preference:

1. Bilingual Staff

- a.** City departments will use their best efforts to assign Limited English Proficiency (LEP) persons to bilingual staff who speaks their language. In the event that there are not enough direct service bilingual staff available to assist with spoken language needs, the department's staff interpreters will augment available language assistance services on an as-needed basis. As not all departments have staff interpreters on site, the protocol may vary from department to department. Each department/unit must maintain a current and accessible list of staff with language interpretation capacity.

2. Volunteers and Interns

- a.** In the event that an insufficient number of permanent staff is available to assist with spoken language needs, volunteers and interns for that department are accessed for services for these language groups. As not all departments have volunteers or interns on site, the protocol may vary from department to department. Each department/unit must maintain a current and accessible list of volunteers and interns with language interpretation capacity.

3. Telephone Interpreter Services- Language Line Services

- a.** Language Line Services, formerly known as AT&T Language Line, provides telephone interpretation in over 150 languages 24 hours a day, seven days a week.
- b.** Staff should use Language Line Services when bilingual staff, volunteer staff interpreters or volunteers and interns are not available.
- c.** Access to Language Line:

- Users of Language Line are charged on a per-minute basis.
- Current flat rate is a \$1.30 per minute for all languages.
- To access Language Line Services, staff are provided an ID number and access code.
- All staff should be given the opportunity to familiarize themselves with the Language Line before they actually need to use it.

3.0 TRANSLATION RESOURCES (WRITTEN MATERIALS)

A. Translation of Written Materials

Each Department must translate written material, including vital documents for each Limited English Proficiency (LEP) language group that constitutes 5% or 1,000 (whichever is less) of population eligible to be served. The City of Alexandria has identified Spanish as one language that currently meets the above criteria for translation of vital documents.

1. Vital Documents or Information

Vital documents or information are those that are critical for accessing City services.

2. Limited English Proficiency (LEP) person cannot read or write in their native or preferred language

When confronted with a situation in which the Limited English Proficiency (LEP) person is illiterate – cannot read or write in his or her own language – the staff person, with assistance from an interpreter, will assist the Limited English Proficiency (LEP) individual in the completion of necessary forms and documents. Preferably, an on-site interpreter will be used. However, if that is not possible, a contracted service interpreter will be utilized.

Appendix F

DASH (Alexandria Transit Company)

Board of Directors Memorandum for Approval of
Title VI Service Policy Documents

Appendix F Sub-Attachments

Attachment A – DASH Title VI Service Standards & Policies,

Attachment B – DASH Title VI Service Equity Analysis Policy

Attachment C - DASH Service Standards Monitoring Results Memorandum



MEMORANDUM

DATE: March 2, 2022

TO: ATC Board of Directors

FROM: Martin Barna, Director of Planning & Marketing

SUBJECT: **Consideration of New DASH Title VI Policies for Board Adoption**

Introduction/Background

As outlined in Title VI Circular 4702.1B and Environmental Justice Circular 4703.1, all transit agencies that receive federal funds must establish Title VI policies and standards that outline the policies and procedures that the agency will follow to ensure the fair and equitable provision of transit service and passenger amenities.

These policies must be subjected to a public outreach process and approved by the agency's Board of Directors.

Action Requested

The ATC Board of Directors is asked to consider for adoption two (2) new DASH Title VI Policies that were previously presented to the Board during the February 9, 2022 board meeting. The two policies are listed below and attached to this memorandum as Attachments A and B.

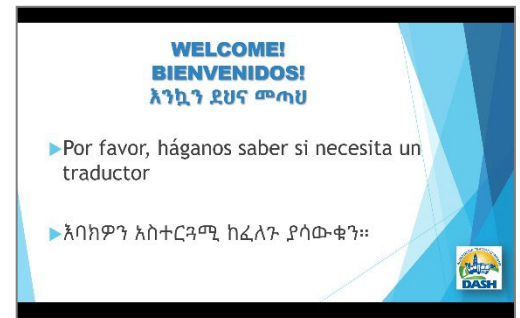
- 1. DASH Title VI Service Standards & Policies**
- 2. DASH Title VI Service Equity Analysis Policies**
 - a. Major Service Change Policy***
 - b. Disparate Impact Policy***
 - c. Disproportionate Burden Policy***

A memorandum providing the initial service monitoring findings based on the proposed Title VI Service Standards & Policies document is included as Attachment C.

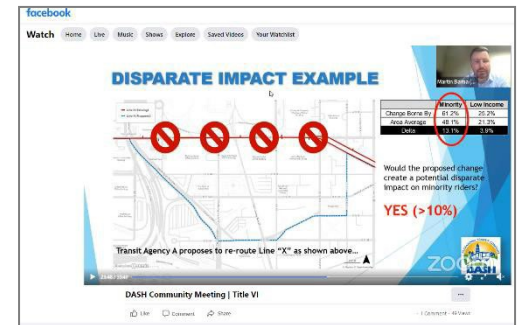
Title VI Outreach Summary

The draft DASH Title VI policy documents listed above were presented to the ATC Board of Directors in February 2022 and a public outreach process has been conducted over the last four weeks. A summary of the public outreach process is provided below:

- **Virtual Community Meeting.** A virtual community meeting was conducted on Wednesday, February 23rd at 6:00 PM in which staff presented the proposed Title VI policies to the public, answered questions and collected feedback. The meeting had 11 virtual attendees, and the recording of the meeting that was posted on Facebook has been viewed 54 times. Spanish- and Amharic-speaking translators were included as part of the meeting introduction with on-screen text, shown at right (Video - www.facebook.com/dashbus).



- **Virtual Public Hearing.** DASH is conducting a virtual public hearing as part of the March 9, 2022 Board of Directors meeting. This public hearing will be an opportunity for any members of the public to provide feedback on the Final DASH Title VI policies prior to Board consideration for adoption.
- **DASH Title VI Website (Spanish/Amharic).** DASH created a special “Title VI” website that serves as the central location for all policies and information relating to Title VI (www.dashbus.com/titlevi). The website has been used during public outreach but will also serve as a resource center for any individuals who want to learn more about the City/DASH Title VI program or submit a Title VI complaint.



In addition to the English version, DASH also created alternate versions of the Title VI website with information in Spanish (www.dashbus.com/titlevi/spanish) and Amharic (www.dashbus.com/titlevi/amharic). During the public outreach period, the DASH Title VI websites received a combined total of 66 unique visits.



- **Bus Posters/Flyers.** DASH posted flyers onboard all DASH buses that notified customers about the proposed Title VI policies and the ways in which interested parties could learn more or provide input. An example of the poster is shown in the picture, at right. The posters were also translated into Spanish and Amharic to promote engagement among non-native English speakers.



- **Community Group Outreach.** In addition to sending several e-mail blasts to the DASH email subscription list, DASH also sent personalized outreach emails to 35 individuals representing over 30 different community groups and civic associations. These groups included Casa Chirilagua, the Ethiopian Community Development Council (ECDC), the Senior Services of Alexandria’s Senior Ambassadors, and dozens of other civic associations.



Public Feedback

In the last two weeks, staff compiled and reviewed the public feedback that was received on the Title VI programs. A summary of the most relevant questions and feedback are included below.

Feedback Received during ATC Board Meeting (2/9/2022)

1. Add text to explicitly prohibit discrimination based on “dress or appearance”
2. Replace reference to “Public Works” with “T&ES” on page 9 of Title VI Service Standards & Policies.
3. Be sure to reach out to Senior Ambassadors for outreach opportunities.
4. Emphasize the availability of Spanish/Amharic translators at community meetings on website and all related outreach materials

Feedback Received During Virtual Community Meeting (2/23/2022)

5. Attendee suggests adding text about reviewing demographic statistics related to mobility impairments when looking at bus stop improvements and accessibility to the “Title VI Service Standards & Policies” document; attendee notes that minority groups tend to have a higher percentage of persons with disabilities.
6. Additional questions from Meeting Attendees (2/23):
 - a. How do you define “minority route”?
 - b. What service does DASH provide to/from schools for students?
7. Several attendees were members of the Alexandria Public Health Advisory Commission that developed Community Health Improvement Plan (CHIP). The CHIP seeks to promote public transit and DASH staff will be coordinating with these individuals to learn more about CHIP and
8. Facebook Comment: “It seems like you really are working on my problem. Sorry I missed most, there were no show on some buses coming home tonight.”

Based on input received from the ATC Board and the Alexandria community, the Title VI Service Standards & Policies and the DASH Title VI Service Equity Analysis Policies have been revised to incorporate the first, second, and fifth suggestions listed above. Staff also followed the Board guidance on the third and fourth items by emphasizing the translator availability and reaching out to Senior Services of Alexandria.

The final, approved DASH Title VI policies are included below as Attachments A and B, and will be posted on www.dashbus.com/titlevi. The staff memorandum summarizing the initial results of the new Title VI Service Standards & Policies monitoring process is also included as Attachment C. This memorandum includes several maps depicting the service area demographics and the distribution of service and passenger amenities.

Attachment A
Final DASH Title VI Service Standards & Policies



OFFICIAL COMPANY POLICY

ALEXANDRIA TRANSIT COMPANY (ATC)

Policy Name:	DASH Title VI Service Standards & Policies				
Section #:	N/A	Section Title:	N/A	Former Reference ID:	N/A
Approval Authority:	ATC Board of Directors		Adopted:	03/09/2022	Reviewed: 2/9/2022
Responsible Executive:	General Manager		Revised:	N/A	
Responsible Department:	Planning & Marketing		Contact:	Martin Barna	

1. Policy Statement

The Alexandria Transit Company (ATC) prohibits any discrimination in the provision of its fixed-route bus services on the basis of race, color or national origin, as outlined by the Federal Transit Administration's Title VI Circular 4702.1B and Environmental Justice Circular 4703.1. Discrimination based on appearance or dress as it relates to racial identity or cultural practices is also prohibited.

2. Reason for Policy

Title VI (codified at 42 U.S.C. S2000 et seq.) was enacted as part of the landmark Civil Rights Act of 1964. It prohibits discrimination on the basis of race, color, and national origin in programs and activities receiving federal financial assistance.

As outlined in Title VI Circular 4702.1B and Environmental Justice Circular 4703.1, the Federal Transit Administration (FTA) requires that all fixed route transit providers establish and monitor a set of service standards and policies that can be used to measure system performance and ensure that transit services are being provided in a fair and equitable manner. The purpose of this document is to establish the new Title VI standards and policies that will be used by the City of Alexandria, Alexandria Transit Company (ATC), and DASH, and submitted to the FTA as part of the triennial Title VI Program.

3. Who Should Read this Policy

These standards and policies apply to all DASH bus service and passenger facilities. General oversight for the policies is performed by the City of Alexandria's Office of Human Rights. The ATC/DASH Department of Planning & Marketing, with support from the City of Alexandria's Department of Transportation & Environmental Services, is responsible for the ongoing implementation and execution of these policies. ATC and the City of Alexandria have drafted a separate Memorandum of Agreement (MOA) that will outline city roles and responsibilities and will be subject to ATC Board review and approval.

4. Resources

[Federal Transit Administration \(FTA\) Title VI Circular](#) (2012)

5. Definitions

ATC: Alexandria Transit Company (DASH)

All policies are subject to amendment at any time. Finalized policies are subject to the approval of the Approval Authority as indicated on Page 1 in the head section.

6. Title VI Service Standards

In accordance with FTA Title VI requirements, ATC/DASH shall regularly monitor the performance of its bus routes relative to system-wide service standards for the following indicators to ensure that minority and non-minority routes are being operated in a fair and equitable manner:

- Vehicle Load;
- Vehicle Headways;
- On-Time Performance; and
- Service Availability

Any significant service deficiencies identified through this process must be evaluated further to determine the extent to which minorities are affected. If the negative effect on minority persons is proportionally higher than the effect on non-minority persons, additional steps may be necessary to address or mitigate any impacts that might result from the discrepancy.

ATC/DASH shall also monitor its vehicle assignments and the distribution of passenger amenities based on the policies outlined in this document to prevent discriminatory practices in the quality of the buses that are being used on different routes or the provision of bus shelters, benches or real-time information displays. Since bus stops, shelters and benches are owned and maintained by the City of Alexandria, ATC/DASH staff will coordinate with City staff on evaluating the distribution of these assets and addressing or mitigating any adverse impacts on minority passengers.

Route Categories

In order to develop appropriate service standards for the different types of routes, each DASH bus line is classified as belonging to one of the four categories listed below. These classifications are used to identify service standards which are specific to and appropriate for each route category.

- **Frequent.** Frequent routes are defined as the routes that operate every 15 minutes or better, all-day, seven days per week. The 15-minute service standard on these routes is maintained from at least 6am to 7pm on weekdays and from 7am to 6pm on weekends. The routes will typically operate earlier in the morning and later in the evening, but with less frequent service.
- **Local.** All other routes that operate seven days per week but do not meet the “frequent” standard are classified as “local routes.”
- **Commuter.** Any bus routes that are primarily intended for passengers who commute during the weekday peak hours are classified as “Commuter” routes. These routes typically do not operate on Saturdays or Sundays.
- **Trolley.** The King Street Trolley is classified with its own route category due to its distinct purpose and unique operating characteristics.

Tables 1 and 2 provide information on route categories for the DASH system and for each bus route.

Minority Routes

As part of the Title VI service monitoring evaluation procedure, each bus line is also designated as either a “minority route” or a “non-minority route”. The FTA definition of a “minority route” is “a route that has at least 1/3 of its revenue mileage in a Census Block or block group, or traffic analysis zone(s) with a percentage of minority population that exceeds the percentage of minority population in the transit service area.”

Based on this “minority route” definition, 5 of the 11 current DASH routes are classified as minority routes. This information is summarized in Table 1 and listed by route in Table 2.

Table 1 – DASH Route Classifications

Route Category	Minority	Non-Minority	Total	Percent
Frequent	2	1	3	27%
Local	2	2	4	36%
Commuter	1	2	3	27%
<u>Trolley</u>	0	1	1	9%
Total	5	6	11	100%
<i>Percent</i>	45%	55%	100%	

Table 2 – DASH Route Classifications by Route

Route	Name	Route Category	Minority Route?
30	Van Dorn Metro - Braddock Road Metro via Duke Street	Local	Minority
31	NVCC-Braddock Road Metro via King Street	Frequent	Non-Minority
32	Landmark Mall - King Street Metro via Eisenhower Avenue	Local	Minority
33	Potomac Yard - King Street Metro via Del Ray	Local	Non-Minority
34	Braddock Road Metro - Lee Center via City Hall	Local	Non-Minority
35	Van Dorn Metro - Pentagon via West End	Frequent	Minority
36A/B	Mark Center - Potomac Yard via Shirlington	Frequent	Minority
102	Mark Center - King Street Metro via Seminary Road	Commuter	Minority
103	Braddock Road Metro - Pentagon via Parkfairfax	Commuter	Non-Minority
104	Braddock Road Metro - Pentagon via Parkfairfax	Commuter	Non-Minority
KST	King Street Trolley	Trolley	Non-Minority

Systemwide Service Standards

The following sections outline the four primary service indicators that will be used to monitor ATC/DASH bus lines. Each standard is set based on the route categories listed above and monitoring will compare the performance of minority routes against those of non-minority routes to ensure that DASH service is being operated in an equitable manner.

The data samples used to compare route performance to these standards should be collected over a representative time period to ensure that they provide an accurate snapshot of each route. To ensure consistency, ATC/DASH typically uses data from March, April, September or October, which represent the busiest months of the year in terms of ridership. These months also serve as good comparison points because schools are in session and few major holidays are observed. Data collection time periods may also fluctuate based on data availability. Weekday peak periods are generally defined as 6:00 – 9:00 AM and 3:00 – 6:00 PM.

Vehicle Loads

The FTA Title VI Circular describes vehicle loads as follows:

Vehicle load can be expressed as the ratio of passengers to the total number of seats on a vehicle. For example, on a 40-seat bus, a vehicle load of 1.3 means all seats are filled and there are approximately 12 standees. A vehicle load standard is generally expressed in terms of peak and off-peak times. Transit providers that operate multiple modes of transit must describe the specific vehicle load standards for peak and off-peak times for each mode of fixed route transit service (i.e., bus, express bus, bus rapid transit, light rail, heavy rail, commuter rail, passenger ferry, etc., as applicable), as the standard may differ by mode.

ATC/DASH service planners monitor load factor data on all routes to prevent overcrowding and determine when additional capacity is needed. The load factor for each route is calculated based on the average maximum load of each trip on a route during the peak, off-peak, and weekend periods.

The following table outlines the vehicle load factor standards, which are based upon historical data, industry practices, and staff analyses. If a route exceeds its respective peak load factor standard, ATC/DASH staff will review the service to determine if additional capacity should be provided. Commuter routes are subject to a reduced load factor standard to ensure passenger safety on routes that operate on highways. The King Street Trolley includes a higher load factor standard due to the lower number of seats on Trolley vehicles, and the shorter average trip lengths.

Table 3 – DASH Peak Load Factor Standards

Route Category	Average Peak Load Factor		
	Weekday (Peak)	Weekday (Off-Peak)	Weekend
Frequent	1.2	1.0	1.0
Local	1.2	1.0	1.0
Commuter	1.0	1.0	-
Trolley*	1.5	1.5	1.5

*Trolley does not typically operate during AM peak periods or on weekends before 11:00 AM.

Vehicle Headways

The FTA Circular describes headways as follows:

Vehicle headway is the amount of time between two vehicles traveling in the same direction on a given line or combination of lines. A shorter headway corresponds to more frequent service. Vehicle headways are measured in minutes (e.g., every 15 minutes); service frequency is measured in vehicles per hour (e.g., 4 buses per hour). Headways and frequency of service are general indications of the level of service provided along a route. Vehicle headway is one component of the amount of travel time expended by a passenger to reach his/her destination.

As outlined in the 2022/2030 Alexandria Transit Vision Plan, ATC/DASH emphasizes frequent service with short headways of 15 minutes or less as the most important determinant of how useful a bus service will be for the average customer.

Based on changes in ridership levels, headways may be proposed for adjustment during the annual ATC/DASH Transit Development Process (TDP) process, or if needed during regular service changes throughout the year.

ATC/DASH calculates headways as the average length of time between the scheduled arrival times of subsequent vehicles on a specific route. Table 4 outlines the vehicle headway standards by route category and time of day. These standards represent typical headways for each route category.

Table 4 – Vehicle Headway Standards

Route Category	Minimum Headway Standard (minutes)		
	Weekday (Peak)	Weekday (Off-Peak)	Weekend
Frequent	15	15	15
Local	30	60	60
Commuter	30	60	-
Trolley*	15	15	15

*Trolley does not typically operate during AM peak periods or on weekends before 11:00 AM.

On-Time Performance

The FTA Title VI Circular describes on-time performance as follows:

On-time performance is a measure of runs completed as scheduled. This criterion first must define what is considered to be "on time." For example, a transit provider may consider it acceptable if a vehicle completes a scheduled run between zero and five minutes late in comparison to the established schedule. On-time performance can be measured against route origins and destinations only, or against origins and destinations as well as specified time points along the route. Some transit providers set an on-time performance standard that prohibits vehicles from running early (i.e., ahead of schedule) while others allow vehicles to run early within a specified window of time (e.g., up to five minutes ahead of schedule). An acceptable level of performance must be defined (expressed as a percentage).

ATC/DASH regularly monitors on-time performance to increase service reliability and determine if running time changes are needed. Running times on each route are reviewed on a monthly basis and adjusted as warranted by changing traffic conditions or other operating factors.

ATC/DASH has previously established an on-time performance goal of 85 percent for all routes based on industry-wide standards. A trip is considered to be "on time" when the bus arrives to timepoint no more than one minutes before or five minutes after the scheduled arrival time.

Table 5 – On-Time Performance Standards

Route Category	On-Time Performance (OTP)		
	Weekday (Peak)	Weekday (Off-Peak)	Weekend
Frequent	85%	85%	85%
Local	85%	85%	85%
Commuter	85%	85%	-
Trolley*	85%	85%	85%

*Trolley does not typically operate during AM peak periods or on weekends before 11:00 AM.

Service Availability

The FTA Title VI Circular describes service availability as follows:

Service availability is a general measure of the distribution of routes within a transit provider's service area. For example, a transit provider might set a service standard to distribute routes such that a specified percentage of all residents in the service area are within a one-quarter mile walk of bus service or a one-half mile walk of rail service.

The ATC/DASH approach to service availability is shaped largely by the Alexandria Transit Vision Plan (<https://www.alexandriava.gov/uploadedFiles/tes/Alexandria%20Transit%20Vision%20Final%20Report%202020-02-24.pdf>). One of the key statistics that was used during the development of the Alexandria Transit Vision Plan was the percentages of city residents who live within ¼ mile of a bus stop with “frequent” bus service, and the percentage within ¼ mile of a bus stop with any bus service. This metric was also calculated for percentages of minority residents, low-income residents, senior residents and jobs. These percentages help to measure the availability of bus service to residents, and the availability of useful, frequent, all-day service. These metrics will be calculated for each of these population groups as part of the regular service monitoring process.

The Alexandria Transit Vision Plan, which was adopted by the ATC Board of Directors in 2019, called for a bus network that increases total ridership by providing more useful, frequent bus service in high-ridership transit areas as opposed to providing more infrequent service across a wider geographic area. This approach guided the development of the 2022/2030 Alexandria Transit Vision Plan and the resulting New DASH Network, which provides frequent, all-day bus service in key corridors across the City of Alexandria. This focus on increasing the amount of useful, frequent service in areas where lots of people can use it has proven to be particularly effective at increasing ridership as well as fulfilling the transit needs of the City of Alexandria's minority and low-income populations.

Table 6 – Service Availability Standards

Service Availability	City Residents
Within 1/4 Mile of a Frequent Route	50%
Within 1/4 Mile of Any Route	90%

7. Systemwide Service Policies

These policies are intended to provide guidance and instruction to ensure that vehicle assignment and passenger amenity distribution practices do not result in discrimination on the basis of race, color or national origin.

Vehicle Assignment

The FTA Title VI Circular describes vehicle assignment as follows:

Vehicle assignment refers to the process by which transit vehicles are placed into service in depots and on routes throughout the transit provider's system. Policies for vehicle assignment may be based on the age of the vehicle, where age would be a proxy for condition. For example, a transit provider could set a policy to assign vehicles to depots so that the age of the vehicles at each depot does not exceed the system-wide average. The policy could also be based on the type of vehicle. For example, a transit provider may set a policy to assign vehicles with more capacity to routes with higher ridership and/or during peak periods. The policy could also be based on the type of service offered. For example, a transit provider may set a policy to assign specific types of

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vehicles to express or commuter service. Transit providers deploying vehicles equipped with technology designed to reduce emissions could choose to set a policy for how these vehicles will be deployed throughout the service area.

The ATC/DASH bus fleet is comprised of roughly 100 buses in active revenue service. The DASH fleet operates out of the DASH William B. Hurd Maintenance & Operations Administration Facility, which is located at 3000 Business Center Drive in Alexandria, Virginia. The current fleet includes a mix of buses of varying lengths and propulsion types, which are shown in Table 7, below:

Table 7 – Active DASH Bus Fleet (2022)

Vehicle ID's	Year	Make	Type	Length	# of Vehicles
200-206	2011	Gillig	Hybrid	35'	7
300-302	2011	Gillig	Hybrid	40'	3
400-404	2011	Gillig (Trolley)	Hybrid	29'	5
207-211	2012	Gillig	Hybrid	35'	5
303-307	2012	Gillig	Hybrid	40'	5
212-216	2014	Gillig	Hybrid	35'	5
308-309	2014	Gillig	Hybrid	40'	2
217-229	2015	Gillig	Hybrid	35'	13
405	2015	Gillig (Trolley)	Hybrid	35'	1
230-233	2017	Gillig	Hybrid	35'	4
310-311	2017	Gillig	Hybrid	40'	2
501-514	2018	Gillig	Clean Diesel	35'	14
515-527	2019	New Flyer	Clean Diesel	35'	13
528-530	2020	New Flyer	Clean Diesel	35'	3
701-705	2020	New Flyer	Clean Diesel	40'	5
801-803	2020	New Flyer	Electric	40'	3
804-806	2021	Proterra	Electric	40'	3
807-810	2021	Proterra	Electric	40'	4
901-904	2021	New Flyer	Electric	60'	4
TOTAL ACTIVE FLEET					101

The majority of the DASH fleet is comprised of 35- and 40-foot low-floor transit buses, however, DASH also has several 60-foot articulated buses. DASH also operates the King Street Trolley on behalf of the City of Alexandria and has several 30- and 35-foot buses that have been equipped with specialized Trolley replica features for this purpose. All DASH buses are handicap-accessible and compliant with the Americans with Disabilities Act (ADA) of 1990.

In terms of vehicle propulsion, most of the DASH fleet consists of either hybrid diesel-electric or clean diesel buses, however, DASH has acquired over a dozen 100% electric buses over the last two years and will continue to transition its fleet to 100% electric over the next decade.

Vehicle Assignment refers to the process by which transit vehicles are assigned to routes for revenue service. A summary of the ATC/DASH Vehicle Assignment Process is included below:

- DASH Operations staff typically assign buses at random, based on fleet availability at the time when a bus is scheduled to pull out. In most instances, whichever bus is most accessible or near the front of the garage is used for pullout.

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- DASH employs a significant amount of “interlining”, which is a vehicle blocking strategy whereby a single bus and operator will rotate through multiple routes during the course of the day to maximize operating cost efficiency. In addition to lowering operating costs, this approach also results in buses being rotated through the system in a more fair and equitable manner.
- Exceptions to the vehicle assignment policy described above are employed for several routes with increased ridership or specific operating or branding constraints. Examples include:
 - Dispatchers typically avoid assigning the larger, 40- and 60-foot buses to routes that operate on narrow streets or tight turns, including those on Lines 36A/B, 103 and 104;
 - Dispatchers try to assign these larger buses to routes with higher ridership that may be more susceptible to overcrowding. These high-ridership routes include Lines 30 and 35 in West Alexandria, which has a higher percentage of low income and minority residents than the rest of the service area.
 - DASH has a series of buses that have been specifically wrapped and branded for Line 35 service in West Alexandria. These buses include a mix of 35- and 40-foot vehicles and are used almost exclusively on Line 35.
 - The King Street Trolley service is also operated with a dedicated sub-fleet of six buses that have been equipped with a custom livery package that emulates historic trolley design features. These trolley buses are used exclusively on the King Street Trolley.

ATC/DASH maintains extremely high safety standards and closely monitors the age and condition of its vehicles to determine when repairs are needed and when the buses are due for replacement. Buses are typically replaced at the end of their useful 12-year lifespan in accordance with the ATC/DASH Fleet Replacement Plan. DASH has a comprehensive Preventive Maintenance (PM) program which outlines regular maintenance procedures that are performed on all buses to ensure a high level of vehicle reliability. The oldest vehicles in the active DASH revenue fleet date were manufactured in 2011, while the average age of the fleet is 5.7 years old.

Transit Amenities

The FTA Title VI Circular describes transit amenities as follows:

Transit amenities refer to items of comfort, convenience, and safety that are available to the general riding public. Fixed route transit providers must set a policy to ensure equitable distribution of transit amenities across the system. Transit providers may have different policies for the different modes of service that they provide. Policies in this area address how these amenities are distributed within a transit system, and the manner of their distribution determines whether transit users have equal access to these amenities. This ... is not intended to impact funding decisions for transit amenities. Rather, this ... applies after a transit provider has decided to fund an amenity.

The City of Alexandria provides a wide array of transit amenities such as bus shelters, benches, trash cans, lighting, and real-time bus arrival displays. These amenities are distributed throughout the service area based on ridership data, income/ethnicity/disability status demographics, staff analysis, funding opportunities, development conditions and customer requests. General policies for the distribution of bus shelters, benches, trash cans, lighting fixtures and posted schedule information are outlined below. ATC/DASH and City staff monitor the locations of all transit amenities to ensure that they are equitably distributed to minority and low-income areas.

Bus Shelters

Bus shelters are provided at roughly 60 stops throughout the City of Alexandria. The installation of bus shelters is generally based upon ridership data and staff input, but many shelters have been installed as part of developer agreements on construction projects. Generally, bus shelters are prioritized for bus stops with at least 50 average boardings per weekday.

Benches

Benches are provided at approximately 180 stops throughout the City of Alexandria. The installation of benches is based upon ridership, customer requests and staff input. Stops located near medical and senior facilities are also furnished with benches as much as possible. Generally, bus shelters are prioritized for bus stops with at least 20 average boardings per weekday, however, stops located near significant populations of seniors, the disabled, students, or other special uses (e.g., hospitals, medical offices, tourist attractions) may receive special consideration.

Trash Cans

Trash cans are installed at roughly 150 stops in the City of Alexandria. Trash cans are typically installed at stops where there is a demonstrated issue with littering, but ridership data, customer requests, maintenance trends and staff input are also considered. Trash cans are regularly maintained by the City of Alexandria's Department of Transportation & Environmental Services (T&ES).

Lighting

As part of its focus on passenger safety, the City of Alexandria installs lighting at many of its bus stop locations, including those with bus shelters. The distribution of lighting fixtures is primarily based upon ridership, customer requests, safety considerations, and staff recommendations.

Real-Time Information Displays

ATC/DASH have installed real-time information displays at more than 60 stops across the City of Alexandria. These displays provide customers with information on when the next buses will arrive based on real-time bus locations. Most of the displays are solar-powered tablets mounted on bus stop poles, but several larger TV screens or real-time kiosks have been installed at major transit hubs or transfer locations across the City. Installation decisions on real-time information displays is generally based upon ridership, transfer activity, grant opportunities, developer considerations, operating factors, sunlight exposure, and staff input.

In addition to these real-time information displays, DASH also makes real-time bus arrival information available via the DASH Tracker website, third-party real-time apps, SMS text message, and an interactive voice response (IVR) on the DASH Customer Service telephone hotline. A static display featuring QR Codes with links to the "Schedules" page on the DASH website is also provided at several dozen bus stop locations.

Attachment B
Final DASH Title VI Service Equity Analysis Policies



OFFICIAL COMPANY POLICY

ALEXANDRIA TRANSIT COMPANY (ATC)

Policy Name:	DASH Title VI Service & Fare Equity Analysis Policies				
Section #:	N/A	Section Title:	N/A	Former Reference ID:	N/A
Approval Authority:	ATC Board of Directors		Adopted:	03/09/2022	Reviewed: 2/9/2022
Responsible Executive:	General Manager		Revised:	N/A	
Responsible Department:	Planning & Marketing		Contact:	Martin Barna	

1. Policy Statement

The Alexandria Transit Company (ATC) prohibits any discrimination in the provision of its fixed-route bus services on the basis of race, color or national origin, as outlined by the Federal Transit Administration's Title VI Circular 4702.1B and Environmental Justice Circular 4703.1. Discrimination based on appearance or dress as it relates to racial identity or cultural practices is also prohibited.

2. Reason for Policy

In order to comply with the Federal Transit Administration's (FTA) Title VI Circular 4702.1B and Environmental Justice Circular 4703.1 requirements, the Alexandria Transit Company (ATC) and DASH are required to create and adopt Major Service Change, Disparate Impact, and Disproportionate Burden Policies. These policies are used during the planning process to evaluate the impact of major service and fare changes on minority and low-income passengers.

In the development of these policies, ATC/DASH is also required to seek input from the community including low-income, minority and limited-English proficiency (LEP) populations, which are traditionally under-represented in planning decision-making processes.

The ATC Board of Directors must approve the Major Service Change, Disparate Impact, and Disproportionate Burden policies before they can be incorporated into the Title VI Program and be submitted to the FTA. Any future amendments to the policies are also subject to Board review.

3. Who Should Read this Policy

General oversight for the following Title VI policies is performed by the City of Alexandria's Office of Human Rights. The ATC/DASH Department of Planning & Marketing, with support from the City of Alexandria's Department of Transportation & Environmental Services, is responsible for the ongoing implementation and execution of these policies. ATC and the City of Alexandria have drafted a separate Memorandum of Agreement (MOA) that will outline city roles and responsibilities and will be subject to ATC Board review and approval.

4. Resources

[Federal Transit Administration \(FTA\) Title VI Circular](#) (2012)

5. Definitions

ATC: Alexandria Transit Company (DASH)

All policies are subject to amendment at any time. Finalized policies are subject to the approval of the Approval Authority as indicated on Page 1 in the head section.

6. Title VI Service Equity Analysis Policy

In accordance with FTA Title VI requirements, ATC/DASH shall perform a Service or Fare Equity Analysis to evaluate the positive and negative impacts that all major service changes and fare changes will have on minority and low-income passengers. The Major Service Change policy determines which proposed service changes require equity analyses. The Disparate Impact and Disproportionate Burden policies are intended to provide guidance to staff in their analysis of the equity of the impacts of the proposed changes.

The Disparate Impact and Disproportionate Burden policies apply to all “major” service changes, and to all fare changes, regardless of magnitude, except as specifically defined herein. General oversight for the following Title VI policies is performed by the City of Alexandria’s Office of Human Rights. The ATC/DASH Department of Planning & Marketing, with support from the City of Alexandria’s Department of Transportation & Environmental Services, is responsible for the ongoing implementation and execution of these policies.

Major Service Change Policy

ATC/DASH implements service and fare changes based on the annual ATC Transit Development Plan (TDP), which is adopted by the ATC Board of Directors each spring after an extensive public outreach process. Most ATC/DASH service and fare changes are identified and proposed through this process.

Service Changes

Any proposed “major” service changes must be submitted to the ATC Board of Directors for review and approval. For Title VI purposes, all “major” service changes will require a Service Equity Analysis to identify any disparate impacts they may create on minority passengers, or disproportionate burden that they place on low-income riders.

The following service modifications shall be considered “major” service changes:

- The establishment of a new bus line or service;
- The elimination of a bus line or service;
- A routing change that impacts 25 percent or more of the line’s route mileage;
- A frequency or service span change that increases or decreases the revenue hours of the line by 25 percent or more;
- A series of changes on a single route within a two-year period that cumulatively meet any of the above criteria;
- Proposed changes that are anticipated to be controversial with a particular community or interested parties based on public feedback; and
- A systemwide change that concurrently increases or decreases the total system-wide revenue hours by five (5) percent or more.

The following types of modifications are exempted from the above criteria and shall not be classified as major service changes or be subject to Service Equity Analysis.

- Special Event service;
- Routing changes due to construction, or other road/facility closures;
- Special service operated during emergencies, including but not limited to rail replacement services; and
- Temporary service or route changes that are expected to operate for a period of time that is six months or less.

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Service change proposals that do not meet the criteria for “major” service changes are still subject to an appropriate level of public review and comment.

Fare Changes

For the purposes of this policy, a “fare change” is defined as any increase or decrease in a transit provider’s base fare or any fare product or pass with the following exceptions:

- Promotional or pilot fare programs (e.g. “Spare the Air” fare-free promotions) that last for less than six months, per the FTA definition of “permanent” fare changes; and
- Temporary fare reductions that are mitigation measures for other projects or actions such as rail closures or bus re-routes.

Any transition to or from 100% “fare-free” operation would be subject to a Fare Equity analysis.

Disparate Impact Policy

The Disparate Impact Policy establishes a threshold for determining if proposed service or fare changes would result in a fair distribution of positive and negative effects on minority passengers.

As defined by FTA Title VI Circular 4702.1B:

Disparate impact refers to a facially neutral policy or practice that disproportionately affects members of a group identified by race, color, or national origin, where the recipient's policy or practice lacks a substantial legitimate justification and where there exists one or more alternatives that would service the same legitimate objectives but with less disproportionate effect on the basis of race, color, or national origin.

The policy shall establish a threshold for determining when adverse effects of fare/service changes are borne · disproportionately by minority populations. The disparate impact threshold defines statistically significant disparity and may be presented as a statistical percentage of impacts borne by minority populations compared to impacts borne by non-minority populations. The disparate impact threshold must be applied uniformly ... and cannot be altered until the next Title VI Program submission.

For Service or Fare Equity Analyses conducted by ATC/DASH, a disparate impact threshold of **10 percent** shall be used to determine if minority riders are more negatively affected - or less positively affected - by the proposed change (s) than DASH riders as a whole. The 10 percent threshold applies to the difference between the aggregate impacts of the proposed change(s) on minority passengers and the aggregate impacts of the proposed change(s) on overall DASH ridership. Analyses shall be based on the most recent DASH passenger survey data but may also use census data if survey data is inadequate or unavailable. Analyses will only compare ridership survey data with ridership survey data, or census data with census data, and will not mix and match different data types.

If ATC/DASH finds that a disparate impact exists with the proposed change(s), it shall analyze alternatives to determine if another alternative could serve the same legitimate objective with less of a disparate impact. If a less discriminatory alternative does not exist and ATC/DASH has substantial legitimate justification that cannot otherwise be accomplished, ATC/DASH shall take steps to mitigate the impact of the change on affected minority riders.

Disproportionate Burden Policy

The Disproportionate Burden Policy establishes a threshold for determining if a given service or fare change would result in a fair distribution of positive and negative effects on low-income riders.

As defined by FTA Title VI Circular 4702.1B:

All policies are subject to amendment at any time. Finalized policies are subject to the approval of the Approval Authority as indicated on Page 1 in the head section.

A disproportionate burden refers to a neutral policy or practice that disproportionately affects low-income populations more than non-low-income populations. A finding of disproportionate burden requires the recipient to evaluate alternatives and mitigate burdens where practicable.

The policy shall establish a threshold for determining when adverse effects of service changes are borne disproportionately by minority populations. The disparate impact threshold defines statistically significant disparity and may be presented as a statistical percentage of impacts borne by minority populations compared to impacts borne by non-minority populations. The disparate impact threshold must be applied uniformly, regardless of mode, and cannot be altered until the next Title VI Program submission.

For Service or Fare Equity Analyses conducted by ATC/DASH, a disproportionate burden threshold of **10 percent** shall be used to determine if low-income riders are more negatively affected – or less positively affected – by the proposed changes(s) than DASH riders as a whole. The 10 percent threshold applies to the difference in the aggregate impacts of the proposed change(s) on low-income passengers compared to the aggregate impacts of the proposed changes(s) on overall DASH ridership. Analyses shall be based on the most recent DASH survey data but may also use census data if survey data is inadequate or unavailable. Analyses will only compare ridership survey data with ridership survey data, or census data with census data, and will not mix and match different data types.

If ATC/DASH finds that low-income populations will incur a disproportionate burden from proposed change(s), ATC/DASH shall identify alternatives available to affected low-income riders and take steps to avoid, minimize or mitigate impacts where practicable.

Service Equity Analysis Example

As an example, Table 1 below provides the results of a Service Equity Analysis for a proposed service reduction on a fictitious bus route (Line X). For the purposes of this example, staff have already determined that the proposed change to Line X meets at least one of the minimum thresholds to be considered a “Major Service Change”.

For the Disparate Impact and Disproportionate Burden analyses, staff compare the demographic percentage of riders who are negatively impacted by the proposed change with the demographic percentages of DASH riders as a whole. Since the percentage of minority passengers who would be adversely affected by the proposed change is 12 percent higher than the overall percentage of minority passengers across the DASH system, this proposed change would exceed the 10 percent threshold and create a “disparate impact”. The difference between low-income passengers who are affected by this change and the overall DASH systemwide average is less than 10 percent so no “disproportionate burden” would be created by the proposed change.

Table 1 – Service Equity Analysis for Proposed Reduction to Line X
(For demonstration purposes only)

	<u>Minority</u>	<u>Low Income</u>
Adversely-Impacted Riders	60.3%	22.4%
<u>DASH Service Area Average</u>	<u>48.1%</u>	<u>21.3%</u>
Delta	12.2%	1.1%

In this example, staff would be required to conduct further assessments to determine if there are alternatives that would achieve the same objectives without creating a disparate impact, or to mitigate the impact of the proposed change on affected minority riders.

Attachment C
Board Memorandum for Service Monitoring Results



MEMORANDUM

DATE: March 2, 2022

TO: ATC Board of Directors

FROM: Martin Barna, Director of Planning & Marketing

SUBJECT: **FTA Title VI Standards & Monitoring Results**

Introduction

The following memorandum presents the findings of an initial review of ATC/DASH fixed-route bus service and passenger amenities based on the proposed “DASH Title VI Service Standards & Policies”, which were presented to the ATC Board on February 9, 2022 and will be considered for adoption on March 9, 2022. The findings in this memo are intended to provide additional information about the proposed Title VI Service Standards & Policies to help inform any feedback from the ATC Board, community groups, or members of the public.

As outlined in Title VI Circular 4702.1B and Environmental Justice Circular 4703.1, the Federal Transit Administration (FTA) requires that all fixed route transit providers establish and monitor a set of service standards and policies that can be used to measure system performance and ensure that transit services are being provided in a fair and equitable manner. These standards apply to all DASH bus service and passenger facilities.

For a full summary of the monitoring process methodology and data requirements, please review DASH Title VI Service Standards & Policies document.

Based on the findings summarized by this memo, DASH staff finds no instances in which fixed-route services or passenger amenities are being provided in an unfair or inequitable manner.

Title VI Service Standards

In accordance with FTA Title VI requirements, ATC/DASH shall regularly monitor the performance of its bus routes relative to system-wide service standards for the following indicators to ensure that minority and non-minority routes are being operated in a fair and equitable manner:

- Vehicle Load;
- Vehicle Headways;
- On-Time Performance; and
- Service Availability

Any significant service deficiencies identified through this process must be evaluated further to determine the extent to which minorities are affected. If the negative effect on minority persons is proportionally higher than the effect on non-minority persons, additional steps may be necessary to address or mitigate any impacts that might result from the discrepancy.

Route Categories

In order to develop appropriate service standards for the different types of routes, each DASH bus line is classified with a route category and as a “minority” or “non-minority” route. These classifications are used to identify appropriate service standards for each route category and to compare the operating characteristics of “minority” routes to “non-minority” routes to ensure that service is being provided in an equitable manner.

A summary of the route categories and “minority” classifications are provided in Tables 1 and 2 below. Maps depicting the route categories and classifications are included in Appendix A.

Table 1 – DASH Route Classifications

Route Category	Minority	Non-Minority	Total	Percent
Frequent	2	1	3	27%
Local	2	2	4	36%
Commuter	1	2	3	27%
<u>Trolley</u>	0	1	1	9%
Total	5	6	11	100%
<i>Percent</i>	<i>45%</i>	<i>55%</i>	<i>100%</i>	

Table 2 – DASH Route Classifications by Route

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Route	Name	Route Category	Minority Route?
30	Van Dorn Metro - Braddock Road Metro via Duke Street	Local	Minority
31	NVCC-Braddock Road Metro via King Street	Frequent	Non-Minority
32	Landmark Mall - King Street Metro via Eisenhower Avenue	Local	Minority
33	Potomac Yard - King Street Metro via Del Ray	Local	Non-Minority
34	Braddock Road Metro - Lee Center via City Hall	Local	Non-Minority
35	Van Dorn Metro - Pentagon via West End	Frequent	Minority
36A/B	Mark Center - Potomac Yard via Shirlington	Frequent	Minority
102	Mark Center - King Street Metro via Seminary Road	Commuter	Minority
103	Braddock Road Metro - Pentagon via Parkfairfax	Commuter	Non-Minority
104	Braddock Road Metro - Pentagon via Parkfairfax	Commuter	Non-Minority
KST	King Street Trolley	Trolley	Non-Minority

Systemwide Service Standards

The following sections outline the four primary service indicators that will be used to monitor ATC/DASH bus lines. Each standard is set based on the route categories listed above and compares the performance of minority routes against those of non-minority routes to ensure that DASH service is being operated in an equitable manner.

The ridership, schedule, and on-time performance data included below is based on system performance during November and December 2021. These months were selected as a representative sample of system performance in light of COVID recovery trends and the introduction of the New DASH Network and fare-free operations in September 2021. For purposes of this analysis, weekday “peak” periods are generally defined as 6:00 AM to 9:00 AM and 3:00 PM to 6:00 PM.

For more information on the standards included below and the FTA requirements for monitoring, please review the “DASH Title VI Service Standards & Policies” document.

Vehicle Loads

Vehicle loads are generally shown as a ratio of passengers to the total number of seats on the vehicle. A vehicle load of 0.5 indicates that half of the available seats are occupied. A vehicle load of 1.2 indicates that all available seats are occupied, and that there is an excess of passengers who are likely having to stand in the aisle. Vehicle load factors are typically measured as the maximum or “peak” vehicle load on a given trip and the average of multiple trips on the same route or group of routes.

A full summary of the peak load factors by route category is provided in Table 3 below.

Table 3 – DASH Peak Load Factor by Route Category & Time Period

Route Designations (Line #'s)	Average Peak Load Factor (Max Load/Seated Capacity)		
	Weekday (Peak)	Weekday (Off-Peak)	Weekend
Frequent (Standard)	1.2	1.0	1.0
Minority Routes (35, 36A/B)	0.3	0.2	0.2
Non-Minority Routes (31)	0.2	0.2	0.2
Local (Standard)	1.2	1.0	1.0
Minority Routes (30, 32)	0.2	0.3	0.3
Non-Minority Routes (33, 34)	0.2	0.2	0.2
Commuter (Standard)	1.0	1.0	-
Minority Routes (102)	0.2	0.2	-
Non-Minority Routes (103, 104)	0.1	-	-
Trolley (Standard)*	1.5	1.5	1.5
Minority Routes (N/A)	-	-	-
Non-Minority Routes (KST)*	0.6	0.5	0.7

*Trolley does not typically operate during AM peak periods or on weekends before 11:00 AM.

The peak vehicle load data shows that no routes are operating near the peak load factor standards of 1.0 or above. This is likely due to the reduced ridership that has occurred during the COVID pandemic. In most cases, the “minority” routes have slightly higher peak load factors than the “non-minority” counterparts due to their higher ridership, but none of the minority routes are in danger of frequent overcrowding.

Vehicle Headways

Vehicle headways measure the average amount of time (in minutes) between scheduled trips in the same direction on the same route. For example, the frequent routes shown below are scheduled to run every 15 minutes or better all day, seven days per week.

A full summary of the vehicle headways by route category is provided in Table 4 below.

Table 4 – Vehicle Headways by Route Category & Time Period

*Trolley does not typically operate during AM peak periods or on weekends before 11:00 AM.

The vehicle headway data that is summarized above shows that all routes are currently meeting or exceeding the designated headway standards for their respective route categories. For the “Frequent” and “Local” route categories, the minority routes are operating with equivalent or better headways than the non-minority routes in the same category.

On-Time Performance

On-Time performance measures the percentage of times across an entire trip or route that a bus arrives at a timepoint “on-time”. DASH defines “on-time” as no more than one minute prior to the scheduled arrival time and no more than five minutes late.

A full summary of on-time performance by route category is provided in Table 5 below.

Table 5 – On-Time Performance Standards by Route Category & Time Period

*Trolley does not typically operate during AM peak periods or on weekends before 11:00 AM.

Based on the on-time percentage data provided above, most routes and route categories meet or exceed the 85 percent standard for on-time performance. Several routes fall below the 85 percent threshold for parts of the day, but none are consistently unreliable for the entire weekday or throughout the entire week. Most of the “minority” routes are running on time the same amount of time or more than the “non-minority” routes in their route categories.

The main exception to this is the frequent, minority route category, which has two routes that are only shown to operate “on-time” 84 percent of the time, compared to an 87 percent on-time performance for frequent, non-minority routes. The reason for this is that Line 35, which operates the most service of any route in the DASH system, runs on a “headway management” schedule in which buses do not have a public-facing schedule and are permitted to run early or late, as needed, to maintain consistent 10-minute headways. DASH will also monitor Line 102 on-time performance during weekday peaks to determine if any schedule adjustments are needed to improve reliability.

Service Availability

The ATC/DASH approach to service availability is shaped largely by the Alexandria Transit Vision Plan (www.dashbus.com/transitvision). One of the key statistics that was used during the development of the Alexandria Transit Vision Plan was the percentages of city residents who live within ¼ mile of a bus stop with “frequent” bus service, and the percentage within ¼ mile of a bus stop with any bus service. This metric was also calculated for percentages of minority residents, low-income residents, senior residents and jobs. These percentages help to measure the availability of bus service - and the availability of useful, frequent, all-day service – to city residents.

A summary of Service Availability for each the demographic groups noted above is included as Table 6. Note that these values include both DASH and Metrobus routes within the City of Alexandria to accurately capture the degree to which residents are effectively served by public transit.

Table 6 – Transit Service Availability for the City of Alexandria

The Service Availability data provided above shows that the City of Alexandria’s bus network does an exceptional job of providing frequent service to a large percentage of the community, particularly minority and low-income households. Nearly 3 out of every 4 city residents lives within close proximity of a bus stop with “frequent” service (15 minutes or better, all-day, seven days per week), while 95 percent of all residents have access to bus service. In terms of low income and minority communities, roughly 4 out of every 5 individuals are served by the frequent bus network, while 96% have access to any bus service. Prior to the launch of the City’s New DASH Network, fewer than 30 percent of residents had access to frequent, all-day service, including less than 25 percent of minority residents. These statistics demonstrate that the new bus network has significantly increased the number of residents with access to frequent, useful bus service while maintaining baseline service availability for the vast majority of city residents.

Systemwide Service Policies

The following section is intended to provide insights into current vehicle assignment and passenger amenity distribution practices to ensure that they are not resulting in discrimination on the basis of race, color or national origin. Based on these maps and analyses, no discriminatory practices have been identified in the assignment of vehicles or the distribution of passenger amenities.

Vehicle Assignment

The ATC/DASH bus fleet is comprised of roughly 100 buses in active revenue service. The DASH fleet operates out of the DASH William B. Hurd Maintenance & Operations Administration Facility, which is located at 3000 Business Center Drive in Alexandria, Virginia. The current fleet includes a mix of buses of varying lengths and propulsion types, which are shown in Table 7.

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230-233	2017	Gillig	Hybrid	35'	4
310-311	2017	Gillig	Hybrid	40'	2
501-514	2018	Gillig	Clean Diesel	35'	14
515-527	2019	New Flyer	Clean Diesel	35'	13
528-530	2020	New Flyer	Clean Diesel	35'	3
701-705	2020	New Flyer	Clean Diesel	40'	5
801-803	2020	New Flyer	Electric	40'	3
804-806	2021	Proterra	Electric	40'	3
807-810	2021	Proterra	Electric	40'	4
901-904	2021	New Flyer	Electric	60'	4
TOTAL ACTIVE FLEET					101

Vehicle Assignment refers to the process by which transit vehicles are assigned to routes for revenue service. A summary of the ATC/DASH Vehicle Assignment Process is included below:

- DASH Operations staff typically assign buses at random, based on fleet availability at the time when a bus is scheduled to pull out. In most instances, whichever bus is most accessible or near the front of the garage is used for pullout.

- DASH employs a significant amount of “interlining”, which is a vehicle blocking strategy whereby a single bus and operator will rotate through multiple routes during the course of the day to maximize operating cost efficiency. In addition to lowering operating costs, this approach also results in buses being rotated through the system in a more fair and equitable manner.
- Exceptions to these vehicle assignment policies are employed for several routes with increased ridership or specific operating or branding constraints. Examples include:
 - Dispatchers typically avoid assigning the larger, 40- and 60-foot buses to routes that operate on narrow streets or tight turns, including those on Lines 36A/B, 103 and 104;
 - Dispatchers try to assign these larger buses to routes with higher ridership that may be more susceptible to overcrowding. These high-ridership routes include Lines 30 and 35 in West Alexandria, which has a higher percentage of low income and minority residents than the rest of the service area.
 - DASH has a series of buses that have been specifically wrapped and branded for Line 35 service in West Alexandria. These buses include a mix of 35- and 40-foot vehicles and are used almost exclusively on Line 35.
 - The King Street Trolley service is also operated with a dedicated sub-fleet of six buses that have been equipped with a custom livery package that emulates historic trolley design features. These trolley buses are used exclusively on the King Street Trolley.

ATC/DASH maintains extremely high safety standards and closely monitors the age and condition of its vehicles to determine when repairs are needed and when the buses are due for replacement. Buses are typically replaced at the end of their useful 12-year lifespan in accordance with the ATC/DASH Fleet Replacement Plan. DASH has a comprehensive Preventive Maintenance (PM) program which outlines regular maintenance procedures that are performed to ensure a high level of vehicle reliability.

The oldest vehicles in the active DASH revenue fleet date were manufactured in 2011, and the newest were delivered in 2021. The average age of the fleet is 5.7 years old, which is less than half of the typical 12-year lifespan. Based on a random sampling of bus utilization from December 2021, the average age of the buses used on minority routes is 5.5 years, while the average age of the buses used on non-minority routes is 5.8 years. This finding indicates that buses are being used in a fair and a equitable manner.

Transit Amenities

The City of Alexandria provides a wide array of transit amenities such as bus shelters, benches, trash cans, lighting, and real-time bus arrival displays. These amenities are distributed throughout the service area based on ridership data, staff analysis, funding opportunities, development conditions and customer requests. General policies for the distribution of bus shelters, benches, trash cans, lighting fixtures and posted schedule information are outlined below. ATC/DASH and City staff monitor the locations of all transit amenities to ensure that they are distributed equitably.

Table 8 – City of Alexandria Bus Amenities in Minority Areas

	Minority Areas	Non-Minority Areas	Totals	% in Minority Areas
Bus Shelters	49	69	118	42%
Benches	60	98	158	38%
Trash Cans	93	142	235	40%
Real-Time Display	30	32	62	48%
Total Bus Stops	308	525	833	37%

As shown in Table 8, roughly 37 percent of bus stops are in census block groups that are below the citywide average minority percentage. By comparison, 42 percent of bus shelters are located in minority communities. Similarly, 48 percent of real-time information displays have been deployed to areas with higher concentrations of minority populations. Additional maps depicting the locations of passenger amenities are provided in Appendix A. These maps and tables indicate that passenger amenities are distributed in an equitable manner.

Appendix A

Title VI Demographic & Service Profile Maps

Figure A1 – City of Alexandria Bus Service & Passenger Amenities

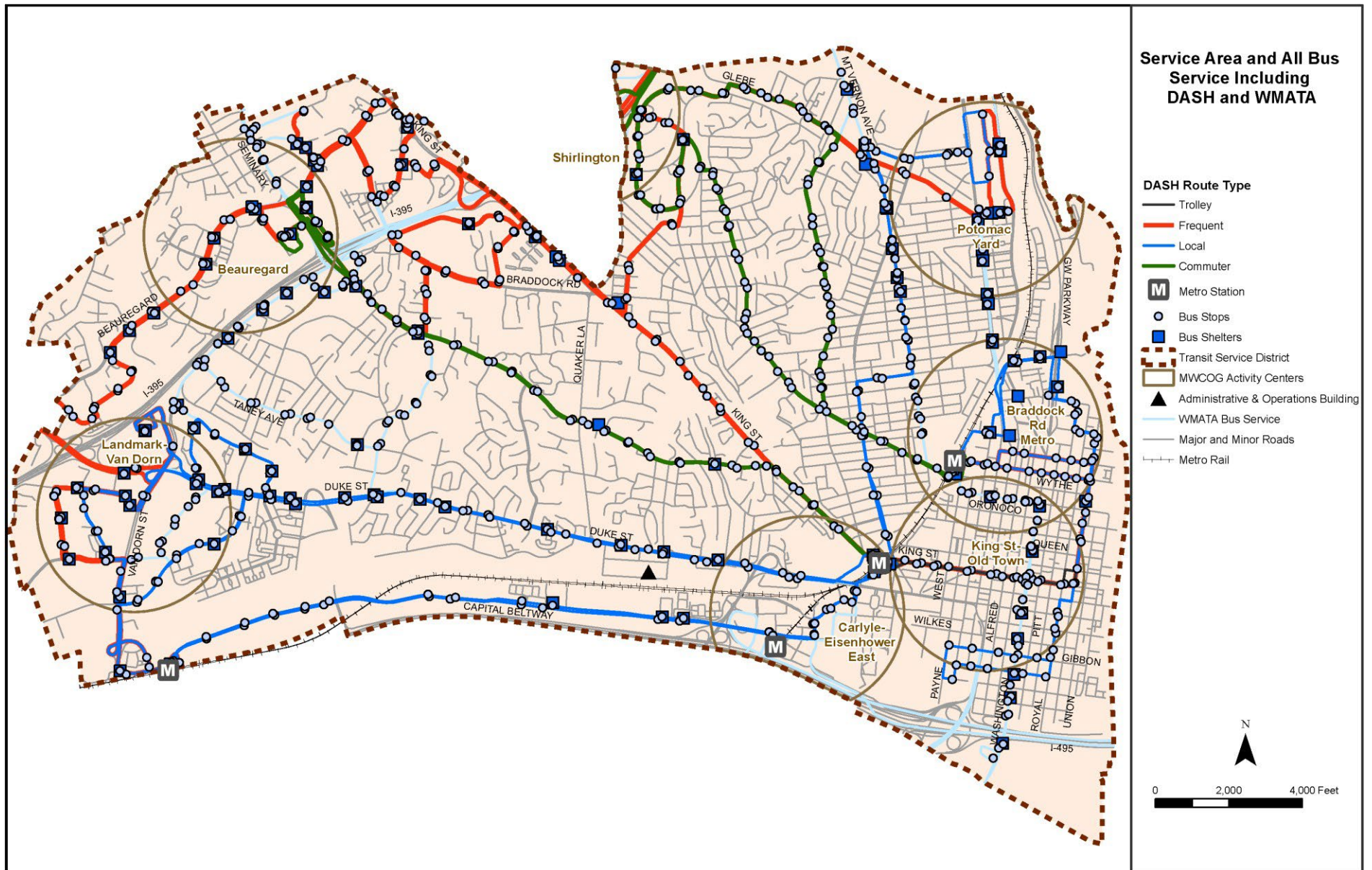


Figure A2 – DASH “Minority” Route Classifications & Minority Populations

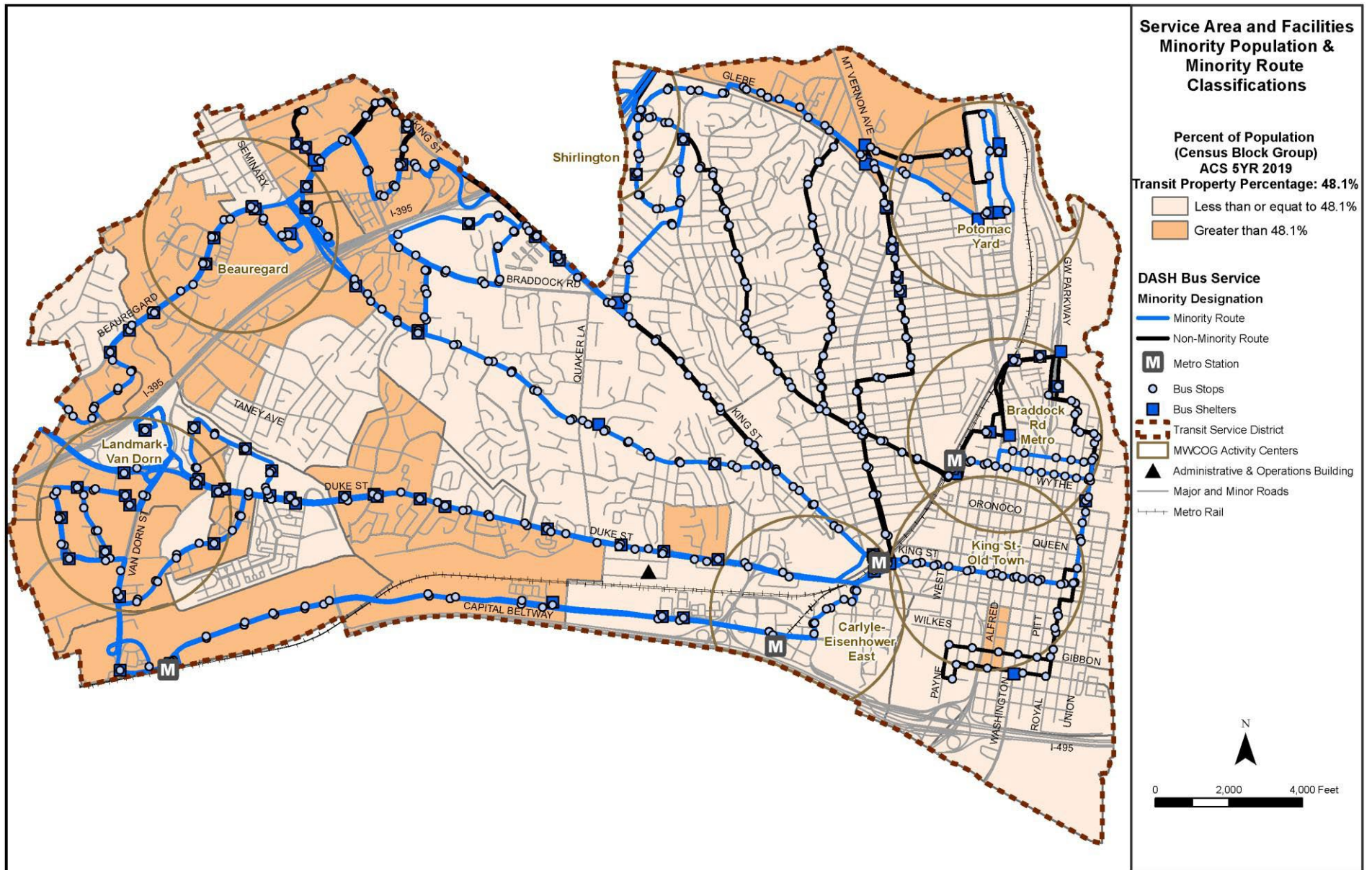


Figure A3 –Low Income Populations & DASH Bus Service

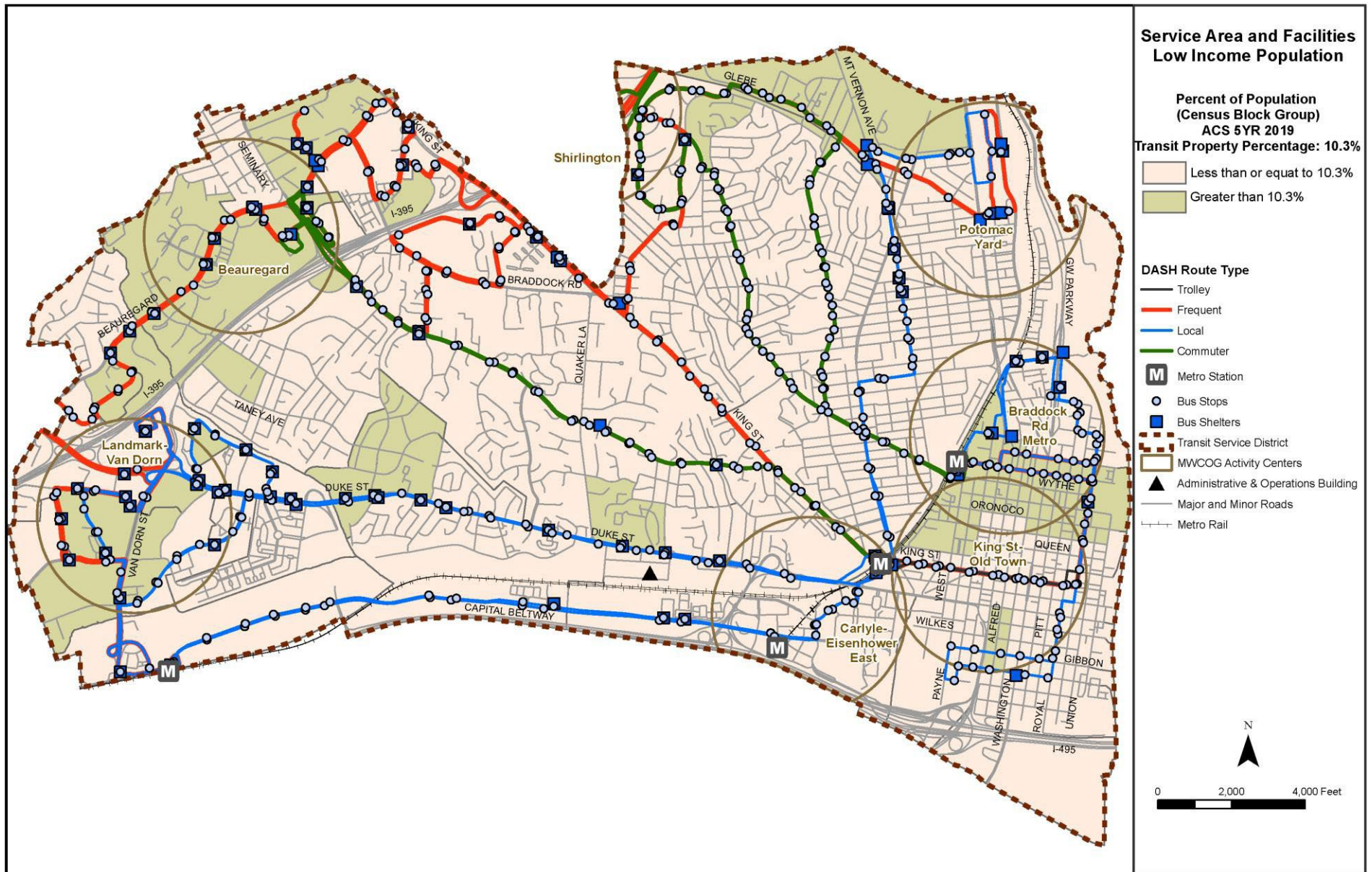


Figure A4 –Limited English Proficiency (LEP) Populations & DASH Bus Service

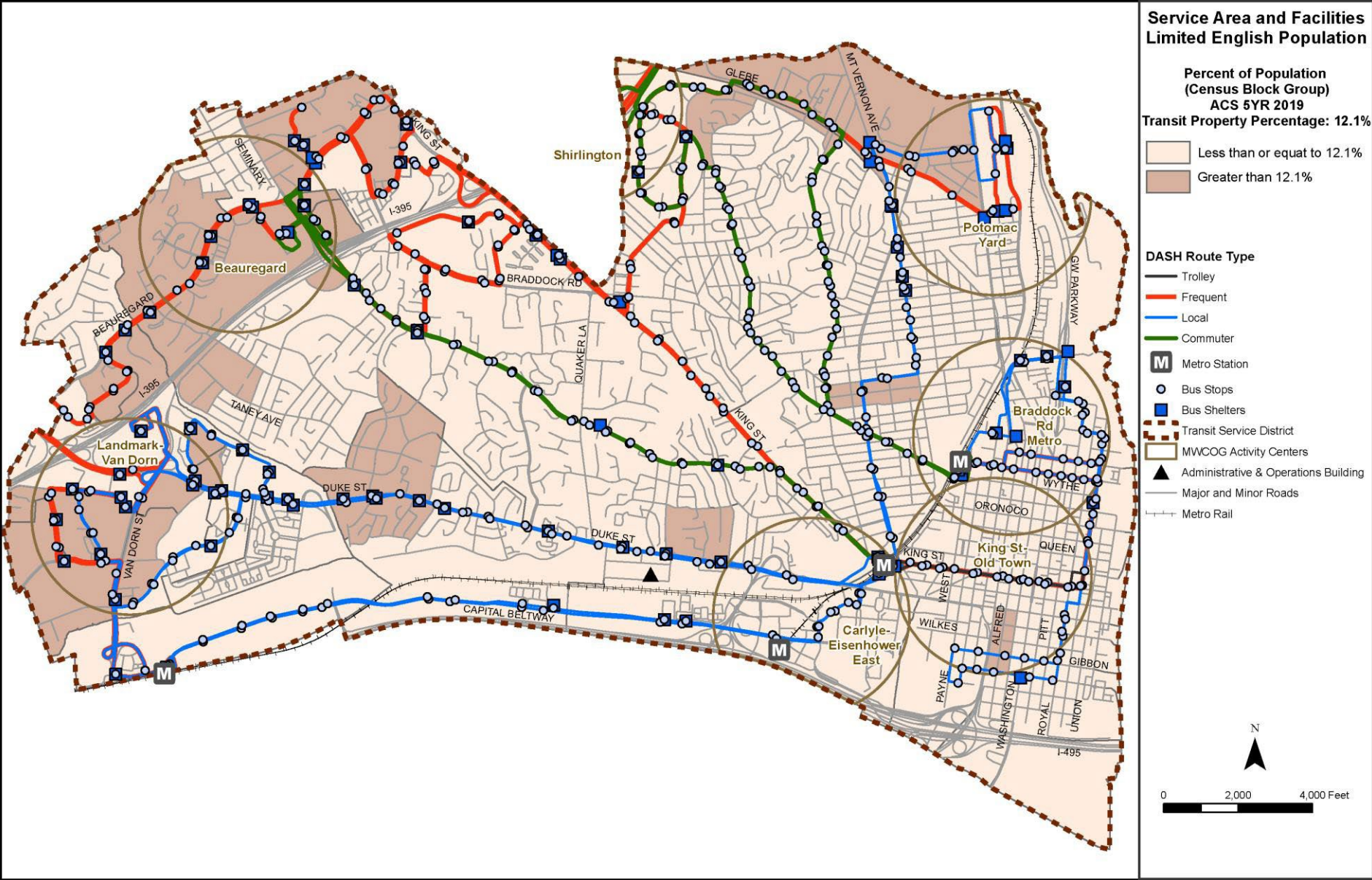


Figure A5 – City of Alexandria Bus Passenger Amenities & Minority Populations

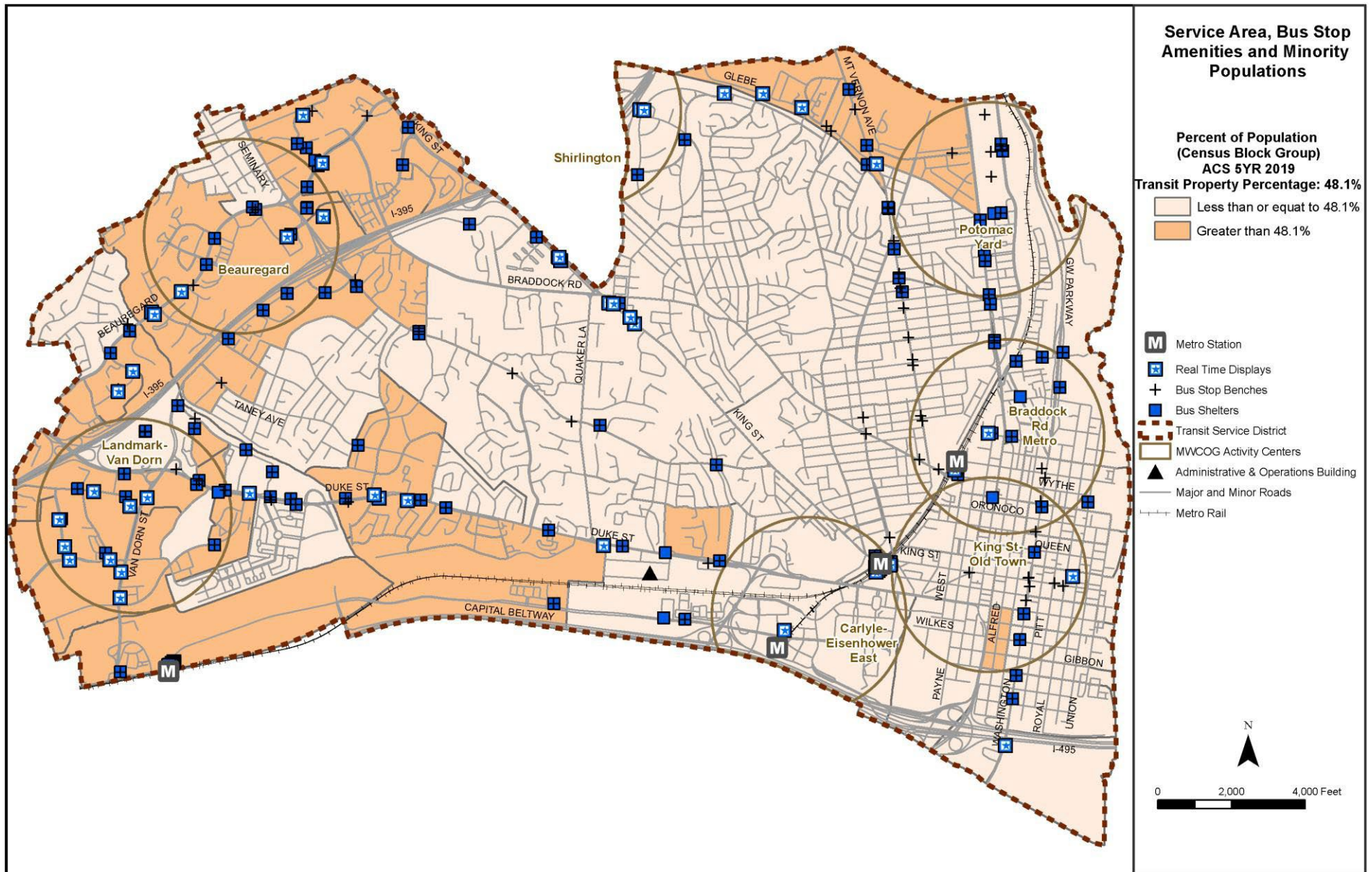
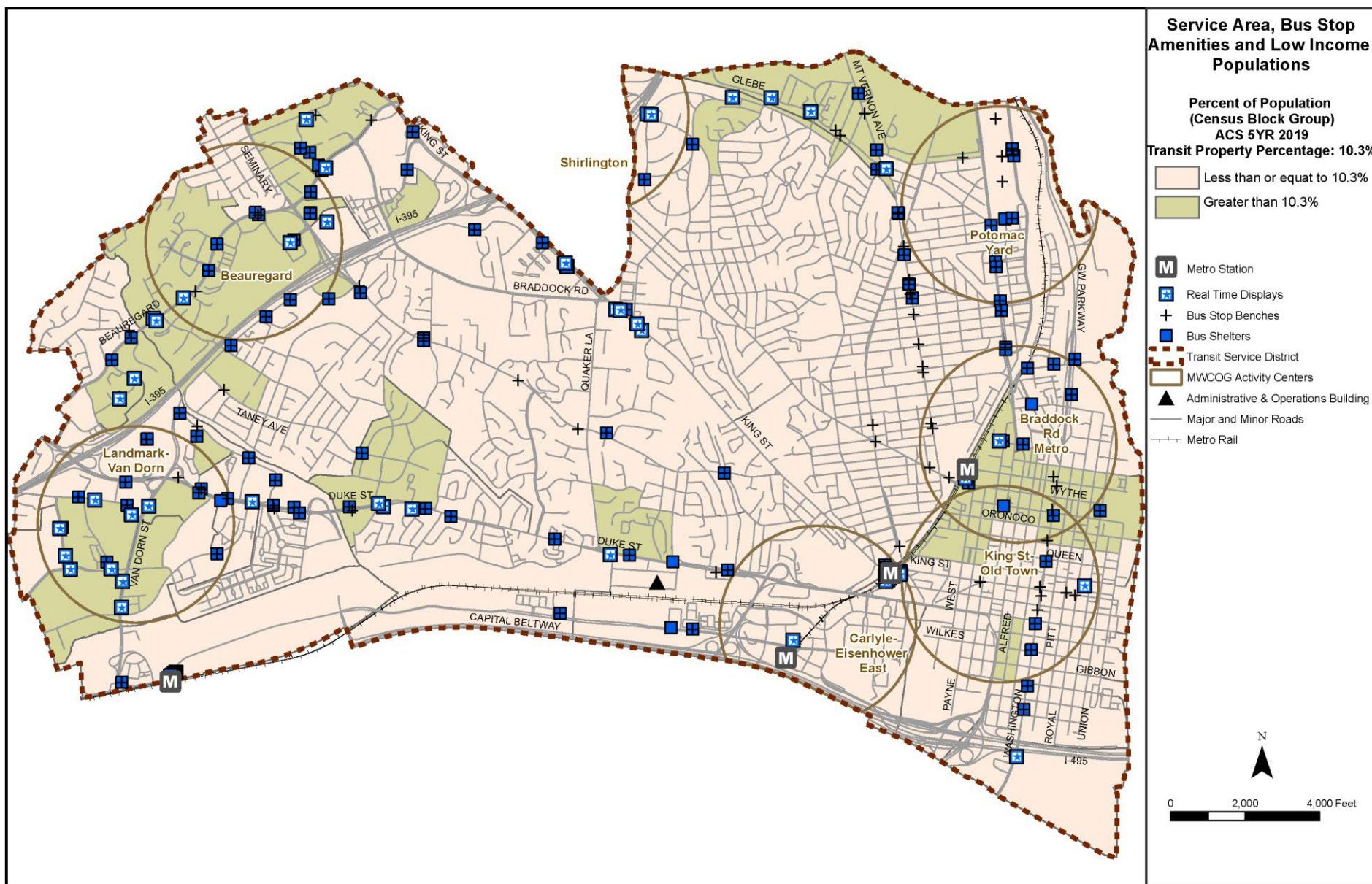


Figure A6 – City of Alexandria Bus Passenger Amenities & Low-Income Populations





COMMONWEALTH of VIRGINIA

DEPARTMENT OF TRANSPORTATION
1401 EAST BROAD STREET
RICHMOND, VIRGINIA 23219-2000

Stephen C. Brich, P.E.
Commissioner

March 4, 2022

Dear Sub-recipient of Federal-Aid Funding:

As sub-recipients of federal highway administration (FHWA) financial assistance, Local Public Agencies (LPAs) are required to comply with 23 CFR Part 200 which implements FHWA's Title VI compliance program under Title VI of the Civil Rights Act of 1964 and related civil rights laws and regulations. To ensure nondiscrimination in all of its programs and activities on the grounds of race, color or national origin and continuous compliance with Title VI, each LPA must implement a Title VI Program. When you sign the Virginia Department of Transportation (VDOT) federal aid project administration agreement, you are agreeing to your adherence to these requirements.

Each sub-recipient of federal transportation funds is also required, to submit a signed copy of the United States Department of Transportation (USDOT) Standard Title VI/Nondiscrimination Assurances (USDOT Order 1050.2A) Title VI/Nondiscrimination Assurance form to the Department annually. This form outlines the requirements and assurances your locality is agreeing to when accepting federal aid. We are requesting that an authorized individual in your locality sign this form and submit the signed form to the Department by **March 18, 2022**. The locality signatory would typically be the same individual authorized to sign our project administration agreements. This form is attached to this document and can also be found at this link https://www.virginiadot.org/business/civil_rights_contract_compliance_program.asp. Note that due to configurations of VDOT's website, you may need to copy this and other links in this document and paste them into your browser. Signed documents can be submitted electronically to corina.herrera@vdot.virginia.gov. Digital signatures are acceptable.

March 4, 2022
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As likely recipients of federal aid from other programs, you are probably already familiar of many Title VI requirements; however, we have developed numerous tools to assist you which can be found on the [VDOT Civil Rights Webpage](#) at the following link: www.virginiadot.org/business/civil_rights_contract_compliance_program.asp#Local. Those tools include a [template Title VI Implementation Plan](#), a [Title VI Implementation Plan Checklist](#), and a [flyer on the basic requirements of Title VI for Sub-recipients](#) of federal aid. If you are unfamiliar with Title VI requirements, we encourage you to review those materials on the webpage and also take advantage of [FHWA's federal aid essentials videos](#) on Title VI Requirements for Sub-recipients of federal aid located at: www.fhwa.dot.gov/federal-aidessentials/indexofvideos.cfm#civilrights.

VDOT is also required to perform periodic reviews of sub-recipients of federal aid to monitor sub-recipients' efforts to implement Title VI requirements. These reviews will begin later this year and we will notify selected localities with additional details prior to beginning any review.

If you have any questions about this correspondence, please feel free to contact us at Sandra.Norman@VDOT.Virginia.gov or Russell.Dudley@VDOT.Virginia.gov.

For any questions about Title VI Requirements, you may contact your local Civil Rights Office or Ms. Corina Herrera, Title VI Specialist at corina.herrera@vdot.virginia.gov.

Sincerely,

Sandra D. Norman
Division Administrator/Title VI Coordinator
Civil Rights Division

Russell A. Dudley
Division Administrator
Local Assistance Division

Cc: District Civil Rights Managers



Title VI Program Packet

Final Audit Report

2022-04-12

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