

***Federal Transit Administration  
Title VI Program***

**Carroll County Transit**

**July 27, 2023 of Plan Approval**

(Plan expires 3 years from date approved by the board)

## **Title VI Plan Table of Contents**

The **Carroll County Transit** Title VI plan includes the following elements:

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**Section 1: Title VI Plan Approval & Compliance Requirements**

Title VI Plan  
Adopted on: 07/27/2023

Adopted by: Board of Carroll County Commissioners

Signature(s): 

Approval:

## Annual Certifications and Assurances

In accordance with 49 CFR Section 21.7(a), every application for financial assistance from FTA must be accompanied by an assurance that the applicant will carry out the program in compliance with Title VI regulations. This requirement shall be fulfilled when the applicant/recipient submits its annual certifications and assurances. Primary recipients will collect Title VI assurances from sub-recipients prior to passing through FTA funds.

Carroll County Transit will remain in compliance with this requirement by annual submission of certifications and assurances as required by ODOT.

The date of last submission of these certifications and assurances (at the time of this Plan's approval) is: May 9, 2022

## Title VI Plan Revision Log

<b>Date</b> Month/day/year	<b>Section Revised</b>	<b>Summary of Revisions</b>
7/13/2023	All new template	Currently no documents are interpreted due to being less than 5% of the LEP Language Group

## **Section 2: Title VI Policy Statement**

### **Policy Statement**

**Carroll County Transit**, operating demand response transit provider, as a recipient of Federal Transit Administration (FTA) grant dollars either directly from FTA or through the Ohio Department of Transportation (ODOT), will comply with the Title VI of the Civil Rights Act of 1964 (42 U.S.C. 2000d), the U.S. Department of Transportation implementing regulations, FTA Circular 4702.1B, and ODOT Public Transportation requirements as specified in Master Grant Agreement, and State Management Plan. **Carroll County Transit** operates its programs and services without regard to race, color, and national origin in accordance with Title VI of the Civil Rights Act.

### **Section 3: Notice to the Public**

#### **Title VI Notice to the Public**

Carroll County Transit's Notice to the Public is as follows:

### **Notifying the Public of Rights Under Title VI**

## **Carroll County Transit**

- The Carroll County Transit operates its programs and services without regard to race, color, and national origin in accordance with Title VI of the Civil Rights Act. Any person who believes she or he has been aggrieved by any unlawful discriminatory practice under Title VI may file a complaint with the **Carroll County Transit**
- For more information on the **Carroll County Transit** civil rights program, the procedures to file a complaint, or to file a complaint, please contact **Melissa Schaar, Superintendent of Office Management & Clerks/Title VI Coordinator** at **330-627-4869, (TTY 800-750-0750)**; email [mschaar@carrollcountyohio.us](mailto:mschaar@carrollcountyohio.us) ; or visit our administrative office at **119 S. Lisbon Street, Suite 201, Carrollton, OH 44615**. For more information, visit [www.carrollcountyohio.us/commissioners/publicnotices.html](http://www.carrollcountyohio.us/commissioners/publicnotices.html)

- For transportation-related Title VI matters, a complaint may also be filed directly with the:

Ohio Department of Transportation, Attn: Office of Opportunity, Diversity, and Inclusion, Title VI Coordinator, 1980 West Broad Street, Mailstop 3270, Columbus, Ohio 43223

Federal Transit Administration, Office of Civil Rights, Attention: Complaint Team, East Building, 5<sup>th</sup> Floor-TCR, 1200 New Jersey Ave., SE Washington, DC, 20590.

- If information is needed in another language, contact Sonja Trbovich, Transit Director at **330-627-1900**.

Carroll County Transit's Notice to the Public is posted in the public areas of the office and inside the transit vehicles.

1. Carroll County Courthouse
2. Website: [www.carrollcountyohio.us](http://www.carrollcountyohio.us)

## **Section 4: Title VI Complaint Procedure**

**Carroll County Transit's** Title VI Complaint Procedure is made available in the following locations:

- Agency website, if available [carrollcountyohio.us/commissioners/publicnotices.html](http://carrollcountyohio.us/commissioners/publicnotices.html);
  - Hard copy in the central office
  - Agency Title VI Plan
- 

Any individual, group of individuals or entity that believes they have been discriminated against on the basis of race, color, or national origin by **Carroll County Transit** may file a Title VI complaint by completing and submitting the agency's Title VI Complaint Form.

Any individual having filed a complaint or participated in the investigation of a complaint shall not be subjected to any form of intimidation or retaliation. Individuals who have cause to think that they have been subjected to intimidation or retaliation can file a complaint of retaliation following the same procedure for filing a discrimination complaint.

A complaint must be filed with **Carroll County Transit** no later than 180 days after the following:

1. The date of the alleged act of discrimination; or
2. The date when the person(s) became aware of the alleged discrimination; or
3. Where there has been a continuing course of conduct, the date on which that conduct was discontinued of the latest instance of the conduct.

Once the complaint is received, **Carroll County Transit** will review it to determine if our office has jurisdiction. A copy of each Title VI complaint received will be forwarded to the Ohio Department of Transportation within ten (10) calendar days of receipt. The complainant will receive an acknowledgement letter informing her/him whether the complaint will be investigated by our office.

**Carroll County Transit** has 45 days to investigate the complaint. If more information is needed to resolve the case, **Carroll County Transit** may contact the complainant requesting further information. The complainant has 7 business days from the date of the letter to send requested information to the investigator assigned to the case. If the investigator is not contacted by the complainant or does not receive the additional information within 7 business days, **Carroll County Transit** can administratively close the case.

After the investigator reviews the complaint, the agency will issue one of two (2) letters to the complainant: a closure letter or a letter of finding (LOF).

- ✓ A closure letter summarizes the allegations and states that there was not a Title VI violation and that the case will be closed.
- ✓ A letter of finding (LOF) summarizes the allegations and the interviews regarding the alleged incident, and explains whether any disciplinary action, additional training of the staff member, or other action will occur.

If the complainant wishes to appeal the decision it must direct the appeal to the agency initially. The complainant has 14 days after the date of the closure letter or the letter of finding to do so. If there is outstanding concern, the appeal may be directed to the state DOT or FTA. The appeal process information will be included in the letter.

A person may also file a complaint directly with the: Ohio Department of Transportation, Attn: Office of Opportunity, Diversity and Inclusion 1980 West Broad Street, Mailstop 3270, Columbus, OH 43223  
Or

Federal Transit Administration, Office of Civil Rights, Attention: Complaint Team, East Building, 5<sup>th</sup> Floor-TCR, 1200 New Jersey Ave., SE Washington, DC, 20590.

If information is needed in another language, then contact Sonja Trbovich, Transit Director at **(330) 627-1900**.



**Section 5: Title VI Complaint Form**

Carroll County Transit's Title VI Complaint Procedure is made available in the following locations:

- Agency website, if available: [www.carrollcountyohio.us/commssioners/publicnotices.html](http://www.carrollcountyohio.us/commssioners/publicnotices.html)
- Hard copy in the central office
- Agency Title VI Plan

<b>Section I:</b>			
Name:			
Address:			
Telephone (Home):		Telephone (Work):	
Email Address:			
Accessible Requirements?	Format	Large Print	Audio Tape
		TDD	Other
<b>Section II:</b>			
Are you filing this complaint on your own behalf?		Yes*	No
*If you answered "yes" to this question, go to Section III.			
If not, please supply the name and relationship of the person for whom you are complaining:			
Please explain why you have filed for a third party:			
Please confirm that you have obtained the permission of the aggrieved party if you are filing on behalf of a third party.		Yes	No
<b>Section III:</b>			
I believe the discrimination I experienced was based on (check all that apply):			
<input type="checkbox"/> Race		<input type="checkbox"/> Color	
		<input type="checkbox"/> National Origin	
Date of Alleged Discrimination (Month Day, Year) _____			
Explain as clearly as possible what happened and why you believe you were discriminated against. Describe all persons who were involved. Include the name and contact information of the person(s) who discriminated against you (if known) as well as names and contact information of any witnesses. If more space is needed, please use the back of this form.			
_____			
_____			
_____			
<b>Section IV</b>			
Have you previously filed a Title VI complaint with this agency?		Yes	No
<b>Section V</b>			
Have you filed this complaint with any other Federal, State, or local agency, or with any Federal or State court?			
<input type="checkbox"/> Yes		<input type="checkbox"/> No	
If yes, check all that apply:			
<input type="checkbox"/> Federal Agency: _____			
<input type="checkbox"/> Federal Court _____		<input type="checkbox"/> State Agency _____	
<input type="checkbox"/> State Court _____		<input type="checkbox"/> Local Agency _____	

Please provide information about a contact person at the agency/court where the complaint was filed.
<b>Name:</b>
<b>Title:</b>
<b>Agency:</b>
<b>Address:</b>
<b>Telephone:</b>
<b>Section VI</b>
Name of agency complaint is against:
Contact person:
Title:
Telephone number:

You may attach any written materials or other information that you think is relevant to your complaint.  
 Signature and date required below

\_\_\_\_\_

Signature

\_\_\_\_\_

Date

If information is needed in another language, contact Sonja Trbovich, Transit Director (330) 627-1900.

Please submit this form to:

**Carroll County Title VI Coordinator  
 Board of Carroll County Commissioners  
 119 S. Lisbon Street, Suite 201  
 Carrollton, OH 44615  
 (330) 627-4869  
 mschaar@carrollcountyohio.us**

**Section 6: List of Transit Related Title VI Investigations, Complaints and Lawsuits**

Carroll County Transit maintains a list or log of all Title VI investigations, complaints and lawsuits, pertaining to its transit-related activities.

**Check One:**

  X   There have been no investigations, complaint and/or lawsuits filed against us since the last plan submission.

       There have been investigations, complaints and/or lawsuits filed against us. *See list below. Attach additional information as needed.*

	<b>Date</b> (Month, Day, Year)	<b>Summary</b> (include basis of complaint: race, color, or national origin)	<b>Status</b>	<b>Action(s) Taken</b>
<b>Investigations</b>				
1.				
2.				
<b>Lawsuits</b>				
1.				
2.				
<b>Complaints</b>				
1.				
2.				

**Section 7: Public Participation Plan**

**Strategies and Desired Outcomes**

To promote inclusive public participation, **Carroll County Transit** will employ the following strategies, as appropriate (make these determinations based on a demographic analysis of the population(s) affected, type of plan, program and/or service under consideration, and the resources available):

- ✓ Provide for early, frequent and continuous engagement by the public
- ✓ Select accessible and varied meeting locations and times
- ✓ Employ different meeting sizes and formats
- ✓ Use social media in addition to other resources as a way to gain public involvement
- ✓ Use radio, television or newspaper ads on stations and in publications that serve LEP populations. Outreach to LEP populations may also include audio programming available on podcasts.
- ✓ Expand traditional outreach methods by visiting ethnic stores/markets and restaurants, community centers, libraries, faith-based institutions, local festivals, etc.

**Public Outreach Activities**

The public outreach and involvement activities conducted by **Carroll County Transit** since the last Title VI Program submission are summarized in the table below.

Specific Public Participation activities are listed in the table below:

<b>Event Date</b>	<b>Carroll County Transit Staffer(s) or Department</b>	<b>Activity</b>	<b>Communication Method</b> (Public notice, posters, social media)	<b>Notes</b>
7/19/22-7/24/22	Transit Staff	County Fair	Handouts, posters	Providing Transit information
2022	Commissioners	Posting	Website	Title VI/LEP/ADA
2022	Transit	Posting	Public Notice	

## **Section 8: Language Assistance Plan**

### ***Plan Components***

As a recipient of federal US DOT funding, **Carroll County Transit** is required to take reasonable steps to ensure meaningful access to our programs and activities by limited-English proficient (LEP) persons.

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

**Carroll County Transit** Language Assistance Plan includes the following elements:

Item #1: The results of the *Four Factor Analysis*, including a description of the LEP population(s), served.

Item #2: A description of how language assistance services are provided by language

Item #3: A description of how LEP persons are informed of the availability of language assistance service

Item #4: A description of how the language assistance plan is monitored and updated

Item #5: A description of how employees are trained to provide language assistance to LEP persons

### ***Four Factor Analysis Methodology***

To determine if an individual is entitled to language assistance and what specific services are appropriate, Carroll County Transit has conducted a *Four Factor Analysis* of the following areas: 1) Limited-English Proficient (LEP) Speaker Demography, 2) Contact Frequency, 3) Importance of Service, and 4) Resources and Costs.

**Factor 1: The number or proportion of LEP persons eligible to be served or likely to be encountered by the program or recipient.** In addition to the number or proportion of LEP persons served, **Carroll County Transit** will identify:

- (a) How LEP persons interact with the recipient's agency;
- (b) Identification of LEP communities, and assessing the number or proportion of LEP persons from each language group to determine the appropriate language services for each language;
- (c) The literacy skills of LEP populations in their native languages, in order to determine whether translation of documents will be an effective practice; and
- (d) Whether LEP persons are underserved by the recipient due to language barriers.

**Factor 2: The frequency with which LEP persons come into contact with the program:** Identifies and assesses the frequency **Carroll County Transit** staff comes into contact with LEP persons. Examples of contact could include:

- (a) Use of bus and rail service;
- (b) Purchase of tickets through vending machines, outlets, websites, and over the phone;

- (c) Participation in public meetings;
- (d) Customer service interactions;
- (e) Ridership surveys;
- (f) Operator surveys.

**Factor 3: The nature and importance of the program, activity, or service provided by the program to people’s lives.** Generally speaking, the more important the program, the more frequent the contact and the likelihood that language services will be needed.

**Factor 4: The resources available to the recipient for LEP outreach, as well as the costs associated with that outreach.** Resource and cost issues can often be reduced by technological advances, reasonable business practices, and the sharing of language assistance materials and services among and between recipients, advocacy groups, LEP populations and Federal agencies. Large entities and those entities serving a significant number of LEP persons should ensure that their resource limitations are well substantiated before using this factor as a reason to limit language assistance.

**Item #1 – Results of the Four Factor Analysis (including a description of the LEP population(s) served)**

**Factor 1: The number or proportion of LEP persons eligible to be served or likely to be encountered.**

Of the 25,534 residents 5 years and over in Carroll County Transit’s service area, 230 residents describe themselves as speaking English less than “very well”. People of Other Indo-European descent are the primary LEP persons likely to utilize Carroll County Transit services. For Carroll County Transit service area, the latest U.S. Census Bureau data shows that among the area’s population 0.90% speak English “less than very well.” **For these groups** who speak English “less than very well”, 0.86% speak Other Indo-European Languages.

Carroll County – Languages Spoke at Home

	Total Number	Percent of Population	Total Population of County – 5 Years and Over
Speak Language other than English	1,266	4.96%	25,534
Speak English Less than Very Well	230	0.90%	25,534
Spanish – Speak English Less than Very Well	10	0.04%	25,534
Other Indo-European Languages – Speak English Less than Very Well	220	0.86%	25,534
Asian and Pacific Island Languages – Speak English Less than Very Well	0	0.00%	25,534
Other Languages – Speak English Less than Very Well	0	0.00%	25,534

*US Census Bureau: ACS 5-Year Estimates – S1601 Language Spoken at Home*

**Factor 2: The frequency with which LEP persons come into contact with the program.**

Carroll County Transit assessed the frequency with which staff and drivers have, or could have, contact with LEP persons. Carroll County Transit provides approximately 22,465 passenger trips per year. If an individual has speech limitations, the dispatcher or driver will work with the Ohio Department of Transportation, if needed, to ensure the individual receives access to the transit services.

**Factor 3: The nature and importance of the program, activity, or service provided by the program to people's lives.**

All of Carroll County Transit's programs are important; however, those related to safety, public transit, nondiscrimination and public involvement are among the most important. Carroll County Transit is committed to providing meaningful access and will provide competent oral interpretation for any of its documents, when reasonable, effective and with the available resources when the LEP Language Group is under 5% of the total population. In other cases, Carroll County Transit will strive to provide alternative but meaningful accessibility. Moreover, Carroll County Transit continually evaluates its programs, services, and activities to ensure that persons who may be LEP are always provided with meaningful access.

**Factor 4: The resources available for LEP outreach, as well as the costs associated with that outreach.**

Carroll County Transit makes every effort to make its programs, services, and activities, accessible to LEP individuals. Carroll County Transit will use available resources, both internal and external to accommodate reasonable requests for translations free of cost.

**Item # 2 – Description of how Language Assistance Services are Provided, by Language**

Carroll County Transit has identified, developed, and uses the following:

- a) Carroll County Transit has developed partnerships with local agencies and organizations that are available to assist with its LEP responsibilities.
- b) A list of web-based translation services can be provided by contacting the Carroll County Transit office.

**Item # 3 – Description of how LEP Persons are Informed of the Availability of Language Assistance Service**

In order to ensure that LEP individuals are aware of Carroll County Transit language assistance measures, Carroll County Transit provides the following:

- Title VI Program including the Language Assistance Plan is made available on website, if applicable, and hard copy in central office.
- Drivers and dispatchers are provided "I Speak" language identification guide/card to identify language needs in order to match them with available services.

**Item # 4 – Description of how the Language Assistance Plan is Monitored and Updated**

Carroll County Transit will continue to update the LEP plan as required by U.S. DOT. At a minimum, the Title VI Plan will continue to be reviewed and updated every three (3) years in conjunction with the Title VI submission and use data from the U.S. Decennial Census or the American Community Survey as available, or when it is clear that the concentrations of LEP individuals are present in Carroll County Transit service area.

Updates will continue to include the following:

- The number of documented LEP person contacts encountered annually.
- How the needs of LEP persons have been addressed.

- Determination of the current LEP population in the service area.
- Determination as to whether the need for translation services has changed.
- Determine whether local language assistance programs have been effective and sufficient to meet the need.
- Determine whether Carroll County Transit financial resources are sufficient to fund language assistance resources needed.
- Determine whether Carroll County Transit has fully complied with the goals of this LEP Plan.
- Determine whether complaints have been received concerning Carroll County Transits failure to meet the needs of LEP individuals

**Item # 5 - Description of how Employees are Trained to Provide Language Assistance to LEP Persons**

The following training will continue to be provided to Carroll County Transit staff:

- Information on the Carroll County Transit Title VI Procedures and LEP responsibilities.
- Description of language assistance services offered to the public.
- Use of "I Speak" language Identification Guide and Card (used to identify language preference).
- Documentation of language assistance requests.
- Use of web-based interpreter services (over the phone interpretation provider).
- How to handle a potential Title VI / LEP complaint.

Limited English Proficient (LEP) Resource Materials:

**LEP Policy**

**Carroll County Transit** shall provide communication for limited English proficient riders to ensure them equal opportunity to benefit from services. Family members or friends of limited English proficient riders will not be used as translators unless specifically requested by that individual. Arrangements have been made with Jill Cunningham-Mobility Management Tuscarawas/Carroll and Harrison Counties to obtain translators. The agency will also utilize a telephone interpreting service translator program if available.

**If you need help with English, please call 330-627-1900.**



## “I Speak” Language Identification Card

**Note:** For additional languages visit the US Census Bureau website <http://www.lep.gov/ISpeakCards2004.pdf>

Mark this Box if you speak...	Language Identification Chart	Language
<input type="checkbox"/>	Mark this box if you read or speak English	English
<input type="checkbox"/>	Marque esta casilla si lee o habla español	Spanish
<input type="checkbox"/>	Kos lub voj no yog koj paub twm thiab hais lus Hmoob	Hmong
<input type="checkbox"/>	如果说中国在方框内打勾	Chinese
<input type="checkbox"/>	Xin ñaùnh daáu vaø oâ naøy neáu quyù vò bieát ñoic vaø noui ñöôic Vieät Ngöð.	Vietnamese
<input type="checkbox"/>	당신이한국어말할경우이 상자를표시	Korean
<input type="checkbox"/>	Markahan itong kuwadrado kung kayo ay marunong magbasa o magsalita ng Tagalog.	Tagalog
<input type="checkbox"/>	Kreuzen Sie dieses Kästchen an, wenn Sie Deutsch lesen oder sprechen	German
<input type="checkbox"/>	Отметить этот флажок, если вы говорите по-русски	Russian
<input type="checkbox"/>	Означите ову кућицу ако говорите српски	Serbian
<input type="checkbox"/>	आप हिंदी बोलते हैं तो इस बक्से को चिह्नित करें	Hindi
<input type="checkbox"/>	پر نشان لگائیں تو اس باکس بولتے ہیں اردو اگر آپ	Urdu

### Log of LEP Encounters

Date	Time	Language Spoken By Individual <i>(if available)</i>	Name and Phone Number of Individual <i>(if available)</i>	Service Requested	Follow Up Required	Staff Member Providing Assistance	Notes

**Section 9: Minority Representation Information**

Recipients that have **transit-related**, non-elected planning boards, advisory councils or committees, or similar committees, 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.

**\*Guidance:** Elected transit-related board, committee, or council, do not need to complete the table below, and write in section B that there are no non-elected transit-related boards, committees, or councils.

**A. Minority Representation Table**

**Table Depicting Membership of Board, Committees, Councils, Broken Down by Race**

<b>Body</b>	<b>Caucasian</b>	<b>Hispanic</b>	<b>African American</b>	<b>Asian American</b>	<b>Native American</b>	<b>Two or More Races</b>
(Insert service area total population racial breakdown)	N/A	N/A	N/A	N/A	N/A	N/A
[Insert Name of Committee/Board]	N/A	N/A	N/A	N/A	N/A	N/A

*Note: insert the number of people and % of total board membership*

**B. Efforts to Encourage Minority Participation**

*To encourage participation on its boards, committees, and councils, the Carroll County Transit will make every effort to encourage minority participation on the boards. Detail any further efforts below.*

There are no non-elected transit-related boards, committees, or councils.

## **Section 10: Providing Assistance to and Monitoring Subrecipients**

1. Does agency provide funding to subrecipients?

No, the agency does not have subrecipients.

Yes. If yes, list the subrecipient names: (list other agency names here)

Insert Agency Name monitors subrecipients using the following process:

1. Insert Agency Name uses the following process for ensuring all subrecipients are complying with the general reporting requirements of FTA Circular 4702.1B: (document the process here)
2. Insert Agency Name collects Title VI programs from the subrecipients listed above and reviews programs for compliance by (list the process here)

## **Section 11: Title VI Equity Analysis for Facility Acquisition**

Title 49 CFR, Appendix C, Section (3)(iv) requires “the location of projects requiring land acquisition and the displacement of persons from their residences and business may not be determined on the basis of race, color, or national origin.” For purposes of this requirement, “facilities” does not include bus shelters, as they are considered transit amenities. It also does not include transit stations, power substations, or any other project evaluated by the National Environmental Policy Act (NEPA) process. Facilities included in the provision include, but are not limited to, storage facilities, maintenance facilities, operations centers, etc. Has the agency built a facility? (check a response below)

No, the agency has not built a facility.

Yes, the agency has built a facility and completed a Title VI equity analysis to compare the equity impacts of various siting alternatives, and the analysis must occur before the selection of the preferred site. (Include at the end of the Title VI plan a copy of the Title VI equity analysis.)

**Section 12: Requirements for Metropolitan Planning Organizations (MPOs)**

N/A

All MPOs must meet the following requirements if the agency is included in the MPO constituency.

MPO Requirements (Ref: FTA Circular 4702.1B Chapter VI)	Status
1) Does the plan contain a demographic profile of the metropolitan area that includes identification of the locations of minority populations in the aggregate?	<input type="checkbox"/> Y <input type="checkbox"/> N
2) A description of the procedures by which the mobility needs of minority populations are identified and considered within the planning process?	<input type="checkbox"/> Y <input type="checkbox"/> N
3) Demographic maps that overlay the percent minority and non-minority populations as identified by Census or American Community Survey (ACS) data, at the Census tract or block group level, and charts that analyze the impacts of the distribution of State and Federal funds in the aggregate for public transportation purposes, including federal funds managed by the MPO as a designated recipient?	<input type="checkbox"/> Y <input type="checkbox"/> N
4) Analysis of disparate impacts on the basis of race, color, or national origin, and, if so, determines whether there is a substantial legitimate justification for the policy that resulted in the disparate impacts, and if there are alternatives that could be employed that would have a less discriminatory impact.	<input type="checkbox"/> Y <input type="checkbox"/> N
Comments:	