

Federal Transit Administration

Title VI Program

2026

Reviewed and Approved by _____



Vicki Kramer
Director

Nebraska Department of Transportation

05/27/2026

Date



Contents

- 1 Introduction and Overview 1
 - 1.1 Organization and Staffing of the NDOT Civil Rights and Transit Units..... 1
- 2 General Requirements and Guidelines..... 2
 - 2.1 Assurances..... 2
 - 2.2 Prepare and Submit a Title VI Program 2
 - 2.3 Title VI Notice..... 3
 - 2.4 Title VI Complaint Procedure and Complaint Form..... 3
 - 2.5 List of Title VI Investigations, Complaints, and Lawsuits 5
 - 2.6 Inclusive Public Participation..... 6
 - 2.7 Providing Meaningful Access to LEP Persons 7
 - 2.8 Planning and Advisory Bodies 7
 - 2.9 Assisting Subrecipients 7
 - 2.10 Monitoring Subrecipients 8
 - 2.11 Equity Analysis to Determine Site or Location of Facilities..... 8
- 3 Requirements for States..... 8
 - 3.1 State of Nebraska Demographic Data 8
 - 3.2 Distribution of Funds..... 16
 - 3.3 Disparate Impact Analysis..... 19
 - 3.4 Statewide Transportation Planning Process 21
 - 3.5 Passing Through FTA Financial Assistance in a Nondiscriminatory Manner 21
 - 3.6 Assisting Subrecipients 22

Tables

- Table 1. Example Log for Complaints, Investigations, and Lawsuits..... 5
- Table 2. Demographic Profile of Nebraska 8
- Table 3. Counties with a Meaningfully Greater Population of Hispanic or Latino Persons 10
- Table 4. County with a Meaningfully Greater Population of Black or African American Persons 12
- Table 5. Counties with a Meaningfully Greater Population of American Indian and Alaska Native Persons..... 14
- Table 6. Geographic Distribution of Fiscal Year 2024–2025 (FY 24–25) FTA Funds 17

Figures

- Figure 1. Population of White Persons (not Hispanic or Latino) by County..... 9
- Figure 2. Population of White Persons (not Hispanic or Latino) by Census Block Group..... 10
- Figure 3. Population of Hispanic or Latino Persons by County..... 11
- Figure 4. Population of Hispanic or Latino Persons by Census Block Group..... 11
- Figure 5. Population of Black or African American Persons by County..... 12
- Figure 6. Population of Black or African American Persons by Census Block Group..... 12
- Figure 7. Population of Asian Persons by County 13
- Figure 8. Population of Asian Persons by Census Block Group..... 13
- Figure 9. Population of American Indian and Alaska Native Persons by County 14
- Figure 10. Population of American Indian and Alaska Native Persons by Census Block Group 15
- Figure 11. Population of Hawaiian or Pacific Islander Persons by County..... 16
- Figure 12. Population of Hawaiian or Pacific Islander Persons by Census Block Group..... 16

Appendices

- A. NDOT Title VI Notice
- B. NDOT Title VI Discrimination Complaint Forms

Non-Discrimination Statement of Policy

Under Title VI of the Civil Rights Act of 1964 and related statutes, the Nebraska Department of Transportation is committed to ensuring that no person shall, on the grounds of race, color, or national origin, be excluded from participation in, denied the benefits or services of, or be otherwise subjected to discrimination in all programs, services, or activities administered by the Nebraska Department of Transportation.

Vicki Kramer
Director
Nebraska Department of Transportation

Date

1 Introduction and Overview

The Nebraska Department of Transportation (NDOT) is a recipient of federal financial assistance and complies with Title VI of the Civil Rights Act of 1964 and related nondiscrimination laws and regulations. NDOT programs, policies, and activities are administered without regard to race, color, or national origin.

NDOT expects all employees, contractors, and subrecipients of federal funds to uphold these principles and ensure nondiscriminatory practices in the delivery of transportation services and programs. In addition, NDOT includes Title VI language in agreements with subrecipients and integrates federal guidance concerning access for persons with limited English proficiency (LEP).

The NDOT Office of Civil Rights, in partnership with the Local Assistance Division's Office of Transit, oversees Title VI compliance, updates the program as required, and ensures meaningful access, equitable service, and full participation for all individuals in transportation programs and decision-making.

The NDOT Title VI Program plan is approved by NDOT Director Vicki Kramer every 3 years and is amended as necessary to reflect standard operating practice. NDOT developed the current Title VI Program plan in accordance with the Title VI requirements, guidelines, and definitions set forth in Federal Transit Administration (FTA) Circular 4702.1B.

NDOT submitted the current Title VI Program as evidence of its compliance with FTA and U.S. Department of Transportation Title VI requirements.

NDOT is the direct recipient of the following FTA funds:

- Section 5303 and 5304 Metropolitan & Statewide Planning and Non-Metropolitan Transportation Planning
- Section 5310 Enhanced Mobility of Seniors & Individuals with Disabilities
- Section 5311 Formula Grants for Rural Areas
- Section 5339(a) Grants for Buses and Bus Facilities Formula Program

NDOT passes these funds to rural areas, public purpose organizations, and metropolitan planning organizations (MPO) in small and large urbanized areas. As the primary grant recipient, NDOT is responsible for ensuring that subrecipients administer their programs in accordance with FTA requirements.

1.1 Organization and Staffing of the NDOT Civil Rights and Transit Units

NDOT has designated staff to ensure compliance with Title VI requirements across its programs, including public transit.

- NDOT Civil Rights Office – Provides overall agency coordination, technical assistance, monitoring, and oversight of Title VI compliance across all divisions, program areas, and modal administrations.
- Local Assistance Division – Serves as the primary point of contact for NDOT's FTA-funded programs. Within this office, the Transit Program Manager has responsibility for coordinating Title VI compliance activities with subrecipients of FTA funds, including ensuring Title VI plans are current, providing guidance to transit agencies, and serving as the liaison between the Civil Rights Office and transit providers.

Together, the Civil Rights Compliance Manager (Civil Rights Office) and the Transit Manager (Local Assistance Division) ensure that Title VI requirements are embedded in NDOT's transit programs and that subrecipients meet federal nondiscrimination obligations. Both the Transit Manager and the Civil Rights Compliance Manager have a direct line of communication with the NDOT Director.

For more information regarding NDOT FTA Title VI obligations, contact:

Nebraska Department of Transportation
Civil Rights Office
Attn: Civil Rights Compliance Manager
1500 Nebraska Parkway
P.O. Box 94759
Lincoln, NE 68509-4759
402-479-4544
ndot.civilrights@nebraska.gov

2 General Requirements and Guidelines

2.1 Assurances

NDOT fully complies with Title VI regulations and carries out its Title VI Program in accordance with FTA and U.S. Department of Transportation Title VI requirements. NDOT developed the current Title VI Program in accordance with Title VI requirements and guidelines set forth in FTA Circular 4702.1B. NDOT submits its Title VI certifications and assurances to FTA annually and collects Title VI assurances from subrecipients prior to passing through FTA funds.

NDOT, its transit subrecipients, and contractors may not discriminate on the basis of race, color, or national origin in the delivery of services, program administration, and operations.

As the designated recipient of FTA Section 5310 and 5311 and statewide Section 5339 program funds, NDOT is responsible for ensuring that all subrecipients comply with applicable civil rights requirements. NDOT provides oversight through program reviews, monitoring, and technical assistance to verify compliance.

All joint participation agreements and contracts with subrecipients include Title VI assurance clauses, which incorporate by reference the requirements of FTA Circular 4702.1B. By signing these agreements, transit providers affirm their commitment to nondiscrimination and agree to administer transit services and programs in full compliance with Title VI and related federal requirements.

NDOT's Civil Rights Office oversees implementation of these assurances and ensures that Title VI principles are applied across all federally funded public transit programs in Nebraska.

2.2 Prepare and Submit a Title VI Program

NDOT submitted its previous Title VI Program to the FTA Region VII Civil Rights Officer in August 2023. The current Title VI Program is intended to fulfill submission requirements for the 2026–2029 reporting period.

NDOT's Director reviewed and approved the current Title VI Program prior to its submission to FTA. This approval is documented via the signature line on the cover of this plan.

2.3 Title VI Notice

NDOT complies with Title VI and notifies the public of the protections against discrimination afforded to them by Title VI. The notice is posted in the following public locations: (a) on the Nebraska Public Transit website (nebraskatransit.com), which is operated by NDOT and serves as a public hub for information about Nebraska's rural and urban transportation systems; and (b) at a visible public location at NDOT's main offices, located at 1500 Nebraska Parkway in Lincoln, Nebraska. This notice has been translated in accordance with NDOT's LEP plan.¹ See Appendix A for a copy of NDOT's Title VI notice to the public.

2.4 Title VI Complaint Procedure and Complaint Form

NDOT, as a designated recipient of FTA funds, is required under Title VI of the Civil Rights Act of 1964 and FTA Circular 4702.1B to develop procedures for prompt processing and disposition of Title VI complaints received directly by NDOT. The following complaint procedures are patterned after the FTA's requirements and guidance.

All FTA-related Title VI complaints filed against NDOT or its subrecipients are forwarded to both the NDOT Civil Rights Compliance Manager and NDOT Transit Manager for processing, in coordination with the NDOT Civil Rights Office. NDOT will maintain a log of all complaints received, including the following:

- The date the complaint was filed
- A description of the complaint
- Dates of all significant actions taken
- All correspondence with the complainant or respondent

NDOT will review all complaints for programs and activities receiving FTA financial assistance.

NDOT's Title VI complaint procedures and forms are available to the public via [Plans & Policies](#) or by request. The Title VI Complaint Form has been translated in accordance with NDOT's LEP plan and is provided in **Appendix B**.

The following section describes NDOT's Title VI complaint procedures.

2.4.1 Filing a Transit-Related Complaint with NDOT

Persons Eligible to File

Any person who believes they, or any program beneficiary, has been subjected to unequal treatment or discrimination in their receipt of transit benefits and/or services on the basis of race, color, or national origin may file a Title VI complaint with NDOT. Complaints may be filed directly by the affected individual(s) or by a representative.

Complaint Substance and Format

To file a complaint with NDOT, complainants should complete and submit the agency's Title VI Complaint Form or submit a written letter containing the following information:

- The name(s) of the persons(s) filing the complaint (the complainant)

¹ <https://dot.nebraska.gov/media/rngflsav/ndot-limited-english-proficiency-plan.pdf>

- Mailing address and phone number of the complainant(s)
- Name of the person(s) or entity alleged to have engaged in discrimination
- Date of the incident
- Detailed description of the incident
- Explanation of how the incident involved discrimination based on race, color, or national origin
- Names, mailing addresses, and phone numbers of witnesses or third parties to the incident
- Any additional information relevant to the complaint

A complaint may be filed on behalf of another person with their expressed written consent. The Title VI Complaint Form or letter of complaint must be signed by the complainant or by their authorized representative.

Time Frame for Filing Complaints

Complaints must be received no more than 180 calendar days after the alleged incident and must involve allegations of discrimination on the basis of race, color, or national origin to be investigated as an unlawful discriminatory practice under Title VI. FTA may grant an extension. NDOT will process complaints that are complete.

After a complaint is received, an investigator will determine whether it meets the criteria and whether NDOT has jurisdiction. The complainant will receive an acknowledgment letter by mail about whether the investigation will proceed.

Processing and Investigating Complaints

NDOT strives to complete investigations within 90 days. At any time during the investigation, the investigator may request additional information to assist in investigating the incident. The complainant will be given 15 business days to respond to the request for additional information. If NDOT is not contacted by the complainant or does not receive the additional information within 15 business days, NDOT can administratively close the case. A case can be administratively closed if the complainant no longer wants to pursue the case.

Closing a Complaint

After NDOT reviews the complaint, one of two letters will be issued to the complainant: a closure letter or a letter of finding. 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 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. Complainants have 30 days to appeal the findings of the investigation.

Contact Information

Complaint forms are available on the NDOT website. For assistance placing a complaint in writing or for language assistance, contact the NDOT Civil Rights Office:

Nebraska Department of Transportation
 Kimberly Baker, Civil Rights Compliance Manager
 1500 Nebraska Parkway
 P.O. Box 94759
 Lincoln, NE 68509-4759
 402-479-4544
 ndot.civilrights@nebraska.gov

A person may also file a complaint directly with FTA:

Federal Transit Administration
 Region 7
 901 Locust Street, Suite 404
 Kansas City, MO 64106
 Phone: (816) 329-3920

or

Federal Transit Administration
 Office of Civil Rights
 Attention: Title VI Coordinator
 East Building, 5th Floor-TCR
 1200 New Jersey Ave., SE,
 Washington, D.C. 20590

2.4.2 NDOT Title VI Complaint Form

See **Appendix B** for a copy of NDOT’s Title VI Discrimination Complaint Form.

2.5 List of Title VI Investigations, Complaints, and Lawsuits

As of the current Title VI Program submission, no transit-related complaints specific to Title VI were filed; therefore, there are no incidents to track or report. NDOT will use Table 1 to conduct an investigation, receive a complaint, or file a lawsuit alleging discrimination on the basis of race, color, or national origin.

Table 1. Example Log for Complaints, Investigations, and Lawsuits

Type	Date	Summary of Incident	Status	Actions
Investigation	N/A			
Complaints	N/A			
Lawsuit	N/A			

2.6 Inclusive Public Participation

As a state-level agency that does not directly operate public transportation, NDOT's public engagement activities typically surround transportation-related projects. Examples include the following:

- Intercity bus needs assessment
- Nebraska Public Transit Week
- Enterprise commute vanpool project

NDOT typically uses newspaper announcements and electronic or social media to inform the public of upcoming opportunities for public participation. In the early phases of a planned activity or event, NDOT considers whether circumstances, such as proximity to LEP communities, indicate the need for targeted minority outreach or the provision of non-English language assistance. For example, public hearing announcements are routinely translated into one or more non-English languages spoken by residents near upcoming projects and published in a widely circulated newspaper. Additional translated documents could include comment cards, community surveys, event advertisements, social media posts, and so forth.

In accordance with its LEP plan, NDOT translates all vital, publicly distributed documents into any language on request, as reasonable. Public comments or inquiries received in languages other than English are translated and reviewed by NDOT as part of the agency's normal decision-making process to prevent the exclusion of minority or LEP persons. Additionally, Title VI materials (complaint forms, notices to the public) are translated in accordance with NDOT's LEP plan and distributed to all subrecipients.

2.6.1 Meetings and Public Outreach

All public meetings held by NDOT are scheduled for times and locations that are convenient for public attendance and accessible to persons with disabilities, families, and minority and LEP communities. Adequate advance notice of meetings is provided to encourage public participation. Meetings are structured in formats that provide opportunities for the public to engage in dialogue regarding impactful transportation issues.

Over the past 3 years, NDOT performed a number of public outreach activities as part of its larger effort to promote and enhance public transportation in Nebraska. These included outreach efforts targeted specifically toward minority and LEP populations.

For example, NDOT has developed and provides Title VI training for transit employees, which focuses on the responsibility to provide service to all passengers regardless of race, skin color, or nationality. This training also discusses how to work with LEP persons to ensure full service is provided.

NDOT also celebrates Nebraska Public Transit Week, which was declared by Governors Pete Ricketts and Jim Pillen, and includes a number of public outreach events and corresponding public advertisements. To advertise the event, social media campaigns in English and Spanish were created.

NDOT will continue with additional public outreach activities during the subsequent reporting period, including the Annual Nebraska Public Transit Week, scheduled for April 2026.

2.7 Providing Meaningful Access to LEP Persons

Because NDOT is a state-level agency, a four-factor analysis was performed and documented in the NDOT LEP Plan, available on the NDOT Civil Rights Office website² and by request. The four-factor analysis ensures meaningful access to NDOT programs, services, and activities.

As documented in the NDOT LEP plan, of the LEP populations in Nebraska, the Spanish-speaking LEP population is the largest (65.8 percent of the LEP persons in Nebraska).

2.7.1 Monitoring and Updating the NDOT LEP Plan

NDOT understands that language needs will change as the Nebraska population changes. Further, NDOT will comply with the requirement to assess its programs, services, or activities each year to determine compliance with Title VI. NDOT will revisit the LEP plan each year and make appropriate changes.

2.7.2 Employee Training

NDOT's Workforce Development Section is responsible for the overall administration, development, and implementation of the Employee and Leadership Development programs. Title VI training for subrecipients is held annually and is available through the NDOT website. The NDOT Civil Rights Office Compliance Manager and the Transit Program Manager are primarily responsible for administering language assistance, including requesting translated documents and operating Nebraska's Language Line as needed. These staff members are assisted by personnel familiar with FTA's Title VI compliance requirements.

2.8 Planning and Advisory Bodies

NDOT does not have a transit-related, non-elected planning board, advisory council, or other committee.

2.9 Assisting Subrecipients

NDOT provides the following ongoing support to all subrecipients in achieving and maintaining Title VI compliance:

- Assists in formulating an FTA-complaint Title VI Program.
- Provides sample Title VI Notices to the Public and Discrimination Complaint Forms. These forms are provided in English and Spanish. Copies of the sample Title VI documents provided by NDOT to grant recipients as part of the current Title VI Program document.
- Provides procedures and assistance for investigating and tracking Title VI complaints.
- Facilitates in-person or teleconferenced Title VI training for subrecipient transportation personnel, including drivers and dispatchers, on request.

² <https://dot.nebraska.gov/business-center/civil-rights/>

2.10 Monitoring Subrecipients

NDOT reviews and electronically stores subrecipient Title VI programs. Following the initial Title VI program submission, all subrecipients are required to submit approved Title VI programs to NDOT every 3 years. The most recent primary Title VI submission cycle occurred in 2026.

To monitor ongoing compliance, NDOT staff conduct site visits at each 5310 and 5311 subrecipient location at least once every 3 years. A site visit checklist is used to review critical Title VI elements, such as the availability of complaint forms and the proper display of the Title VI Notice to the public. Deficiencies are noted, and corrective action is required for subrecipients who are not in compliance.

NDOT also monitors Title VI compliance among MPOs receiving Section 5303 funds. Title VI assurances are included in the 5303 agreements signed by MPOs. MPO work plans submitted with funding applications are reviewed to ensure they reference Title VI compliance.

2.11 Equity Analysis to Determine Site or Location of Facilities

NDOT will complete a Title VI equity analysis during the planning stage for construction projects using FTA funds with regard to where a project is located or sited to ensure the location is selected without regard to race, color, or national origin and to compare the impact of siting alternatives. Copies of subsequent equity analyses will be included in NDOT's 2029 Title VI Program submission. For projects requiring land acquisition with or without federal participation, NDOT follows the Uniform Relocation Assistance and Real Property Acquisition Policies Act of 1970.

As of the publication of this Title VI Program plan, no new location or existing facility upgrade is programmed for the time period of this plan. If one is programmed after approval, it will be amended into this document as an appendix.

3 Requirements for States

As a state agency, NDOT must meet the requirements of both Chapter III and Chapter IV of FTA Circular 4702.1B.

3.1 State of Nebraska Demographic Data

NDOT obtained U.S. Census Bureau 2019–2023 American Community Survey 5-Year Estimates data to generate a demographic profile of Nebraska by race and ethnicity, as shown in Table 2.

Table 2. Demographic Profile of Nebraska

Race	Percent of Total Population
White	75.7%
Hispanic or Latino	12.0%
Black or African American	4.8%
Asian	2.7%
American Indian and Alaska Native	0.8%
Native Hawaiian and Other Pacific Islander	0.1%

Source: U.S. Census Bureau, 2019–2023 American Community Survey 5-Year Estimates

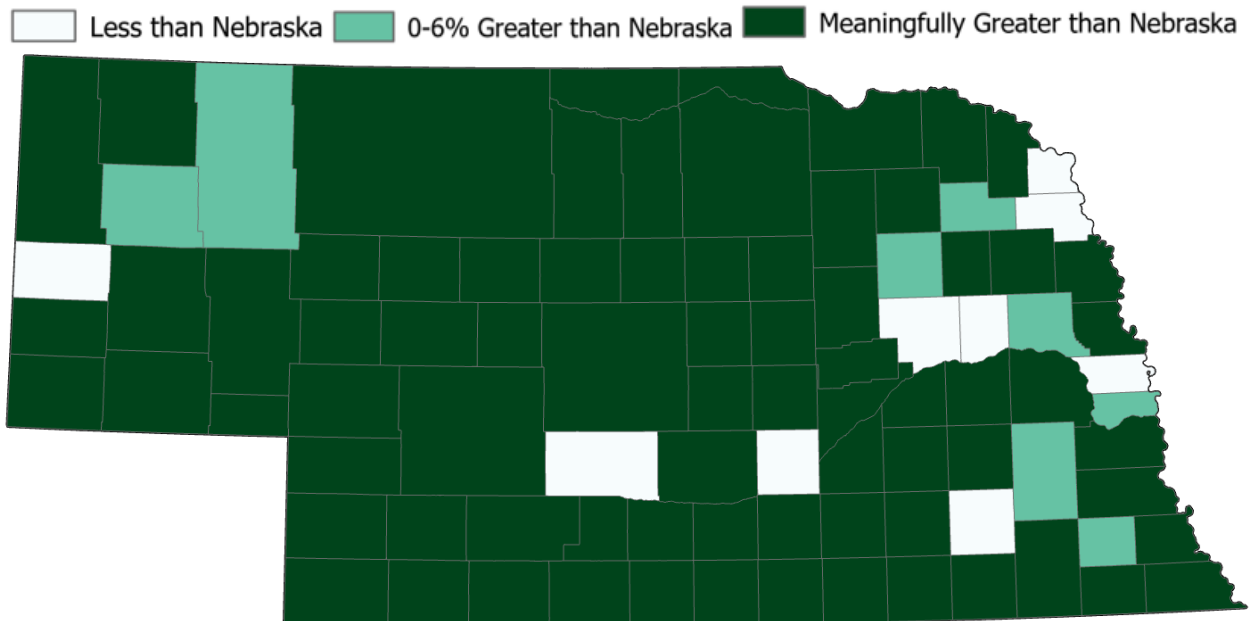
To determine the primary locations of Nebraska’s minority persons and groups, data was used from the 2019–2023 American Community Survey 5-Year Estimates to generate maps that identify estimates and percentages for race and ethnicity by both Nebraska counties and census block groups. This analysis includes both counties and block groups because transit funds are passed through to subrecipients based on jurisdictions, so county-wide data is the most appropriate reference geography for disparate impact comparisons. Data was analyzed at a more granular level using census block groups to provide more detail about areas of Nebraska with higher percentages of non-White, and potentially LEP, persons, which has implications for public transit services across the state.

This analysis considers the potential impacts on vulnerable populations, as transportation and other infrastructure projects have historically had a greater impact on these groups. This methodology evaluates population data from the census to analyze whether the percentage of the minority population is “meaningfully greater” than a larger reference geography, in accordance with NDOT policy. This means the minority group percentage for a specific block group or county is compared to the same minority group for the state of Nebraska. The term “meaningfully greater” is usually 6 to 8 percent higher.

Based on American Community Survey data, nearly 76 percent of the state’s population identifies as White, which is shown in **Figure 1** for Nebraska counties and **Figure 2** for census block groups.

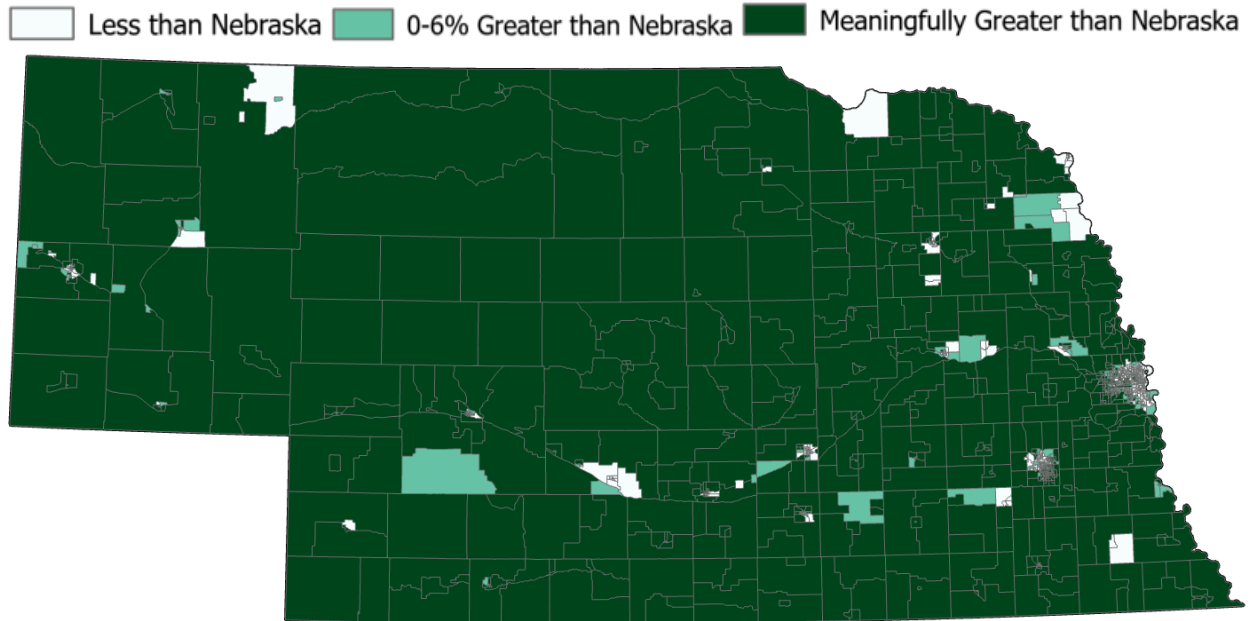
Figure 3 through **Figure 12** show race and ethnicity by both county and block group, correlating to the data presented in **Table 3** through **Table 5**.

Figure 1. Population of White Persons (not Hispanic or Latino) by County



Source: U.S. Census Bureau, 2019–2023 American Community Survey 5-Year Estimates

Figure 2. Population of White Persons (not Hispanic or Latino) by Census Block Group



Source: U.S. Census Bureau, 2019–2023 American Community Survey 5-Year Estimates

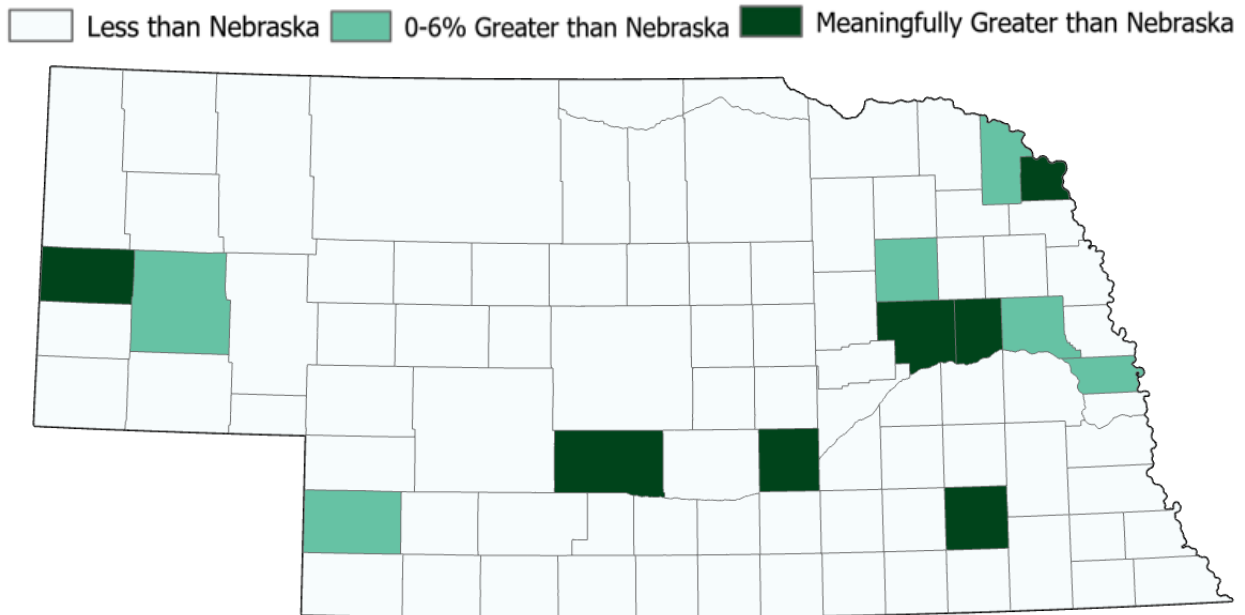
Based on American Community Survey data, approximately 12 percent of the state’s population identifies as Hispanic or Latino. Therefore, counties and census block groups would contain meaningfully greater populations of Hispanic or Latino persons if they contain 18 percent populations, which is shown in **Figure 3** for Nebraska counties and **Figure 4** for census block groups and listed in **Table 3**.

Table 3. Counties with a Meaningfully Greater Population of Hispanic or Latino Persons

County	Percent Hispanic or Latino
Colfax	47.2%
Dakota	40.8%
Dawson	35.8%
Hall	30.5%
Platte	21.1%
Saline	28.5%
Scotts Bluff	22.7%

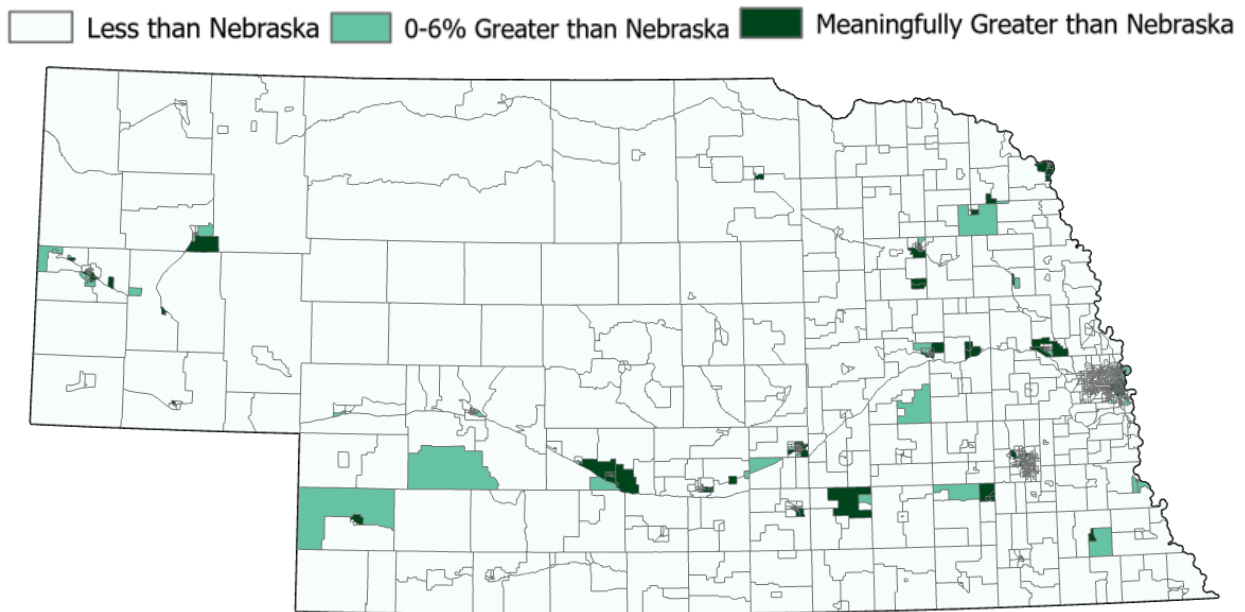
Source: U.S. Census Bureau, 2019–2023 American Community Survey 5-Year Estimates

Figure 3. Population of Hispanic or Latino Persons by County



Source: U.S. Census Bureau, 2019–2023 American Community Survey 5-Year Estimates

Figure 4. Population of Hispanic or Latino Persons by Census Block Group



Source: U.S. Census Bureau, 2019–2023 American Community Survey 5-Year Estimates

Based on American Community Survey data, approximately 4.8 percent of the state’s population identifies as Black or African American. Therefore, counties and census block groups would contain meaningfully greater populations of Black or African American persons if they contain 10.8 percent populations, which is shown in **Figure 5** for Nebraska counties and **Figure 6** for census block groups and listed in **Table 4**.

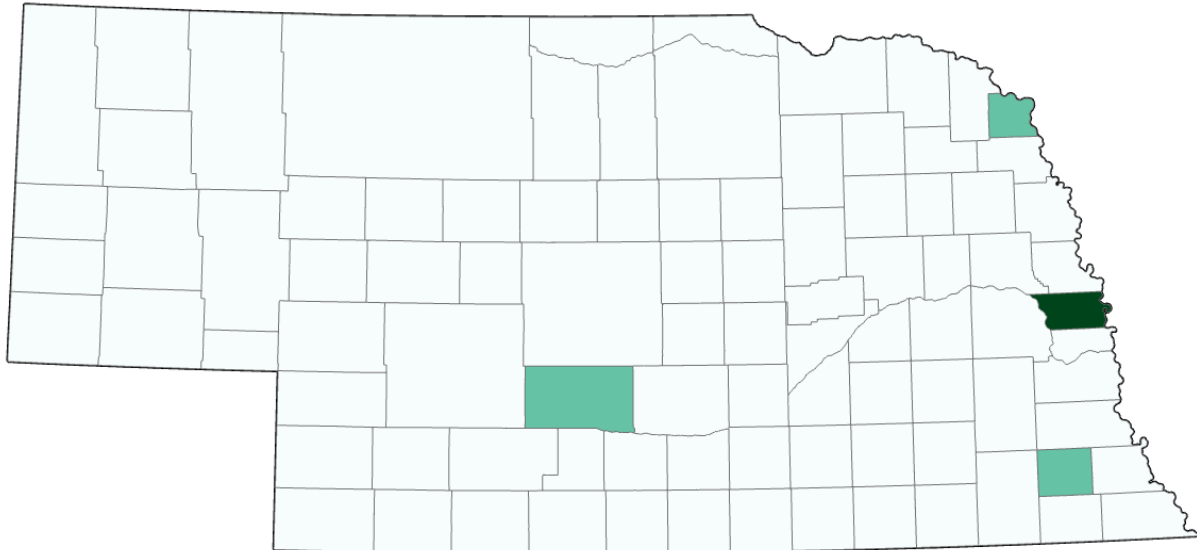
Table 4. County with a Meaningfully Greater Population of Black or African American Persons

County	Percent Black or African American
Douglas	10.9%

Source: U.S. Census Bureau, 2019–2023 American Community Survey 5-Year Estimates

Figure 5. Population of Black or African American Persons by County

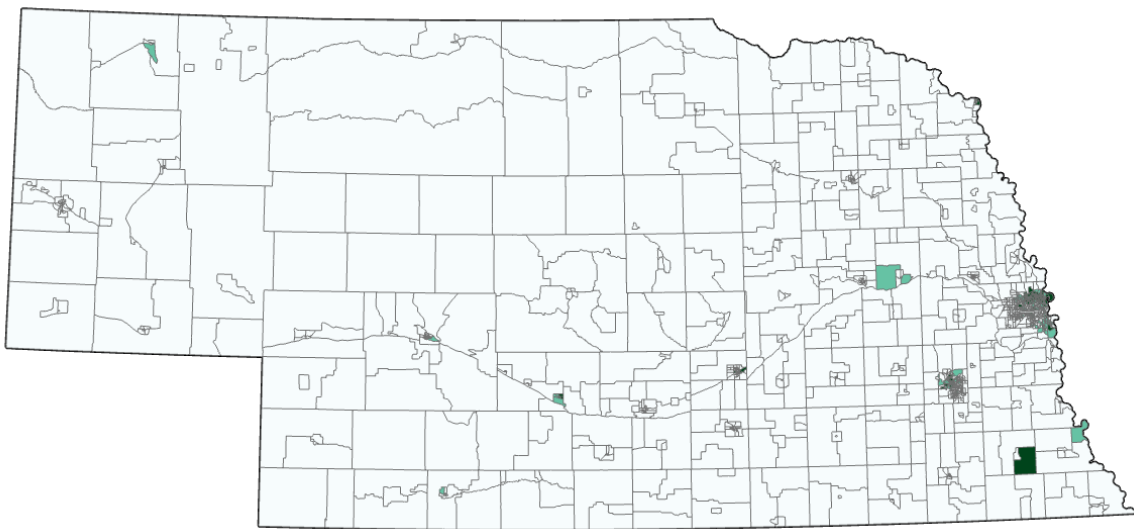
Less than Nebraska
 0-6% Greater than Nebraska
 Meaningfully Greater than Nebraska



Source: U.S. Census Bureau, 2019–2023 American Community Survey 5-Year Estimates

Figure 6. Population of Black or African American Persons by Census Block Group

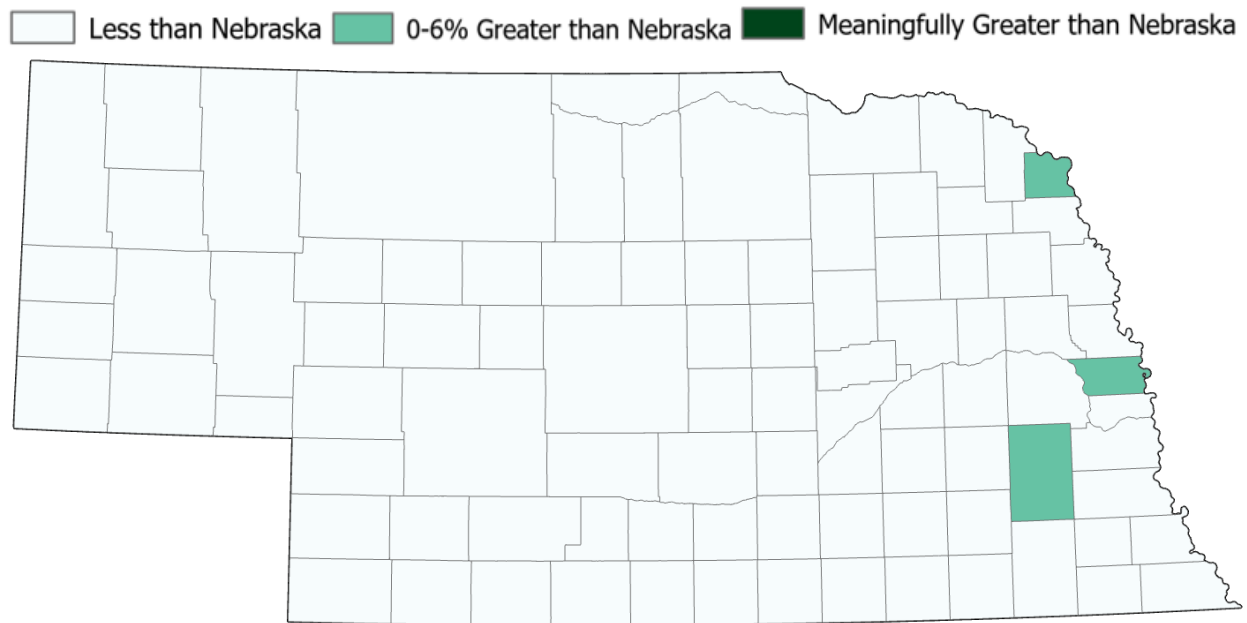
Less than Nebraska
 0-6% Greater than Nebraska
 Meaningfully Greater than Nebraska



Source: U.S. Census Bureau, 2019–2023 American Community Survey 5-Year Estimates

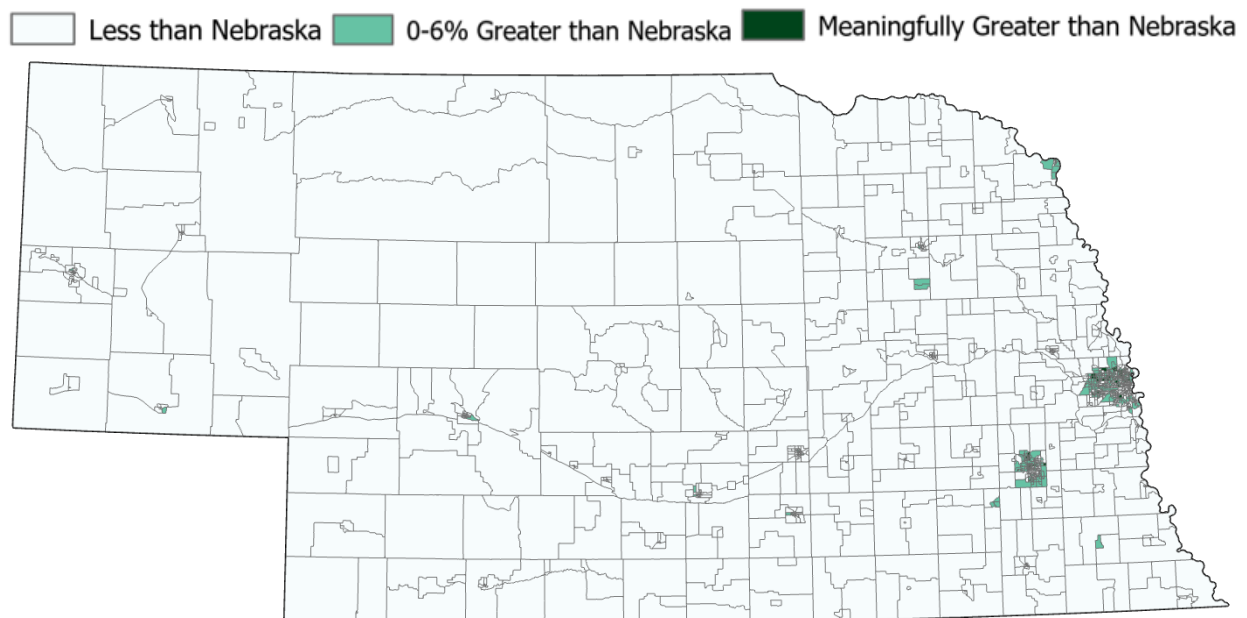
Based on American Community Survey data, approximately 2.7 percent of the state’s population identifies as Asian. Therefore, counties and census block groups would contain meaningfully greater populations of Asian persons if they contain 8.7 percent populations. None of the counties have a meaningfully greater population of Asian persons than Nebraska, which is shown in **Figure 7** for Nebraska counties and **Figure 8** for census block groups.

Figure 7. Population of Asian Persons by County



Source: U.S. Census Bureau, 2019–2023 American Community Survey 5-Year Estimates

Figure 8. Population of Asian Persons by Census Block Group



Source: U.S. Census Bureau, 2019–2023 American Community Survey 5-Year Estimates

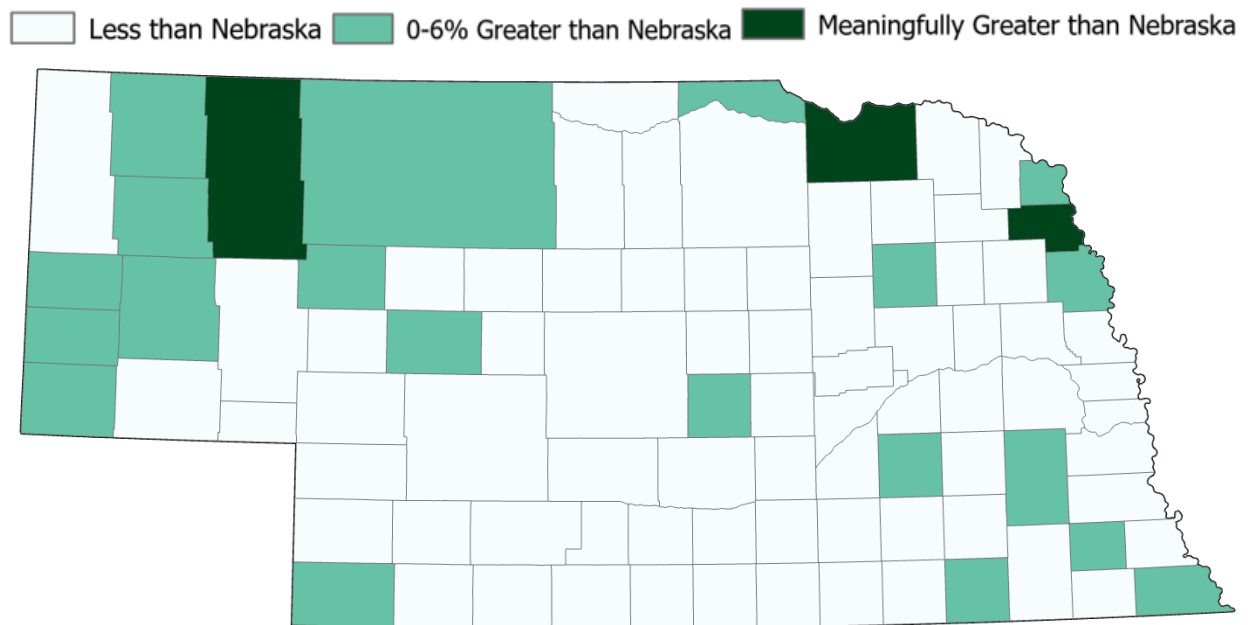
Based on American Community Survey data, approximately 0.8 percent of the state’s population identifies as American Indian and Alaska Native. Therefore, counties and census block groups would contain meaningfully greater populations of American Indian and Alaska Native persons if they contain 6.8 percent populations, which is shown in **Figure 9** for Nebraska counties and **Figure 10** for census block groups and listed in **Table 5**.

Table 5. Counties with a Meaningfully Greater Population of American Indian and Alaska Native Persons

County	Percent American Indian or Alaska Native
Knox	11.2%
Sheridan	10.2%
Thurston	57.5%

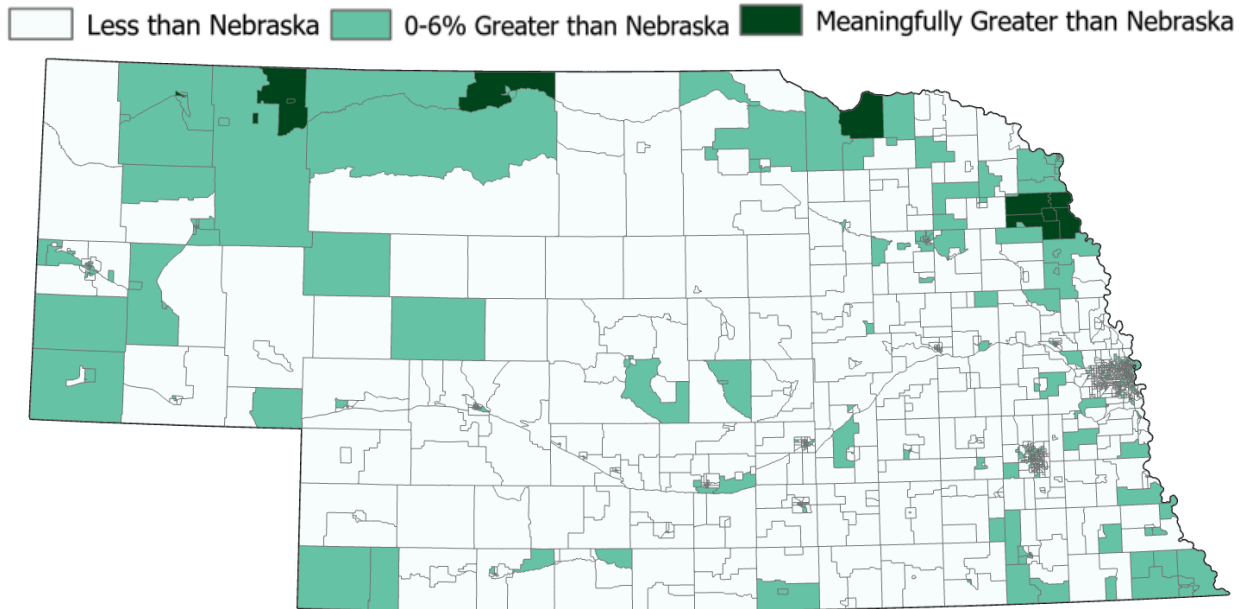
Source: U.S. Census Bureau, 2019–2023 American Community Survey 5-Year Estimates

Figure 9. Population of American Indian and Alaska Native Persons by County



Source: U.S. Census Bureau, 2019–2023 American Community Survey 5-Year Estimates

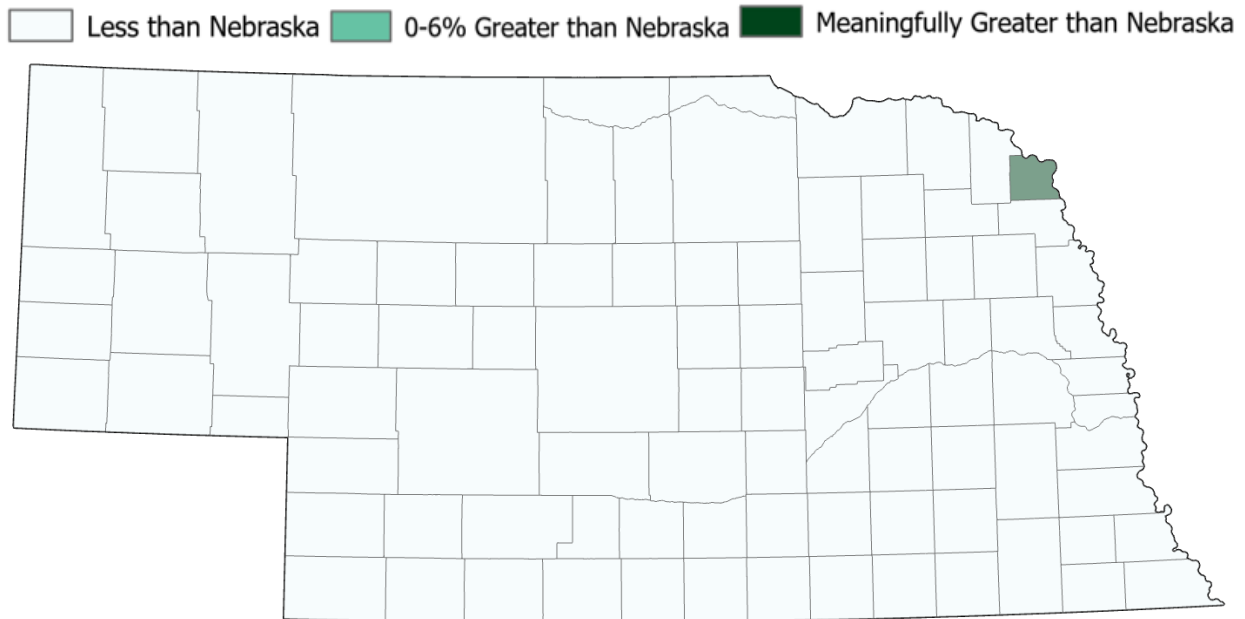
Figure 10. Population of American Indian and Alaska Native Persons by Census Block Group



Source: U.S. Census Bureau, 2019–2023 American Community Survey 5-Year Estimates

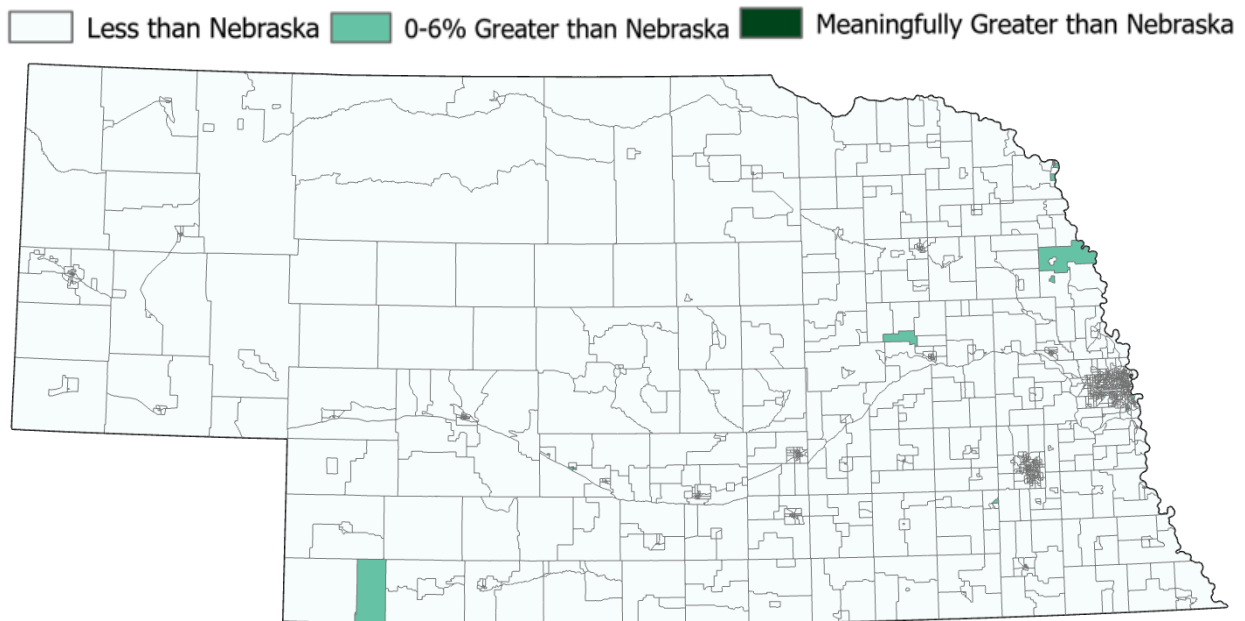
Based on American Community Survey data, approximately 0.1 percent of the state’s population identifies as Hawaiian or Pacific Islander. Therefore, counties and census block groups would contain meaningfully greater populations of Hawaiian or Pacific Islander persons if they contain 6.1 percent populations. None of the counties have a meaningfully greater population of Hawaiian or Pacific Islander persons than Nebraska, which is shown in **Figure 11** for Nebraska counties and **Figure 12** for census block groups.

Figure 11. Population of Hawaiian or Pacific Islander Persons by County



Source: U.S. Census Bureau, 2019–2023 American Community Survey 5-Year Estimates

Figure 12. Population of Hawaiian or Pacific Islander Persons by Census Block Group



Source: U.S. Census Bureau, 2019–2023 American Community Survey 5-Year Estimates

3.2 Distribution of Funds

NDOT is the direct recipient of FTA funding and is responsible for the oversight and distribution of the following FTA funding sources:

- FTA Section 5311 Rural Area Formula Funds (5311)

- FTA Section 5310 Enhance Mobility of Seniors and Individuals with Disabilities Program
- FTA Section 5303 Metropolitan Planning
- FTA Section 5304 Statewide Planning
- FTA Section 5339 Bus and Bus Facilities

These programs are administered in accordance with the Nebraska Transit Statewide Management Plan. Sections 5311, 5310, and 5339 funds are awarded through a competitive application process based on program-specific eligibility criteria. Section 5303 funds are distributed by formula to Nebraska’s four urbanized areas (Grand Island, Lincoln, Omaha, and Sioux City), while Section 5304 funds support statewide transportation planning activities.

Table 6. Geographic Distribution of Fiscal Year 2024–2025 (FY 24–25) FTA Funds

Subrecipient	Fund Type	FY 24–25 Expenditures	County(s) Included in the Service Area	NDOT District(s)
Grand Island	5304	\$ 92,020	Hall	4
Lincoln	5304	\$ 420,542	Lancaster	1
Omaha	5304	\$ 1,038,667	Douglas, Sarpy	2
Sioux City	5304	\$ 28,354	Dakota	3
Avera Creighton Hospital	5311	\$737,000	Knox, Cedar, Antelope, Pierce, Holt, Boyd	3, 8
Avera St. Anthony Hospital	5311	\$563,562	Holt, Boyd, Rock, Brown, Wheeler	8
Blue Rivers AAA	5311	\$1,649,046	Gage, Jefferson, Johnson, Nemaha, Otoe, Pawnee, Richardson, Thayer	1, 4
Blue Valley Community Action Partnership (Fillmore County)	5311	\$323,388	Fillmore	4
Butler County Rural Service	5311	\$249,753	Butler	1
Callaway Hospital Public Transit Services	5311	\$294,998	Custer, Dawson, Buffalo, Sherman, Valley, Loup, Logan, Lincoln	6, 4
Cambridge Memorial Hospital, Inc.	5311	\$705,701	Furnas, Red Willow	7
Cedar County	5311	\$1,557,200	Cedar, Knox	3
Chase County Transit	5311	\$420,950	Chase	7
City of Alliance Public Transit	5311	\$1,039,900	Box Butte	5
Dundy County Bus Transit	5311	\$78,488	Dundy	7
City of Chadron	5311	\$400,461	Dawes	5
City of Columbus	5311	\$520,908	Platte	3

Subrecipient	Fund Type	FY 24–25 Expenditures	County(s) Included in the Service Area	NDOT District(s)
City of Crawford	5311	\$249,835	Dawes, Box Butte, Scotts Bluff	5
City of Fremont Transit	5311	\$642,989	Dodge	2
City of Loup City	5311	\$236,392	Sherman	4
City of McCook	5311	\$362,800	Red Willow	7
City of Neligh (Dial-A-Ride)	5311	\$182,645	Antelope	3
City of North Platte	5311	\$1,926,497	Lincoln	6
City of Oakland	5311	\$149,971	Burt	3
City of Ogallala	5311	\$523,600	Keith	6
City of Plainview	5311	\$49,412	Pierce, Knox, Antelope, Madison	3
City of Schuyler	5311	\$151,140	Colfax	3
City of Sidney	5311	\$1,079,300	Cheyenne	5
City of Tecumseh	5311	\$232,577	Johnson	1
City of Wayne	5311	\$238,161	Wayne	3
Community Action Partnership of Mid-NE (RYDE – Kearney)	5311	\$4,612,261	Buffalo, Adams, Dawson, Franklin, Hamilton, Kearney, Gosper	4, 6, 7
Community Memorial Health Center	5311	\$136,650	Loup, Custer, Garfield	6, 8
Garden County Transportation	5311	\$986,100	Garden	5
Grant County	5311	\$80,140	Grant	6
Hall County Rural Transportation	5311	\$157,145	Hall	4
Harlan County Health System (Public Transportation)	5311	\$238,712	Harlan	7
Hooker County	5311	\$80,500	Hooker	6
Kimball County	5311	\$7,190,357	Banner, Cheyenne, Deuel, Kimball, Morrill, Scotts Bluff	5
Lancaster County	5311	\$330,567	Lancaster	1
Midland AAA	5311	\$1,128,400	Clay, Howard, Merrick, Nuckolls, Webster	4
Morrill County	5311	\$210,000	Morrill	5
NanceTrans	5311	\$488,346	Nance, Merrick, Boone	3, 4
North Fork Area Transit	5311	\$5,893,837	Madison	3

Subrecipient	Fund Type	FY 24–25 Expenditures	County(s) Included in the Service Area	NDOT District(s)
Panhandle Transit Services (Open Plains Transit)	5311	\$1,166,910	Grant, Keith, Cherry, Thomas, Logan, Lincoln, Box Butte, Sheridan, Sioux	6, 8
Perkins County	5311	\$163,150	Perkins	7
Phelps County	5311	\$383,370	Phelps	7
Ponca Tribe	5311	\$2,220,012	Adams, Antelope, Blaine, Boone, Boyd, Brown, Buffalo, Burt, Butler, Cass, Cedar, Cherry, Clay, Colfax, Cuming, Custer, Dakota, Dawson, Dixon, Dodge, Douglas, Fillmore, Franklin, Gage, Garfield, Gosper, Greeley, Hall, Hamilton, Harlan, Holt, Howard, Jefferson, Johnson, Kearney, Keya Paha, Knox, Lancaster, Lincoln, Logan, Loup, Madison, Merrick, Nance, Nemaha, Nuckolls, Otoe, Pawnee, Phelps, Pierce, Platte, Polk, Richardson, Rock, Saline, Sarpy, Saunders, Seward, Sherman, Stanton, Thayer, Thomas, Thurston, Valley, Washington, Wayne, Webster, Wheeler, York	1, 2, 3, 4, 6, 7, 8
Saline County Area Transit	5311	\$502,404	Saline	1
Saunders County	5311	\$265,388	Saunders	1
Scotts Bluff County	5311	\$3,017,167	Scotts Bluff	5
Southeast Nebraska Community Action (SENCA)	5311	\$418,970	Richardson, Pawnee	1
Seward County	5311	\$630,955	Seward	1
Stratton Industrial Commission (Hitch N' Hay)	5311	\$851,411	Hitchcock, Hayes, Frontier, Dundy	7
Valley County Health Systems	5311	\$245,497	Valley, Garfield, Loup, Sherman, Greeley	4, 8
Wolf Memorial Good Samaritan Public Transit (Sanford Health)	5311	\$92,781	Boone	3
York County	5311	\$538,362	York	4

3.3 Disparate Impact Analysis

NDOT conducted a disparate impact analysis of public transit fund distribution to ensure compliance with Title VI of the Civil Rights Act of 1964 and FTA Circular 4702.1B. The analysis evaluates whether the distribution of federal rural transit funds results in disparate impacts on minority populations or disproportionately high and adverse effects on low-income populations.

NDOT uses demographic and geographic data, presented in Table 2 through Table 6, to evaluate potential impacts and ensure the nondiscriminatory distribution of funds. The following section presents the findings of the current disparate impact analysis.

3.3.1 Methodology and Scope of Analysis

This analysis is limited to Section 5311 and 5304 funding. Funding amounts reflect actual expenditures incurred during fiscal year 2024–2025. Programmed, awarded, or anticipated funds are not included. The analysis was conducted at the county level, consistent with the geographic scale at which Section 5311 service areas are defined and administered in Nebraska. All 93 Nebraska counties were included in the evaluation. Service areas were identified using NDOT-approved fiscal year 2024–2025 subrecipient service area descriptions.

NDOT applied the following binary evaluation method:

- Counties were categorized as either served or not served by non-tribal Section 5311-funded transit.
- Overlapping service areas were counted once to avoid duplication.
- Funding distribution was assessed based on actual fiscal year 2024–2025 expenditures associated with providers serving each county.

County-level demographic characteristics were then evaluated to determine whether the distribution of funds resulted in disparate impacts or disproportionately high and adverse effects. The analysis also assumes the impact of receiving 5311 funding is generally comparable, given the consistent use of funds for demand-response transit services throughout the state.

3.3.2 Findings

The analysis found the following:

- Most counties were served by at least one Section 5311-funded transit provider operating in their boundaries during fiscal year 2024–2025. This is due to the service areas offered by the Ponca Tribe, which covers all of central and eastern Nebraska, and Open Plains Transit, which covers western Nebraska in the region known as the Panhandle.
- Several counties served by the Ponca Tribe did not have another Section 5311-funded provider during the fiscal year 2024–2025 analysis period. These counties include Cass, Cuming, Douglas, Polk, Sarpy, Stanton, Thurston, and Washington.
- These counties may receive public transit service through other funding programs, including urbanized area formula funds (Section 5307).
- Of those noted as not having 5311 providers, the following have minority populations present:
 - Douglas County – Served by Metro (section 5307) – Black or African American
 - Dakota County – Served by Sioux City Transit (Section 5307) – Hispanic
 - Sheridan County – Served by Open Plains Transit – American Indian or Alaska Native

3.3.3 Conclusion

Based on the methodology and findings described, NDOT determined that the fiscal year 2024–2025 distribution of NDOT-administered transit funds complies with Title VI requirements and does not result in a disparate impact or disproportionate burden on protected populations:

- Funds were distributed using consistent eligibility criteria applied statewide.
- NDOT's allocation methodology does not result in disparate impacts on minority populations or disproportionately high and adverse effects on low-income populations.
- NDOT will continue to monitor service availability and coordination opportunities in unserved areas.

3.4 Statewide Transportation Planning Process

NDOT conducts statewide transportation planning through its Strategic Planning Division, in coordination with other NDOT divisions and districts, MPOs, transit providers, and federal, state, tribal, and local partners. NDOT prepares and maintains both long-range and short-range transportation plans that establish the policy and investment framework for the Statewide Transportation Improvement Program and support development of the Long-Range Statewide Transportation Plan (LRSTP).

Title VI considerations are incorporated throughout the statewide transportation planning process to ensure meaningful public involvement and nondiscriminatory decision-making. NDOT takes affirmative steps to encourage participation by minority, low-income, elderly, and persons with disabilities, consistent with federal civil rights requirements and NDOT public involvement practices.

The NDOT Transit Office provides information, as requested, to support the development of and updates to the LRSTP. This information may include cost and ridership data, descriptive transit system data, and summaries of service gaps, needs, and barriers. NDOT supports inclusive public involvement by working with transit agencies to ensure language access and accessibility at public meetings. NDOT reviews grant agreements, funding programs, and program selection criteria to ensure that required Title VI and nondiscrimination assurances are included. NDOT coordinates regularly with the Federal Highway Administration (FHWA) and FTA on statewide planning and oversight activities. FHWA and FTA conduct joint reviews of NDOT's planning processes, including oversight of MPOs, to assess compliance with federal planning and civil rights requirements, including Title VI. FHWA and FTA conduct joint reviews of NDOT's planning processes to assess compliance with federal planning and civil rights requirements, including Title VI. Written findings are issued following these reviews.

Demographic characteristics, including minority and low-income populations, are evaluated as part of NDOT's statewide transportation planning efforts, including updates to the LRSTP. Consistent with the LRSTP, NDOT's planning process emphasizes safety, accessibility, system preservation, economic competitiveness, and quality of life while recognizing that transportation needs and travel behavior may vary across population groups. As Nebraska's population and transportation needs evolve, NDOT will continue to integrate demographic and equity considerations into statewide planning, programming, and investment decisions to support equitable access to the transportation system.

3.5 Passing Through FTA Financial Assistance in a Nondiscriminatory Manner

NDOT includes required Title VI, equal employment opportunity, and disadvantaged business enterprise certifications and assurances in its financial assistance agreements with subrecipients, which are signed upon awarding funds. Section 5310 and 5311 subrecipients are required to develop and submit a Title VI Program plan to NDOT for review and approval. Title VI programs must be reviewed and approved by the subrecipient's governing board or appropriate governing entity/official, and proof of this approval (e.g., meeting minutes, board resolution) must be submitted with the approved Title VI program to the Office of Civil Rights and the Transit Program Manager. NDOT does

not discriminate on the basis of race, color, or national origin in its pass-through of financial assistance to FTA recipients.

Current subrecipients and other potential applicants are contacted when the 5310 applications are available. Funding availability is announced through a dedicated list serv, a postcard notification to current and potential applicants, and a statewide press release. Applicants are given an application form, instructions, procedures, and other sample documents. Applications and supporting documentation must be submitted by a deadline determined by NDOT.

The Transit Program Manager follows a rubric when deciding which applications receive funding. The rubric considers eligibility of the applicant, budget to provide proposed services, non-duplication of services, and public involvement. Other factors may be considered, such as need in the proposed service area. These factors ensure the funds are passed through in a nondiscriminatory manner.

3.6 Assisting Subrecipients

The Transit Program Manager contacts potential Section 5311(f) intercity bus applicants annually to inform them when program applications will be accepted. Private, for-profit intercity bus providers are encouraged to apply for funding. In addition, the Transit Program Manager may release a request for proposal soliciting intercity bus providers to apply for funding. Applicants are given an application form, instructions, procedures, and other sample documents.

The Transit Manager maintains and updates a list of potential applicants for Section 5310. Eligible local entities are notified of program availability, and current subrecipients and other potential applicants are contacted when the 5310 application process begins. Applicants are given an application form, instructions, procedures, and other sample documents.

The Transit Manager notifies awarded recipients of the availability of no-cost Title VI program assistance, including assistance with Title VI program and LEP plan formulation, the provision of city and/or county demographic and LEP data, no-cost document translation, and other resources on request.

Appendix A

NDOT Title VI Notice

Title VI Notice to the Public

NDOT operates its programs and services without regard to race, color, or national origin in accordance with Title VI of the Civil Rights Act. Any person who believes they have been aggrieved by an unlawful discriminatory practice under Title VI may file a complaint of discrimination by completing and submitting the agency's Title VI Discrimination Complaint Form. This form can be downloaded from the subrecipient's website at dot.nebraska.gov/public-transit or requested by contacting the Civil Rights Compliance Manager y Transit Manager at the address provided below.

To request more information on the agency's Title VI obligations or to obtain a detailed description of the agency's Title VI discrimination complaint procedures, please visit the agency website or contact the agency using the information provided. A telephone interpreter can be provided to assist persons of limited English proficiency.

Questions about Title VI? Please contact:

¿Preguntas sobre el Título VI? Por favor comuníquese con:



Nebraska Department of Transportation
Office of Civil Rights

Attn: Civil Rights Compliance Manager y
Transit Manager

1500 Nebraska Parkway
P.O. Box 94759
Lincoln, NE 58609-4759



402-479-4544



ndot.civilrights@nebraska.gov



dot.nebraska.gov/public-transit

Notificación al Público sobre el Título VI

NDOT opera sus programas y servicios sin tomar en cuenta raza, color, u origen nacionalidad de conformidad con el Título VI del Acta de Derechos Civiles. Cualquier persona que crea que ha sido agraviada por cualquier práctica discriminatoria ilegal bajo el Título VI puede presentar una queja de discriminación al completar y enviar el Formulario de Queja de Discriminación de Título VI de la agencia. Este formulario se puede descargar del sitio web del subreceptor en dot.nebraska.gov/public-transit o solicitarse comunicándose con Civil Rights Compliance Manager y Transit Manager a la dirección proporcionada arriba.

Para solicitar más información sobre las obligaciones de Título VI de la agencia o para obtener una descripción detallada del procedimiento de Quejas de Discriminación del Título VI, favor de visitar la pagina de la agencia o contactar la agencia a la dirección proporcionada arriba. Un interprete telefónico está disponible para asistir personas de dominio de Inglés limitado.



NEBRASKA
Good Life. Great Journey.
DEPARTMENT OF TRANSPORTATION

Appendix B

NDOT Title VI Discrimination Complaint Form

Title VI Discrimination Complaint Form

Please complete, sign, and return this form to the address listed at the bottom of the page.

NEBRASKA

Good Life. Great Journey.

DEPARTMENT OF TRANSPORTATION

Complainant name							
Address			City		State		Zip code
Phone			Email				

Person discriminated against, if different from complainant							
Address			City		State		Zip code
Phone			Email				

Type of discrimination:	<input type="checkbox"/> Race/Color	<input type="checkbox"/> Age	<input type="checkbox"/> Sex	<input type="checkbox"/> National origin	<input type="checkbox"/> Disability	<input type="checkbox"/> Other	
Date of incident							

Please provide the date and location of the alleged discriminatory actions, including both the earliest and most recent incidents.

Please provide a brief and clear account of the discriminatory incident, including details of what happened, who was involved and any differential treatment compared to others. You may also include supporting materials for your complaint. Please attach any additional written or supporting information that you believe is relevant to this complaint.

Please provide the names and contact information of persons, including witnesses or others, whom we may contact for additional information to investigate your complaint.

To process your complaint, please ensure it is signed and dated below.	
Signature	
Date	



NDOT Office of Civil Rights
1500 Nebraska Parkway
P.O. Box 94759
Lincoln, NE 68509-4759



ndot.civilrights@nebraska.gov

OFFICE USE ONLY			
Received by		Date received	

Título VI Formulario de queja por discriminación **NEBRASKA**

Good Life. Great Journey.
DEPARTMENT OF TRANSPORTATION

Complete, firme y envíe este formulario a la dirección que aparece en la parte inferior de la página.

Nombre del denunciante							
Dirección		Ciudad		Estado		Código postal	
Teléfono		Correo electrónico					

Víctima de la discriminación, si es diferente del denunciante							
Dirección		Ciudad		Estado		Código postal	
Teléfono		Correo electrónico					


Tipo de discriminación:	<input type="checkbox"/> Raza/Color	<input type="checkbox"/> Edad	<input type="checkbox"/> Sexo	<input type="checkbox"/> Nación de origen	<input type="checkbox"/> Discapacidad	<input type="checkbox"/> Otra opción
Fecha del incidente						


Proporcione la fecha y el lugar de las supuestas acciones discriminatorias, incluidos tanto los incidentes más tempranos como los más recientes.

Proporcione un informe breve y claro del incidente discriminatorio, incluidos los detalles de lo que sucedió, quién estuvo involucrado y cualquier tratamiento diferencial en comparación con otros. También puede incluir materiales de respaldo para su queja. Adjunte cualquier información adicional por escrito o de apoyo que considere relevante para esta queja.

Proporcione los nombres y la información de contacto de las personas, incluidos los testigos u otras personas, con quienes podamos comunicarnos para obtener información adicional para investigar su queja.

Para procesar su queja, asegúrese de que esté firmada y fechada a continuación.	
Firma	
Fecha	

 NDOT Office of Civil Rights
1500 Nebraska Parkway
P.O. Box 94759
Lincoln, NE 68509-4759

 ndot.civilrights@nebraska.gov