

TITLE VI PROGRAM
IN COMPLIANCE WITH FTA CIRCULAR 4702.1B

move MINNEAPOLIS



Adopted: November 15, 2022

MOVE MINNEAPOLIS' mission is to be a leader in sustainable commuting. We help downtown Minneapolis employers maximize success and employee satisfaction while reducing drive-alone commutes. We guide building owners and managers in implementing world-class commuter amenities. And we advocate for commuters and residents who wish to live their green values every day.

On request, this publication will be made available in alternative formats to people with disabilities. Call Move Minneapolis at 612-370-9121. For TTY, call 711.

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Introduction

Move Minneapolis is the registered assumed name of Downtown Minneapolis Transportation Management Organization. The purpose of Move Minneapolis' Title VI Program is to ensure that no person, on the grounds 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 under the control of Move Minneapolis. Move Minneapolis will ensure that members of the public within the Move Minneapolis service area are aware of Title VI provisions and the responsibilities associated with Title VI of the Civil Rights Act of 1964.

Title VI Requirements

Title VI of the Civil Rights Act of 1964 prohibits discrimination on the basis of race, color, or national origin in programs receiving federal financial assistance. Title VI states 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 subjected to discrimination under any program or activity receiving federal financial assistance.”

In 1994, President Bill Clinton issued Executive Order 12898, which states that each federal agency “shall make achieving environmental justice part of its mission by identifying and addressing disproportionately high and adverse human health or environmental effects of its programs, policies, and activities on minority populations and low-income populations.”

To that end, the Federal Transit Administration (FTA) issued Circular 4702.1B in 2012, which replaced Circular 4702.1A issued in 2007. This document outlines Title VI and Environmental Justice compliance procedures for recipients of FTA-administered transit program funds.

Specifically, FTA requires recipients, including Move Minneapolis, to “document their compliance with DOT’s [United States Department of Transportation’s] Title VI regulations by submitting a Title VI Program to their FTA regional civil rights officer once every three years or as otherwise directed by FTA. For all recipients (including subrecipients), the Title VI Program must be approved by the recipient’s board of directors or appropriate governing entity or official(s) responsible for policy decisions prior to submission to FTA.”

General Requirements

The Title VI Circular requires all recipients of FTA funding to meet a number of basic requirements. The requirements that are addressed include:

- Prepare and submit a Title VI Program
- Notify beneficiaries to protection under Title VI
- Develop Title VI complaint procedures and complaint form
- Record and report transit-related Title VI investigation, complaints and lawsuits
- Promote inclusive public participation
- Provide meaningful access to persons with limited English proficiency
- Monitor and provide assistance to subrecipients

Title VI Public Notice, Grievance Procedure, and Complaint Form

The Title VI Circular provides the following direction regarding public notice of Title VI protections:

Title 49 CFR Section 21.9(d) requires recipients to provide information to the public regarding the recipient's obligations under DOT's Title VI regulations and apprise members of the public of the protections against discrimination afforded to them by Title VI. At a minimum, recipients shall disseminate this information to the public by posting a Title VI notice on the agency's website and in public areas of the agency's office(s), including the reception desk, meeting rooms, etc. Recipients should also post Title VI notices at stations or stops, and/or on transit vehicles.

As the primary recipient, The Metropolitan Council and Metro Transit provide notice of Title VI protections through a variety of means on behalf of Move Minneapolis. Detailed information and instructions for filing a Title VI complaint are available at the following web addresses:

- [Metropolitan Council Title VI Webpage](#)
- [Metro Transit Title VI Webpage](#)
- [Move Minneapolis Title VI Webpage](#)

In addition, Move Minneapolis posts its Title VI notice at its offices located at 81 S 9th St, Suite 200, Minneapolis, MN 55402.

Complaint Procedures

As the primary recipient, The Metropolitan Council and Metro Transit posts its Title VI complaint procedures on its website on behalf of Move Minneapolis at <https://metro council.org/About-Us/What-We-Do/Office-of-Equal-Opportunity/Discrimination-Complaints/Public-Service-Discrimination/Discrimination-and-Title-VI.aspx>. This web page also includes a link to these procedures. The Title VI complaint procedures are as follows:

1. Any individual, group of individuals, or entity who believes they have been subjected to discrimination prohibited by Title VI nondiscrimination provisions may file a written complaint with Move Minneapolis. The complaint must meet the following requirements:
 - a. Complaint shall be in writing and signed by the complainant(s).
 - b. Include the date of the alleged act of discrimination (the date when the complainant(s) became aware of the alleged discrimination, the date on which that conduct was discontinued, or the latest instance of the conduct).
 - c. Present a detailed description of the issues, including names and job titles of those individuals perceived as parties in the complained-of incident.
 - d. Allegations received by fax or e-mail will be acknowledged and processed, once the identities of the complainant(s) and the intent to proceed with the complaint have been established. The complainant is required to mail a signed, original copy of the fax or email transmittal for Move Minneapolis to be able to process it.
 - e. Allegations received by telephone will be reduced to writing and provided to complainant for confirmation or revision before processing. A complaint form will be forwarded to the complainant for them to complete, sign, and return to Move Minneapolis for processing.
2. Upon receipt of the complaint, Move Minneapolis will determine its jurisdiction, acceptability, and need for additional information, as well as investigate the merit of the complaint. In cases where the complaint is against one of Move Minneapolis' sub-recipients of federal funds, Move

Minneapolis will assume jurisdiction and will investigate and adjudicate the case. Complaints against Move Minneapolis will be referred to FTA or the appropriate federal agency for proper disposition pursuant to their procedures.

3. In order to be accepted, a complaint must meet the following criteria:
 - a. The complaint must be filed within 180 calendar days of the alleged occurrence or when the alleged discrimination became known to the complainant.
 - b. The allegation(s) must involve a covered basis such as race, color, national origin.
 - c. The allegation(s) must involve a program or activity of a federal-aid recipient, sub-recipient, or contractor.
4. A complaint may be dismissed for the following reasons:
 - a. The complainant requests the withdrawal of the complaint.
 - b. The complainant fails to respond to repeated requests for addition information needed to process the complaint.
 - c. The complainant cannot be located after reasonable attempts.
5. Once Move Minneapolis decides to accept the complaint for investigation, the complainant and the respondent will be notified in writing of such determination within seven calendar days. The complaint will receive a case number and will then be logged into Move Minneapolis' records, identifying its basis and alleged harm.
6. In cases where Move Minneapolis assumes the investigation of the complaint, Move Minneapolis will provide the respondent with the opportunity to respond to the allegations in writing. The respondent will have 10 calendar days from the date of Move Minneapolis' written notification of acceptance of the complaint to furnish their response to the allegations.
7. Move Minneapolis' final investigative report and a copy of the complaint will be forwarded to the appropriate federal agency and affected parties within 60 calendar days of the acceptance of the complaint.

8. Move Minneapolis will notify the parties of its final decision.
9. If complainant is not satisfied with the results of the investigation of the alleged discrimination and practices the complainant will be advised of the right to appeal to the appropriate federal agency.

The Title VI Complaint Form is available on The Metropolitan Council and Metro Transit website. Translations of the complaint instruction and complaint form are available on the website in Hmong, Karen, Somali, Spanish, and Vietnamese.

Title VI Complaint, Investigation, Lawsuits

There are no complaints, investigations, or lawsuits, either pending or that have occurred since the last Program update.

Facility Siting Equity Analysis

Move Minneapolis has not constructed a facility, such as a vehicle storage facility, maintenance facility, operation center, etc.

Public Participation Plan

Move Minneapolis Strategic Reset

In September 2022, Move Minneapolis began a process to assess and refresh its strategic direction. As a part of this process, Move Minneapolis will develop an equity framework that will enable us to serve and engage communities of color and lower-income individuals more effectively and equitably. The equity framework will guide and inform Move Minneapolis' strategic priorities, how it executes its work and how it evaluates success. This process will conclude in January 2023.

Current principles and tactics that are being employed now to engage BIPOC communities include:

- Establishing & enacting guiding principles for how Move Minneapolis conducts its work, which are as follows:
 - Design for the most vulnerable and historically under-served
 - Engage those who are most affected by the work we do
 - Foster an inclusive internal team culture that enables all perspectives to be heard, valued & respected
 - Creating & implementing “Safer Spaces” policies at in-person events
- Exploring engagement methods for expanding the reach of Move Minneapolis services to those employed within service industries. Workers within these industries are disproportionately lower-income individuals of color who are under-served by the transit system. Methods have included:
 - Conducting outreach to employers with large populations of shift workers
 - Sharing insights on the challenges and opportunities of those who are under-served by transit with service providers, Human Resources & Diversity/Equity & Inclusion leaders
 - Elevating and promoting carpool, shuttle and vanpool options as a solution for shift workers
 - Providing 1:1 customized trip planning services for individual shift workers

- Identifying & building relationships with leaders & organizations grounded in the communities we're trying to serve & who can be active partners in the equity framework process
 - In 2022, Move Minneapolis established a partnership with the Cultural Wellness Center/Slow Roll MSP to expand our visibility and reach within neighborhoods and community events
- Promoting affordability, access & customized solutions to BIPOC communities
 - Contracting with Lyft to promote their Nice Ride for All Program to lower-income communities – this has involved a comprehensive outreach strategy with targeted community events
 - Refreshing & promoting the Move Minneapolis Transportation Affordability Guide
- Elevating & exploring dimensions of safety & mobility justice for marginalized populations through Move Minneapolis' upcoming Annual Transportation Summit in November 2022

In addition, a copy of the Metropolitan Council's Public Engagement Plan is available here: <https://metro council.org/About-Us/Publications-And-Resources/Public-Engagement-Plan.aspx>

Language Assistance Plan

Move Minneapolis would provide language assistance to persons with limited English proficiency (LEP), based on the DOT LEP Guidance. Move Minneapolis is currently in the process of evaluating providing written materials in languages other than English.

In addition, a copy of the Metropolitan Council's Language Assistance Plan is available at <https://metrocouncil.org/About-Us/Publications-And-Resources/EQUAL-OPPORTUNITY-DOCUMENTS/Limited-English-Proficiency-Language-Access-Plan.aspx>.

Minority Representation on Planning and Advisory Bodies

The Title VI Circular states the following regarding the membership of planning and advisory bodies:

Recipients that have transit-related non-elected planning boards, advisory councils or committees, or similar bodies, the membership of which is selected by the recipient, must provide a table depicting the racial breakdown of the membership of those committees, and a description of efforts made to encourage the participation of minorities on such committees or councils.

Committee Membership

The following table depicts the membership of non-elected committees and councils, the membership of which is selected by Move Minneapolis, broken down by race, and a description of the process the agency uses to encourage the participation of minorities on such committees

	White/Caucasian	Hispanic or Latino	Black/African-American	Asian/Asian-American	Native Hawaiian or Other Pacific Islander	Other Two or More Races	No Response
Move Minneapolis Governing Board							
13 members	76.90%	0%	23.10%	0%	0%	0%	-

The Move Minneapolis governing board is comprised of the Minneapolis Regional Chamber of Commerce Board’s Executive Committee. The Minneapolis Regional Chamber of Commerce Board of Directors has established racial diversity and gender metrics for its composition. These metrics are informing its outreach and recruitment process and has led to measurable increases in the racial diversity of the board with many of the

board members serving new terms. As these board members serve for longer periods of time, it is expected that more will eventually serve on the board's executive committee. In addition, Move Minneapolis will establish an advisory board in 2023 and will appoint new board members to serve on the Minneapolis Regional Chamber of Commerce Executive Committee. Move Minneapolis' strategic reset will set specific goals for expanding the racial diversity of its committees and board representation and Meet Minneapolis will leverage relationships with community partners to conduct comprehensive recruitment efforts to seek out racially diverse leaders.

Board/Agency Approval of the Title VI Program

On November 15, 2022, the Board of Directors of Move Minneapolis passed the following resolution:

WHEREAS, Title VI of the Civil Rights Act of 1964 states 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; and

WHEREAS, Move Minneapolis does not discriminate on the basis of race, color, religion, sex, national origin, or disability in admission or access to, or treatment or employment in, its services, programs, and activities; and

WHEREAS, as a recipient of federal funds via Metropolitan Council and Metro Transit, Move Minneapolis is required to adopt a Title VI Plan; and

WHEREAS, the Board of Directors feels it is in the best interests of to adopt a Title VI Plan.

NOW, THEREFORE, BE IT RESOLVED by the Board of Directors for Move Minneapolis as follows:

1. That the Board of Directors hereby approves and adopts the Title VI Plan for Move Minneapolis attached to this resolution as Exhibit A.
2. That the Executive Director is authorized to take such steps as she deems necessary to implement and manage the Title VI Plan for Move Minneapolis.
3. That this Resolution is effective upon its adoption.

I certify that the Move Minneapolis Board of Directors adopted the foregoing resolution on November 15, 2022.



President & CEO