

**PEORIA/PEKIN
URBANIZED AREA
TRANSPORTATION
STUDY**

TITLE VI PROGRAM

**Striving for Non-Discrimination in
Transportation**

2015

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*In Accordance With :
MAP-21, FTA C 4702.1B and FTA C 4703.1*

PURPOSE

Section 601 of Title VI of the Civil Rights Act of 1964 requires that no person in the United States shall, on the ground of race, color, or national origin, be excluded from participation in, be denied the benefits of, or be subjected to discrimination under any program or activity receiving Federal financial assistance.

All programs which receive funding from the Federal Transit Administration (FTA) and Federal Highway Administration (FHWA) are required to follow the U.S. Department of Transportation's Title VI regulations of 49 CFR Part 21. As a recipient of USDOT financial assistance, the Tri-County Regional Planning Commission is required to prepare a Title VI Program as stipulated in the FTA Circular 4702.1B. The objectives of Circular 4702.1B are to provide FTA recipients with the direction, guidance and procedures to: ensure that the level and quality of the transportation planning process is provided in a nondiscriminatory manner; promote full and fair participation in transportation decision-making without regard to race, color, or national origin; and ensure meaningful access to transportation planning-related programs and activities by persons with limited English proficiency.

Following the requirements laid out in Circular 4702.1B, the Tri-County Regional Planning Commission (TCRPC) is required to prepare a Title VI Program comprised of a public notice of protection against discrimination, procedures to filing a Title VI discrimination complaint, public participation plan, language assistance plan, racial composition of membership on non-elected related boards or committees, demographic profile of the MPO planning area that includes identification of locations of minority populations, description of the procedures by which the mobility needs of minority populations are identified and considered within the planning process, demographic maps that overlay minority /non-minority populations that analyze the impacts of distribution of State and Federal funds for public transportation purposes and an analysis of any disparate impacts on the basis race, color, or national origin. The Title VI program must be approved by the MPO Policy Committee and submitted to USDOT every three years.

This Title VI program was approved by the Peoria/Pekin Urbanized Area Transportation Study on November 4, 2015. A copy of the PPUATS Policy Committee resolution can be found in **Appendix A.**

Definitions

The following are a selection of definitions applicable to this Title VI Program, which can be found in Chapter I of FTA Circular 4702.1B.

Discrimination- Refers to any action or inaction, whether intentional or unintentional, in any program or activity of a Federal aid recipient, sub-recipient, or contractor that results in disparate treatment, disparate impact, or perpetuating the effects of prior discrimination based on race, color, or national origin.

Limited English Proficiency (LEP) Person- Refers to persons for whom English is not their primary language and who have a limited ability to read, write, speak, or understand English. It includes people who reported to the U.S. Census that they speak English less than very well, not well, or not at all.

Low-Income Person- Means a person whose median household income is at or below the U.S. Department of Health and Human Services poverty guidelines.

Metropolitan Planning Organization (MPO)- The organization created and designated to carry out the federal required metropolitan transportation planning process.

Minority Person- Includes the following:

1. American Indian and Alaska Native, which refers to people having origins in any of the original peoples of North and South America (including Central America), and who maintain tribal affiliation or community attachment.
2. Asian, which refers to people having origins in any of the original peoples of the Far East, Southeast Asia, or the Indian subcontinent, including, for example, Cambodia, China, India, Japan, Korea, Malaysia, Pakistan, the Philippine Islands, Thailand, and Vietnam.
3. Black or African American, which refers to people having origins in any of the Black racial groups of Africa.
4. Hispanic or Latino, which includes persons of Cuban, Mexican, Puerto Rican, South or Central
5. American, or other Spanish culture or origin, regardless of race.
6. Native Hawaiian or Other Pacific Islander, which refers to people having origins in any of the original peoples of Hawaii, Guam, Samoa, or other Pacific Islands.

Primary Recipient- Means any USDOT recipient that extends Federal financial assistance to a sub-recipient.

Sub-recipient- Means an entity that receives Federal financial assistance from USDOT through a primary recipient.

Title VI and Environmental Justice

On February 11th, 1994 President Clinton issued Executive Order 12898 “Federal Actions to Address Environmental Justice in Minority Population and Low-Income Populations.” Environmental Justice (EJ) builds on to Title VI activities by including the consideration of the impacts to low-income populations in addition to minority populations into transportation planning and decision-making processes. The guiding principles of Environmental Justice are:

1. To avoid, minimize, or mitigate disproportionately high and adverse human health and environmental effects, including social and economic effect, on minority populations and low-income populations.
2. To ensure the full and fair participation by all potentially affected communities in the transportation decision-making process.
3. To prevent the denial of, reduction in, or significant delay in the receipt of benefits by minority and low-income populations.

Prior to 2012, Title VI and EJ requirements were included together under one circular. Given the close relationship between Title VI and EJ, the distinctions between the requirements were often confused. As a result FTA released two separate Circulars, FTA 4702.1B which outlines Title VI requirements and FTA 4703.1 with EJ requirements in 2012. Title VI is a Federal statute, and as such, in the event of discrimination legal action may be sought. Executive Order 12898 however is not enforceable in court and does not create any legal rights or remedies. While E.O. 12898 does not create a protected class for low-income populations, TCRPC recognizes the close relationship between the two and believes it important to include the consideration of effects borne by low-income populations in our Title VI considerations and assessment.

ABOUT TRI-COUNTY REGIONAL PLANNING COMMISSION AND THE PEORIA/PEKIN URBANIZED TRANSPORTATION STUDY

The Tri-County Regional Planning Commission is the designated Metropolitan Planning Organization (MPO) for the Peoria/Pekin Metropolitan Planning Area. TCRPC has delegated the responsibilities and functions of the MPO to the Peoria/Pekin Urbanized Area Transportation Study (PPUATS).

Planning Area

The full jurisdictional area of PPUATS is the Metropolitan Planning Area (MA). To understand what land and jurisdictions are included in the MA, two additional designated areas must be explained: the “Urbanized Area” and the “Adjusted Urbanized Area”.

The Urbanized Area (UA) is defined by the US Census Bureau in accordance with strict population density criteria. Generally speaking, urbanized areas must have a minimum of 50,000 persons living in contiguous dense settlement patterns. From the 2010 Census, the Peoria Urbanized Area covers portions of Peoria County, Tazewell County, and Woodford County; and consisted primarily of the incorporated areas of Peoria, Peoria Heights, Dunlap, Chillicothe, West Peoria, East Peoria, Morton, Washington, Bartonville, Creve Coeur, Pekin, Germantown Hills, and immediately surrounding intensely developed lands.

The Urbanized Area based on the 2010 census contains three areas that were not in the 2000 Urbanized Area – Dunlap, Chillicothe, and Germantown Hills. In addition, South Pekin was removed from the Urbanized Area.

The real importance of the UA is that this area, along with population and other statistics computed for this area relative to other such areas throughout the USA, serve as the basis for several federal funding formulas. Federal transportation funding for the Peoria area is substantial. In recent years, the Peoria area has received Federal transportation planning funds approaching \$615,000 per year, roadway construction funds approaching \$2.8 million per year, and public transit funds close to \$8.5 million per year.

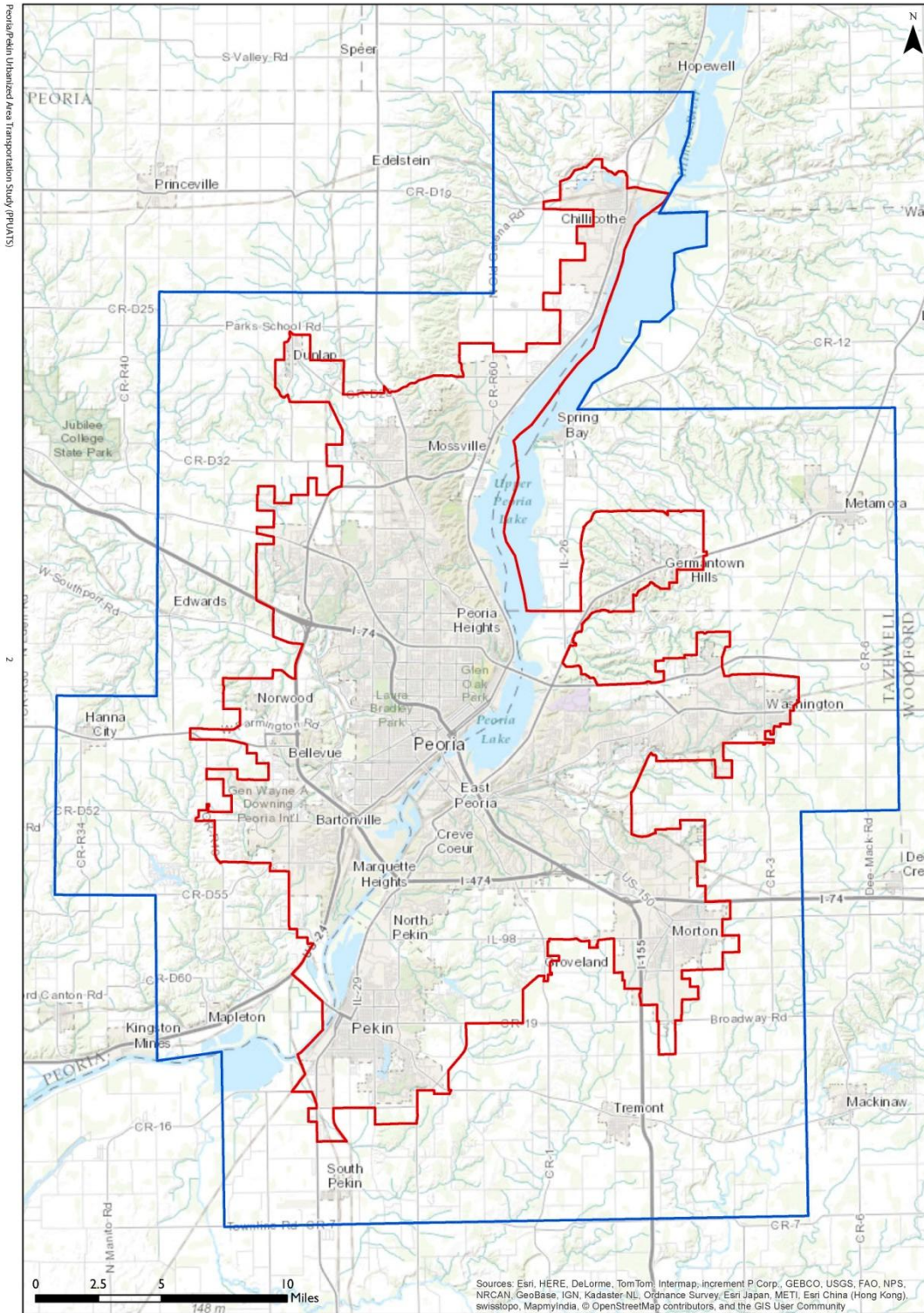
For transportation planning purposes, the Adjusted Urbanized Area includes all of the UA, plus other small areas necessary to round-off the jagged or sometimes irregular boundaries of the UA. In addition, the Adjusted Urbanized Area includes lands that are highly likely to be developed within the next five years, and other abutting or nearby developed lands. The Adjusted Urbanized Area is used primarily to determine which roadways are eligible for federal “urban” and “rural” funding assistance (but does not affect the total amount of federal assistance available).

The Metropolitan Planning Area (MA) is similarly determined by PPUATS. The MA is the area that is expected to be urbanized in the next 20 years. It can be as large as the entire metropolitan statistical area or consolidated metropolitan statistical area, as defined by the Census Bureau.

A map of the Adjusted Urbanized Area and the Metropolitan Planning Area (also referred to as the 20-Year Planning Boundary) can be found on the next page.

2010 PPUATS Urbanized Area and 20-Year Planning Boundary

Approved by PPUATS Policy Committee May 7, 2014



PPUATS Urbanized Area PPUATS 20-Year Planning Boundary



PPUATS Membership

Representation on PPUATS is drawn from elected officials and staff of local municipalities and counties, along with the General Wayne A. Downing Peoria International Airport, the Greater Peoria Mass Transit District, and the Illinois Department of Transportation. Other entities such as the Federal Highway Administration and Illinois Department of Transportation – Office of Planning and Programming serve as advisory members to PPUATS.

Two committees make up PPUATS: a Policy Committee and a Technical Committee.

The PPUATS Policy Committee is made up of elected officials representing their respective communities. The Policy Committee function is to determine transportation policy within the framework of the urban transportation planning process.

The PPUATS Technical Committee is made up of individuals appointed by their respective PPUATS communities. Most of the individuals are public works and/or engineering staff. Throughout the year the Technical Committee reviews and recommends planning policies and measures to the Policy Committee.

The members of the PPUATS Policy and Technical Committees can be found on the following page.

Peoria/Pekin Urbanized Area Transportation Study (PPUATS) Membership

<u>PPUATS Community</u>	<u>Policy Committee</u>	<u>Technical Committee</u>
Peoria County (2 Seats)	STEVE MORRIS – VICE CHAIR Thomas O’Neill	Amy Benecke-McLaren Jeff Gilles (*Josh Sender)
Tazewell County (2)	Greg Sinn Russ Crawford	Craig Fink Dan Parr
Woodford County (1)	Barry Logan	Lindell Loy
City of Peoria (3)	James Ardis (*Nick Stoffer) Michael Rogers Scott Reese	Scott Reese Nick Stoffer Stephen Letsky
City of Pekin (1)	John McCabe (*Darin Girdler)	Michael Guerra (*Darin Girdler)
City of East Peoria (1)	Dave Mings (*Steve Ferguson)	Ric Semonski
City of Washington (1)	Gary Manier	Ed Andrews (*Jon Oliphant)
Village of Bartonville (1)	Rhonda Wolfe (*Tina Hart)	Patrick Meyer
Village of West Peoria (1)	James Dillon (*John Carlson)	Henry Strube, Jr. (*Alicia Hermann)
Village of Morton (1)	RONALD RAINSON – CHAIR (*Ginger Hermann)	CRAIG LOUDERMILK – CHAIR (*Frank Sturm)
Village of Peoria Heights (1)	Mark Allen (*Matt Fick)	KYLE SMITH - VICE CHAIR
Village of Creve Coeur (1)	Fred Lang	Vacant (*Alicia Hermann)
City of Chillicothe (1)	Douglas Crew	Ken Coulter
Greater Peoria Mass Transit (1)	Sharon McBride (*Josh Moore)	Josh Moore (*Joe Alexander)
I.D.O.T. – District 4 (1)	Maureen Addis	Terrisa Worsfold
Greater Peoria Airport Auth.	N/A	Gene Olson
Tri-County RPC	N/A	Eric Miller

ALL CAPS - OFFICER
*Alternate

Required MPO Planning Documents

Moving Ahead for Progress in the 21st Century (MAP-21) requires the cooperation of all state and local jurisdictions and other transportation stakeholders to be in concert with each other while addressing transportation and other governmental issues within the PPUATS planning area. No federal funding can be applied towards transportation improvement projects, transportation services, or transportation studies in the planning area unless the project, service, or study are included in one or more of the following three comprehensive, coordinated, and cooperative documents developed by PPUATS:

1. The Long-Range Transportation Plan (LRTP). The LRTP is a comprehensive proposal for the further development, improvement and maintenance of the major transportation systems for the Peoria/Pekin Urbanized Area. The LRTP has a 20-year (minimum) time horizon and addresses all modes of transportation: highway, transit, freight, and enhancement. The LRTP is updated every five years. A new LRTP document, referred to as *Envision HOI*, was completed and approved by PPUATS in March 2015.
2. The Transportation Improvement Program (TIP). The TIP proposes expenditures using federal dollars for transportation improvements scheduled for the next four years. The listing includes all transportation projects proposed within the planning area. The listing establishes priorities and is financially constrained (i.e., a project can only be included if there is a reasonable expectation of sufficient funding for its completion). The TIP is updated annually.
3. The Unified Planning Work Program (UWP). The UWP is prepared annually to direct day-to-day work of the PPUATS staff and committees. The UWP outlines specific planning activities to be accomplished in the coming fiscal year. The bulk of the work is funded by grants from the Federal Highway Administration (FHWA) and the Federal Transit Administration (FTA).

Funding

PPUATS is funded through a combination of Federal, State and local dollars. Eighty percent of the funding for the PPUATS organization is provided by Federal funding sources (USDOT, FHWA, FTA) and the remaining twenty percent is provided through a combination of local dollars.

Minority Representation

Minority Representation	Caucasian	African American	Asian American	All Other	Hispanic
PPUATS Urbanized Area	80.7%	12.8%	2.5%	4.0%	3.4%
PPUATS Policy Committee	94.7%	5.23%	0	0	0
PPUATS Technical Committee	95.2%	4.8%	0	0	0

FTA Title VI Circular 4702.1B requires that any recipients that have transportation-related, non-elected planning boards, advisory council or committees, or similar bodies, membership of these committees must be broken down by race, accompanied by a description of efforts made to encourage the participation of minorities on these committees. The table above provides detail as to the demographic representation on the various Committees.

It should be noted that as a result of the PPUATS Policy Committee membership consisting of locally elected officials and the PPUATS Technical Committee membership consisting of State and local planning and engineering staff (based on the individual's position/title), PPUATS does not have control over the racial/ethnic/demographic composition of those committees. PPUATS however will continue to make efforts to promote diversity and encourages participation of all citizens in the transportation planning and programming process.

NONDISCRIMINATION POLICY

PPUATS unequivocally seeks to provide fair and equitable access to the transportation planning process to all persons in the metropolitan planning area. No persons shall be shorted, limited, or in any other way be discriminated against on the basis of race, color, national origin, sex, age, religion, physical or mental abilities or disabilities, ability to speak or understand the English language, or financial wealth or the ability to earn financial income. PPUATS agrees to compile, maintain, and submit in a timely manner Title VI information required by FTA Circular 4702.1B and in compliance with the U.S. Department of Transportation's Title VI Regulation. Furthermore, PPUATS will make it known to the public that those person or persons alleging discrimination on the basis of race, color, or national origin as it relates to the provision of transportation services and transit-related benefits may file a complaint with the Federal Transit Administration, Federal Highway Administration and/or the U.S. Department of Transportation. The following policies and procedures in the duration of this document are

intended to ensure that PPUATS continues to adhere to the requirements of Title VI and Environmental Justice and provides an inclusionary transportation planning process.

Title VI and Environmental Justice must be considered as PPUATS develops transportation proposals, plans and projects. Specifically, PPUATS must make concerted efforts to recognize the adverse impacts of its proposals, as well as the beneficial aspects. Second, PPUATS must take action to identify exactly who will be affected and to what degrees. Third, PPUATS must inform and involve the public, especially those persons likely to be affected, in the planning and decision-making process. Fourth, PPUATS must consider alternatives and choose carefully and fairly among those alternatives. As the MPO proceeds through these steps, PPUATS and the PPUATS participant member agencies must strive to:

- A. Direct fair shares of funding or assistance to minority and low-income persons, populations and geographies.
- B. Minimize the adverse impacts of all activities on all persons and groups, but especially on minority and low-income persons and populations.
- C. Make concerted efforts to determine what populations are going to be affected, before expenditure of any federal funds, implement any federal program, impose any federal regulations, or create or cause any adverse or harmful impacts.
- D. Periodically, review and analyze past actions to determine, to the extent possible, if all groups are being treated equitably.
- E. Make concerted efforts, as PPUATS plans and programs its activities, to involve minority and low income groups, in the decision-making process.
- F. Promote Title VI & Environmental Justice efforts both within PPUATS and by all the PPUATS participant member agencies within their respective jurisdictions, especially the local units of government with transportation responsibilities.
- G. Take into account the diversity of the PPUATS participants and all the communities within the PPUATS planning area. Specifically: the older central cities of Peoria, Pekin, and East Peoria, which have higher concentrations of minorities, should be given special consideration. Similarly, the smaller communities of Peoria Heights, Bartonville, Creve Coeur, Marquette Heights, and North Pekin that have some concentrations of low-income persons should not be neglected.

Notice To The Public

PPUATS's Title VI Notice is posted within the public reception area of Tri-County Regional Planning Commission offices as well as on the TCRPC website. References to Title VI and Environmental Justice considerations, as well as its inclusion in the transportation planning process, are also contained within the various MPO documents.

To view a copy of PPUATS's Title VI Notice to the public please see **Appendix B**.

Complaint Procedure

TCRPC has developed a procedure for investigating and tracking any Title VI complaints that may be filed. Any person who believes that he or she, or any specific class of persons, has been subjected to discrimination or retaliation by TCRPC's administration of federally funded programs, 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 TCRPC shall be referred immediately to the TCRPC Title VI Coordinator. Verbal and non-written complaints received by TCRPC shall be resolved informally by the TCRPC Title VI Coordinator. If the issue has not been satisfactorily resolved through informal means, or if at any time the complainant requests to file a formal written complaint, the complainant shall be permitted to do so, and the complaint shall follow the process for written complaints.

The TCRPC Executive Director will be informed of any written complaint within 10 days of receipt of the complaint. Within 30 days of receipt of the complaint the TCRPC Title VI Coordinator will acknowledge receipt of the complaint and inform the complainant of proposed action to process the complaint. Within 120 days of receipt of the complaint the TCRPC Title VI Coordinator will conduct and complete a full investigation of the complaint and provide a recommendation for action in a report of findings to the TCRPC Executive Director. Within 150 days of receipt of the complaint, the TCRPC Executive Director will notify the complainant in writing of the final decision reached. The notification will advise the complainant of their right to file a formal complaint with the Federal Transit Administration, the Federal Highway Administration, or the Illinois Department of Transportation if they are dissatisfied with the final decision rendered by TCRPC. The TCRPC Title VI Coordinator will also provide the PPUATS Policy Committee with a copy of this decision and summary of findings.

A person may also file a complaint directly with the following agencies:

- Federal Transit Administration, at FTA Office of Civil Rights, 1200 New Jersey Avenue SE, Washington, DC 20590.
- Federal Highway Administration, at FHWA Office of Civil Rights, 1200 New Jersey Avenue SE, Washington, DC 20590.
- Illinois Department of Transportation, at IDOT Bureau of Civil Rights, 2300 South Dirksen Parkway, Springfield, IL 62764

To view a copy of the Complaint Procedure please see **Appendix C**.

Title VI Investigations

All FTA /FHWA funding recipients are required to prepare and maintain a list of any complaints alleging discrimination on the basis of race, color, or national origin. TCRPC is pleased to report the organization has not received any Title VI complaints since the previously submitted Title VI document.

Additional Information

Previous Submittals and Documents

“Title VI Compliance Report: Striving for Non-Discrimination in Planning” October 2012

“Title VI Compliance Review” August 2008

Recent PPUATS Changes, Improvements, or Efforts

Since the adoption of the previous PPUATS Title VI Report, the following significant changes have occurred in the PPUATS planning process:

- The addition of the communities of Dunlap, Chillicothe, and Germantown Hills to the Adjusted Urbanized Area based on the 2010 U.S. Census.
- The completion of the 2015-2040 Long Range Plan, entitled “Envision HOI: The Heart of Illinois Long Range Transportation Plan”
- The use of social media to disseminate information and gather input. The joint Facebook page shared by Tri-County Regional Planning Commission and the Peoria/Pekin Urbanized Area Transportation Study can be found at www.facebook.com/tcrpc.page.

PUBLIC PARTICIPATION AND OUTREACH

PPUATS is dedicated to providing access to the transportation planning process and associated MPO planning documents to all people, regardless of race, color, national origin, socio-

economic status, English proficiency, or disability. PPUATS has prepared several documents to help guide the agency in ensuring that the transportation planning process is open to everyone.

Public Participation Plan

Public participation is an important component of any planning process. A planning process should both communicate information about the process to the general public and enable the general public to provide input into the process. The constant exchange of information and ideas between planners and the general public helps save time and money by discovering and avoiding issues long before they become burdens on the tax base. Effective participation also builds trust and buy-in from the general public, resulting in not only a better plan, but a more easily executable plan that is more likely to be supported and embraced by the region.

PPUATS's Public Participation Plan (PPP) outlines the strategies developed to distribute information to the public on our transportation planning and programming processes. This plan includes methodologies in which the MPO utilizes in addition to projects, studies and plans, as well as gathering public feedback on these projects. PPUATS recognizes that effective public participation, with an emphasis on traditionally underserved populations, is critical to ensuring that a comprehensive viewpoint and considerations are appropriately incorporated into the transportation planning process. The Public Participation Plan is attached as **Appendix D**.

PPUATS uses numerous methods to communicate information to the public and to obtain input. **Appendix E** describes the public participation efforts that were used as part of the process to develop the most recent Long Range Transportation Plan, which was adopted in March 2015. These outreach methods are also commonly used for other planning activities.

Limited English Proficiency Analysis

PPUATS prepared a Limited English Proficiency (LEP) analysis to determine if the region met the Safe Harbor Threshold. The Safe Harbor Threshold states that if 5% of the population, or 1,000 persons, whichever is less, are defined as those who speak English "not well," or "not at all"), then a Limited English Proficiency Plan that identifies reasonable steps to provide language assistance must be developed.

According to 2013 American Community Survey 5-Year Estimate, 1,082 or 0.4% of the population of the Urbanized Area of 272,615 ages five and over speak English "not well" or "not at all." The number and percent of persons who speak English "not well" or "not at all" is below the Safe Harbor Threshold.

The PPUATs Limited English Proficiency Analysis is attached as **Appendix F**.

MONITORING PROCEDURES AND EFFORTS

PUATS Procedures

PPUATS is charged with the responsibility to direct, coordinate, and administer the continuing, comprehensive, and cooperative (3-C) transportation process. As the MPO, PPUATS takes a comprehensive approach to monitoring population trends across the region. PPUATS assembles detailed Census data to track demographic trends across the area. It studies the employment locations of minority and low-income groups in relation to their place of residence to help identify key transportation linkages.

PPUATS works closely with the Greater Peoria Mass Transit District. Representatives of the mass transit district have had a seat on the PPUATS Technical and Policy Committees for over 15 years. A Memorandum of Understanding for Cooperative Transportation Planning between PPUATS and public transit operators includes:

- Ensuring that plans require federal funding for implementation, including plans for major transit capital investments, conform to priorities established in the Long Range Transportation Plan,
- Ensuring that public transit operators assist PPUATS in securing data and source materials concerning transit plans, programs, and funding necessary to the effective accomplishment of the transportation planning process.

PPUATS ensures that all sub-recipients follow the requirements of Title VI. The following chart shows the funds for which PPUATS is responsible for as a Direct Recipient, and the types of sub-recipients in each program. PPUATS includes the appropriate language in each sub-recipient agreement and monitors the sub-recipient to ensure that all Title VI regulations are followed.

PPUATS Direct Recipient Sources of Funds		
Federal Funding Source	Purpose of Funds	Recipients
JARC (Pre-Map-21)	Transportation for job access for low-income persons	Transit District, local governments
New Freedom (Pre-Map-21)	Transportation for elderly/disabled individuals	Transit District, local governments
FTA 5310	Transportation for elderly/disabled individuals	Transit District, local governments

DEMOGRAPHICS

Analyzing current and past demographic data is an important step in defining future transportation needs for individuals living and working in the PPUATS Metropolitan Planning Area. This section provides an overview of current and historic trends in population, race and ethnicity, poverty, disability, and zero-vehicle households.

As of the 2010 Census, the Tri-County Area of Peoria, Tazewell, and Woodford Counties had a total population of 360,552 people. Of those, 272,615 resided within the Urbanized Area, comprising 108,861 households with an average household size of 2.38 persons.

See **APPENDIX G** for a detailed analysis of the demographic make-up of the PPUATS Urbanized Area.

Consideration of the Mobility Needs of Minority Populations

The minority population of the PPUATS Urbanized Area is 19.3 percent of the population. The areas with the highest density of minority populations are the southside and near north side of the city of Peoria.

The mobility needs of the minority population are identified primarily through the Human Service Transportation Plan (HSTP) process. A HSTP committee was formed in 2008 and includes representatives from the following:

- Mass transit district para-transit service
- Agency on Aging
- Para-transit User
- Community workshop
- Independent living agency

The committee meets bi-monthly.

PPUATS staff also sits on the mass transit district ADA committee and the Accessible Transportation Coalition Initiative of the Greater Peoria area.

Non-Discrimination Procedures

PPUATS, as the Co-Designated Recipient of FTA Section 5310 funds, sub-allocates a portion of the funds to local governments, transit districts, and/or para-transit providers in a

nondiscriminatory manner. Funds are allocated without regard to race, ethnicity, color, or national origin of the beneficiaries. The application for FTA Section 5310 funding (**APPENDIX H**) does not ask for information regarding the race of the potential beneficiaries of the funding.

Funds are allocated based on the following:

- Applicant involvement in the HSTP process;
- Applicant commitment to provide required match;
- Ability of the project to increase mobility for elderly persons or persons with disabilities;
- Applicant ability to begin project in a reasonable time frame;
- Number of new persons who will benefit from the project.

Assistance to Sub-Recipients Serving Predominantly Minority Populations

PPUATS is committed to assisting potential sub-recipients who serve primarily minority populations with the application process. In the most recent funding round, one such potential sub-recipient was assisted (Council for Disadvantaged People).

SELF-CERTIFICATION

The PPUATS self-certification is attached as **APPENDIX I**.