



**2018 Tennessee Department of Transportation
Civil Rights Division
Metropolitan Planning Organization
Title VI Compliance Assessment**



TDOT, Civil Rights Division; Suite 1800, James K. Polk Building; 505 Deaderick Street, Nashville, Tennessee 37243
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I. Agency Contact Information

Pragati Srivastava Administrator
Administrative Head Title

Grant Recipient: Memphis Urban Area Metropolitan Planning Organization (MPO)

Address: 125 N. Main St., Room 450
City/State: Memphis, TN Zip Code/County: 38103/Shelby

Name and Title of Title VI Coordinator:

Alvan-Bidal Sanchez Transportation Planner
Name Title
Address: 125 N. Main St., Room 450
City/State: Memphis, TN Zip Code/County: 38103/Shelby
Phone/Fax: 901-636-7156 Email: Alvan.Sanchez@memphlstn.gov

*** Please notify the Civil Rights Division if the Title VI Coordinator changes.**

II. Title VI Training Information

1. Has the Title VI Coordinator attended TDOT’s Title VI Program training within the past 3 years?

Yes No

If yes, provide date of last training completed. 02/21/2017

If no, please visit the TDOT Title VI Program’s website to take the online training or attend a Regional training: <https://www.tn.gov/tdot/article/title6-training>

III. Organization - 42 USC 2000et seq.; 49CFR Part 21; 28CFR Part 42, subpart F, Executive Order 12898 on Environmental Justice and Title VI; FTA C4702.1B; FTA C4703.1.

1. Planning Commission(s), Board(s), and/or Advisory Body (ies) should reflect the racial/ethnic composition of the community affected by their programs.

Provide a breakdown for all MPO staff, transportation - related appointed board(s), advisory body (ies) or commission(s) by race and gender.

Body	Caucasian	Latino	African American	Asian American	Native American
Population					
Committee 1					
Committee 2					
Committee 3					

*Use addendum sheet to add additional committees. See attachments 9 and 10.

2. How are members of the board(s)/ or commission(s) selected? [\(attach by-laws\)](#)

See addendum 3.2 and attachment 8

3. How often do members of the board(s), commission(s), and/ or advisory bodies meet? Are there regularly scheduled meetings?

See addendum 3.3

4. Provide a narrative or description of efforts made to encourage the participation of minorities on such committees or decision-making boards.

See addendum 3.4

5. Provide a demographic profile of MPO's metropolitan area that includes identification of minority and/ or low income populations in the aggregate. (Use addendum sheets)

See attachment 10

6. Provide a description of the procedures used to determine and consider the mobility needs of the minority population. (Use addendum sheets.)

See addendum 3.6 and attachments 10, 14, and 15

7. Provide a copy of the MPO's Public Participation Plan that includes an outreach plan to engage the minority and limited English proficient (LEP) population.

See attachment 5

8. Provide a copy of the MPO's plan for providing language assistance to LEP persons.

See attachment 7

9. Provide a copy of MPO's complaint procedures and instructions to the public regarding how to file a Title VI discrimination complaint.

See attachment 2

10. Provide copies of MPO's Title VI Poster, informing the public of the protections provided to them in Title VI. Include locations where notices are posted, e.g., website, building entrance, etc.

See Posters

IV. Documentation - 23 USC 109(h); Executive Order 12898; 49 CFR Part 21; Title VI; FTA C4702.1B; FTA C4703.1.

1. Have there been any special studies of traditionally under-served or low income communities conducted in the past three years? What type studies? Purpose?

Yes No if yes, what type?

See addendum 4.1

2. Provide a narrative of the MPO's complaint procedures, and provide a copy of complaint form and log.

See addendum 4.2 and attachment 2

3. List all active transportation-related Title VI complaints, investigations or lawsuits filed on the basis of race, color, and/or national origin (including, but not limited to, actions brought pursuant to Title VI against subrecipient containing the date of filing; summary of allegation(s); and status.

The MPO does not have any active transportation-related Title VI complaints, investigations, or lawsuits.

4. List all funding sources to the MPO and provide a description of the procedures the MPO uses to pass through Federal financial assistance to subrecipients in a nondiscriminatory manner.

See addendum 4.4

5. List funding sources and any applications approved for federal projects.

See addendum 4.5

6. Provide a summary of all FHWA/FTA Title VI reviews conducted on your agency in the past three years; name of agency or organization performing review; any findings and recommendations; and status of and/or disposition of findings and recommendations.

See addendum 4.6

7. Provide a written description of the planning process, discussing how project selection and/or criteria for the Unified Planning Work Program (UPWP), Long Range Transportation Plan (LRTP) and Transportation Improvement Program (TIP) will be accomplished in a nondiscriminatory manner.

See addendum 4.7

9. Provide an analysis assessing any effects on Environmental Justice (EJ) traditionally under-served communities that include transportation congestion and air quality projects.

- The potential impact on traditionally under-served communities and businesses during and after project;
- The potential environmental impact;
- Detailed list of traditionally under-served owned businesses and households to be effected;
- Any significant changes or impacts on traditionally under-served communities; and
- Description of how this/these project(s) will mitigate any identified adverse, social, economic, or environmental effects.

Note: If report(s) on the above-described projects have been conducted or are in the possession of TDOT personnel, provide the name, date and project termination date of each such project.

See addendum 4.8 and attachment 14

V. **Public Involvement – 42 USC 2000d et seq.; 49 CFR Part 21; 28 CFR Part 42, Subpart F, Executive Order 12898**

1. Describe the effectiveness of your public involvement process as well as any strategies to ensure traditionally under-served populations have an opportunity for full participation in your planning process.

See addendum 5.1

2. Describe how traditionally under-served media sources are appropriately included in all notification processes for public meetings or public reviews of agency documents.

See addendum 5.2

3. Describe how meeting locations and formats encourage or facilitate participation by traditionally under-served populations.

See addendum 5.3

VI. Contracting Opportunities – 42 USC 2000d et seq.; 49 CFR Part 21.5(b) (2) & (3); 28 CFR Part 42, Subpart F

4. List primary or subcontracting opportunities for planning studies, corridor studies, or other work which have been provided to minorities and women owned firms in the last twelve months.

See addendum 6.1 and attachment 13

Include documentation for the following information:

_____ The number and nature of consultant contracts used by the MPO.

_____ The number of certified Disadvantaged Business Enterprises and other small, minority and women – owned businesses (by race) used by the MPO, including the nature of the work, type and description of projects, and locations.

See addendum 6.1

_____ Outreach methods used by the MPO to attract certified Disadvantaged Business Enterprises and other small, minority and women – owned businesses.

Program Specific Requirements

The following applies to planning areas with a population of 200,000 or greater

VII. Community Impact Assessment – 23 USC 109(h) lists the types of adverse social and economic impacts that must be investigated and documented.

1. Describe how community value, social, neighborhood issues; environmental justice and any discrimination issues are normally addressed by the MPO.

See addendum 7.1

VIII. Service Equity – Executive Order 12898 Cumulative Impacts; 42 USC 2000d et seq.; 49 CFR Part 21; 28 CFR Part 42, Subpart F. In the context of land use planning, cumulative impacts of the benefits and burdens (regional plan level), please address the following:

1. Describe to what extent the MPO coordinates with citizens and community-based agencies, groups and/or organizations in defining communities within the MPO’s geographic area of responsibility in assessing potential benefits and impacts of transportation system investments, particularly related to traditionally under-served populations and other traditionally under utilized populations.

See addendum 8.1

2. What specific criteria are used to determine which projects will be included in the TIP?

See addendum 8.2 and attachment 15

3. How is the distribution of impacts to socioeconomic and/or ethnic minorities identified and measured?

See addendum 8.3

4. How does the MPO collect and utilize transit data?

See addendum 8.4

For MPOs that are providers of fixed route public transportation service (50 + peak vehicles):

1. If there have been any major service changes, provide the Title VI equity analysis that was conducted during the planning stage for the particular change, i.e., fare changes, facility constructions (in regard to location), etc. with regard to facility location.
2. Provide passenger surveys.
3. Provide a copy of the MPOs Set System-Wide Service Standard, i.e., non-discrimination policies, etc.
4. Submit any evaluations conducted on Service fare changes.
5. Submit any analysis/monitoring of ridership data, minority routes, etc.

IX. Title VI Assurance

As required by the contractual agreement, Memphis Urban Area MPO will comply with the applicable laws and regulations relative to nondiscrimination in federally or state assisted programs of the Tennessee Department of Transportation.

Memphis Urban Area MPO assures that no person shall on the grounds of race, color, or national origin as provided by **Title VI of the Civil Rights Act of 1964** and as amended, and the Civil Rights Restoration Act of 1987 (P.I. 100.259) be excluded from participation in, be denied the benefits of, or be otherwise subjected to discrimination under any program or activity receiving federal financial assistance from the Tennessee Department of Transportation (TDOT). Memphis Urban Area MPO further assures every effort will be made to ensure nondiscrimination in all of its programs and activities, whether those programs or activities are federally funded or not.

In the event Memphis Urban Area MPO distributes federal financial assistance to a consultant, contractor or subcontractor and other participants, Memphis Urban Area MPO will include Title VI nondiscrimination language in all written agreements and will monitor the consultant, contractor or subcontractor and other participants for compliance. The Memphis Urban Area MPO Title VI Coordinator is responsible for initiating and monitoring Title VI activities, preparing required reports and other responsibilities as required by 23 CFR 200 and 49 CFR 21.

As required by the contractual agreement, Memphis Urban Area MPO will comply with the applicable laws and regulations relative to nondiscrimination in federally or state assisted programs of the Tennessee Department of Transportation (TDOT).

X. Declaration of Respondent

I declare that I have completed this Title VI Compliance Assessment to the best of my knowledge and believe it to be true and correct.



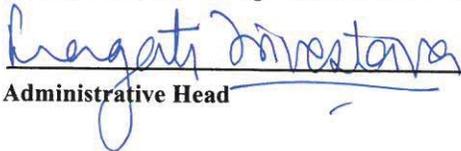
Title VI Coordinator

8/23/18

Date

XI. Declaration of Administrative Head

I declare that I have reviewed and approved the information provided in this assessment and to the best of my knowledge and believe it is true, correct and complete.



Administrative Head

8/28/18

Date



2018 Title VI Compliance Assessment
Addendum

III. Organization - 42 USC 2000et seq.; 49CFR Part 21; 28CFR Part 42, subpart F, Executive Order 12898 on Environmental Justice and Title VI; FTA C4702.1B; FTA C4703.1.

1. *Planning Commission(s), Board(s), and/or Advisory Body (ies) should reflect the racial/ethnic composition of the community affected by their programs.*

Provide a breakdown for all MPO staff, transportation - related appointed board(s), advisory body(ies) or commission(s) by race and gender.

(See Attachment 9 and 10)

2. *How are members of the board(s)/ or commission(s) selected? (attach by-laws)*

The Memphis Urban Area MPO Transportation Policy Board (TPB) consists of the principal elected officials of the governmental jurisdictions located within the Metropolitan Planning Area (MPA) of the Memphis MPO, along with the chairpersons of the major providers of local and regional transportation facilities (Article II). Election of the TPB chairman and vice-chairman takes place on the first meeting of the calendar year, and that term of office is for one year or until such time as new officers are elected. An officer may succeed himself/herself with no limitation of the number of terms, contingent on eligibility as a Voting Member of the TPB (Article IV).

(For bylaws, see Attachment 8, or visit the MPO's website:

http://memphismpo.org/sites/default/files/public/MPO%20Bylaws_Final.pdf)

3. *How often do members of the board(s), commission(s), and/ or advisory bodies meet? Are there regularly scheduled meetings?*

The TPB and Engineering Technical Committee (ETC) meet at least four times each year (quarterly). In addition, the Interagency Consultation Committee (IAC) meets quarterly, the Active Transportation Advisory Committee (ATAC) meets biennially, and the Freight Advisory Committee (FAC) and Planning and Land-Use Advisory Committee (PLAC) meet on an as needed basis.

4. *Provide a narrative or description of efforts made to encourage the participation of minorities on such committees or decision-making boards.*

As part of its general planning and programming process, the Memphis MPO strives to involve as broad a cross-section of the population and the region as possible through its public outreach strategies, which are included in the PPP. In addition, the Memphis MPO uses a variety of techniques to identify the transportation needs of underrepresented populations and encourage participation in the transportation planning process. These efforts are outlined in the Chapter 6 of the PPP and Chapter

4 of the Title VI Report. The Memphis MPO strives to involve the following groups to the fullest extent possible: residents, member municipalities, affected public agencies, representatives of transportation agency employees or unions, public and private providers of transportation, freight shippers, providers of freight transportation services, representatives of users of public transportation, representatives of users of pedestrian walkways and bicycle transportation facilities, representatives of persons with disabilities, and other parties who have expressed an interest in the process. Some of the efforts made to encourage participation of traditionally underserved communities include, but are not limited to, the following:

- Hold public meetings at convenient locations near transit routes at reasonable times where the working and non-working public can attend, where possible;
- Potential meeting locations may include: neighborhood faith centers, community centers, public schools, public buildings, libraries, transit facilities, etc.
- Employ visualization techniques to describe regional transportation plans; and
- Make public information available in electronically accessible format and means, such as the Memphis MPO website, as appropriate to afford reasonable opportunities for consideration of public comment and opinion.
- Targeted outreach and public notifications using methods such as direct mail, community association outreach, and other methods, in order to increase involvement.
- Provide foreign language translated documents for limited English speakers at local libraries, will make efforts to provide translations and large print versions of other documents upon ten (10) calendar days advance notice, and provide foreign and sign-language translators as needed.
- All MPO TPB, ETC, and other committee meetings are open to the general public, and members of the public are provided the opportunity to comment or ask questions at each of these meetings.

5. *Provide a demographic profile of MPO's metropolitan area that includes identification of minority and/ or low income populations in the aggregate. (Use addendum sheets)*

(See Attachment 10).

6. *Provide a description of the procedures used to determine and consider the mobility needs of the minority population. (Use addendum sheets.)*

Among the methods used to identify potential imbalances in transportation improvements and studies are:

- Creating maps using GIS to analyze the most current U.S. Census data and identify low-income and minority populations within the project's study area;
- Incorporating income information from the U.S. Census into the travel-demand forecasting model to assess the benefits to and burdens of existing and planned transportation system investments on low-income populations and minority populations;
- Using mapping and data analysis to strengthen outreach efforts in the communities most directly impacted by transportation projects.

Identifying the size and location of low-income communities and communities of color is an important first step towards assessing whether transportation system investments disproportionately burden or fail to meet the needs of any segment of the population. Low-income community data is utilized in the travel demand model to analyze demand for transit service.

Using Census data, the Memphis MPO calculates the percentages of minority, limited English proficient, seniors, low-income, and persons with a disability for geographic areas/boundaries defined by the Census within the planning area, using an internally established threshold to determine whether a particular geography contains a significant number of people of color or low-income individuals, or persons with Limited English Proficiency. The Memphis MPO is currently updating its internally established thresholds as part of its update to the Title VI report and LEP plan to account for demographic changes.

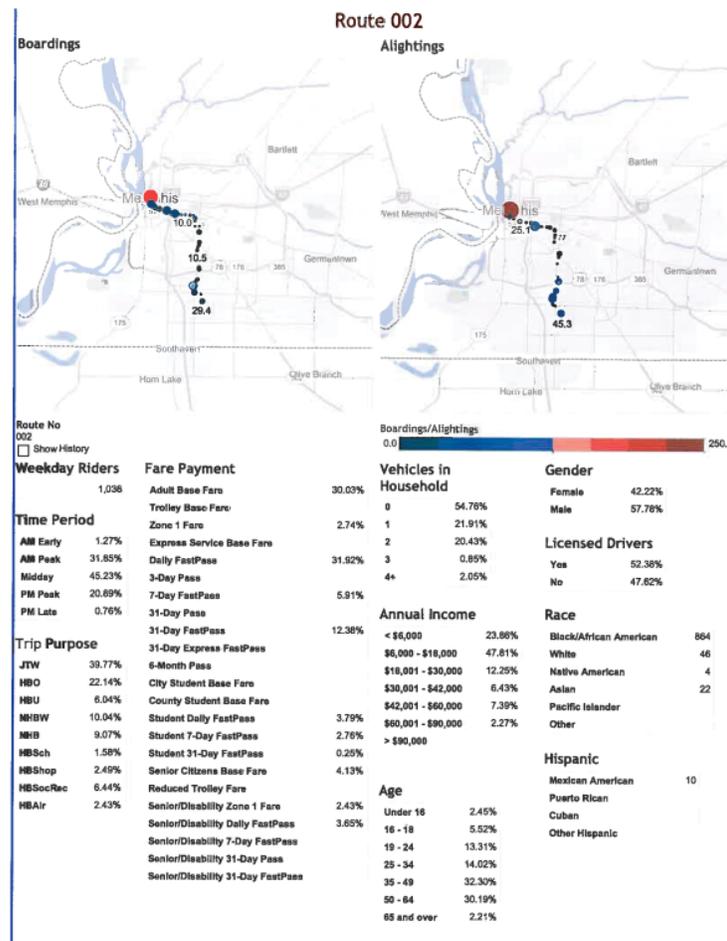
(See Attachment 10 for more on Demographic Profile/Analysis)

Various studies conducted by the MPO are tailored to identify the needs of the low-income and minority communities. Recent studies produced by the MPO that evaluate the needs of these communities include:

As part of the MPO's Bus Stop Design and Accessibility Guidelines, the Memphis MPO and MATA conducted a survey during the summer of 2016 to learn more about how riders use MATA service and to gain a better understanding of the factors and amenities that riders and non-riders find most important at bus stops. Surveys were distributed to bus riders at the William Hudson Transit Center on June 21, 2016 from 2 p.m. to 6 p.m. Respondents answered questions about how often they travel, which routes they use, and rated the importance of several factors or amenities at bus stops. Seventy (70) riders completed surveys at the Transit Center. An additional 115 surveys were completed online between June and July 2016. Survey respondents were asked a series of questions regarding their perception of the importance of factors and features at bus stops. The results give insight into the factors and amenities that both riders and non-riders value most at bus stops.

In 2016, the Memphis MPO completed a Coordinated Public Transit-Human Services Transportation Plan. The purpose of the CPT-HSTP is to create a better transit system for transportation disadvantaged communities: older adults, persons with disabilities, and persons of low-income. The development of the plan was a collective effort between the Memphis MPO, the West Memphis MPO, the West Tennessee RPO, the Tennessee Department of Transportation (TDOT), the Arkansas Department of Transportation (ArDOT), and the Mississippi Department of Transportation (MDOT). The development of the CPT-HSTP included a public survey & multiple public meetings.

In January 2015, the MPO finalized an On-Board Transit Survey that was conducted during the Fall of 2013 through the Spring of 2014. The survey was developed in an effort to gather more information regarding the demographic composition of MATA's customers and to better understand the needs and preferences of MATA's customers. The responses from this survey were compiled and have been used for further analysis, (see example below):



All core MPO plans and programs, as well as the majority of special studies conducted by the MPO, include analysis of existing conditions in and potential effects on affected communities. For example, as part of the Memphis MPO's 2017 Greater Memphis Regional Freight Plan, an analysis was conducted to evaluate the geographic relationship between Environmental Justice Communities and the Regional Industrial Areas. The plan discusses the importance of ensuring that EJ communities are connected to the major employment hubs throughout the region while mitigating the negative impacts associated with heavy industry.

(See attachments 14 and 15)

7. *Provide a copy of the MPO's Public Participation Plan that includes an outreach plan to engage the minority and limited English proficient (LEP) population.*

(See Attachment 5, or visit the MPO's website:

<http://memphismpo.org/sites/default/files/public/2014%20PPP%20Final.pdf>)

8. *Provide a copy of the MPO's plan for providing language assistance to LEP persons.*

(See Attachment 7 or visit the MPO's website:

<http://memphismpo.org/sites/default/files/public/LEP%20draft.pdf>)

9. *Provide a copy of MPO's complaint procedures and instructions to the public regarding how to file a Title VI discrimination complaint.*

(See Attachment 2 or visit the MPO's website:

<http://memphismpo.org/sites/default/files/public/2018%20Title%20VI%20Complaint%20Procedure.pdf>)

10. *Provide copies of MPO's Title VI Poster, informing the public of the protections provided to them in Title VI. Include locations where notices are posted, e.g., website, building entrance, etc.*

(See Posters)

IV. Documentation - 23 USC 109(h); Executive Order 12898; 49 CFR Part 21; Title VI; FTA C4702.1B; FTA C4703.1.

1. *Have there been any special studies of traditionally under-served or low-income communities conducted in the past three years? What type studies? Purpose?*
 - a. Coordinated Public Transit-Human Service Transportation Plan: 2016
The purpose of the CPT-HSTP is to create a better transit system for transportation disadvantaged communities: older adults, persons with disabilities, and persons of low-income. The project effort included:

- Evaluating existing paratransit, demand response transportation, human service agency, non-profit and private for-profit providers;
- Assessing the transportation needs of transportation disadvantaged communities: including older adults, persons with disabilities, and persons of low-income;
- Identifying gaps, challenges, and duplications of services;
- Selecting short-term and long-term strategies for meeting unmet transportation needs; and
- Producing an action plan for funding and implementation of strategies and activities.

In 2017, the CPT-HSTP was chosen as one of ten award winners of the Federal Highway Administration (FHWA) 2017 Transportation Planning Excellence Awards (TPEA) Program for demonstrating a cooperative and comprehensive effort to establish a process that addresses the transportation needs of disadvantaged communities.

(The CPT-HSTP can be found on the MPO's website:

<http://memphismpo.org/sites/default/files/public/Memphis%20CPT-HSTP%202016.pdf>)

b. Bus Stop and Accessibility Guidelines: 2017

The plan is intended to facilitate proper siting, design, installation, and maintenance of existing and proposed bus stops throughout the Greater Memphis Region. Creation of the Guidelines is the first step in ensuring that MATA bus stops offer the highest comfort and accessibility for residents who ride the bus. The project effort included:

- Studying existing bus stops on MATA routes and identifying needed improvements to better accommodate needs of residents.
- Conducting multiple outreach efforts (incl. two stakeholder meetings, a public survey, and an engagement activity at the William Hudson Transit Center) to better understand the priorities of users.
 - These outreach efforts were designed to facilitate discussion about the specific experiences and perspectives related to bus stop design and placement, and to establish goals for the bus stop guidelines document.
- Researching best practices, ADA requirements, and peer city strategies for improved transit experiences.
- Developing a manual regarding improvements to existing bus stops. Possible improvements include seating options (incl. accommodation for people with disabilities), clear signage (incl. schedules, route information, and maps), trash receptacles, lighting, etc.
- Developing standard conceptual engineering designs for different types of bus stops, based on location and volume.

- Recommending better placement of bus stops along MATA routes through optimal stop spacing.
- Recommending an implementation plan and schedule.

(The Bus Stop Design Guidelines can be found on the MPO's website:
<http://memphismpo.org/sites/default/files/public/documents/transit-plans/bus-stop-design-and-accessibility-guidelines-apr-2017.pdf>)

2. Provide a narrative of the MPO's complaint procedures, and provide a copy of complaint form and long.

Any individual that believes that they have been subjected to discrimination or retaliation, by any Memphis Urban Area Metropolitan Planning Organization's (Memphis MPO) programs or activities, as prohibited by Title VI of the Civil Rights Act of 1964, as amended, and related statutes, may file a written complaint. All written complaints received by the Memphis MPO shall be reviewed immediately by the Memphis MPO's Title VI Coordinator, Alvan-Bidal Sanchez, and submitted to the Tennessee Department of Transportation's (TDOT) Title VI Program Director for processing in accordance with approved State procedures. In addition, the MPO Title VI coordinator will notify the Shelby County Title VI coordinator to determine how to best investigate and respond to the complaint.

Verbal and non-written complaints received by the Memphis MPO shall be resolved in- formally by the MPO's Title VI Coordinator. If the issue has not been satisfactorily resolved through informal action, or if at any time the individual(s) submitting Complainant(s) request to file a formal written complaint, the Complainant(s) shall be reviewed by the Memphis MPO's Title VI Coordinator and submitted to TDOT's Title VI Program Director for processing in accordance with approved State procedures. In addition, the MPO Title VI coordinator will notify the Shelby County Title VI coordinator to determine how to best investigate and respond to the complaint.
 (See Attachment 2 for more information regarding complaint procedures, or visit the MPO's website:

<http://memphismpo.org/sites/default/files/public/2018%20Title%20VI%20Complaint%20Procedure.pdf>)

3. List all active transportation-related Title VI complaints, investigations or lawsuits filed on the basis of race, color, and/or national origin (including, but not limited to, actions brought pursuant to Title VI against subrecipient containing the date of filing; summary of allegation(s); and status.

The MPO does not have any active transportation-related Title VI complaints, investigations, or lawsuits.

4. List all funding sources to the MPO and provide a description of the procedures the MPO uses to pass through Federal financial assistance to subrecipients in a nondiscriminatory manner.

The MPO is a recipient, through the state DOTs, of FHWA Section 112 (PL) and FTA Section 5303 funds. The Memphis MPO follows the policies and guidelines of Shelby County Government to ensure Title VI compliance in its contracts with consultants. MATA, as a designated recipient of Formula FTA funds, must maintain a current Title VI program, and coordinates with the MPO to ensure the compliance of both agencies. The MPO also can indirectly receive for use on planning activities State Planning & Research (SPR) funds from the Tennessee and Mississippi DOTs, both of which must maintain current Title VI programs and coordinate with the MPO to ensure compliance.

As the fiscal and administrative agent for the Memphis MPO and Shelby County Government, in particular the Purchasing Department and Contracts Office, are responsible for ensuring Title VI compliance for all MPO contractors. In addition, TDOT is responsible for reviewing all MPO contracts to ensure compliance with federal and state regulations. The MPO and Shelby County Government coordinate to ensure that Title VI requirements are included in contract and grant language. The MPO and Shelby County have the power to evaluate contractors or grantees working with the MPO for unresolved Title VI violations.

Shelby County Government's Contract Compliance Program requires that all vendors and contractors have a current, valid Equal Opportunity Compliance (EOC) Certification Number in order to do business with Shelby County Government, effective April 1, 2007. All firms, regardless of number of employees, must pre-qualify for EOC Contract Compliance Eligibility Number prior to submission of a bid for a contract. Shelby County also maintains a list of EOC numbers for qualified vendors, which are considered in the evaluations of proposals and qualifications for contract work with the Memphis MPO.

5. List funding sources and any applications approved for federal projects.

The MPO is directly responsible for approving projects under the Surface Transportation Block Grant (STBG) and Transportation Alternatives (TA) Programs. Other funding programs within the MPO planning area are administered by the state DOTs in coordination with the MPO and its member jurisdictions. All federal funding for projects within the MPO, including enhancement projects, is shown in the MPO's current 2017-2020 Transportation Improvement Program (TIP). The tables below lists all of the funding sources included in the Memphis MPO's FY2017-2020 TIP:

FAST Act Federal Funding Sources				
Funding Program	Abbreviation	Source	Availability	Funding Share
Surface Transportation Block Grant Program - Metropolitan	STBG	FHWA	All TN & MS Jurisdictions	80% Federal 20% Match

Surface Transportation Block Grant Program - State	STBG-S	FHWA	TDOT & MDOT	80% Federal 20% Match
Congestion Mitigation and Air Quality	CMAQ	FHWA	All TN & MS Jurisdictions designated as Non-Attainment and Maintenance, TDOT & MDOT	80% Federal 20% Match
National Highway Performance Program	NHPP	FHWA	TDOT & MDOT	80% Federal 20% Match
Transportation Alternatives	TA	FHWA	All TN & MS Jurisdictions	80% Federal 20% Match
Highway Safety Improvement Program	HSIP	FHWA	TDOT & MDOT	90% Federal 10% Match
Section 5307 Urbanized Area Formula	5307	FTA	MATA	80% Federal 10% State, 10% Local
Section 5309 Bus and Bus Facilities Program (Ladders of Opportunity Initiative)	5309	FTA	MATA	80% Federal 10% State 10% Local
Section 5310 Enhanced Mobility of Seniors & Individuals with Disabilities	5310	FTA	TDOT, MDOT, & MATA	80% Federal 10% State, 10% Local*
Section 5337 State of Good Repair	5337	FTA	MATA	80% Federal 10% State 10% Local
Section 5339 Bus and Bus Facilities	5339	FTA	MATA	80% Federal 10% State 10% Local

*MATA is the designated recipient of FTA funds

Carry-Over Federal Funding Sources				
Funding Program	Abbreviation	Source	Availability	Funding Share
Interstate Maintenance (Discretionary)	IM / IMD	FHWA	TDOT & MDOT	90% Federal, 10% Match
National Highway System	NHS	FHWA	TDOT & MDOT	80% Federal, 20% Match
Transportation Enhancement	ENH	FHWA	All TN & MS Jurisdictions	80% Federal, 20% Match

6. *Provide a summary of all FHWA/FTA Title VI reviews conducted on your agency in the past three years; name of agency or organization performing review; any findings and recommendations; and status of and/or disposition of findings and recommendations.*

The MPO's last review was conducted by TDOT in concurrence with the MPO's quadrennial federal certification review in August 2014. In the past year, the MPO has conducted annual online Title VI training for its staff, Title VI Coordinator Training through Shelby County Government, and staff have completed a Multilanguage survey to identify staff members that are able to provide language assistance

7. *Provide a written description of the planning process, discussing how project selection and/or criteria for the Unified Planning Work Program (UPWP), Long Range Transportation Plan (LRTP) and Transportation Improvement Program (TIP) will be accomplished in a nondiscriminatory manner.*

It is the goal of the Memphis MPO to ensure that no one is denied the opportunity to participate in the metropolitan transportation planning process because of their race, color, or national origin. The MPO informs the public through regular legal notices published in all major newspapers and in newspapers that target minority populations in the metropolitan area. The MPO uses a variety of public involvement tools to engage and inform the public. These tools are described in Title VI report in detail in Chapter 4 (Public Involvement), and in the MPO's Public Participation Plan.

In selecting projects for inclusion in its plans and programs, the MPO relies on input from its board, committees, stakeholder groups, and the general public in developing criteria that evaluate proposals based on their benefits to and impacts on the region and individual communities. Project selection criteria used by the MPO make considerations for projects which advance the region's goals, including increased transportation choices and mobility, reduced environmental impacts, and more equitable distribution of funding. Specifically, the criteria consider regional transportation impacts, including: traffic congestion, air pollution, freight traffic through inner-city residential neighborhoods, regional transit availability, ADA accessible sidewalks, regional bicycle and pedestrian connectivity, and mobility options for the elderly, low-income or limited English proficiency communities, and persons with disabilities.

The Memphis MPO places particular emphasis on reaching out to public who typically have not been participants in the transportation planning process, whether low income, minority or ethnic groups or communities with limited English proficiency (LEP). Special ad hoc committees are formed as needed to solicit comments and input on issues specific to those communities. Furthermore, the MPO takes steps to bring the involvement process to underrepresented communities, with staff attending neighborhood meetings and special events, rather than relying on MPO event as the sole opportunity for involvement.

For public comment, the MPO holds formal public meetings and review and comment periods for all its major activities, and conducts public hearings at all TPB meetings to allow persons the opportunity to comment on proposed transportation improvements. In addition, during the development of the TIP, the MPO requires all member jurisdictions to host a public meeting to allow for public comment and to ensure that the TIP reflects community needs.

Some of the MPO's efforts to reach out to all segments of the community, which are described in more detail in this document in MPO's Title VI Report and in the Public Participation Plan, include:

- Outreach to underserved communities through documents sent to libraries for public review and informational posters placed in libraries, community centers, public buildings, etc.;
- Media releases (radio and newspaper);
- Plans and documents available on the Memphis MPO's website;
- Public Notices run in La Prensa Latina (Spanish language newspaper), and the Tri-State Defender (African American newspaper);
- Information updates on Facebook (/MemphisUrbanAreaMPO) Twitter (@MemphisMPO), and YouTube (/memphismpo)
- Flyers and posters for public meetings printed in Spanish;
- Distribution of flyers and posters for public meetings to senior centers, including several with high minority populations;
- Plans and documents provided in accessible formats when requested, executive summaries for major documents provided in Spanish on the MPO website;
- Web translation service provided for the MPO website;
- Inviting representatives of organizations that represent minority, disability and elderly members of our community to meetings and appropriate workshops;
- Provision of translators at public meetings if requested;
- Interactive polling at public meetings;
- Paper and online surveys, made available in English and Spanish;

- Informational videos, made available in English and Spanish.
- Online and paper mapping exercises

8. Provide an analysis assessing any effects on Environmental Justice (EJ) traditionally underserved communities that include transportation congestion and air quality projects.

- The potential impact on traditionally under-served communities and businesses during and after project;*
- The potential environmental impact;*
- Detailed list of traditionally under-served owned businesses and households to be affected;*
- Any significant changes or impacts on traditionally under-served communities; and*
- Description of how this/these project(s) will mitigate any identified adverse, social, economic, or environmental effects.*

While the MPO does not directly implement the environmental or design phases of capital transportation projects, it does perform an analysis of the cumulative environmental and social effects of all transportation projects included in its plans and programs. The MPO planning process includes these analyses in or to avoid or mitigate any unfair or disproportionate impacts transportation projects may have on a community. The methodology followed by the MPO in assessing Title VI and environmental justice issues, including demographic analyses, stakeholder outreach, and assessment of the impacts of projects, is included in the attached Chapter 4.5: Transportation Disadvantaged Communities and Chapter 9.3: Transportation Disadvantaged Analysis of the MPO's Livability 2040 Regional Transportation Plan. Similar methodology will be used in the development of the MPO's Livability 2050 Regional Transportation Plan.

(See Attachment 14 for more information on environmental justice analysis, or visit the MPO's website:

<http://memphismpo.org/sites/default/files/public/Chapter%209%20-%20Livability%202040.pdf>)

V. Public Involvement – 42 USC 2000d et seq.; 49 CFR Part 21; 28 CFR Part 42, Subpart F, Executive Order 12898

- 1. Describe the effectiveness of your public involvement process as well as any strategies to ensure traditionally under-served populations have an opportunity for full participation in your planning process.***

The public involvement process for the Memphis MPO, including tracking the effectiveness of outreach strategies used, is described in full in the MPO's Public

Participation Plan. Additionally, each plan conducted by the Memphis MPO contains a specific public outreach strategy based on the tools contained in the Public Participation Plan. An important outreach strategy for the Memphis MPO is to take the planning process directly to the community, by attending neighborhood meetings and special events to provide information and solicit input on MPO planning activities.

The MPO has instituted performance measures related to its reach in communicating with and involving the public in the planning process. Over the previous years, the MPO has seen an increase in its communications with interested residents, a broader reach of its media and social media campaigns, and greater participation from diverse communities throughout the region. These stakeholders, including individual residents, business owners, public officials, environmental groups, civic organizations, neighborhood associations, and advocacy groups, provide valued input regarding transportation needs and priorities for the MPO planning area.

The Memphis MPO regularly utilizes the following strategies to reduce barriers to participation in the planning process and encourage the involvement of traditionally underserved communities and populations:

- Monthly tracking of public involvement activities and outreach strategies (social media hits, attendance at MPO meetings, website views, etc.)
- Provide adequate public notice of activities, particularly as it relates to the RTP and the TIP;
- Provide timely notice and reasonable access to information regarding issues and process;
- Incorporate innovative visualization techniques in the planning process for the RTP and TIP;
- Provide information in electronic formats for easy accessibility;
- Schedule public meetings at convenient and accessible locations and times (most meetings are located along public transit routes);
- Allow for open consideration and response to public input regarding the RTP and TIP;
- Seek out and consider the needs of those who are traditionally underserved;
- Allow for public comment regarding significant changes to the RTP and TIP;
- Periodically review the PPP for effectiveness;
- Potential meeting locations may include: neighborhood faith centers, community centers, public schools, libraries, and transit facilities;
- Provides Spanish translations of documents distributed to local libraries, and make efforts to provide translations of other documents upon request;
- Uses demographic information from the US Census to analyze regional socio-economic characteristics and to target limited English proficiency and low literacy populations for additional outreach.
- Incorporates user friendly technology into public meetings and surveys to gather feedback on planning activities (interactive polling, online surveys, etc.)

2. Describe how traditionally under-served media sources are appropriately included in all notification processes for public meetings or public reviews of agency documents.

As part of regular public notification, the MPO sends news releases to minority newspapers, including “The New Tri-State Defender” (African American Community) and “La Prensa Latina” (Hispanic Community). Legal public notices and advertisements of availability of documents for review, public comment periods and public meetings are posted in these and other news outlets as needed, in accordance with the MPO’s adopted public involvement guidelines. The MPO have produced several informational videos that explain the MPO’s purpose and process. All videos are available online with Spanish subtitles. The MPO also maintains lists of contacts within traditionally under-represented communities, translation services for its website, documents, and meetings when necessary, and regularly updating the Memphis MPO with meeting materials. The MPO regularly utilizes social media (Facebook, Twitter) to notify the public at-large.

3. Describe how meeting locations and formats encourage or facilitate participation by traditionally under-served populations.

All proceedings of the Memphis MPO, its Transportation Policy Board, and its committees are open to the public. Notification for all MPO meetings and workshops are made according to federal regulations and best practices for public outreach as reflected in the MPO’s Public Participation Plan. As stated on MPO public notices and documents, MPO documents and presentations are available in accessible formats with sufficient notice by MPO staff.

The MPO holds all its public meetings in ADA-accessible facilities, and strives to locate MPO events in locations which provide the greatest accessibility within the region, including by transit service. Assistance in attending MPO proceedings is available by contacting the MPO prior to the event. Public meetings that are generally open and informal, with project team members interacting with the public on a one-to-one basis. The purpose of project-specific meetings is to provide project information and to solicit public comment/prioritization. The Memphis MPO employs a variety of techniques to gather public feedback at public meetings. Some of these techniques include, but are not limited to, the following;

- Comment Cards: Comment cards are used to solicit public comment on specific issues being presented at Memphis MPO public meetings. Comment forms are also used to solicit input regarding general input regarding Memphis MPO plans and projects.
- Interactive Polling: Interactive polling has been used to solicit public comment and to gage the public opinion on various transportation projects, issues, proposals, etc.
- Charrettes: Maps and presentation boards are provided along with pens, markers, stickers, and other notation devices to allow the public to make

comments pertaining to specific concerns and issues as well as ideas they may have about a specific project or plan.

- Q&A Sessions: During public meetings, MPO staff will periodically allow for members of the public to ask questions regarding the various topics being discussed at the meeting. This facilitates an informal discussion between MPO staff and members of the public, and enhances the public's understanding of the topics being discussed.

(Please see Chapter 4.4 of the PPP (Attachment 5) for more information on meeting formats, which can be found on the MPO's website:

<http://memphismpo.org/sites/default/files/public/2014%20PPP%20Final.pdf>)

VI. Contracting Opportunities – 42 USC 2000d et seq.; 49 CFR Part 21.5(b) (2) & (3); 28 CFR Part 42, Subpart F

- 1. List primary or subcontracting opportunities for planning studies, corridor studies, or other work which have been provided to minorities and women owned firms in the last twelve months.*

Shelby County Purchasing maintains a list of EOC qualified vendors, including a number of minority and women owned firms, to which notification of all requests for contracting services with the county is provided. Additionally, The Memphis MPO, in accordance with its Public Participation Plan, advertises contracting opportunities through its website, email, and media lists, including legal notices in regional newspapers. These legal notices are made in the Commercial Appeal, the DeSoto Times, the Tri-State Defender (African American community), and La Prensa Latina (Hispanic and Latino community).

(See Attachment 13 for list of DBE subcontractors, vendors, and suppliers)

VII. Community Impact Assessment – 23 USC 109(h) lists the types of adverse social and economic impacts that must be investigated and documented.

- 1. Describe how community value, social, neighborhood issues; environmental justice and any discrimination issues are normally addressed by the MPO.*

The MPO's primary method of evaluating the impacts of the regional transportation system on minority, low-income, and Limited English Proficiency communities is the Regional Transportation Plan, which also includes an evaluation of all projects programmed in the current TIP for short term implementation. The RTP evaluates transportation impacts, including: regional traffic congestion, regional air pollution from mobile (on-road) sources, freight traffic through inner-city residential neighborhoods, regional transit availability, ADA accessible sidewalks, regional bicycle and pedestrian connectivity, mobility for the Spanish speaking community, mobility options for the elderly, low-income communities, and persons with disabilities.

These issues are also addressed as part of the MPO's TIP project selection criteria, which are used in programming funds for locally managed roadway and enhancement projects, particularly under the STBG and TA funding programs. In administering these programs the MPO staff engages the board, committees, stakeholder groups, and the general public in ensuring that proposed projects are evaluated on a holistic basis as to their benefits and impacts on the region and individual communities. The project selection criteria used by the MPO is designed to ensure that projects selected for funding advance regional goals to the greatest extent.

VIII. Service Equity – Executive Order 12898 Cumulative Impacts; 42 USC 2000d et seq.; 49 CFR Part 21; 28 CFR Part 42, Subpart F. In the context of land use planning, cumulative impacts of the benefits and burdens (regional plan level), please address the following:

- 1. Describe to what extent the MPO coordinates with citizens and community-based agencies, groups and/or organizations in defining communities within the MPO's geographic area of responsibility in assessing potential benefits and impacts of transportation system investments, particularly related to traditionally under-served populations and other traditionally underutilized populations.*

The Memphis MPO strives to take into account the needs of low-income and minority populations in all its plans, studies, and documents. The MPO planning process reaches out to community organizations such as community development corporations (CDCs), neighborhood associations, disability community representatives, and the regional transit agency to form a more comprehensive understanding of the needs of these communities. These conversations help the MPO better identify the size and location of low-income and minority population groups, an important first step toward assessing whether or not transportation system investments disproportionately burden or fail to meet the needs of any segment of the population.

- 2. What specific criteria are used to determine which projects will be included in the TIP?*

The project evaluation criteria included in the FY 2017-2020 TIP was developed to reflect and advance national goals established through federal legislation and the goals identified in the Livability 2040 RTP. Several project evaluation categories (groupings) were established to ensure that the projects evaluated were compared to similar project types. These groupings included, STBG Road Projects, Resurfacing Projects, Signalization Projects, Bicycle and Pedestrian Projects, Bridge Projects, Safety Projects, and TA projects. Approximately 32% of STBG funds for the Tennessee portion of the MPO were allocated to road projects, 23% were allocated to resurfacing projects, 22% were allocated to bike/pedestrian/transit projects, 13% were allocated to signalization projects, and 10% were allocated to bridge projects. TA funding accounted for approximately 1% of the total federal funds programmed in the Tennessee portion of the MPO. The evaluation criteria for each project grouping was developed to provide more weight to the criteria that best advanced the regional goals established in the Livability 2040 RTP. Furthermore,

criteria that evaluated a given project's ability to improve safety & security and infrastructure condition were given a higher weighting than other criteria.

The project selection process gave particular consideration to the scoring of projects eligible for those funding categories directly managed by the MPO, including the Surface Transportation Block Grant Program (STBG) metropolitan funds and Transportation Alternatives (TA) funds. The FAST Act eliminates the MAP-21 Transportation Alternatives Program (TAP) and replaces it with a set-aside of Surface Transportation Block Grant (STBG) program funding for TA. These set-aside funds include all projects and activities that were previously eligible under TAP, encompassing a variety of smaller-scale transportation projects such as pedestrian and bicycle facilities, recreational trails, safe routes to school projects, community improvements such as historic preservation and vegetation management, and environmental mitigation related to storm water and habitat connectivity. The MPO staff worked with Memphis Area Transit Authority (MATA) on the selection of projects using FTA Sections 5307, 5309, 5310, 5337, and 5339 funds for inclusion into the TIP. Aligning with the RTP, preventative maintenance is the top priority for MATA with a need based approach ensuring that immediate needs are addressed first. Projects better suited for state-managed funding programs, such as interstate and certain highway projects, were evaluated primarily for the purpose of communicating priorities to the state DOTs.

The project selection process and criteria used by the Memphis MPO included an analysis of the benefits and environmental effects of potential TIP projects on the diverse communities within the Memphis MPO planning area. This analysis gave direct consideration to communities in which Environmental Justice issues may be present, including minority and low-income communities, as well as areas with substantial concentrations of persons with Limited English Proficiency (LEP). Points were awarded (or subtracted for negative effects) based on the benefits a project is expected to provide to the surrounding Environmental Justice community; no points were awarded for projects located outside these areas.

(See Attachment 15 for more information on TIP Project Ranking Criteria, or visit the MPO's website: http://memphismpo.org/sites/default/files/public/documents/2017-20-tip/FY%202017-20%20TIP%20Appendix%20A_Adjusted%2007.27.18.pdf).

3. How is the distribution of impacts to socioeconomic and/or ethnic minorities identified and measured?

As described previously, the Memphis MPO's RTP evaluates all projects within the planning area for their impacts on and benefits to the diverse communities within the region. The RTP looks at a variety of factors, including environmental, mobility, accessibility, air quality, and economic impacts on minority and low-income communities. As part of this evaluation, the MPO uses its Regional Travel Demand Model, which utilizes income and other demographic data to analyze factors such as demand for transit service in the region.

As any project moves from the conceptual planning stage to implementation, it must be evaluated for environmental and socio-economic impacts under the National Environmental Protection Act (NEPA) process. The environmental analysis conducted under the Preliminary Engineering (PE) phase of any project is the responsibility of the implementing agency, whether state or local.

For state-sponsored projects in Shelby or Fayette County, TDOT collects Census data for the area in which the proposed transportation facility will be located. Specifically, both socioeconomic and demographic data is collected for the affected area. This data is used to evaluate the potential effects a transportation project may have on a community. For projects which likely will have an impact, or for which the environmental outcomes are unsure, an Environmental Assessment (EA) must be conducted by the project sponsor. If the EA concludes that there would be significant impacts on the community because of the proposed project, the project sponsor is responsible for preparing an Environmental Impact Statement (EIS). This report is an investigative report as required by the National Environmental Policy Act (NEPA) that quantifies the environmental impacts of.

4. How does the MPO collect and utilize transit data?

MATA is directly responsible for maintaining a database of transit ridership data, including passenger counts and other geographic data, which is used in planning, travel demand modeling, and reporting on system performance. The MPO partners with MATA to help maintain and use the data in performing regional analysis of the transportation network as a whole, including modeling existing and potential future transit services. The MPO actively utilizes transit data, including those collected and generated by MATA, in its travel demand model and analyses for the RTP, TIP, air quality and other programs.

In an effort to improve the quality of bus stops in the Greater Memphis Region the Memphis MPO, in partnership with the Memphis Area Transit Authority (MATA), embarked on a project to develop a set of guidelines for the improvement of current and proposed bus stops. The intent is to facilitate proper siting, design, installation, and maintenance of existing and proposed bus stops throughout the Greater Memphis Region. Creation of the Guidelines is the first step in ensuring that MATA bus stops offer the highest comfort and accessibility for residents who ride the bus.

In January 2015, the MPO finalized a report detailing the results of an on-board transit survey conducted in the Fall of 2013 and the Spring of 2014. The results of this survey have been used to analyze the needs and preferences of MATA customers and have provided more insight into the socioeconomic characteristics of MATA's customers.

The Memphis MPO's 2016 CPT-HSTP, which is intended to create better transit for transportation disadvantaged communities, collected data to identify and evaluate existing paratransit, demand response transportation, human service agency, and non-profit and private for-profit providers across the 20-county study area. In addition, data was collected to identify the location and geographical concentration of people with

disabilities, the elderly population, and low-income population. The data collected as part of this study was used to identify service gaps for these socioeconomic groups and to develop recommendations to address these gaps.

The Memphis MPO and MATA cooperatively determine their mutual responsibilities in carrying out regional transportation planning tasks as programmed in the MPO's Unified Planning Work Program. Currently, MATA is the lead agency for transit data collection, maintenance, and analysis.



Memphis MPO

METROPOLITAN PLANNING ORGANIZATION

Strengthening Regional Transportation

List of Attachments:

1. Memphis MPO Title VI Coordinator Trainings and Assurance Statement
2. Memphis MPO Title VI Documentation (Policy, Goals and Objectives, Log, Procedures, and Forms)
3. Memphis MPO Organizational Chart
4. Shelby County Government Title VI Annual Staff Trainings
5. 2014 Public Participation Plan (PPP)
6. 2014 Title VI Report
7. 2014 Limited English Proficiency (LEP) Plan (w/Four Factor Analysis)
8. Memphis MPO Bylaws
9. Demographic Profile of MPO Boards/Committees
10. Demographic Profile of MPO Planning Area (Including Maps)
11. Sample Public Notices and Outreach Examples (English and Spanish)
12. Sample Contract Non-Discrimination Language
13. DBE Subcontractors, Vendors, and Supplies
14. Livability 2040 Regional Transportation Plan (RTP) – Chapter 4.5: Transportation Disadvantaged and Chapter 9.3: Transportation Disadvantaged Analysis
15. FY 2017-20 Transportation Improvement Program (TIP) Environmental Justice Map and Project Evaluation Criteria

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