

Metro Transit Title VI Program Update

Metro Transit's 2022 Title VI Program covers reporting years 2020-2022 prior to the Transit Network Redesign.

What is a Title VI Program?

- Title VI is a provision in the Civil Rights Act of 1964 that prohibits discrimination on “the grounds of race, color, or national origin” for any program receiving Federal funding. As a recipient of Federal funds from the Federal Transit Administration (FTA), Metro Transit is required to maintain compliance with the provisions of Title VI.
- The FTA sets the regulatory requirements for transit providers under Title VI in FTA Circular 4702.1B and requires agencies to submit a program providing evidence of compliance for the past three years.
- Metro Transit's last Title VI program was submitted in 2020 and covered reporting years 2017-2019.

What is included in the 2023 Title VI Program Update?

- All regulatory requirements provided in FTA Circular 4702.1B are included in the 2022 Title VI Program Update, including but not limited to:
 - Identification of Limited English Speaking (LEP) populations with Metro Transit's service area.
 - Adoption of a Language Access Plan for LEP populations.
 - Adoption of policies establishing thresholds for major service changes, disparate impacts to minority populations, and disproportionate burdens to low-income populations.
 - Results of Title VI Equity Analyses for major service changes in the reporting period.

Future Title VI Considerations

- Mandarin was identified in the 2022 Title VI program update as a “Safe Harbor Language”, which means Metro will now translate vital documents in Mandarin. Other Safe Harbor Languages in our service area include Spanish and Hmong.
- Potential future policy changes to bring Metro Transit in line with industry standards – presented at a future date (TBD).



2022 Title VI Program Update

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Introduction

Section 601 of Title VI of the Civil Rights Act of 1964 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 subject to discrimination under any program or activity receiving federal financial assistance.” FTA requires that all direct and primary recipients document their compliance with the Federal Transit Administration’s (FTA) Title VI regulations in FTA Circular 4702.1B. The Title VI Program must be approved by the recipient’s board of directors or officials responsible for policy decisions prior to submission to the FTA. Attachment A includes a copy of the Madison Transportation Commission’s resolution evidencing approval of this program submission.

Section I - General Requirements

FTA Circular 4702.1B sets general requirements under Title VI for all recipients of FTA funding. These requirements are addressed in this section and include:

- Preparation and submission of a Title VI Program
- Notification to beneficiaries of Title VI protections
- Development of a Title VI complaint form and procedures
- Record of transit-related Title VI investigations, complaints, and lawsuits
- Preparation of a public participation plan
- Prepare a plan for providing language assistance to persons with limited English proficiency
- Prepare an equity analysis for facilities constructed since the previous program update
- Provide a table depicting the racial breakdown of non-elected board members
- Monitor and provide assistance to subrecipients

Title VI Notice to the Public

Metro Transit provides notice of Title VI protections that includes the following statement along with contact information for the Metro Transit and the City of Madison's Department of Civil Rights. This notice is shared with the public through a multiple means, including postage on all Metro vehicles, printed ride guides, within Metro's administrative offices, and on every page of the Metro website (link provided in footer of webpage). The notice is printed in all languages that meet the Safe Harbor Requirement, including Spanish and Hmong in Metro's service area. A copy of the posted notice is available in Appendix B.

Non-Discrimination Notice - See Appendix B for Copy of Posted Notice

The City of Madison and Metro Transit Assure that no person shall on the grounds of race, color, or national origin be excluded from participation in, be denied the benefits of, or be otherwise subjected to discrimination under any program or activity.

For more information or to file a complaint, contact:

Metro Transit

(608) 266-4904

mymetrobus@cityofmadison.com

Department of Civil Rights

(608) 266-4910

dcr@cityofmadison.com

Title VI Complaint Procedures

Metro provides several methods for filing a Title VI complaint. These include filing an official complaint form available on Metro's website, filing an online complaint on Metro's website, and filing a complaint with the City of Madison's Department of Civil Rights. Guidance on how to file a complaint is included in Metro's Title VI Notice and is posted in the same locations. A copy of the official complaint form is included in Appendix C.

All complaints to Metro Transit are recorded into a feedback database. This includes all phone call and email complaints made to its customer service center. A Metro general operations supervisor as well as Metro's customer service manager review entries into this database daily and flag/follow up on any feedback that involves the appearance of a violation of this policy.

Title VI Investigations, Complaints & Lawsuits

Metro Transit maintains a record of all Title VI complaints, investigations, and lawsuits filed since the last submission (October 2020). Since the last Title VI Program update, there have been 16 complaints, investigations, or lawsuits. A list of these complaints is provided in Appendix D.

Public Participation Plan

The following Public Participation Plan reflects Metro Transit's goal of providing the public with timely, diverse and continuous engagement opportunities to be involved in Metro's planning and decision processes. During the COVID-19 pandemic, the City of Madison and Metro Transit saw a move to virtual public meetings. Ensuring language access as well as access to those without access to technology was always top-of-mind and continues to be a work in progress.

Goal

Through the means of effective and diverse communication, Metro wants to achieve continuous, meaningful and equitable public participation, ensuring that decisions affecting service, fares and policies truly reflect community wishes and needs.

Effective Strategies

1. Engage a variety of socioeconomic, ethnic, and cultural perspectives, including minority, low income and Limited English Proficiency (LEP) populations.
2. Provide materials and comment opportunities that meet the cultural and language preference of all individuals and communities within our approximate 126 square mile service area.

3. Work with elected representatives, community-based organizations, and diverse media outlets to help build awareness and encourage participation.
4. Provide comment opportunities and feedback on multiple platforms, at various times and locations to ensure all voices are being heard and considered equally.
5. Review census data and future Metro survey data annually to properly distinguish areas of low income, LEP and minority populations in an evolving population. Additionally, analyze census/survey data in accordance with Metro service maps and schedules.
6. Place marketing and public information materials at variety of convenient and easily accessible locations, such as at appropriate bus stops, on Metro and City of Madison website, targeted media, mailed newsletters, social media, etc...
7. Continue to use bilingual marketing specialist to ensure Metro's website is translated and available in Spanish. This position provides in-person translation and not auto-generated.
8. During Covid-19, worked with City of Madison's Civil Rights Department to provide language assistance as able to public meetings. This was a work in progress. During some Zoom meetings, live consecutive interpretation was provided in multiple languages including Spanish, Hmong and Chinese as well as open captioning. Some meetings, consecutive translation was provided. Resources are challenging to provide this for every meeting, but a language assistance solution is always identified upon customer request.
9. In late 2022, Metro added an outreach specialist to its marketing team. This position's main focus is to work with groups, agencies, and event organizers to provide in-person rider information and training. Though the person in this position is not bilingual, this person works with agencies that serve those with multiple language needs to provide translated information as well as bring out interpreters to trainings and events.

Public Engagement: Oversight Committees

Metro is dedicated to providing the public with timely, diverse and continuous engagement opportunities to be involved in Metro's planning and decision processes.

Metro understands that in order to create a comprehensive and successful public involvement process, Metro must adhere to, abide by, and/or consider all rules, regulations, suggestions and comments brought forth by oversight committees. All committees listed and explained below share the same goal: to ensure equal and fair public participation among all served populations, including ADA, LEP, minority and low-income populations.

1. City of Madison Transportation Policy & Planning Board – dissolved in 202

2. City of Madison Transportation Commission – established 7/2018

The Transportation Commission shall decide the transportation issues listed below in a manner that is consistent with the transportation policies and plans adopted by the Common Council: (a) Transit. 1. Transit service standards; 2. Transit fares; 3. Transit route additions, extensions or contractions; 4. Transit changes in schedules and hours of service; 5. Rules necessary to ensure safety for bus passengers; 6. Regional transit contracts (services and pass programs); 7. Bus routes and stops; 8. Charter service, taxis, limousines, courtesy cars, hotel buses, jitney services hire-and-drive service, ride-sharing, car-sharing, transportation network companies, subscription bus service, park and ride facilities, and any other issues pertaining to the operation of the City's transit and services; 9. Transit for people with disabilities; and 10. Other items referred by the Common Council, Transportation Policy and Planning Board, or Director of Transportation.

(b) Parking. 1. Off-street parking rates; 2. Provide recommendations to the Common Council regarding on-street parking rates. 3. Rules necessary to ensure safe and proper operation of parking facilities; 4. Revenue collection technology and systems; and 5. Other items referred by the Common Council, Transportation Policy and Planning Board, or Director of Transportation.

(c) Pedestrian, Bicycle, and Motor Vehicle. 1. Pedestrian and bicycle safety, enforcement, and facility maintenance programs; 2. School crossings; 3. Safety programs and projects; 4. Traffic signals; 5. Crossing guard assignments; 6. Traffic calming; 7. Provide recommendations to the Board of Public Works regarding right-of-way use and geometric design on arterial and collector street projects; 8. Development Review; and 9. Other items referred by the Common Council, Transportation Policy and Planning Board, or Director of Transportation.

3. Neighborhood Resource Teams (NRT)

Neighborhood Resource Teams (NRT) are an innovative City-wide effort to improve the delivery of services and connect City government agencies, including Metro Transit, directly to Madison neighborhoods.

NRTs keep Metro informed about major trends and issues as they develop within neighborhoods, which enables Metro to better coordinate and adapt our services to meet the needs of each specific area, including those with LEP, low income and minority populations. Metro works closely with the City of Madison's Neighborhood Resource Coordinator to ensure all voices are being heard and addressed equally.

Metro is currently a part of eight Neighborhood Resource Teams that meet regularly at destinations within the designated neighborhood. Teams are comprised of City agency representatives, citizens, coordinators and neighborhood leaders.

Communication Formats & Techniques

1. Public Hearings/ Meetings

Metro posts notice of a public hearing (30) calendar days prior to the hearing. During the COVID-19 pandemic, notices were not placed on paper flyer on buses due to our disinfection fogging processes. Posters were placed at high volume stops and transfer points and on digital screens at transfer points and select stops. During the COVID-19 pandemic, Metro relied heavily on email and text messages to subscription groups, social media, and other electronic means to notify passengers

Transportation Commission meetings are available and open for public participation. Regularly scheduled meetings are held on Wednesdays at 5 p.m. in the Madison Municipal Building or another centrally located government building that meets accessibility needs, while public hearings are typically scheduled to start at 6 p.m. in order to be more convenient for the general public to attend and participate.

All notices encourage those that cannot attend to fill out a feedback form, write a letter, send an email, or call Metro.

2. Polls/ Surveys

Depending on the subject matter, Metro encourages feedback in the form of polls and surveys from all members of the community, as we understand that our decisions often affect more than just those who ride. Surveys are disseminated online, on all fixed-route vehicles, in-person (at stops, transfer points and on-vehicle) and are sent via postal mail to those living near the affected area.

In 2019, Metro conducted mini-touch point surveys, or intercepts, regarding our future Bus Rapid Transit service and whether or not it should operate and serve stops on our Capitol Square. The decision was highly politicized and business-driven. To ensure low income and minority voices were being heard, Metro staff went out to the Capitol Square area and asked riders questions regarding how they use the service, and if providing direct transportation to the Capitol was important to them.

Unfortunately, this effort was part of a city staff training program that didn't continue as a result of Covid-19. Though it wasn't completed and we don't have official results, it did generate internal conversations and helped shape our efforts when launching a complete redesign of our routes in preparation of our soon-to-be implemented Bus Rapid Transit system.

3. News Releases

News Releases are written and distributed by a City of Madison electronic dissemination system to local media outlets including those with predominately minority audiences. Public hearing news releases are sent approximately (14) calendar days prior to the hearing. All news releases are translated and posted in Spanish. Other alternative language and formats are available upon request.

4. *Rider Update Emails*

More than 2,500 riders are subscribed to our General Rider Updates e-newsletter. This is a weekly newsletter containing service updates/announcements, public hearing/ meeting announcements (links in English, Spanish and Hmong), Metro news, rider reminders, detours, etc. The e-newsletter is available to anyone that signs up online.

Riders can also subscribe to more tailored newsletter groups to receive targeted updates, including Aviso al Pasajero (general service updates in Spanish), Employment Alerts, Paratransit ADA Alerts, Supplemental School Service Alerts, specific route alerts and more.

5. *Text Alerts*

More than 6,000 riders are subscribed to our Rider Alert text messaging service. Metro sends out text reminders and updates containing service updates, employment opportunities, public hearing/meeting announcements, weather and detour updates, etc. The text messaging service is available to anyone that signs up online through the City of Madison.

Riders can subscribe to tailored text groups to receive targeted updates, including general information, winter weather notifications, detour notices, and Aviso al Pasajero (general service updates in Spanish).

6. *Social Media*

Metro Transit has an active English Twitter account (@mymetrobus) with around 4,000 followers that participate in various conversations regarding service updates, live delays, public announcements/meetings, detour/weather updates, etc. Metro also has a Spanish Twitter account (@mymetrobus_es), which has 151 followers. Although a much smaller audience, Metro continues to post exclusively in Spanish to engage and inform the Latinx and Spanish-speaking communities.

Metro Transit's Facebook page (/mymetrobus) has 1,300 likes and 1,600 followers. Staff post at least four times a week with Metro updates, along with other City of Madison updates including information on civil rights, employment, voting, citywide events, etc...

The Metro Instagram account has 1,029 active followers that receive periodic updates. Metro plans to focus on growing its Instagram following over the next three years.

Metro also encourages all of its social media followers to fill out feedback forms when tweeting/posting about complaints, compliments or suggestions. A Bilingual (English/Spanish) Metro marketing specialist is responsible for checking account activity hourly to monitor public perceptions, opinions and feedback. Staff also have an open, active dialogue with customers over social media, if needed.

7. Digital Displays

Large digital displays are located at each transfer point, the Capitol Square, and Dane County Airport. Metro also promotes a link which allows any member of the general public to display live-arrival information on any screen that supports a browser display and has an internet connection. Displays show real-time bus arrival times, as well as important rider messages, like information on public hearings, reduced service announcements or detours.

8. Printed Newsletters

Metro produces two Paratransit ADA newsletters per year. Newsletters are sent via postal mail and go to all ADA paratransit riders. If paratransit individuals have marked LEP status on their application, we provide the newsletter in their preferred language or alternative format. All past newsletters are available online as well.

9. Website

Metro's website is available in both English and completely translated into Spanish. In 2022, recorded more than 267,000 visitors to its site with more than 1.1 million pages viewed.

Metro's online feedback form is available at mymetrobus.com/feedback or in the drop-down menu on the homepage. Supervisors and staff are required to sort and respond to all complaints, compliments and suggestions on a daily basis. In the past year, the online feedback form was visited around 3,600 times.

The homepage also features the latest news and highlights. All public participation opportunities are posted in the "Rider Updates" section at least (30) calendar days prior to the event, as previously stated.

Visitors can access the Civil Rights/ Title VI information on all every page throughout the site in both English and Spanish. The Civil Rights/ Title VI English page received around 289 views last year.

10. Interior and Exterior Bus Advertising

All fixed-route buses include Civil Rights/ Title VI Notice to the Public interior cards in English, Spanish and Hmong. Metro also posts important updates and notices on bus exterior advertising.

Civil Rights/ Title VI Notices are at the Metro Administration Office reception window where customers can purchase tickets, retrieve lost and found, or receive any customer service needed.

11. Bus Flyers

Bus flyers regarding important fare, service and policy announcements are posted in the interior of the bus in English and Spanish. Riders are encouraged to take a copy with them. Per Metro's policy, flyers regarding public participation opportunities will be installed on all fixed-route and paratransit vehicles at least (10) days prior to the event.

12. Bus Stops

Flyers are posted at stops that are affected by a (or proposed to be) service or policy update - i.e. important detours, service reductions, stop eliminations, etc.

13. Targeted Mailings

Targeted mailings are sent for location-based feedback/communication. If affected locations are in a predominantly minority area, mailings may be provided in alternate languages or methods.

14. Other Media Outlets

Metro utilizes print, radio and online paid advertisements including those with predominately minority audiences (La Movida Radio). Per Metro policy, paid advertisements will appear in local media approximately (7) calendar days prior to a public input event.

Public Participation and Engagement for Major Service Change

As a standard practice, Metro holds public hearings for all fixed route and paratransit service and policy changes, even those not considered as having a major impact.

Several public hearings and community meetings were held to during the reporting period to provide information and solicit feedback on Metro's system redesign and upcoming Bus Rapid Transit System.

Metro promoted public hearings as described earlier in this report including posting posters legal notices and paid ads in local newspapers, targeted mailings, posting on Metro's website, series of text and email alerts as well as paid posts on social media. Information was also relayed to Neighborhood Resource Teams, and City of Madison alders for dissemination at the neighborhood level. Metro partnered with organizers to promote individual community meetings using a combination of methods already described. Resources were available in multiple language formats including Spanish, Hmong, Mandarin and Braille.

Customers are encouraged in these notices to provide their input at the public hearing, online, in writing via mail or email, or over the phone to Metro's customer service center. Staff and the Madison Transportation Commission reviewed all comments.

After the participation and engagement processes were completed, Metro staff reviewed feedback and on occasion removed proposals from consideration based on negative comments or found disproportionate burdens.

Evaluation and Update of Public Participation Plan

Metro Transit monitors and tracks all participation methods, as well as, continuously evaluates the ever-evolving population, and makes plan adjustments as necessary. Metro continues to search for new, effective communication techniques and formats to increase public awareness, accessibility and equality in all planning and decision processes.

No major updates have been made since the last plan of 2017. However, with the City of Madison shifted to more virtual public meetings, language and access by those that might have technology limitations is being monitored and evaluated for potential improvements. As a result, Metro's public participation plan will be updated from time to time. Updates will be made public and are subject to comment and critique.

Dissemination of Public Participation Plan

When changes are made draft versions will be posted on its website at mymetrobus.com for public comment. Printed versions will be made available at the Metro Administration Office or can be mailed to individual customers upon request. Customers can request a printed version by calling (608) 266-4466 or emailing mymetrobus@cityofmadison.com.

Notices to the public that the plan will be available for review will be posted online at mymetrobus.com, on bus flyers, through email and text alerts, social media and posters at Metro's reception window. Notices will include information on how to leave feedback including use of Metro's online feedback form or how to submit by phone to Metro's customer service center or in writing by email or mail to Metro's administrative offices.

Language Assistance Plan

FTA Circular 4702.1B requires transit agencies to create a plan for providing language assistance to populations within their service area than have Limited English Proficiency (LEP). This includes the completion of a four-factor analysis that identifies LEP populations, how often they interact with Metro services, the nature and importance of the service being provided, and the available resources the agency has to provide language assistance. Metro's four-factor analysis and language assistance plan are described in the following sections.

Four Factor Analysis

Factor 1: The number or proportion of LEP persons eligible in the Metro Transit service area who may be served or likely to encounter a Metro Program, activity, or service.

A four-factor analysis identifies LEP individuals within Metro’s service area who may need language assistance. Based on U.S. Census Bureau 2017 – 2021 American Community Survey (ACS) five-year estimates, the Metro service area is home to approximately 366,861 people, 15,814 of which identify as LEP individuals. Spanish is the most commonly spoken language in the Metro service area other than English, comprising 1.4% (6,749) of the total population. Table 1 lists the LEP populations in Metro Transit’s service area according to the language classifications listed in ACS table C16001.

The Safe Harbor Provision, adopted by the Department of Transportation from the Department of Justice, states that “if a recipient provides written translation of vital documents for each eligible LEP language group that constitutes five percent (5%) or 1,000 persons, whichever is less, of the total population of persons eligible to be served or likely to be affected or encountered, then such action will be considered strong evidence of compliance with the recipient’s written translation obligations.” Metro evaluated the languages within the ACS 2017-2021 five year estimates for table C16001. Based on this analysis, Metro identified two languages that meet the Safe Harbor Provision – Spanish and Chinese.

Metro currently provides written translation of vital documents in Spanish and Hmong. Hmong was identified as a Safe Harbor language in Metro’s 2017-2020 Title VI Program based on U.S. Census data and Metro 2015 on-board survey. Chinese did not meet the Safe Harbor Provision in the 2017-2020 update. Metro plans to update its vital document translation to include Chinese, which will be included in its 2023-2025 Title VI Program update.

Demographic Ridership and Travel Patterns

Metro periodically conducts on-board surveys to better understand the populations it serves. The last on-board survey was conducted in 2016. Metro plans on conducting another on-board survey in 2024, the results of which will be included in Metro’s 2023-2025 Title VI Program update.

Table 1 – English Language Proficiency in Metro Service Area

Language	Population	Percent Population	Population with LEP	Percent Population with LEP	Percent Population with LEP within Language
English	319,605	87.12%	-	-	-
Spanish	17,827	4.86%	6,749	1.84%	37.86%
French, Haitian, Cajun	1,153	0.31%	207	0.06%	17.96%
German	1,408	0.38%	163	0.04%	11.57%
Russian	1,760	0.48%	377	0.10%	21.42%
Chinese	6,199	1.69%	2,660	0.73%	42.91%
Korean	922	0.25%	461	0.13%	50.01%
Vietnamese	1,048	0.29%	335	0.09%	31.97%
Tagalog	307	0.08%	83	0.02%	27.04%
Arabic	968	0.26%	411	0.11%	42.45%
Other European Languages	6,970	1.90%	1,753	0.48%	25.14%
Other Asian & Pacific Islander Languages	6,711	1.83%	2,049	0.56%	30.53%
Other	1,982	0.54%	566	0.15%	28.56%
Total	366,861	100.00%	15,814	4.31%	-

Factor 2: The frequency with which LEP persons came in contact with our transit programs, activities, or services.

Call Center Requests for Interpretation

Metro Transit rarely receives data that indicates which LEP persons come in contact with its transit service. Metro notes in its materials that interpreter services are available for all calls to its call center. Metro receives nearly 9,100 calls monthly to its call center. Metro estimates that approximately 3,000 calls per year request interpreter services.

Metro has an official bilingual marketing specialist on staff. This person maintains a Spanish version of Metro's website and provides in-house translation for flyers, posters and other printed materials. This person also manages a Spanish only Twitter account and sends translated text message notices to a Spanish subscription group.

Metro also strives to hire Spanish-speaking customer service reps. Metro has one Spanish speaker on staff at this point. Our Spanish-speaking employees assist LEP individuals via phone calls, emails and in-person customer service assistance at our Administration Office reception desk, and outreach events. Metro does not track those interactions.

Printed Document Translation Requests / Public Meeting Interpretation Services

Translated printed information is available through the mail upon request to Metro's call center. Metro's major materials, such as documents related to our service redesign, are created in Spanish, Hmong and Chinese. We don't receive many requests for translated printed materials, but utilizing City of Madison contracted services, Metro translates any printed document into any language upon request including Braille.

Metro's paratransit biannual newsletter is also translated into Spanish and Hmong and mailed to riders that have indicated LEP status on their application materials. The newsletter is also sent in Braille those that are noted as having vision issues.

In the latter part of 2022, Metro started working with City of Madison IT, to provide interpreter service on virtual Zoom meetings. During the final approval meetings for Metro's redesigned service, staff tried different methods of providing interpretation. During one meeting, consecutive interpretation was provided in Spanish. In the following meeting, phone lines were set up with interpreters providing simultaneous interpretation in Spanish and Hmong. In our final virtual public meeting, Metro and the City IT provided simultaneous interpretation in Spanish, Hmong and Chinese.

Staff are only aware of 1 person utilizing these interpreter services for these 2022 meetings, but due to the level of service changes, it was deemed important to set these up to ensure language access. That being said, providing interpretation services at Zoom meetings continues to be a work in progress, figuring out how to best do this is a priority for Metro, and the process will continue to be improved.

Website Information

Metro’s full website is available in Spanish. Online trip planning and bus tracking data are also available in Google Maps, which is available in multiple language formats.

Factor 3: The nature and importance of programs, activities, or service provided to the LEP population.

Metro provides service to residential neighborhoods, major employment centers, schools, universities, parks, and shopping venues.

Staff fully understand the importance of transit serving the LEP population so that individuals have the ability to use transit service to get to jobs, schools, stores, universities, as well as have access to after-hour school activities and other recreational activities. This importance is always top of mind when designing and implementing any potential major service or fare change policy, especially those that might have a direct effect on an LEP population.

As mentioned earlier, Metro staff sit on many Neighborhood Resource Teams (NRT) throughout the Madison area. A driving force of the NRTs is to ensure equal access to programs, activities and services in all communities. Metro often works with LEP community organizations, like Centro Hispano and Hmong Madison in conjunction with the NRTs to make sure there is equitable access for LEP communities.

Factor 4: The resources available to our transit system and the overall cost to provide language assistance.

Metro has appropriate vendors in place to provide language assistance upon request. As described earlier, requests for this service has increased. However, Metro is supported by the City of Madison. Metro and the City of Madison are both dedicated to continue this service. Costs are within budget and have not been an issue.

Language Assistance Measures and Tactics

Metro Transit currently offers a number of language assistance services including:

Oral Translations

- LEP customers who call the Customer Service call center have direct access to Spanish-speaking staff on-site and full interpreter services.
- Metro’s website is completely screen-reader friendly.
- Metro Transit and the City of Madison provide free interpreter service for all public hearings and meetings upon request. All hearing and meeting announcements contain the following statement:

“If you need an interpreter, translator, materials in alternate formats or other accommodations to access this service, activity or program, please contact Metro Transit at (608) 266-4904 at least three business days prior to the meeting.”

- As a City of Madison agency, Metro Transit has full access to the City of Madison’s Civil Rights Department LEP resources and guideline documents, which includes, but is not limited to:
 - Document Interpreter/ Translations services (including Braille)
 - Interpreter/ Translations services for events, meetings, etc. (including American Sign Language)
 - Front Desk Communication Document – includes commonly used phrases in 21 different languages and a step-by-step instructional guide
 - Printable PDF Language Chart (“I speak” cards)

Resources are available upon request at the City of Madison Civil Rights Office, Metro Transit Administrative Office, or online on the City’s Intranet.

Written Translations

- Materials important for accessing and using Metro’s services are translated into Spanish. This includes important service fliers (i.e. changes in fare items or service), public hearing announcements and Ride Guide information. Translated materials are available online and by request. Some materials, such as supplemental school service information, is also translated into Hmong.
- Full website can be viewed in Spanish.
- Metro’s Title VI/Civil Rights Notice to Public and other policy information is available in Spanish and Hmong on our website as well as posted inside buses.
- Google Map trip planning information is available on Metro’s website, which is currently available in nearly 70 languages.

Public Outreach

Metro will translate and furnish any informational material upon request. A notice of this policy is available on Page 1 of the Ride Guide), on the inside of all of our buses and online.

Metro customer service staff are also trained to identify the need for additional translated materials.

Metro Staff Training

Staff that are most likely to come in contact with LEP persons. Metro's language assistance information is reviewed on an annual basis with Metro's customer service representatives and front office staff.

Policies and procedures reviewed include:

- Title VI process and policy
- LEP plan
- Metro Title VI responsibilities
- Language assistance services offered
- Resources, guidelines & documents available

Staff are also trained on these subjects during New Employee Orientation, Customer Service Training and Driver Training.

Monitoring, Evaluating, and Updating the Plan

Metro Transit will review the Language Assistance Plan, Public Participation Plan and related Title VI documents annually. As new census data is released, Metro Transit staff will assess the current policies, methods and communication techniques to ensure meaningful access to benefits, services, information and other important programs/activities for LEP individuals.

Assessment will include:

- An evaluation of effectiveness (I.e. reviewing public comments/critiques, reviewing number of requests for language assistance materials, webpage hits, etc.)
- Sufficiency of staff training
- Detailed evaluation of updated LEP population data and how it affects the Four Factor Analysis
- Reviewing current sources of assistance (language assistance vendors, budget allotment, etc.)
- New opportunities for LEP communication

This language proficiency plan is subject to minor changes from time to time. Updates will be made public and are subject to comment and critique.

Dissemination of the Language Assistance Plan

This Language Assistance Plan will be available online at mymetrobus.com, along with all other Title VI documents.

This plan will also be available upon request in desired language to any person(s) requesting the document via phone, in-person, postal mail, e-mail or feedback request.

Contact Information

Questions, comments and requests can be filled out online at mymetrobus.com/feedback or sent to:

Name: Jessy Stammer
Title: Customer Service Manager
Address: 1245 E. Washington Ave. Suite 201, Madison, WI 53703
Telephone: 608-266-4466
E-mail: jstammer@cityofmadison.com

Monitoring Subrecipient Compliance with Title VI

Metro works with the City of Madison’s Department of Civil Rights (DCR) to monitor subrecipient compliance with Title VI requirements. Metro provides a Title VI template to assist subrecipients in completing their Title VI plan (template attached in Appendix E). Metro then collects Title VI plans from subrecipients, and sends them to DCR to review. DCR reviews for compliance, and once the subrecipient plans are complete and in compliance, DCR sends the subrecipients an approval letter. The approval letter lets them know that their plan is approved for 2 years and are reminded of when they need to resubmit their plan for approval.

Table 2 – List of Subrecipients

Name	Address	Plan Approval Date	Plan Expiration Date
City of Stoughton	207 S Forrest St. Stoughton, WI 53598	1/14/2021	1/14/2024
City of Sun Prairie	300 E Main St. Sun Prairie, WI 53590	2/7/2022	2/7/2025
Colonial Club Inc	301 Blankenheim Ln. Sun Prairie, WI 53590	2/1/2021	2/1/2024
Community Living Connections	6515 Watts Rd. Suite 100 Madison, WI 53719	1/14/2021	1/14/2024
MARC	901 Post Rd. Madison, WI 53719	11/30/2020	11/30/2023
Options in Community Living	22 North 2nd St. Madison, WI 53704	1/14/2021	1/14/2024
Van Go Taxi	700 Cottage Grove Rd. Madison, WI 53716	6/10/2022	6/10/2025
YWCA Madison	101 E. Mifflin St. Madison, WI 53703	1/14/2021	1/14/2024

Section II – Requirements for Transit Providers

FTA Circular 4702.1B sets additional requirements for recipients of FTA funds that provide fixed route public transportation in an urbanized area with a population greater than 200,000 or more and that operate 50 or more fixed-route vehicles in peak service. These requirements are addressed in this section and include the following:

- Set system-wide standards and policies
- Collect and report demographic data
- Evaluate service and fare equity changes
- Monitor transit service

Service Standards

Metro has set the following service standards in accordance with the guidance provided in FTA Circular 4702.1B.

Vehicle Load

Route design, frequency, and scheduling are intended to minimize overcrowding, which can result in pass-ups, lateness, excessive standing, inability to accommodate wheelchairs and strollers, and safety concerns. Metro’s current fleet of 40-foot buses accommodates 35-38 seated passengers and room for additional standees. The peak loads on all trips should not exceed 55 riders, or a load ratio of 1.6 passengers to seats. Standing loads of more than 15 minutes are minimized to the extent possible.

Vehicle Headway

Metro’s 2013-2017 Transit Development Plan establishes guidelines for headway by route category. In general, core routes are defined as routes that serve high-volume travel corridors through the central parts of Madison located on or near the isthmus. Metro’s peripheral routes are designed as secondary routes that connect outlying residential neighborhoods or activity centers with transfer points. Commuter routes provide weekday peak-period service from residential areas to activity and employment centers. Circulator routes operate within major activity centers or between major activity centers and residential areas. Finally, the 15-minute network refers to corridors where one or more bus routes combine to provide 15-minute or less service. Metro strives to have a consistent frequency within its AM-Peak, Mid-day, PM-peak, and evening service (see Tables 3 & 4).

Table 3 – Headway Guidelines by Route Category (minutes)

Route Category	Peak	Mid-day	Evening/Weekend
Core Routes	15 - 30	15 – 30	30
Peripheral	30	30 - 60	60
Commuter	15 - 30	None	None
Circulator	10 – 20	10 - 20	15 - 30
15-Minute Network	7.5 - 10	10 - 15	15 - 30

Table 4 – Standard Time Periods

Time Period	Description
Mid-day	Monday through Friday, 9:30 AM to 3:30 PM
Peak Period	Monday through Friday, 6:30 AM to 9:30 AM and 3:30 PM to 6:30 PM
Evening	Monday through Friday, 6:30 PM to End of Service
Weekend/Holiday	Saturdays, Sunday, and holidays Beginning of Service to End of service

On-time Performance

Metro Transit measures on-time performance for every route. On-time performance is measured as service that passes a scheduled timepoint between 1 minutes before and 5 minutes after the scheduled time. Metro’s 2017 Transportation Development Plan sets on-time performance goals and can be found in Table 5.

Table 5 – On-Time Performance Goals

Headway	On-Time Performance Goal
15 Minutes or Less	90% - 98%
More than 15 Minutes	95% - 98%

Service Availability

The hours of service operation should match the ridership demand generated by the land activities and the route function. Service periods should also accommodate the travel needs of persons who depend on the transit system as their primary means of transportation to the extent possible. The system as a whole should have a consistent span so that riders can count on routes operating until a predictable, standard time. The span of commuter service may be tailored to the specific employment centers that they serve. Table 4 shows the desirable service span for each route category. This goal shows longer service spans than Metro’s existing service provides, including the extension of weekday service to 1:00 AM and the extension of Saturday/Sunday/Holiday service to midnight to serve the needs of second shift workers and others that need to travel late at night.

Table 6 – Desirable Service Span

Route Category	Weekday	Weekend/Holiday
Core Routes	5:30 AM – 1:00 AM	7:00 AM – 12:00 AM
Peripheral Routes	5:30 AM – 1:00 AM	7:00 AM – 12:00 AM
Commuter Routes	6:30 – 9:30 AM, 3:30 – 6:30 PM	None
Circulator Routes	Varies	Varies

Service Change Prioritization

Service changes generally consist of adding service, removing service, or changing service in response to budgeting needs, changes in ridership patterns, or other needs. The prioritization of these needs is outlined below in Table 7.

Table 7 – Service Change Prioritization

#	Goal	Example
1	Bring existing service into compliance with minimum service standards	Adjust the frequency and span to meet the minimum service level for the route category or corridor
2	Improve travel times	Reduce walking distance, wait time, or in vehicle travel time
3	Improve transit reliability	Reduce late buses or missed connections
4	Improve usability of the system	Make the system simpler to use or reduce transfers

5	Reduce overcrowding	Shift resources from underutilized service to overcrowded service
6	Increase service coverage	Add new service to outlying communities or peripheral residential areas
7	Increase accessibility to employment, school, shopping, and services	Add new peak period reverse-direction service
8	Improve cost effectiveness	Implement no-cost or cost-saving improvements
9	Improve mobility in areas with concentrations of low-income and transit dependent populations	Improve service in underserved peripheral neighborhoods with low auto ownership
10	Reduce congestion on high traffic volume roadways	Increase transit use on congested corridors identified in the Congestion Management Plan

Service Policies

FTA Circular 4702.1B requires transit agencies to adopt policies that establish thresholds to determine major service changes, disparate impacts, and disproportionate burdens. Metro’s policies are described in the following sections.

Public Engagement Process for Major Service Change, Disparate Impact, and Disproportionate Burden Policies

Metro Transit will post draft electronic versions of any changes to these plans on its website at mymetrobus.com for public comment. Printed versions will also be mailed to individual customers upon official request to Metro’s customer service center. Customers can request a printed version of the plan by calling (608) 266-4466 or emailing mymetrobus@cityofmadison.com.

Notices to the public that the plan is available for review will be posted online at mymetrobus.com, on bus flyers, through email and text alerts, via Twitter and Facebook, an announcement recording to Metro’s call center, and on a poster at Metro’s reception window. Notices will include information on how to leave feedback including use of Metro’s online feedback form, written comments that can be mailed or emailed to Metro’s administration office, or via phone call to Metro’s customer service center.

Once the public has had a chance to comment, Metro will submit an updated version to the Madison Transportation Commission for approval, where the public will have an additional chance to make a comment.

Major Service Change Policy

Metro Transit's Major Service Change Policy in compliance with applicable federal requirements (Title VI of the Civil Rights Act 1964, 49 CFR Section 21 and FTA Circular 4702.1B). The Federal Transit Administration (FTA) requires that recipients of FTA funding prepare and submit service equity analyses for proposed major service changes. The purpose of this policy is to establish a threshold that defines a major service change and a recipient's definition of an adverse effect caused by a major service change.

Currently, Metro Transit will consider any service changes that qualify for a public hearing as "major" and in need of analysis under Title VI. Service changes that require a public hearing are currently defined as:

- The establishment of new bus routes
- A substantial geographical alteration on a given route of more than 25% of its route miles
- The elimination of any bus service
- A major modification which causes a 25% or greater change in the number of daily service hours provided

All major service changes will be subject to an equity analysis which includes an analysis of adverse effects. An adverse effect is defined as a geographical or temporal reduction in service which includes but is not limited to: elimination of a route, rerouting an existing route and a decrease in frequency. Metro Transit shall consider the degree of adverse effects, and analyze those effects, when planning major service changes.

Disparate Impact Policy/ Disproportionate Burden Policy

Metro Transit has established this Disparate Impact/Disproportionate Burden Policy in compliance with applicable federal requirements (Title VI of the Civil Rights Act 1964, 49 CFR Section 21 and FTA Circular 4702.1B).

Service Changes:

The FTA Circular 4702.1B, requires that recipients of Federal Transit Administration funding prepare and submit service equity analyses for proposed major service changes (defined in Metro Transit's Major Service Change Policy).

The purpose of this policy is to establish a threshold which identifies when the adverse effects of a major service change (defined in Metro Transit's Major Service Change Policy) are borne disproportionately by minority populations.

The Disparate Impact threshold is described as follows for Metro Transit: Should the burden of any major service change require a minority population/ridership (33% threshold) to bear adverse effects greater or less than 2% than those borne by the non-minority population/ridership, that impact will be considered a disparate impact.

Minority Population Definitions:

Minority Ridership identified as part of 2016 On-Board Survey for Metro Transit's Fixed Route System:

- Black/ African American
- American Indian/ Alaska Native
- Asian
- Hawaiian Native/ Pacific Islander
- Other
- Two or more races
- Hispanic, Latino or Spanish Origin

**Based on Census Data %*

Should a proposed major service change result in a disparate impact, Metro Transit will consider modifying the proposed change to avoid, minimize or mitigate the disparate impact of the change. If Metro Transit finds potential disparate impacts and then modifies the proposed changes in order to avoid, minimize, or mitigate potential disparate impacts, Metro Transit will reanalyze the proposed changes in order to determine whether the modifications actually removed the potential disparate impacts of the changes.

Metro Transit may find that there are no alternatives that would have a less disparate impact on minority riders but would still accomplish the transit provider's legitimate program goals.

Distribution of Transit Amenities

Metro Transit operated 48 fixed routes within a service area of 126 square miles, serving over 2,100 bus stops. To improve passenger comfort and system navigability, Metro Transit invests in transit amenities at our bus stops. Metro has more than 120 shelters. In addition, there are approximately 115 privately provided shelters where Metro maintains maps and schedule displays. Each bus stop is unique, and Metro Transit's Bus Stop Guidelines help determine how Metro invests in each location.

Bus stop spacing involves a trade-off between area coverage with convenient pedestrian access to transit and the speed/reliability of the transit service. Bus stops placed excessively close together may result in a higher number of starts and stops that increase travel time. Bus stops that are spread too far apart may increase the walking distance.

The central Madison corridors consist of a variety of higher speed urban arterials (East Washington Avenue, Park Street, and University Avenue) and lower speed streets (Jennifer Street, Johnson/Gorham streets, Mills Street, and Monroe Street). Madison’s geography is relatively free of bridges, open space, steep topography, and other features that would necessitate more closely or widely spaced stops that would influence this analysis.

Bus Stop Spacing

In general, the higher speed roadways in central Madison have a longer average stop spacing (0.14 to 0.18 miles) than do lower speed roadways (0.10 to 0.12 miles). Exceptions occur at Linden Drive and Observatory Drive – the routing for part of Route 80 – where stops are 0.15 miles apart, on average. The peripheral corridors, which are mostly higher speed roadways, generally have a longer average stop spacing (0.14 to 0.20 miles) than the central corridors. Unsurprisingly, central Madison corridors generally have a higher average number of boardings per stop: 16 to 90 average boardings per weekday (excluding the Madison CBD and UW Campus) compared to 12 to 27 on peripheral corridors.

Bus stops should be sited so that they meet bus stop spacing goals while also maximizing the utility for transit passengers. The considerations in Tables 6-8, along with judgment, should be used to site bus stops.

Table 6 - Bus Stop Spacing Guidelines

Route Category	Bus Stop Spacing Guidelines
Core Routes	3/16 to 1/4 mile (330-440 yards), no stops should be less than 1/8 mile (220 yards).
Peripheral Routes	3/16 to 1/4 mile (330-440 yards), no stops should be less than 1/8 mile (220 yards). Flexible routes may have flag stop service where passengers may request a stop anywhere along the line.
Commuter Routes	3/16 to 1/4 mile (330-440 yards), no stops should be less than 1/8 mile (220 yards). Limited stop service should be 1/2 to one mile and express service may have no stops.
Circulator Routes	3/16 to 1/4 mile (330-440 yards), no stops should be less than 1/8 mile (220 yards).

Bus Stop Locations & Amenities

Metro considers multiple factors when determining bus stop locations and amenities. In general, Metro follows the guidelines for stop location and amenities found in Tables 6 & 7. However, as an agency that operates with multiple service partners with jurisdiction over the public right-of-way (ROW) in their municipality, Metro retains direct control of the amenities located within the City of Madison. In some cases, where limited ROW is available, bus stops may be located partially or fully on private property with owner permission. In other instances, limited ROW and a fully built-up urban environment leave little room for amenities even at highly used bus stops.

Table 7 – Factors for Locating Bus Stops

Consideration	Discussion
Ridership	Bus stops should be located where transit ridership is the highest relative to adjacent stops. High ridership areas do not necessarily need more bus stops than lower ridership areas.
Attractions	Bus stops should be located close to ridership generating attractions, such as schools, retail and employment centers, and apartment buildings, to the extent practical.
Street Crossings	Bus stops should be located where transit riders have access to the safe and convenient street crossings, to the extent practical. Facilities that support safe and efficient street crossings are traffic signals, marked crosswalks, and bicycle/pedestrian overpasses.
Operations	Bus stops should be located where bus operators can easily enter and exit the stop with minimal delay and without excessive negative impacts on other traffic.
Other	Other factors may be used to determine the best placement for bus stops, including future land use plans, amenities for waiting passengers, lighting, bicycle parking, and community input.

Table 8 – Bus Stop Amenity Guidelines

Amenity	Daily Boardings
Sign	All bus stops
Platform	All bus stops
Bench	15 or more
Schedule	15 or more
Shelter	30 or more

Boarding Platforms

Many Metro bus stops are equipped with a concrete boarding platform or other hard, flat surface and are wheelchair-accessible. Some stops throughout the system have turf or other materials and are not wheelchair accessible. Metro has a goal of having ADA-accessible boarding areas for all bus stops. Upgrading of stops to ADA standards is done annually through the city’s ongoing curb & sidewalk maintenance program. The Madison Common Council has funded a five year program of bringing all stops up to ADA standards. Substantial progress has been made since the program began in 2018.

In addition to assessing available ROW at stops before placing amenities, planning staff will consider adjacent property use, stop ridership, access to popular destinations, proximity to other stops and existing infrastructure.

Another consideration is accessibility. In any bus stop improvement project, all investments will be made ADA accessible. Sites with connecting sidewalks, curb ramps and concrete pads will be prioritized for investment above sites without existing ADA infrastructure. Metro works with our

service partners to invest in ADA accessible infrastructure where the City of Madison does not have direct control of the ROW.

Bus Stop Pads

If there is not a shelter at the stop, the minimum size of concrete pads is 5'6" minimum width parallel to the street and 8' length from curb back to/including sidewalk.

Shelters

Shelter sizes can vary, but the typical dimensions are 6' x 11'. Required infrastructure includes a 5' x 8' concrete boarding area, an 8' x 13' concrete pad for shelter installation, and a minimum of 2' to 3' of unobstructed pedestrian throughway depending on shelter orientation. All shelters are equipped with benches, a system map, and a schedule of the arrival times for all routes serving that stop.

Benches

Bench types and sizes vary, but the typical required infrastructure includes a 5' x 8' concrete boarding area, a 9' x 3' concrete pad for bench installation, and a minimum of 3' of unobstructed pedestrian throughway.

Trash Bins

Trash bins are provided on an as needed basis at bus stops.

Lighting

Metro bus shelters continue to be upgraded to add solar lighting.

Schedules

Schedules of the arrival times of all buses serving the bus stop are installed at heavily used bus stops.

Live Arrival Digital Displays

Electronic signs displaying real time arrival information are installed at the four transfer points and the seven high capacity bus stops on the Capitol Square.

Park-and-Ride Lots

Metro currently provides service to three officially designated park-and-ride lots. One is the North Transfer Point, one was added in the suburban partner community of Sun Prairie in 2019, and the other is a state owned facility called the Dutch Mill Park-and-Ride. It is located in southeast Madison near the intersection of USH 51 (Stoughton Road) and USH 12/18 (the Beltline Highway). The Dutch Mill Park-and-Ride is also used by intercity bus service.

Unofficial commuter parking and transit use is known to occur, increasing the strain on parking resources in some Madison neighborhoods. Metro continues to explore additional park-and-ride lot locations. Besides Metro buses, park-and-ride lots serve other programs that encourage higher-occupancy vehicles, most notably by providing convenient transfer points for carpools and vanpools. The Dutch Mill Park-and-Ride, in particular, is heavily used by car/vanpool users and by various intercity bus riders. Van Galder Bus Company and other intercity bus company users pay Metro for part of the maintenance costs for the lot.

There is also a state owned park-and-ride lot within the American Center on Madison's Northeast side near USH 151. It is served all day, every day by circulator Route 26, which is funded by the University of Wisconsin Hospital. Another state owned park & ride lot exists near the intersection of Verona Avenue and Old CTH PB in Verona.

Transfer Points

Metro has four major transfer points. Almost all routes that serve transfer points terminate and lay over there. The transfer points are located on the east, north, south, and west sides of Madison and are named based on their locations (e.g., East Transfer Point).

The four original transfer points were located in sites intended to achieve uniform route lengths and cycle times between them necessary for the timed-transfer system, to minimize the travel time to central Madison without introducing excessive new circuitous routing, to minimize bus volumes and impacts on residential streets, and to provide high levels of transit service to activity centers such as shopping malls.

Amenities at each transfer point include a covered canopy, wind-screens, benches, real-time electronic bus schedule information, lighting, security cameras, and other security measures.

The Capitol Square does not have a timed transfer associated with it, although many core routes that serve it arrive and depart at about the same time. Additionally, the East Towne stop serves as an informal transfer point for Routes 6, 20, 26, 30, and 36

Printed Maps, Schedules, and Signs

Metro's printed materials are given to local business and organizations across our service area as requested. Every year, Metro's marketing team coordinates with various organizations to provide printed materials to:

- Universities such as, Madison College, The University of Madison-Wisconsin, Edgewood College, Wisconsin English as a Second Language Institute
- Madison Public Libraries
- Madison DOT
- Local shopping centers such as, Hilldale Mall, West and East Towne Malls, Metro sales outlets
- City of Fitchburg Town Hall
- Hospitals such as, Meriter, UW-Hospital, SSM Health- St. Mary's
- Various apartment complexes and property management companies
- The Goodman Community Center
- Attic Correctional Services
- South Madison Coalition of the Elderly
- Various State of Wisconsin Departments

Vehicle Assignment

Metro's fixed-route fleet is uniform; composed entirely of standard 40-foot, ADA-compliant, low floor, ramp-equipped coaches. Vehicle assignments are based on block length; the longest blocks in terms of daily mileage and/or service hours will be assigned the newest buses. The peak-period commuter routes and supplemental school day routes will generally be assigned the oldest buses in the fleet. As a result of this assignment method, newer buses will be distributed throughout the service area throughout the day on the core and peripheral routes. The oldest buses are on the street only during the a.m. and p.m. peak periods, primarily for commuter routes.

Fare Equity Policy

The FTA Circular 4702.1B, requires that recipients of Federal Transit Administration funding prepare and submit fare equity analyses for all proposed fare changes. The purpose of this policy is to establish a threshold which identifies when the adverse effects of a fare change are borne disproportionately by minority populations and low-income populations. The following sections describe Metro's fare equity policy and provide the results of Metro's most recent on-board survey from 2015. Metro is preparing for a new on-board survey in 2024, the results of which will be included in Metro's 2025 Title VI Program update.

For purposes of this policy, low income population is defined as any readily identifiable group of households who are at or below 150% of the Department of Health and Human Services Poverty Guidelines.

Persons in Household	48 Contiguous States and D.C. Poverty Guidelines (Annual)							
	100%	133%	138%	150%	200%	250%	300%	400%
1	\$12,760	\$16,971	\$17,609	\$19,140	\$25,520	\$31,900	\$38,280	\$51,040
2	\$17,240	\$22,929	\$23,791	\$25,860	\$34,480	\$43,100	\$51,720	\$68,960
3	\$21,720	\$28,888	\$29,974	\$32,580	\$43,440	\$54,300	\$65,160	\$86,880
4	\$26,200	\$34,846	\$36,156	\$39,300	\$52,400	\$65,500	\$78,600	\$104,800
5	\$30,680	\$40,804	\$42,338	\$46,020	\$61,360	\$76,700	\$92,040	\$122,720
6	\$35,160	\$46,763	\$48,521	\$52,740	\$70,320	\$87,900	\$105,480	\$140,640
7	\$39,640	\$52,721	\$54,703	\$59,460	\$79,280	\$99,100	\$118,920	\$158,560
8	\$44,120	\$58,680	\$60,886	\$66,180	\$88,240	\$110,300	\$132,360	\$176,480

Add \$4,480 for each person over 8

Basis for Policy Standards

Periodically, Metro Transit will make adjustments to transit fares in order to generate revenues to help sustain transit service operations. Federal law requires Metro Transit to prepare and submit fare equity analyses for all potential transit fare adjustments, as outlined in Federal Transit Administration (FTA) Circular 4702.1B.

Equity Sensitive Fare Policy:

1. Equity sensitive fares will not increase any higher than the lowest percentage increase of any non-equity sensitive fare type.
2. If the lowest percent increase to a non-equity fare is 0%, then no equity sensitive fares would increase.
3. All efforts will go to ensuring that increases to equity sensitive fares will be kept to minimum amounts.

Example: A fare increase is proposed for several non-equity sensitive fare types. Percentage increases range from 5% - 15%. If additional revenue is needed, an increase to an equity sensitive fare would not be more than 5%.

If any part of the policy is unachievable or causes administrative burden, Metro staff will offer a full explanation to the Transportation Commission as to the reasons of extraordinary measures that necessitate a fare increase to equity sensitive items. When this occurs, staff will utilize its public outreach plan procedures to present this proposal to the public. The public will be asked for comments and suggestions on how a fare increase should be structured in order to reach the assigned budget amount.

Related to this policy, Metro continues to offer its Low-Income Pass program which allows low-income riders to purchase 31-day passes at a 50% discounted rate. Riders need to self-certify that their household income is at or below 150% of the national poverty level.

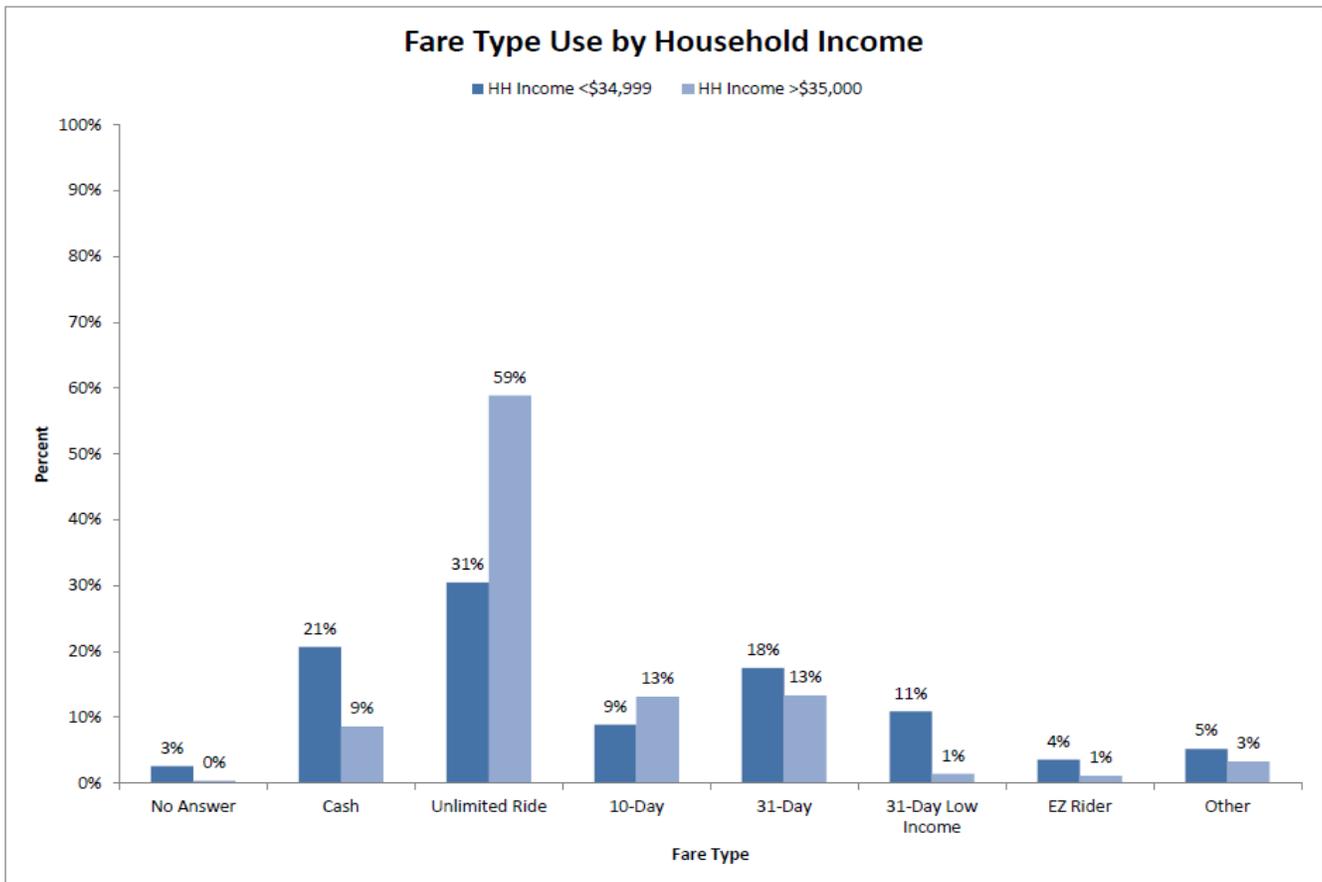
Identifying Equity Sensitive Fares

The following definition is used to determine equity sensitive fares.

Low income Use Fare: Low income ridership using a certain fare is 5% higher than ridership of non-low income riders.

Minority Use Fare: Minority ridership using a certain fare is 5% higher than ridership of non-minority riders.

For simplicity’s sake, Metro considers both definitions to be considered “equity sensitive fares” as explained above. Metro conducted an onboard survey in 2015 that collected data related to fare type, racial identity, and income level.



Metro Transit On-Board Survey 2015 # of Respondents with Income <\$34,999: 6,315 # of Respondents with Income >\$35,000: 10,642
 University Students not included in analysis.

Fare Use by Income

As explained above, Metro uses 150% of the Department of Health and Human Services Poverty Guidelines as definition to determine whether a rider is low income. For a household of one that was \$17,655. The lowest two salary categories tabulated in the onboard salary were “less than \$15,000” and less than “\$35,000. Staff used “less than \$35,000” data to determine low income use fares.

Based on Metro’s definition of low-income use fare (low income ridership using a certain fare is 5% higher than ridership of non-low income riders), the following items are considered low income use fares:

Cash

Low Income Use: 21%

Non-Low Income Use: 9%

Low-Income 31-Day Passes

Low Income Use: 11%

Non-Low Income Use: 1%

Senior/ Disabled 31-Day Passes

Data was not gathered on specific use of the 31-day senior/disabled pass. Since this specific data was not available, staff considered senior/disabled 31-day passes to also be used by low income riders.

31-Day Passes*

Low Income Use: 18%

Non-Low Income Use: 13%

**Staff did not have perfect data that fully showed the use of 31-day passes by income level. Metro also has a 31-day senior/disabled pass that was not accounted for in the data. Since this specific data was not available, staff consider both the 31-day pass and senior/disabled 31-day passes to potentially be used by low income riders.*

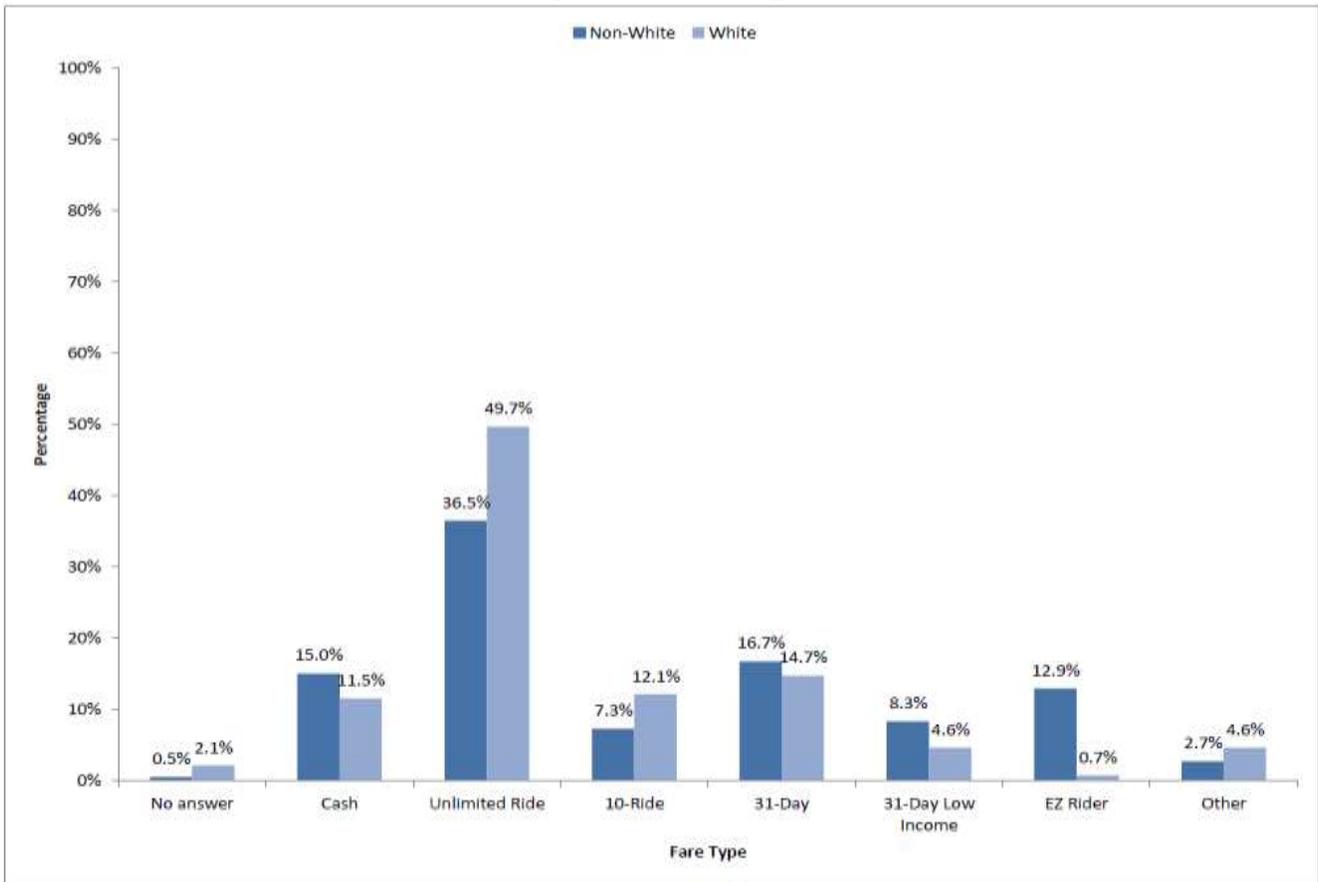
Fare Use by Race Based on Metro’s definition of minority use fare (minority ridership using a certain fare is 5% higher than ridership of non-minority riders), the following are considered minority use fares:

Youth Passes/ EZ Rider

Minorities: 12.9%

Non-Minorities: 1%

Figure 1 - Fare Type



Metro Transit On-Board Survey 2015 Non-White Respondents: 5,934 White Respondents: 15,600 University students not included in analysis.

Note on University Student Data:

Data collected from University students is not used in Metro’s determination of equity sensitive fares due to majority of college students utilizing unlimited ride passes.

Due to bulk purchase discounts, these unlimited ride passes are Metro’s cheapest adult fare. Bulk purchase discounts are not given to the general public. Metro concluded that only fares available to the general public should be considered in the equity sensitive fare determination.

Metro’s onboard data was collected in collaboration with the Madison Area Transportation Planning Board (MPO). MPO staff have excluded university students from their household income charts and have cautioned Metro staff in using this data for its fare analysis. The MPO found that asking students to provide household income numbers is challenging for many reasons. For the consistency of data, students would need to report income of roommates as household income. Many students might not know this number or be willing to share. Other students may have included their parents’ income or reported their income as low, but are actually financially supported by relatives.

Public Participatory Procedures for All Proposed Fare Changes

All staff recommendations for fare increases will be presented to the Transportation Commission (TC). A public hearing will be held about the proposed changes if so requested by anyone with a significant economic, social or environmental interest in said changes. The hearing shall be held in a facility accessible to persons with disabilities.

A detailed legal notice will be published in the City's official paper. This notice will inform the public of the proposed change(s) and the scheduled date, time, and location of the public hearing. The notice will also indicate the location of building's accessible entrance and will state that if someone needs an interpreter, materials in alternate formats or other accommodations to access this hearing, they should contact Metro Transit at (608) 266-4904 at least ten (10) days prior to the hearing date so that proper arrangements can be made in a timely fashion. Efforts will be made to publish the public hearing notice approximately thirty (30) calendar days prior to the hearing.

A news release will be distributed to all local media via the City of Madison's electronic news release dissemination system. In addition, approximately (14) calendar days prior to the public hearing, staff will distribute news release using all available information distribution systems and processes available including but not limited to Metro Transit's website, text and email subscription lists, social media postings, and any other future information dissemination systems that Metro may utilize. Staff will maintain a list of all outreach efforts.

Flyers will be installed on all Metro Transit vehicles approximately ten (10) calendar days prior to the public hearing. Paid advertisements will appear in the City's official paper approximately seven (7) calendar days prior to the public hearing.

The TC will consider the views of all who comment on proposed fare increases or service reductions prior to its voting on the adoption of staff's recommendations. If deemed appropriate, the TC will modify the proposed changes prior to adoption. If a public hearing is held regarding a reduction in service, and if it is the consensus of the public that fares should be increased in order to avoid a reduction in service, and if the TC decides to adopt a fare increase instead of a reduction in service, a second public hearing need not be conducted in order to gather public comments on the fare increase.

However, if the public does not comment on or is not in consensus as to whether fares should be increased in order to avoid a service reduction, yet the TC decides that it would prefer fare increases to staff's proposed service reductions, a second public hearing would be held in order to gather public comments on said changes to staff's recommendations.

The TC will submit a report on the approved changes to the Common Council which can request that the TC reconsider its vote.

The TC meetings are open to the public and, therefore, noticed according to the State of Wisconsin's Open Meeting Law.

Service Monitoring Report

FTA Circular 4702.1B requires transit agencies to monitor the performance of their minority and non-minority routes relative to their adopted service policies and standards. The FTA defines a minority route as any route that has at least 1/3 of its revenue miles passing through a Census Tract, Block Group, or Block with a minority population greater than the system-wide average. Minority populations accounted for 26.43% of Metro’s service area. The FTA requires this monitoring report not-less than once every three years and is submitted with Metro’s Title VI Program Update on the same schedule. Metro’s 2020-2022 service monitoring report was conducting using data from it’s August, 2022 pick period that spanned from 8/21/2022 – 12/3/2022.

Table 9 - Minority & Low-Income Routes

Route	Minority Population	Low-Income Population	Low-Income Route	Minority Route
2	23.95%	35.84%	Yes	No
4	24.96%	38.94%	Yes	No
5	24.65%	38.05%	Yes	No
6	21.85%	34.00%	Yes	No
7	20.19%	34.89%	Yes	No
8	22.98%	42.01%	Yes	No
11	24.80%	37.73%	Yes	No
12	24.33%	39.88%	Yes	No
13	27.48%	53.37%	Yes	Yes
15	24.53%	31.36%	Yes	No
16	30.87%	19.08%	Yes	No
17	26.27%	18.37%	Yes	No
18	45.29%	22.93%	Yes	Yes
20	35.74%	24.84%	Yes	Yes
21	36.76%	24.86%	Yes	Yes
22	35.02%	22.39%	Yes	Yes
23	23.24%	32.50%	Yes	No
26	32.29%	17.41%	No	Yes
28	23.67%	35.11%	Yes	No
30	33.76%	20.93%	Yes	Yes
31	16.67%	12.44%	No	No
32	22.43%	14.36%	No	No
33	22.92%	13.47%	No	No
36	34.70%	20.99%	Yes	Yes

38	21.79%	34.24%	Yes	Yes
39	19.02%	14.59%	No	No
40	49.27%	27.52%	Yes	Yes
44	27.43%	51.89%	Yes	Yes
48	26.43%	51.40%	Yes	Yes
49	42.13%	22.82%	Yes	Yes
50	41.83%	13.82%	No	Yes
51	38.06%	12.00%	No	Yes
52	36.52%	12.48%	No	Yes
55	33.01%	11.89%	No	Yes
59	34.70%	12.91%	No	Yes
63	38.20%	13.44%	No	Yes
67	33.22%	12.26%	No	Yes
68	29.73%	12.82%	No	Yes
70	23.12%	36.74%	Yes	No
72	23.09%	36.95%	Yes	No
73	35.66%	11.37%	No	Yes
75	27.76%	40.02%	Yes	No
78	24.01%	13.86%	No	No
80	24.32%	55.22%	Yes	No
81	22.24%	49.82%	Yes	No
82	21.60%	56.07%	Yes	No
84	25.86%	62.54%	Yes	No

Vehicle Load

Metro’s current standards for headways are established in its 2013-2017 Transit Development Plan and are listed in Table 10. Metro evaluated vehicle load using boarding data collected during the August, 2022 pick period. This dataset was utilized in lieu of Automatic Passenger Count (APC) data due to concerns over the accuracy and integrity of Metro’s APC data. Each trip with greater than 55 passengers was considered overloaded. The percentage of overload trips was then calculated for each route category. The results of this analysis indicate that Metro’s non-minority routes have more frequent overloading than its minority routes. Based on this analysis, no disparate impact to minority populations was identified for the vehicle load standard.

Table 10 - Vehicle Load: Percent of Overloaded Trips

Route Type	Weekday		Weekend	
	Peak	Off-Peak	Peak	Off-Peak
Minority	1.03%	0.31%	0.00%	0.00%
Non-Minority	14.04%	9.13%	3.34%	5.20%
Low-Income	10.66%	6.79%	2.18%	3.56%
Non-Low-Income	0.08%	0.01%	0.00%	0.00%

Vehicle Headway

Metro’s current standards for headways are established in its 2013-2017 Transit Development Plan. Metro’s 2022 headways are listed by route type and service time in Table 11. Additionally, headways were designed to serve Metro’s transfer point system, and are intended to meet at transfer points between 1-2 times an hour.

Table 11 - Headways by Route Type

Route Types					Headway (Weekday)				Headway (Weekend)			
Route	Minority Population	Low-Income Population	Low-Income Route	Minority Route	AM Peak	Mid-Day	PM Peak	Evening	AM Peak	Mid-Day	PM Peak	Evening
2	23.95%	35.84%	Yes	No	30	30	30	30	30	30	30	30
4	24.96%	38.94%	Yes	No	30	30	30	60	60	60	60	60
5	24.65%	38.05%	Yes	No	30	30	30	30	60	60	60	60
6	21.85%	34.00%	Yes	No	30	30	30	30	30	30	30	30
7	20.19%	34.89%	Yes	No	30	30	30	30	30	30	30	30
8	22.98%	42.01%	Yes	No	30	30	30	60	60	60	60	60
11	24.80%	37.73%	Yes	No	60	60	60	-	-	-	-	-
12	24.33%	39.88%	Yes	No	60	60	60	-	-	-	-	-
13	27.48%	53.37%	Yes	Yes	60	60	60	60	60	60	60	60
15	24.53%	31.36%	Yes	No	30	30	30	60	-	-	-	-
16	30.87%	19.08%	Yes	No	30	30	30	60	60	60	60	60
17	26.27%	18.37%	Yes	No	30	30	30	30	30	30	30	30
18	45.29%	22.93%	Yes	Yes	30	30	30	30	30	30	30	30
20	35.74%	24.84%	Yes	Yes	30	30	30	30	30	30	30	30
21	36.76%	24.86%	Yes	Yes	30	30	30	30	60	60	60	60
22	35.02%	22.39%	Yes	Yes	30	30	30	30	60	60	60	60
23	23.24%	32.50%	Yes	No	30	-	30	-	-	-	-	-
26	32.29%	17.41%	No	Yes	30	30	30	30	30	30	30	30

28	23.67%	35.11%	Yes	No	30	30	30	-	-	-	-	-
30	33.76%	20.93%	Yes	Yes	30	30	30	30	30	30	30	30
31	16.67%	12.44%	No	No	60	60	60	60	60	60	60	60
32	22.43%	14.36%	No	No	60	60	60	60	60	60	60	60
33	22.92%	13.47%	No	No	30	30	30	30	-	-	-	-
36	34.70%	20.99%	Yes	Yes	60	60	60	60	60	60	60	60
38	21.79%	34.24%	Yes	Yes	30	30	30	-	-	-	-	-
39	19.02%	14.59%	No	No	60	60	60	60	-	-	-	-
40	49.27%	27.52%	Yes	Yes	30	30	30	60	60	60	60	60
44	27.43%	51.89%	Yes	Yes	30	30	30	-	-	-	-	-
48	26.43%	51.40%	Yes	Yes	30	-	30	-	-	-	-	-
49	42.13%	22.82%	Yes	Yes	30	-	30	-	-	-	-	-
50	41.83%	13.82%	No	Yes	30	30	30	30	60	60	60	60
51	38.06%	12.00%	No	Yes	60	60	60	60	60	60	60	60
52	36.52%	12.48%	No	Yes	60	60	60	60	-	-	-	-
55	33.01%	11.89%	No	Yes	30	30	30	-	-	-	-	-
59	34.70%	12.91%	No	Yes	-	-	-	-	60	60	60	60
63	38.20%	13.44%	No	Yes	60	60	60	60	60	60	60	60
67	33.22%	12.26%	No	Yes	30	30	30	30	30	30	30	30
68	29.73%	12.82%	No	Yes	60	60	60	60	60	60	60	60
70	23.12%	36.74%	Yes	No	60	60	60	60	-	-	-	-
72	23.09%	36.95%	Yes	No	30	30	30	-	-	-	-	-
73	35.66%	11.37%	No	Yes	60	60	60	60	-	-	-	-
75	27.76%	40.02%	Yes	No	60	-	60	-	-	-	-	-
78	24.01%	13.86%	No	No	-	-	-	-	60	60	60	60
80	24.32%	55.22%	Yes	No	5	5	5	40	30	30	30	30
81	22.24%	49.82%	Yes	No	30	30	30	30	30	30	30	30
82	21.60%	56.07%	Yes	No	30	30	30	30	30	30	30	30
84	25.86%	62.54%	Yes	No	15	15	15	15-30	-	-	-	-

On-Time Performance

Metro’s current standard for on-time performance (OTP) is established in its 2013-2017 Transit Development Plan and is listed in Table 12. On-time performance was calculated using automatic vehicle locator technology installed on Metro’s buses. A database query identified whether a bus was on-time, early, or late based on Metro’s service standard for each trip during the August, 2022 pick. The percentage of on-time trips was then calculated for each route category. The results of this analysis

indicate that Metro’s minority routes have greater OTP than its non-minority routes. Based on this analysis, no disparate impact to minority populations was identified for the OTP standard.

Table 12 - On-Time Performance

Route Type	Weekday		Weekend	
	Peak	Off-Peak	Peak	Off-Peak
Minority	88%	89%	89%	89%
Non-Minority	80%	83%	86%	86%
Low-Income	82%	85%	88%	86%
Non-Low-Income	88%	89%	88%	88%

Service Availability

Service span, the number of hours a bus is in operation during a day, is the fundamental measure of service availability and was utilized to measure service availability in the Metro service area. Metro determined service availability by comparing the average span for minority and non-minority routes. The results of this analysis are reflected in Table 13 and indicate that there was no potential disparate impact to minority populations.

Table 13 - Service Span (2022 Network)

Route Type	Weekday	Weekend
Minority	15.91	11.34
Non-Minority	14.73	8.41
Low-Income	15.07	9.44
Non-Low-Income	15.80	10.70

Fare & Service Equity Analysis since 2020 Submission

Metro performed an equity analysis to evaluate the impact of its COVID-19 service reductions. This analysis compared the pre-pandemic system to the stabilized service operating between August, 2021 and June, 2023. The full analysis is included in Appendix G. Metro had a brief period where fares were suspended during the COVID-19 pandemic to minimize the risk of exposure to drivers and passengers. This was an emergency action, and fares were restored to their pre-pandemic rates in September, 2020. Due to the emergency nature of this fare suspension, a fare equity analysis was not conducted.

Equity Analysis for Facility Site/ Location

No new facilities were built during the 2020-2022 reporting period.

Service and Fare Equity Analysis for Any New Fixed Guideway Capital Projects

There have been no new fixed guideway capital projects since Metro's last Title VI submission in 2020.

Appendix A – Copy of Board Meeting Minutes and Resolutions

Appendix C – Title VI Complaint Form



Metro Transit

Madison, Wisconsin

Title VI Complaint Form

The City of Madison and Metro Transit assure that no person shall on the grounds of race, color, or national origin, as provided by Title VI of the Civil Rights Act of 1964, and the Civil Rights Restoration Act of 1987 (P.L. 100-259) be excluded from participation in, be denied the benefits of, or be otherwise subjected to discrimination under any program or activity.

Furthermore, Madison General Ordinance (M.G.O.) Sec. 39.02(8) mandates the execution of this operational requirement. The City of Madison and Metro Transit further assure every effort will be made to ensure nondiscrimination in all of its federally funded program activities.

Any person(s) or organization(s) believing they have been a victim of discrimination based on race, color, or national origin may file a complaint with Metro Transit or with the City of Madison Department of Civil Rights.

COMPLAINTS CAN BE FILED BY CALLING:

Metro's customer service center at (608) 266-4466 or the City of Madison Department of Civil Rights at (608) 266-4910.

COMPLAINTS CAN BE EMAILED:

Please email Metro Transit at mymetrobus@cityofmadison.com or the City of Madison Department of Civil Rights at dcr@cityofmadison.com.

YOU CAN ALSO COMPLETE THE COMPLAINT FORM BELOW. MAIL COMPLETED FORMS TO:

Metro Transit, Attn: Title VI Complaint, 1245 E. Washington Ave., Madison, WI 53703.

Your Name: _____

Home Phone: _____ Cell Phone: _____

Street Address: _____

City: _____ State: _____ Zip Code: _____

Date of incident: _____

Person(s) discriminated against (if other than complainant). List all names: _____

Which of the following best describes the reason the alleged discrimination took place? Please check your answer:

- Race
- Color
- National Origin (Limited English Proficiency)

Metro Transit | 1245 E. Washington Avenue | Madison, WI 53703 | 608.266.4904 | www.mymetrobus.com



Metro Transit

Madison, Wisconsin

Please describe the alleged discrimination incident. Provide the names and title of all Metro Transit employees involved if available. Explain what happened and whom you believe was responsible. Please use the back of this form if additional space is required.

Multiple horizontal lines for text entry.

Have you filed a complaint with any other federal, state, or local agencies? Yes No

If so, list agency/agencies and contact information below:

Two columns of fields for contact information: Contact Name, Agency, Street Address, City, Zip, State, and Phone.

I affirm that I have read the above charge and that is true to the best of my knowledge, information & belief.

Signature: _____ Date: _____

Print or Type Name of Complainant: _____

Office Use Only:

Box containing Date Received and Received By fields.

Metro Transit | 1245 E. Washington Avenue | Madison, WI 53703 | 608.266.4904 | www.mymetrobus.com

Appendix D – List of Title VI Investigations, Complaints, and Lawsuits

	Date	Summary	Status	Actions Taken
Investigations				
N/A				
Lawsuits				
1.	2022	State of WI ERD/DWD complaint discrimination based on race for unequal treatment filed by customer of color.	Case still pending.	
2.	2021	State of WI ERD/DWD complaint discrimination based on race or color by employee against supervisor.	Case dismissed.	
3.	2020	State of WI ERD/DWD complaint discrimination based on race or color in issuing discipline to an employee.	Case still pending	
Complaints				
1.	12/1/22	Operator singles passenger out due to race – discrimination based on race or national origin.	Founded	Discipline issued. Operator pulled off route.
2.	11/21/22	Operator requested identification for customer of color only – discrimination based on race or color.	Reviewed footage – unfounded	
3.	11/17/22	Operator singled out family – discrimination/ unequal treatment based on race or color.	Founded	Reviewed with Operator
4.	7/9/22	Operator requested identification for black riders only –	Founded	Reviewed with Operator

		discrimination based on race or color.		
5.	6/28/22	Operator requested identification for black riders only – discrimination based on race or national origin.	Unfounded	
6.	6/15/22	Operator and passenger argument – discrimination/ unequal treatment based on race or national origin.	Supervisor Intervention - Unfounded	
7.	6/7/22	Passenger continually passed up by same driver - discrimination/ unequal treatment based on race or color.	No video available. Complaint closed.	Left message for driver.
8.	5/9/22	Operator made racist comment – discrimination based on race or color.	No video recovered. Complaint closed.	
9.	2/10/22	Operator requiring only the person of color to exit through back door – discrimination based on color.	Reviewed video – unfounded	
10.	2/9/22	Operator rude only to black drivers and people with disabilities – unequal treatment based on color / ADA status.	Unfounded	Left message for driver.
11.	1/19/22	Operator rude to person of color – discrimination based on color.	Complaint closed	
12.	11/17/21	Operator refused to kneel bus for a black mother and child. Situation escalated. Operator is always rude to BIPOC riders – discrimination/ unequal treatment based on color.	Founded	Discipline issued.
13.	10/7/20	Complaint against operator of discrimination based on race or color.	Reviewed video – unfounded.	

Appendix E – Subrecipient Sample Title VI Template

City of Madison Title VI Requirement and Template

The City of Madison is committed to providing compliance with Title VI of the Civil Rights Act of 1964; 49 CFR, part 21; and related statutes and regulations so that, no person in the state of Wisconsin shall, on the ground of race, color, national origin, sex, age, disability, low-income or limited English proficiency (LEP) be excluded from participation in, be denied the benefits of, or be otherwise subjected to discrimination under any program or activity of the Department. The Title VI Program is required under federal provisions to have an approved Title VI/Nondiscrimination Plan and Assurances.

REQUIREMENT TO PREPARE AND SUBMIT A TITLE VI PROGRAM

Title 49 CFR Section 21.9(b) requires recipients to “keep such records and submit to the Secretary timely, complete, and accurate compliance reports at such times, and in such form and containing such information, as the Secretary may determine to be necessary to enable him to ascertain whether the recipient has complied or is complying with this [rule].” FTA requires that all direct and primary recipients document their compliance with DOT’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. For State DOTs, the appropriate governing entity is the State’s Secretary of Transportation or equivalent. Recipients shall submit a copy of the board resolution, meeting minutes, or similar documentation with the Title VI Program as evidence that the board of directors or appropriate governing entity or official(s) has approved the Title VI Program. FTA will review and concur or request the recipient provide additional information.

Subrecipients shall submit Title VI Programs to the primary recipient from whom they receive funding in order to assist the primary recipient in its compliance efforts. Such Programs may be submitted and stored electronically at the option of the primary recipient. Subrecipients may choose to adopt the primary recipient’s notice to beneficiaries, complaint procedures and complaint form, public participation plan, and language assistance plan where appropriate. Operational differences between the primary recipient and subrecipient may require, in some instances, that the subrecipient tailor its language assistance plan. Subrecipients shall develop and submit to the primary recipient a list of complaints, investigations, or lawsuits. Subrecipients that have transit-related non-elected planning boards, advisory councils, or committees, the membership of which is selected by the subrecipient, 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. Subrecipients must submit all the above information to the primary recipient on a schedule requested by the primary recipient. Collection and storage of subrecipient Title VI Programs may be electronic at the option of the primary recipient.

Requirements (Chapter III, found in this circular: [www.transit.dot.gov/sites/fta.dot.gov/files/docs/FTA Title VI FINAL.pdf](http://www.transit.dot.gov/sites/fta.dot.gov/files/docs/FTA%20Title%20VI%20FINAL.pdf))

A template for subrecipients is provided on the next page and can be found on the WisDot page wisconsindot.gov/Pages/doing-bus/local-gov/astnce-pgms/transit/compliance/title6.aspx

Title VI Plan

City Of USA/Organization Name/Organization Name

POLICY STATEMENT

The **City Of USA/Organization Name/Organization Name** as a recipient of Federal Transit Administration (FTA) grant dollars either directly from FTA or through the City of Madison will comply with the Title VI of the Civil Rights Act of 1964 (42 U.S.C. 2000d) and the U.S. Department of Transportation implementing regulations.

TITLE VI PLAN ELEMENTS

The **City Of USA/Organization Name's** Title VI plan includes the following elements:

1. **EVIDENCE OF POLICY APPROVAL**
2. **LOG OF POLICY UPDATES**
3. **CONTACT INFORMATION/PROGRAM ADMINISTRATION**
4. **NOTICE TO THE PUBLIC**
5. **COMPLAINT PROCEDURE**
6. **COMPLAINT FORM**
7. **LIST OF TRANSIT RELATED TITLE VI INVESTIGATIONS, COMPLAINTS AND LAWSUITS**
8. **PUBLIC PARTICIPATION PLAN**
9. **LANGUAGE ASSISTANCE PLAN**
10. **MINORITY REPRESENTATION TABLE AND DESCRIPTION**
11. **ADDITIONAL ITEMS, IF REQUIRED:**
 - **FACILITY LOCATION EQUITY ANALYSIS (IF CONSTRUCTING A FACILITY)**
 - **FIXED ROUTE SERVICE STANDARDS (IF A FIXED-ROUTE PROVIDER)**
 - **MPO DEMOGRAPHIC DATA, ANALYSIS AND PROCEDURES (IF AN MPO)**

1. EVIDENCE OF POLICY APPROVAL

Revised on: _____

Adopted by: _____

Adopted on: _____

This policy is hereby adopted and signed by:

CITY OF USA/ORGANIZATION NAME

Executive Name/Title: _____

Executive Signature: _____

2. LOG OF POLICY UPDATES

The **City Of USA/Organization Name** will review its policy on an annual basis to determine if modifications are necessary.

The **City Of USA/Organization Name** will use the table below to record reviews/revisions made to the plan.

As applicable, **City Of USA/Organization Name** will discuss Title VI plan requirements with its third-party transit providers on an annual basis to ensure compliance with Title VI plan requirements.

Policy Updates – Activity Log

Date	Activity (Review/Update/Addendum/ Adoption/Distribution)	Person Responsible	Remarks

3. CONTACT INFORMATION/PROGRAM ADMINISTRATION

CHIEF EXECUTIVE

The **City Of USA/Organization Name's** Chief Executive will ensure compliance with Title VI of the Civil Rights Act of 1964 (42 U.S.C. 2000d) and the U.S. Department of Transportation implementing regulations.

Name: _____
Email: _____
Phone: _____

TRANSPORTATION MANAGER

The **City Of USA/Organization Name's** Transportation Manager will ensure implementation of the **City Of USA/Organization Name's** federally funded transportation program. The Transportation Manager has other duties and responsibilities in addition to Title VI. This position has a direct reporting relationship and access to **City Of USA/Organization Name's** Chief Executive.

Name: _____
Email: _____
Phone: _____

CIVIL RIGHTS COORDINATOR

The **City Of USA/Organization Name's** Civil Rights Coordinator ensures Title VI compliance in accordance with the **City Of USA/Organization Name's** federally funded transportation program. The Civil Rights Coordinator has other duties and responsibilities in addition to Title VI. This position has a direct reporting relationship and access to the **City Of USA/Organization Name's** Chief Executive.

Name: _____
Email: _____
Phone: _____

The Civil Rights Coordinator is responsible for initiating, monitoring, and ensuring compliance of the **City Of USA/Organization Name's** Title VI requirements, including the following activities:

- Program Administration
 - Ensure compliance with federal Title VI requirements
 - Develop and implement the **City Of USA/Organization Name's** Title VI Plan
 - Update and maintain Title VI program policies and procedures
- Complaints
 - Review, track, investigate and close Title VI complaints
- Employee Training
 - Educate staff on Title VI issues and regulations
- Reporting
 - Prepare and submit Title reports per state and federal regulations
- Public Dissemination
 - Notify the public of the **City Of USA/Organization Name's** Title VI program requirements via the **City Of USA/Organization Name's** public area, on its website, in vehicles, etc.

- Oversight
 - Ensure contractors and lessees adhere to Title VI requirements

4. NOTICE TO THE PUBLIC¹

The **City Of USA/Organization Name's** Notice to the Public is as follows:

<p>Notifying the Public of Rights Under Title VI</p> <p>CITY OF USA/ORGANIZATION NAME</p> <ul style="list-style-type: none"> • The City Of USA/Organization Name 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 City Of USA/Organization Name. • For more information on the City Of USA/Organization Name's civil rights program, and the procedures to file a complaint, contact _____, (for hearing impaired, please use Wisconsin Relay 711 service); email _____; or visit our administrative office at _____. For more information, visit _____. • A complainant may file a complaint directly with the Federal Transit Administration by filing a complaint with the Office of Civil Rights, Attention: Title VI Program Coordinator, East Building, 5th Floor-TCR, 1200 New Jersey Ave., SE Washington, DC, 20590. • If information is needed in another language, contact _____. Si se necesita informacion en otro idioma de contacto, _____. Yog muaj lus qhia ntxiv rau lwm hom lus, hu rau _____.

The **City Of USA/Organization Name's** Notice to the Public is posted in the following locations: (check all that apply)

- Agency Website: _____
- Public areas of the agency office (common area, public meeting rooms, etc.)
- Public areas of the agency office (common area, public meeting rooms, etc.)
- Inside vehicles
- Rider Guides/Schedules
- Transit shelters and stations
- Other: _____

¹ Title VI regulations require informing customers and the public of their rights under Title VI regulations by posting a Title VI public notice. The Title VI notice must include:

- A statement that the agency operates programs without regard to race, color or national origin.
- Information on how to request additional information about the agency's Title VI obligations, including information on how to file a complaint, the location of the complaint form, etc.
- Information on how to request Title VI information in another language, if required.

The Public Notice should be posted in the following locations: website, public areas of the agencies office, inside vehicles, rider guides/schedules and transit shelters/facilities.

5. COMPLAINT PROCEDURE

The **City Of USA/Organization Name's** Complaint Procedure is made available in the following locations: *(check all that apply)*

- Agency website, either as a reference in the Notice to Public or in its entirety
- Public areas of the agency office (common area, public meeting rooms, etc.)
- Available in appropriate languages for LEP populations, meeting the Safe Harbor Threshold.
- Other: _____

Complaint Procedure Language:

Any person who believes they've been discriminated against on the basis of race, color, or national origin, religion, gender, disability or age by the **City Of USA/Organization Name** may file a complaint by completing and submitting the agency's Complaint Form.

The Complaint Form may also be used to submit general complaints to the **City Of USA/Organization Name**.

The **City Of USA/Organization Name** investigates complaints received no more than 180 business days after the alleged incident. The **City Of USA/Organization Name** will process complaints that are complete.

Once the complaint is received, the **City Of USA/Organization Name** will review it to determine if it has jurisdiction. The complainant will receive an acknowledgement letter stating whether the complaint will be investigated by the **City Of USA/Organization Name**.

The **City Of USA/Organization Name** has _____ business days to investigate the complaint. If more information is needed to resolve the case, the **City Of USA/Organization Name** may contact the complainant.

The complainant has _____ 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 _____ business days, the **City Of USA/Organization Name** can administratively close the case. A case can be administratively closed also if the complainant no longer wishes to pursue their case.

After the investigator reviews the complaint, one of two (2) letters will be issued 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, the complainant has _____ business days after the date of the letter or the LOF to do so.

A person may also file a complaint directly with the Federal Transit Administration, at FTA Office of Civil Rights, 1200 New Jersey Avenue SE, Washington, DC 20590.

If information is needed in another language, then contact _____ .

Si se necesita informacion en otro idioma de contacto _____ .

Yog muaj lus qhia ntxiv rau lwm hom lus, hu rau _____ .

6. COMPLAINT FORM

City Of USA/Organization Name - Complaint/Comment Form

City Of USA/Organization Name is committed to providing you with safe and reliable transportation services and we want your feedback. Please use this form for suggestions, compliments, and complaints.

Please submit this form electronically at _____ or in person at the address below.

City Of USA/Organization Name: _____

Street Address: _____

City, State, Zip: _____

Email: _____

You may also call us at xxx-xxx-xxxx. Please make sure to provide your contact information in order to receive a response.

SECTION I: TYPE OF COMMENT (Choose One) – provide detail in ‘Comment Details’ below

Compliment Suggestion Complaint Other: _____

Title VI:	<input type="checkbox"/> Race	<input type="checkbox"/> Color	<input type="checkbox"/> National Origin
ADA/(Disability):	<input type="checkbox"/> Yes	<input type="checkbox"/> No	
Service:	<input type="checkbox"/> Yes	<input type="checkbox"/> No	
Other:	<input type="checkbox"/> Gender	<input type="checkbox"/> Religion	<input type="checkbox"/> Age <input type="checkbox"/> Limited English Proficient

SECTION II: CONTACT INFORMATION

Name: _____

Rider ID (if applicable): _____

Street Address: _____

City, State, Zip: _____

Phone: _____

Email: _____

Accessible Format Requirements: (choose preferred format(s))

Large Print TDD/Relay Audio Recording Other _____

Are you filing this complaint on your own behalf? Yes No

If you answered “yes” to this question, go to Section IV.

If not, please provide 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

SECTION III: COMMENT DETAILS

Transit Service: Bus Paratransit Shared-Ride Taxi
(Choose one, as applicable)

Date of Occurrence:

Time of Occurrence:

Name/ID of Employee(s) or Others Involved:

Vehicle ID/Route Name or Number:

Direction of Travel:

Location of Incident:

Mobility Aid Used (if any):

If above information is unknown, please provide other descriptive information to help identify the employee:

Description of Incident:

As applicable, explain as clearly as possible what happened and why you believe you were discriminated against. If more space is needed, please add additional pages.

SECTION IV: FOLLOW-UP

May we contact you if new need more details or information?

What is the best way to reach you? (choose one)

Phone Yes No
 Email Mail

If a **phone call** is preferred, what is the best day and time to reach you? _____

SECTION V: DESIRED OUTCOME

What steps have you have taken to address the conflict or problem? _____

What type of corrective actions took place? _____

What remedy are you seeking? _____

SECTION VI: ADDITIONAL INFORMATION

Have you previously filed a complaint with this agency? Yes No

Have you filed this complaint with any other Federal, State or Local agency, or with any Federal or State Court? Yes No

If yes, to the question above, list all agencies contacted: _____

Please provide information about a contact person at the agency/court where each complaint was filed.

Name: _____

Agency: _____

Address: _____

Phone: _____

Email: _____

Please attach any documents you have which support the allegation. Then date and sign this form and send it to the **City Of USA/Organization Name:**

Complainant Signature

Date

Print Your Name

7. LIST OF TRANSIT RELATED TITLE VI INVESTIGATIONS, COMPLAINTS AND LAWSUITS²

The **City Of USA/Organization Name** maintains a list or log of all investigations, complaints and lawsuits, pertaining to its transit-related activities.

Check One:

- There have been **no** investigations, complaint and/or lawsuits filed against us during the report period.
- There have been investigations, complaints and/or lawsuits filed against us. *See list below. Attach additional information as needed.*

	Date (Month, Day, Year)	Complainant's Name/Address	Basis of Complaint³	Summary Complaint Description	Status	Action(s) Taken
Investigations						
Complaints						
Lawsuits						

² **Lawsuit:** The protected classes under Title VI are Race, Color and Nation Origin.

³ **Basis of Complaint:** Specify Race, Color, National Origin, Religion, Gender, Disability, Age, Other

8. PUBLIC PARTICIPATION PLAN

STRATEGIES AND DESIRED OUTCOMES

To promote inclusive public participation, the **City Of USA/Organization Name** will employ the following strategies, as appropriate:

- Provide for early, frequent and continuous engagement by the public.
- Select accessible and varied meeting locations and times
- Employ different meeting sizes and formats
- Provide childcare and food during meetings, if possible.
- 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 **City Of USA/Organization Name** maintains a log/record of the various types of outreach activities it uses to promote inclusive public participation. On an annual basis, the **City Of USA/Organization Name** reviews its log of outreach activities to determine if additional or different strategies are needed to promote inclusive public participation.

The direct public outreach and involvement activities conducted by the **City Of USA/Organization Name** are summarized in the table below. *Efforts include meetings, surveys, focus groups, attendance at community events, etc.*

Information collected on the size, location, meeting format, number of attendees, etc. as well as the scope of the distribution method (i.e., posters were placed in all shopping centers in the affected area) will be used for future planning efforts. Examples of additional supporting materials include copies of meeting announcements, agendas, posters, attendee list, etc.

Event Date	City Of USA/Organization Name Staffer(s)	Event	Date Publicized and Communication Method (Public Notice, Posters, Social Media)	Outreach Method (Meeting, Focus Group, Survey, etc.)	Notes

9. LANGUAGE ASSISTANCE PLAN

PLAN COMPONENTS

As a recipient of federal US DOT funding, the **City Of USA/Organization Name** 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.

The **City Of USA/Organization Name's** Language Assistance Plan includes the following elements:

1. The results of the *Four Factor Analysis*, including a description of the LEP population(s), served.
2. A description of how language assistance services are provided by language
3. A description of how LEP persons are informed of the availability of language assistance service
4. A description of how the language assistance plan is monitored and updated
5. A description of how employees are trained to provide language assistance to LEP persons
6. Additional information deemed necessary

METHODOLOGY

To determine if an individual is entitled to language assistance and what specific services are appropriate, the **City Of USA/Organization Name** has conducted a Four Factor Analysis⁴ of the following areas: 1) Demography, 2) Frequency, 3) Importance and 4) Resources and Costs.

LEP Four Factor Analysis

Factor 1: Demography: Identifies the number or proportion of LEP persons served and the languages spoken in the service area.

The first factor of the *Four Factor Analysis* is the basis of the Language Assistance Plan. It requires the **City Of USA/Organization Name** to review its US Census data to determine if it meets the *LEP Safe Harbor Threshold*.

US Census and American Community Survey (ACS) Data⁵

The **City Of USA/Organization Name** did the following:

1. Inserted a copy of the _____ county LEP data in the Title VI plan. This data was found at the WisDOT website www.dot.wisconsin.gov/localgov/docs/title6-lep.pdf or the US Census Bureau American Fact Finder website <http://factfinder.census.gov/faces/nav/jsf/pages/index.xhtml>
2. Analyzed the LEP demographic data for the **City Of USA/Organization Name's** program and/or service area by calculating the *Safe Harbor Threshold* for two to three of the largest language groups identified other than English.
 - a. The *Safe Harbor Threshold* is calculated by dividing the population estimate for a language group that "Speaks English less than very well" by the total population of the county.
 - i. The *LEP Safe Harbor Threshold* provision stipulates that for each LEP group that meets the LEP language threshold (5% or 1,000 individuals, whichever is less, of the population to be served) the **City Of USA/Organization Name** must provide translation of vital documents in written format for the non-English users.

⁴ DOT LEP guidance <https://www.transportation.gov/civil-rights/civil-rights-awareness-enforcement/dots-lep-guidance>

⁵ The ACS publishes data in many forms on the Census Bureau American Fact Finder website <http://factfinder2.census.gov/faces/nav/jsf/pages/searchresults.xhtml>

- ii. Examples of written translation of vital documents include the Title VI policy statement and/or Notice to the Public (Appendix 2), Title VI Complaint Procedure (Appendix 3), Title VI Complaint Form (Appendix 4), and ADA paratransit eligibility forms.
- 3. Explained the results of the analysis of the county LEP data in the demographic section of the *Four Factor Analysis*.

Factor 2: Frequency: Identifies the frequency staff (and transit provider/lessee, if applicable) comes into contact with LEP persons.

LEP persons are persons identified as speaking English less than very well, not well or not at all. Just because a person speaks a language other than English doesn't mean they don't speak English or are identified as LEP.

The summary below discusses the frequency with which **City Of USA/Organization Name** staff, and/or its contractor/lessee come into contact with LEP persons. It also provides information on the how staff is instructed to meet the needs of LEP persons. **City Of USA/Organization Name** staff persons are encouraged to use LEP resource materials to assist LEP persons.

Factor 3: Importance: Explains how the program, service or activity affects people's lives.

The summary below discusses how the **City Of USA/Organization Name's** program and services impact the lives of persons within the community. The **City Of USA/Organization Name** will specify the community organizations that serve LEP persons, if available.

Factor 4: Resources and Costs: Discusses funding and other resources available for LEP outreach.

The summary below discusses the low-cost methods the **City Of USA/Organization Name** uses to provide outreach to LEP persons as well as train staff (and transit provider/lessee, if applicable) on Title VI and LEP principles.

Additional Required Elements

In addition to the *Four Factor Analysis (listed below as item #1)*, the **City Of USA/Organization Name** addresses the following elements:

- 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

And, any additional information deemed necessary.

City Of USA/Organization Name – Summary of the Language Assistance Plan Components

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

Factor 1 – Demography

The **City Of USA/Organization Name** contracts with a transit provider/lessee to provide transportation service for the **City Of USA/Organization Name** and in USA County.

The US Census Bureau – American Fact Finder (2011-2015) reports there are numerous languages spoken in USA County. Some of these languages include Spanish, German, Russian, Japanese, Hmong, and Vietnamese. After English, the second largest language group is Spanish.

The Safe Harbor Threshold is calculated by dividing the population estimate for a language group that “speaks English less than very well” by the total population of the county. The LEP Safe Harbor Threshold provision stipulates that for each LEP group that meets the LEP language threshold (5% or 1,000 individuals, whichever is less), the **City Of USA/Organization Name** must provide translation of vital documents in written format for non-English speaking persons.

In USA County, with a population estimate of _____, _____ persons have identified themselves as Spanish speaking and “speaks English less than well”. This language group is less than 1% and below the 5% or 1,000 persons threshold of the population to be served. This means the **City Of USA/Organization Name** is not required to provide written translation of vital documents. All the other language groups listed above are also below the Safe Harbor Threshold. This means, at this time, the **City Of USA/Organization Name** is also not required to provide written translation of vital documents in these languages.

Even though the **City Of USA/Organization Name** is below the Safe Harbor Threshold and is not required to provide written translation of vital documents, it publishes a timetable and route map in Spanish on its website.

In the future, if the **City Of USA/Organization Name** meets the Safe Harbor Threshold for any language group, it will provide written translation of vital documents in such languages and consider measures needed for oral interpretation.

Factor 2 – Frequency

The **City Of USA/Organization Name** and its transit provider/lessee will be trained on what to do when they encounter a person that speaks English less than well. The **City Of USA/Organization Name** with assistance from its transit provider/lessee tracks the number of encounters and consider adjustments as needed to its outreach efforts to ensure meaningful access to all persons and specifically to LEP and minority populations of the **City Of USA/Organization Name's** programs and services.

Log of LEP Encounters

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

The **City Of USA/Organization Name's** transit provider/lessee provides rides to _____ persons per year. While formal data has not been collected, the transit provider/lessee has indicated it has encountered _____ LEP persons using the service within the last year.

The **City Of USA/Organization Name** and its transit provider/lessee has an open-door policy and will provide rides to any person who requests a ride. If an individual has speech limitations, the dispatcher or driver will work with the Transit Manager and the **City Of USA/Organization Name** to ensure the individual receives access to the transportation service.

The “I Speak” Language identification card listed below is a document that can be placed in our transit provider/lessee’s vehicles and used by the **City Of USA/Organization Name** staff to assist LEP individuals. Additional languages can be added as needed to match the demographic changes of the **City Of USA/Organization Name's** service area.

“I Speak” Language Identification Card

Mark this Box if you speak...	Language Identification Chart	Language
<input type="checkbox"/>	I speak English	English
<input type="checkbox"/>	Yo hablo español	Spanish
<input type="checkbox"/>	Kug has lug Moob	Hmong
<input type="checkbox"/>	我說中文	Chinese
<input type="checkbox"/>	E nói tiếng Việt	Vietnamese
<input type="checkbox"/>	나는 한국어를	Korean
<input type="checkbox"/>	Marunong akong mag-Tagalog	Tagalog
<input type="checkbox"/>	Ich spreche Deutsch	German
<input type="checkbox"/>	Я говорю по-русски	Russian
<input type="checkbox"/>	Ja говорим српски	Serbian
<input type="checkbox"/>	मैं हिंदी बोलते हैं	Hindi
<input type="checkbox"/>	میں نے اردو بولتے ہیں	Urdu

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

Factor 3 – Importance

The **City Of USA/Organization Name** and our transit provider/lessee understands an LEP person with language barrier challenges also faces difficulties obtaining health care, education, access to employment and nutrition meal sites, recreational services and socialization. A transportation system is a key link to connecting LEP persons to these essential services.

The **City Of USA/Organization Name** has identified activities and services which would have serious consequences to individuals if language barriers prevented access to information or the benefits of those programs. The activities and services include providing emergency evacuation instructions in our facilities and vehicles and providing information to the public on security awareness or emergency preparedness.

The **City Of USA/Organization Name's** assessment of the programs, activities and services that are most critical include contact with community organization(s) that serve LEP persons, as well as contact with LEP persons themselves to obtain information on the importance of the modes or the types of services that are provided to the LEP populations.

Factor 4 – Resources and Costs

Even though the **City Of USA/Organization Name** does not have a separate budget for LEP outreach, it has worked with our transit provider/lessee to implement low cost methods of reaching LEP persons.

City Of USA/Organization Name staff conducts outreach activities to LEP communities throughout the year to inform the public of transportation services available. These outreach/resource awareness efforts are low cost methods and are accomplished by existing staff resources and the use of posting website information and developing and printing brochure/materials.

In addition, the **City Of USA/Organization Name** and our transit provider/lessee uses a variety of low cost outreach methods to reach LEP communities such as visiting ethnic stores/markets and restaurants, community centers, libraries, faith-based institutions and local festivals. The cost is relatively low but the ability to reach the LEP population is high.

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

The **City Of USA/Organization Name** has a bilingual speaking person on staff. In addition, we work with our transit provider/lessee to ensure mechanisms are in place to reach LEP persons in the service area. For example, our transit provider/lessee has a special brochure printed and is available in each vehicle to assist LEP populations in understanding the transportation service.

In addition, the **City Of USA/Organization Name** has developed relationships with language teachers in area schools as well as local Hmong leaders to use a resource to assist in meeting the need of LEP persons, if needed.

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

The **City Of USA/Organization Name** and our transit provider/lessee does the following to inform LEP persons of the availability of language assistance services:

- Review outreach activities and the frequency of contact with LEP individuals to determine whether additional language assistance services are needed.
- Utilize the bilingual speaking person on staff to assist with the development of bilingual outreach materials, including pictograms and other symbols.
- Prioritize the hiring of bilingual staff, as needed.
- Utilize Wisconsin Relay 7-1-1, the state of Wisconsin resource to assist with communication needs <http://www.wisconsinrelay.com> and <http://www.wisconsinrelay.com/features>.

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

*The **City Of USA/Organization Name** reviews its plan on an annual basis or more frequently as needed. The **City Of USA/Organization Name** will evaluate the information collected on encounters with LEP persons as well as public outreach efforts to determine if adjustments should be made to the delivering of programs and services to ensure meaningful access to minority and LEP persons.*

*In addition, the **City Of USA/Organization Name** meets with our transit provider/lessee on an annual basis to ensure the Title VI requirements are met. The last approval and site-visit of the contractor/transit provider was on .*

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

***City Of USA/Organization Name** employees are oriented on the principles of Title VI and the **City Of USA/Organization Name's** Language Assistance Plan. New employees will be provided guidance on the needs of clients served and how best to meet their needs. The **City Of USA/Organization Name** will ensure its transit provider/lessee, as applicable also educates its staff on Title VI requirements, and specifically LEP provisions.*

*If a driver, dispatcher or employee needs further assistance related to LEP individuals, they will work with the **City Of USA/Organization Name's** and/or our transit provider/lessee's Transit Manager to identify strategies to meet the language needs of the participants of the program or service.*

*As part of our annual check in meeting, the **City Of USA/Organization Name** will meet with our transit provider/lessee, as applicable to discuss updates the **City Of USA/Organization Name's** Language Assistance Plan.*

10. MINORITY REPRESENTATION TABLE AND DESCRIPTION

A. Minority Representation Table⁶

The table below depicts the **City Of USA/Organization Name's** non-elected committees/councils related to transit.

Body	Caucasian	Hispanic	African American	Asian American	Native American	Two or More Races
County Population	44%	28%	14%	8%	4%	2%
Access Committee	57%	23%	10%	7%	0%	3%
Citizens Advisory Council	36%	25%	20%	10%	5%	4%
Bicycle Pedestrian Committee	45%	30%	15%	4%	5%	1%

B. Efforts to Encourage Minority Participation

The **City Of USA/Organization Name** understands diverse representation on committees, councils and boards results in sound policy reflective of its entire population. As such, the **City Of USA/Organization Name** encourages participation of all its citizens.

As vacancies on boards, committees and councils become available, the **City Of USA/Organization Name** will make efforts to encourage and promote diversity.

To encourage participation on its boards, committees and councils, the **City Of USA/Organization Name** will continue to reach out to community, ethnic and faith-based organizations to connect with all populations. In addition, the **City Of USA/Organization Name** will use creative ways to make participating realistic and reasonable. Such as, scheduling meetings at times best suited to its members and consider providing transportation, if needed for its members.

Minority Representation Data Collection Form (Sample Document)

Name of board, commission, council, etc.

Date:

Dear Member,

As the **City Of USA/Organization Name** is a recipient of federal funds, we are required under Title VI of the Civil Rights statute to ascertain the racial/ethnic make-up of any non-elected boards, commissions, councils, etc.

Data from this section is used for statistical and reporting purposes. The information may be subject to disclosure under federal or state law or rule.

Anti-Discrimination Notice

It is unlawful for the **City Of USA/Organization Name** to fail or refuse to provide services, access to services or activities, or otherwise discriminate against an individual because of an individual's race, color, religion, sex, national origin, disability or veteran status.

As a council under the jurisdiction of the **City Of USA/Organization Name**, we invite council members to voluntarily self-identify their race/ethnicity in order for us to comply with FTA Title VI regulations. This information will be used according

⁶ County data by race is available at the WisDOT website www.dot.wisconsin.gov/localgov/transit/title6.htm or the US Census Bureau American Fact Finder website <http://factfinder.census.gov/faces/nav/jsf/pages/index.xhtml>

to the provisions of applicable federal and state laws, executive orders and regulations, including those requiring the information to be summarized and reported to the federal government for civil rights enforcement purposes.

Race/Ethnicity

If you choose to self-identify, please mark the **one box** describing the race/ethnicity category with which you primarily identify:

- Asian or Pacific Islander*: All persons having origins in any of the peoples of the Far East, Southeast Asia, the Indian subcontinent, or the Pacific Islands. This area includes, for example, China, Japan, Korea, the Philippine Islands and Samoa.
- Black and/or African American* (not of Hispanic origin): All persons having origins in any of the Black racial groups of Africa.
- Hispanic*: All persons of Mexican, Puerto Rican, Cuban, Central or South American, or other Spanish culture or origin, regardless of race.
- American Indian or Alaskan Native*: All persons having origins in any of the original peoples of North America, and who maintain cultural identification through tribal affiliation or community recognition.
- Caucasian* (not of Hispanic origin): All persons having origins in any of the original peoples of Europe, North Africa or the Middle East.

11. ADDITIONAL ITEMS, IF REQUIRED:

Facility Location Equity Analysis
(For recipients constructing a facility)

COMPLETED BY

Name: _____

Date: _____

Subrecipient: _____

Facility Type: _____

Site Location Address: _____

Project Description: _____

Project Timeline: _____

Analysis of Site Location: _____

Compare the equity impact of various site alternatives

Site Justification: _____

Outreach Activities: _____

List outreach methods used to engage persons potentially impacted by the facility site

NOTES:

- *The definition of “facility” includes storage facilities, maintenance facilities and operation centers. For purposes of this requirement, “facilities” **does not** include bus shelters, transit stations, power substations, as these are transit amenities and are evaluated during project development and the NEPA process.*
- *The Title VI equity analysis must occur before the selection of the preferred site.*
- *If the recipient determines that the location of the project will result in a disparate impact on the basis of race, color, or national origin, the recipient may locate the project in that location if there is a substantial legitimate justification for locating the project there, and where there are no alternative locations that would have a less disparate impact on the basis of race, color, or national origin.*

Fixed Route Service Standards
(For all Fixed Route Transit Providers)

Vehicle Load Standards

1. *Expressed in writing*

The average of all loads during the peak operating period should not exceed vehicles’ achievable capacities, which are 30 passengers for a t 15’ mini-bus, 51 passengers for low-floor 40-foot buses, 60 passengers or standard 40-foot buses, and 133 passengers on a light rail car.

2. *Expressed in tabular format*

Vehicle Type	Average Passenger Capacities		
	Seated	Standing	Total
15’ Mini-Bus	28	2	30
40’ Low Floor Bus	39	12	51
40’ Standard Bus	43	17	60
Light Rail Vehicle	64	69	133

Vehicle Headway Standards

1. *Expressed in writing*

Service operates on regional trunk lines 15 minutes or better from early morning to late in the evening, seven days a week. On weekdays, 15 minutes or better service should begin no later than 6:00 a.m. and continue until 10:30 p.m. On weekends, 15 minute or better service should begin by 8:00 a.m. and continue until 10:30 p.m.

Scheduling involves the consideration of a number of factors including: ridership productivity, transit/pedestrian friendly streets, density of transit-dependent population and activities, relationship to the Regional Transportation Plan, relationship to major transportation developments, land use connectivity, and transportation demand management.

2. *Expressed in tabular format*

Policy Headways and Periods of Operation				
WEEKDAY	Peak	Base	Evening	Night
Regional Trunk	10	15	15	30
Urban Radial	15	15	30	60
Cross-Town	15	15	30	--
Secondary Radial	30	30	60	--
Feeder	30	30	60	--
Peak Express	30	--	--	--
Employer Feeder	60	--	--	--

*Peak 7-9 am and 4-6pm; Base 9 am-4pm; Evening 6-9:30pm; Night: 9:30pm-midnight
 "--" means no service is provided during that time period

SATURDAY	Peak	Evening	Night		SUNDAY	Peak	Evening	Night
Regional Trunk	15	30	30		Regional Trunk	30	60	--
Urban Radial	30	60	--		Urban Radial	30	60	--
Cross-Town	15	30	--		Cross-Town	30	--	--
Secondary Radial	60	60	--		Secondary Radial	--	--	--
Feeder	60	60	--		Feeder	--	--	--
Peak Express	--	--	--		Peak Express	--	--	--
Employer Feeder	--	--	--		Employer Feeder	--	--	--

*Day 7 am-6pm; Evening 6-9:30 pm; Night 9:30 pm-Midnight
 "--" means no service is provided during that time period

On-Time Performance Standards

Sample 1

Ninety-five (95) percent of the **City Of USA/Organization Name's** transit vehicles will complete their established runs no more than five minutes early or late in comparison to the established schedule/published timetables.

Sample 2

A vehicle is considered on time if it departs a scheduled time point no more than one minute early and not more than five minutes late. The **City Of USA/Organization Name's** on-time performance objective is 90% or greater. The **City Of USA/Organization Name** continuously monitors on-time performance and system results are published and posted as part of monthly performance reports covering all aspects of operations.

Service Availability Standards

1. *Expressed in writing*

The **City Of USA/Organization Name** will distribute transit service so that 90% of all residents in the service area are within a 1/4-mile walk of bus service or within a 1/2 mile walk of rail service.

and/or

Local bus stops will not be more than three blocks apart. Express bus stops will be one-half to three-quarters of a mile apart.

Fixed Route Service Policy
(For all Fixed Route Transit Providers)

Vehicle Assignment Policy

Expressed in Writing

Vehicles will be assigned to the South, North and East depots such that the average age of the fleet serving each depot does not exceed “x” years. Low-floor buses are deployed on frequent service and other high-ridership lines, so these busses carry a higher share of ridership than their numerical proportion of the overall bus fleet. Low-floor buses are also equipped with air conditioning and automated stop announcement systems.

All rail cars are equipped with air conditioning, and high-floor rail cars are always paired with a low car to provide accessibility.

Bus assignments take into account the operating characteristics of buses of various lengths, which are matched to the operating characteristics of buses of various lengths, which are matched to the operating characteristics of the route. Local routes with lower ridership may be assigned 30-foot buses rather than the 40-foot buses. Some routes requiring tight turns on narrow streets are operated with 30-foot rather an 40-foot buses.

Transit Amenities Policy

TRANSIT AMENITIES POLICY

Expressed in Writing

Installation of transit amenities along bus routes are based on the number of passenger boardings at the stops along those routes.

MPO Demographic Data, Analysis and Procedures *(For MPOS)*

In addition to the Title VI appendices 1-8 (and appendices 10 and 11, if the MPO is a provider of fixed route public transportation), the MPO is also required to include the elements listed below:

- a. A demographic profile of the metropolitan area that includes identification of the locations of minority populations in aggregate.
- b. A description of the procedures by which the mobility needs of minority populations are identified and considered within the planning process.

This information helps ensure members of minority communities are provided with full opportunities to engage in the transportation planning process. This includes actions to eliminate language, mobility, temporal, and other obstacles to allow minority populations to participate fully in the process.

- c. Demographic maps that overlay the percent minority and non-minority populations as identified by Census or ACS data, at 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.
- d. Analysis of the impacts identified in (c) that identifies any 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.

NOTES:

- If the MPO is a direct recipient, the MPO will be required to submit additional information to FTA per Chapter VI-1 of FTA Circular 4702.1B (October 1, 2012).
- All MPOs are required to self-certify compliance with all applicable federal requirements. Planning certification reviews conducted jointly by FTA and FHWA of the metropolitan transportation planning processes of transportation management areas include a review of Title VI compliance.

Appendix F – Demographic Maps

**2020 Census Block Groups served by
Metro Transit, City of Madison (WI)
Effective Date: February 2023**

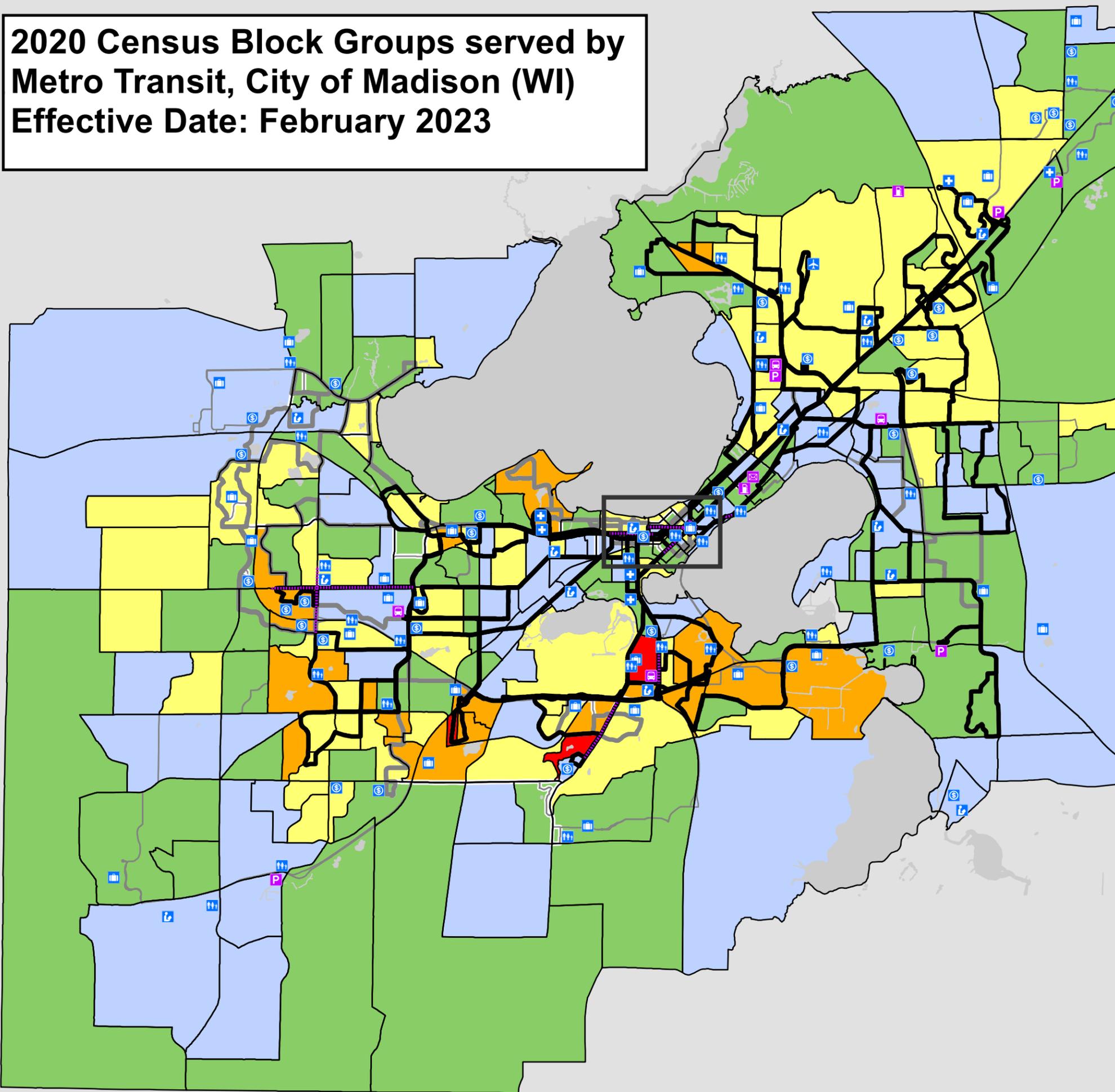
**Minority Populations
and Transit Amenities**

Data: American Community Survey, 2017-2021
Table B03002: Hispanic or Latino by Race

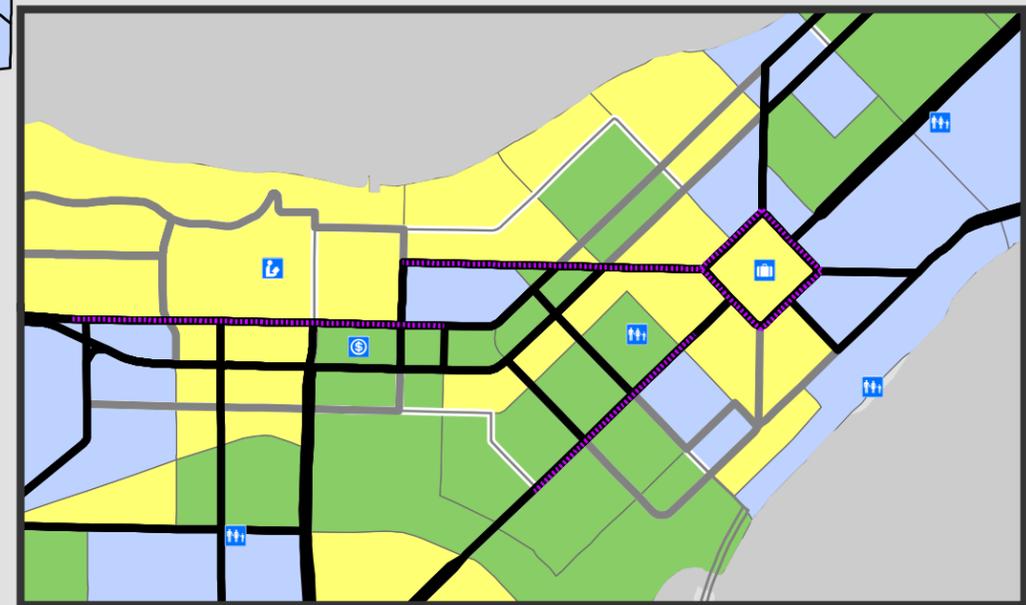
Estimated total individuals for the 256
Block Groups within Metro Transit service area: 388,719

Estimated sub-total of individuals - excluding
White alone, Non Hispanic or Latino: 102,775

Estimated percentage of minority population
within service area (system average): 26.43%



- 0 - 1/2 times system average
- 1/2 - 1 times system average
- 1 - 2 times system average
- 2 - 3 times system average
- 3 + times system average
- Daily service
- Weekday service
- Weekend service
- Limited weekday
- @ Retail
- B Employment
- L Education
- + Healthcare
- T Community
- M Administration office
- G Maintenance garage
- S Transit station
- P Park and Ride lot
- Fixed guideway



**2020 Census Block Groups served by
Metro Transit, City of Madison (WI)
Effective Date: February 2023**

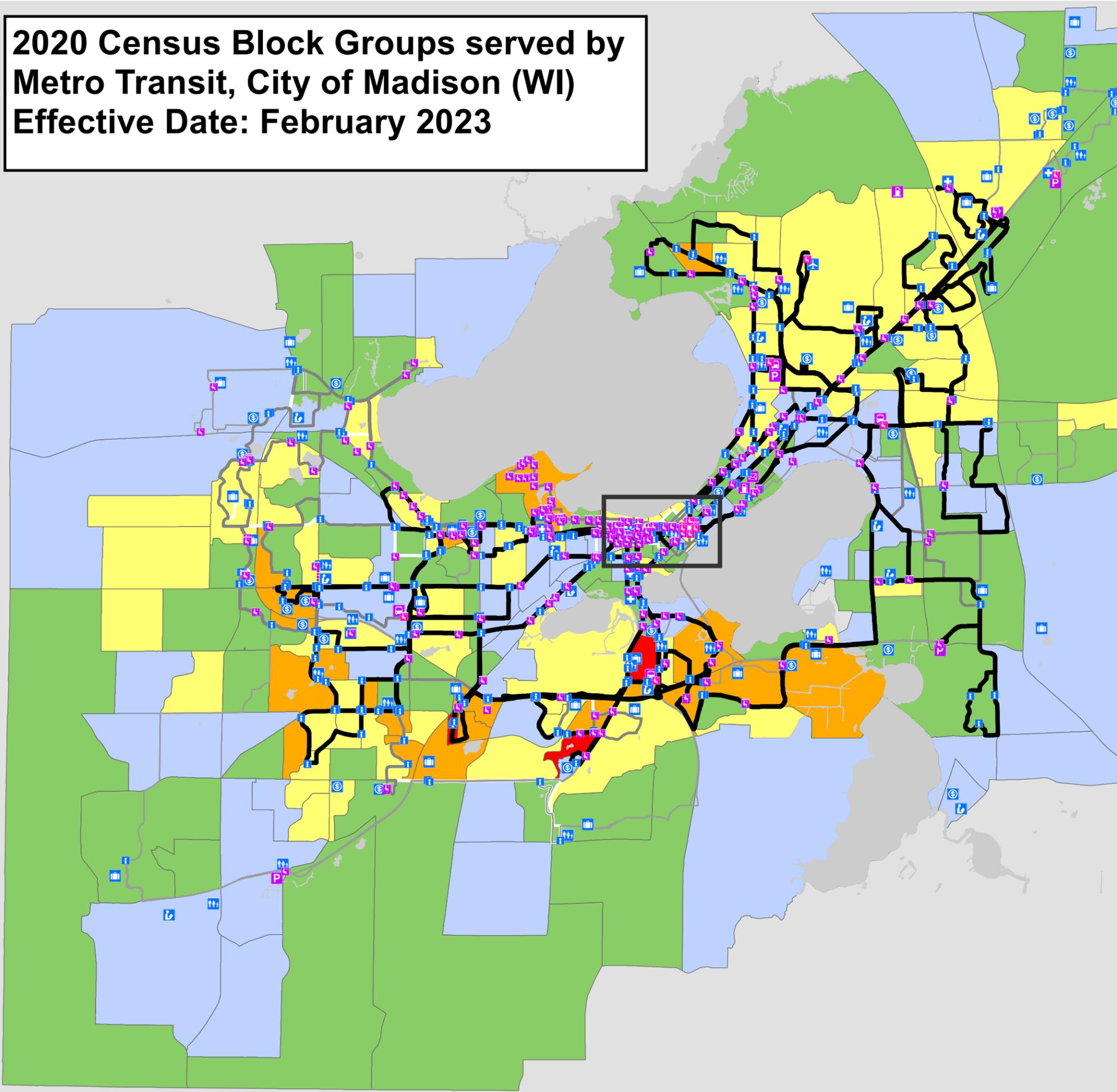
**Minority Populations
and Transit Amenities**

Data: American Community Survey, 2017-2021
Table B03002: Hispanic or Latino by Race

Estimated total individuals for the 256
Block Groups within Metro Transit service area: 388,719

Estimated sub-total of individuals - excluding
White alone, Non Hispanic or Latino: 102,775

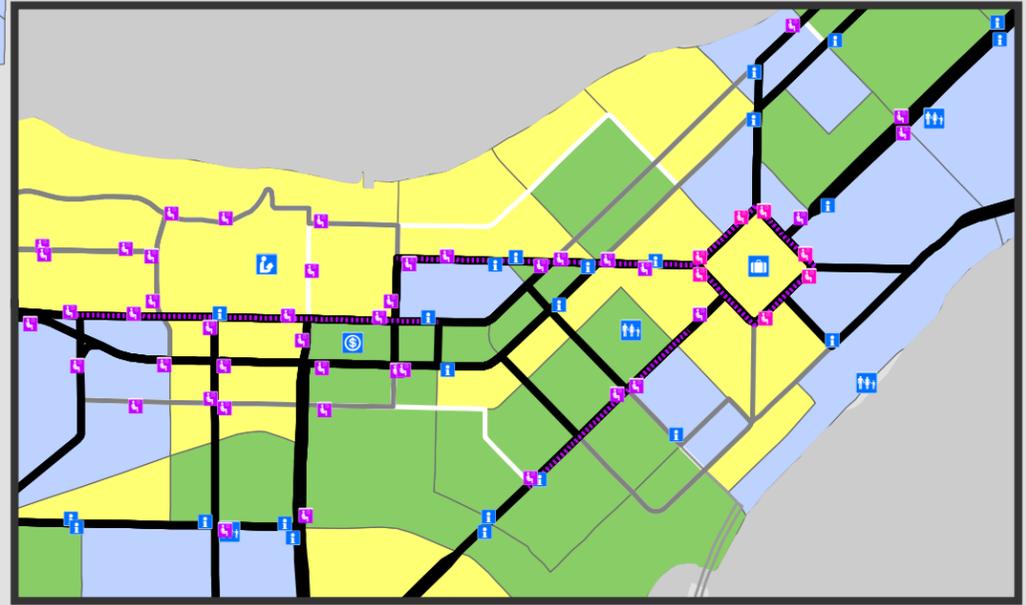
Estimated percentage of minority population
within service area (system average): 26.43%



- 0 - 1/2 times system average
- 1/2 - 1 times system average
- 1 - 2 times system average
- 2 - 3 times system average
- 3 + times system average

- Daily service
- Weekday service
- Weekend service
- Limited weekday

- Shelter with real time & printed information
- Shelter with printed information
- Stop with printed information



2020 Census Block Groups served by Metro Transit, City of Madison (WI)
Effective Date: February 2023

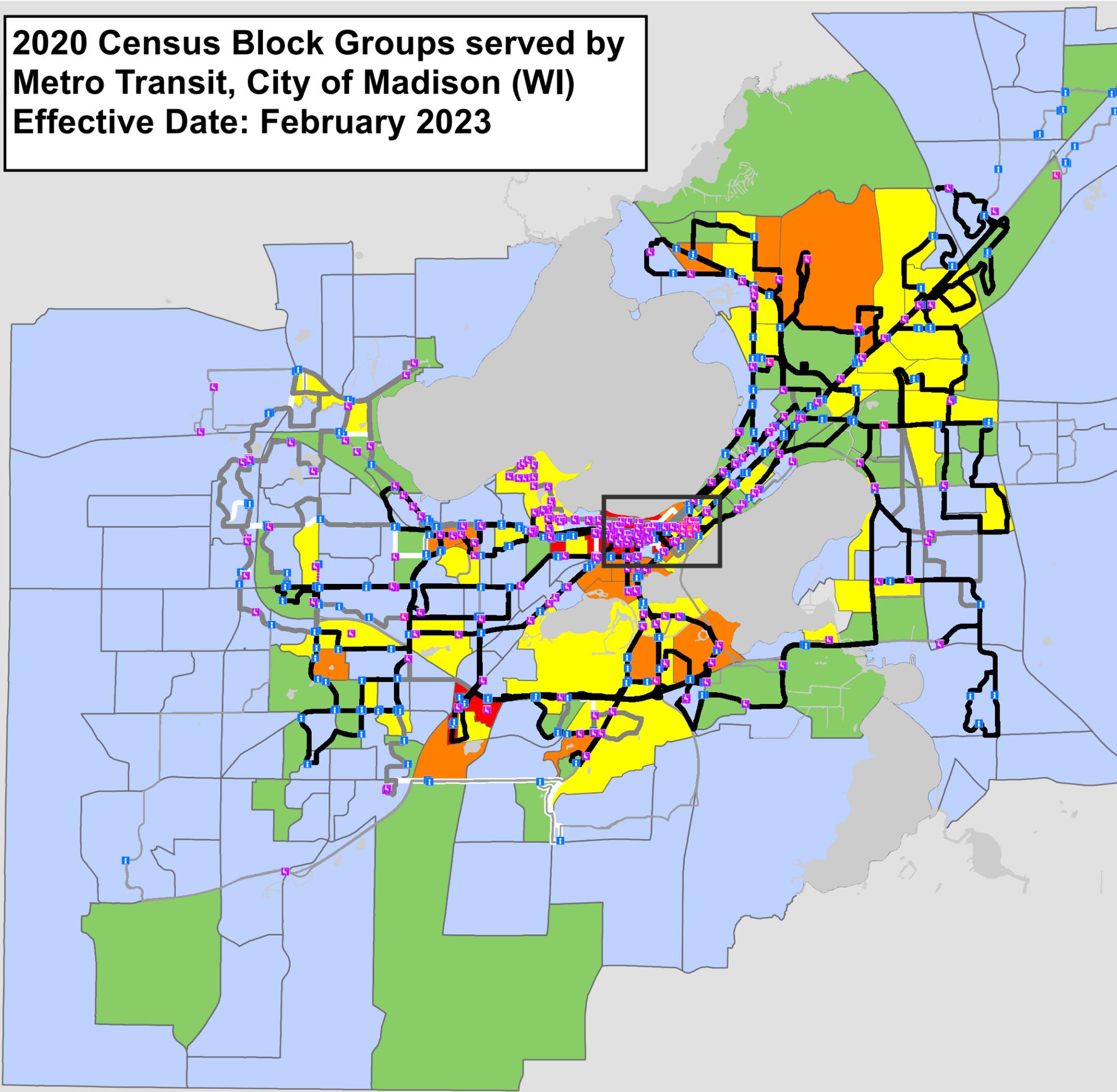
Low Income Populations and Transit Service Area

Data: American Community Survey, 2017-2021
 Table C17002: Poverty Status of individuals in past year

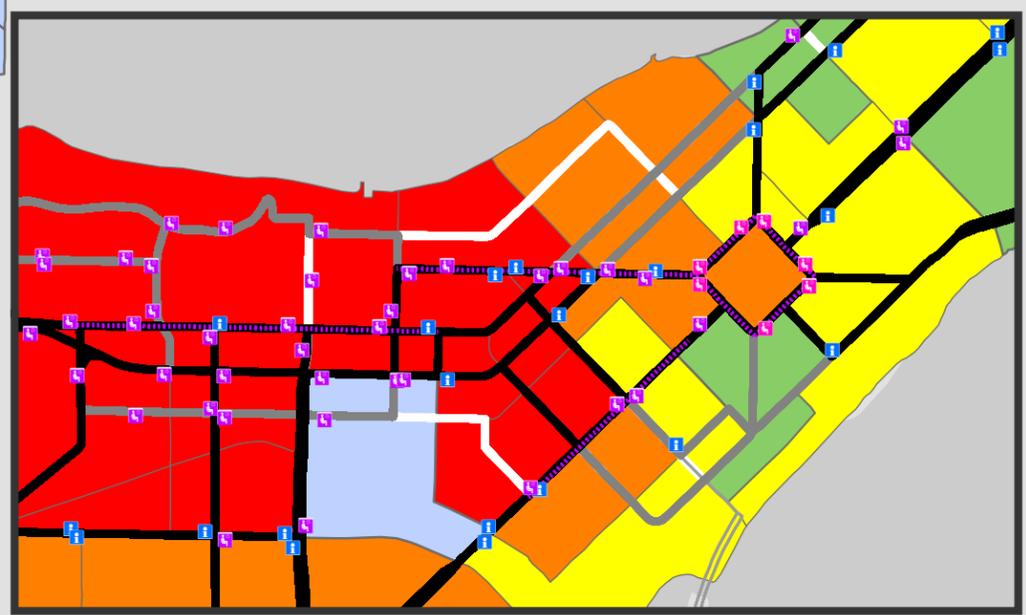
Estimated total individuals with income for the 256 Block Groups within Metro Transit service area: 377,200

Estimated sub-total of individuals in poverty status in past year: 69,118

Estimated percentage of low income population within service area (system average): 18.59%



- 0 - 1/2 times system average
- 1/2 - 1 times system average
- 1 - 2 times system average
- 2 - 3 times system average
- 3 + times system average
- Daily service
- Weekday service
- Weekend service
- Limited weekday
- Shelter with real time & printed information
- Shelter with printed information
- Stop with printed information



**2020 Census Block Groups served by
Metro Transit, City of Madison (WI)
Effective Date: February 2023**

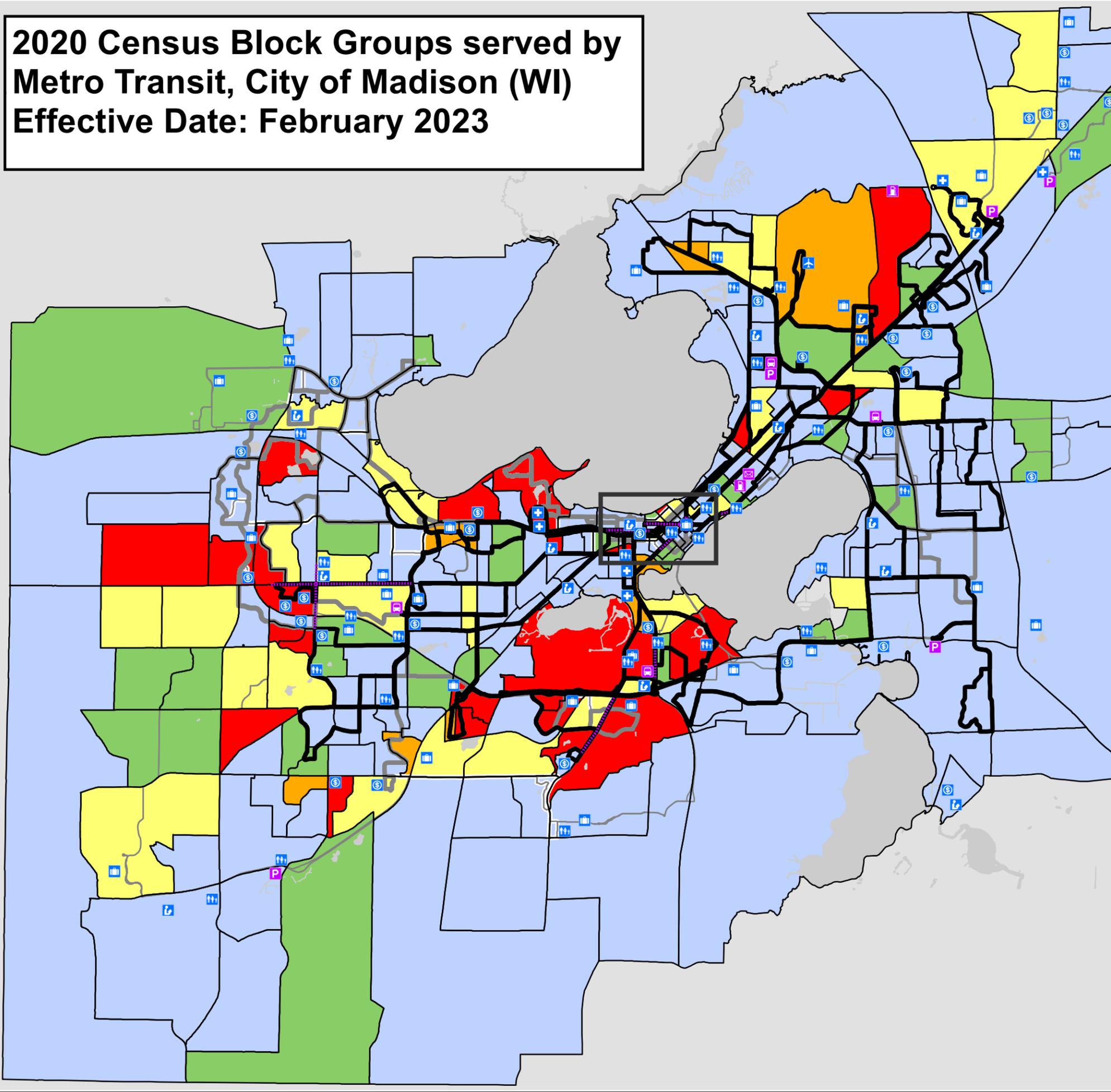
**Limited English Households
and Transit Service Area**

Data: American Community Survey, 2017-2021
Table C16002: Limited English Speaking Households

Estimated total of households for the 256
Block Groups within Metro Transit service area: 171,537

Estimated sub-total of Limited English speaking
households: 3,916

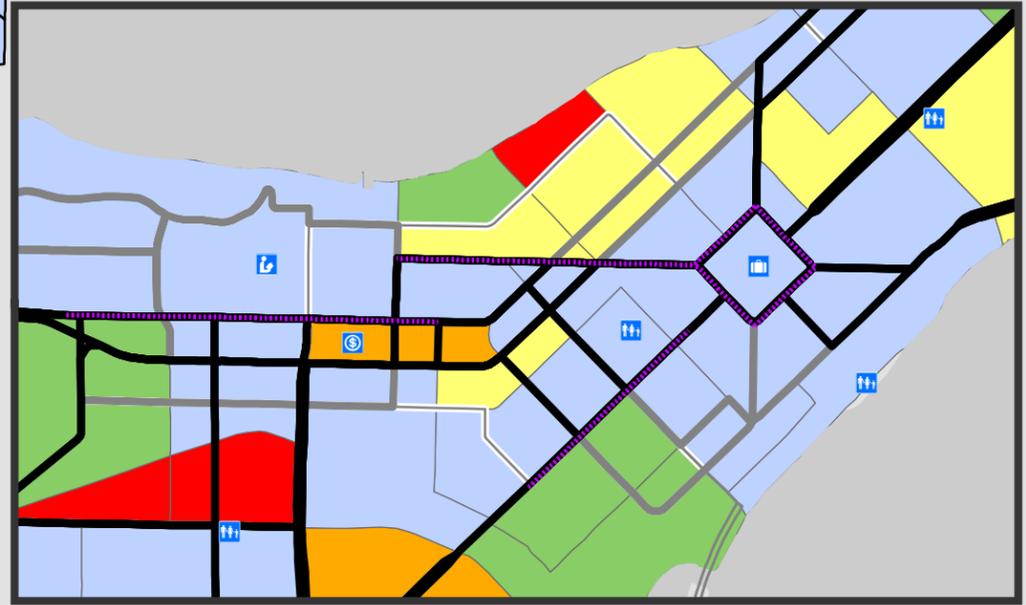
Estimated percentage of Limited English speaking
households (system average): 2.3%



- 0 - 1/2 times system average
- 1/2 - 1 times system average
- 1 - 2 times system average
- 2 - 3 times system average
- 3 + times system average

- Daily service
- Weekday service
- Weekend service
- Limited weekday

- @ Retail
- E Employment
- L Education
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Appendix G – Results of Fare Equity Analyses Since 2020



Title VI Service Equity Analysis

COVID-19 Service Changes 2020-2021

1. Purpose and Context

This report describes the Service Equity Analysis performed in response to service changes undertaken by Metro Transit (Metro) in response to the COVID-19 pandemic. The following legal context sets the foundation for this report:

- Title VI of the Civil Rights Act of 1964 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 subject to discrimination under any program or activity receiving federal financial assistance.” As a recipient of Federal funds, Metro Transit is required to comply with this act.
- Executive Order 12898, Federal Actions to Address Environmental Justice in Minority Populations and Low-Income Populations incorporates requirements from Title VI and other federal laws, expanding the scope to “prevent minority [...] and low-income communities from being subject to disproportionately high and adverse environmental effects”.
- The Federal Transit Administration (FTA) has established regulations that comply with these laws and executive orders in FTA Circular 4702.1B – Title VI Requirements and Guidelines for Federal Transit Administration Recipients.
- When major service changes occur, the FTA requires Metro to perform a Title VI Equity Analysis. This analysis evaluates whether a proposed service change would result in a disparate impact to minority populations or a disproportionate burden to low-income populations.

As the COVID-19 pandemic began in March, 2020, Metro was forced to make severe cuts to its service in order to both maintain operations and provide a safe environment for their employees and customers. As the pandemic continued, Metro gradually reinstated and stabilized its service, reaching approximately 80% of its pre-pandemic service level by August, 2021. This analysis compares Metro’s service in 2019, prior to the COVID-19 pandemic, to the stabilized service operating in 2022.

2. Metro Transit’s Title VI Policies

FTA Circular 4702.1B requires transit providers to establish thresholds to determine when a major service change, disparate impact, and disproportionate burden have occurred. These policies are established in Metro’s Title VI Program, which is submitted to the FTA on a three year cycle, with the last submission in October, 2020. The following definitions reflect the policies contained in Metro’s Title VI Program:

Major Service Change

Changes to Metro’s service are considered a “Major Service Change” if they meet any of the following criteria:

- The establishment of new bus routes
- An alternation on a route of more than 25% of its route miles
- The elimination of any bus service
- A 25% or greater change in the number of daily service hours provided

Adverse Effects

Adverse effects are defined as a geographical or temporal reduction in service that includes, but is not limited to the elimination of a route, rerouting an existing route, and a decrease in frequency. As Metro responded to the COVID-19 pandemic by reducing service levels to ensure safety and operational feasibility, adverse effects were created system-wide. While the gradual reinstatement of service reduced the extent of these effects, adverse effects were still felt by the population as service stabilized. The purpose of this analysis is to establish whether the adverse effects reached the level of causing a disparate impact to minority populations or a disproportionate burden to low-income population.

Disparate Impact on Minority Populations

Metro’s Disparate Impact Policy establishes a threshold to determine whether the adverse effects created by the COVID-19 service reductions disproportionately affect minority populations. Metro’s Disparate Impact Policy states the following:

“Should the burden of any major service change require a minority population / ridership (33% threshold) to bear adverse effects greater or less than 2% than those borne by the non-minority population / ridership, that impact will be considered a disparate impact.”

Disproportionate Burden on Low-Income Populations

Metro’s Title VI program does not clearly establish criteria to determine whether service changes create a disproportionate burden for low-income populations. This analysis applies the disparate impact threshold of 2% to the disproportionate burden analysis.

Metro’s Title VI program defines low-income populations as “households who are at or below 150% of the Department of Health and Human Services Poverty Guidelines.” The poverty thresholds by household size found in Table 1.

Table 1 – Equity Analysis Poverty Thresholds

Household Size	2022 Income: 150% of Federal Poverty Level
1	\$20,385
2	\$27,465
3	\$34,545
4	\$41,625
5	\$48,705
6	\$55,785
7	\$62,865
8	\$69,945
9 and above	Add \$7,080 for each additional person

3. Summary of Service Changes

March 2020

- In response to COVID-19, Metro reduced service levels during the last week of March 2020. The weekend “core route” system was used as the service base with limited commuter trips to neighboring jurisdictions. Frequency on Routes 6 & 67 increased from a 60-minute all-day headway to a 30-minute all-day headway on weekends. The use of weekend schedules resulted in increased service on Route 31, expanding Metro paratransit service boundaries on weekdays. Finally, extra “road buses” were utilized to account for potential overloads due to reduced seating capacity from COVID-19 safety policies.

April 2020

- Metro maintained weekend schedules adding early morning trips back into the schedules with trips directly serving the University of Wisconsin Hospital & Clinics and other primary health care facilities in Metro’s service area. These trips operated seven days a week and began up to ninety minutes earlier than the pre-pandemic weekend schedules.

June 2020

- Early morning trips were added to the peripheral routes to expand coverage for early morning shift workers at health care facilities. These trips operated seven days a week.

August 2020

- Traditional weekday and weekend/holiday schedules were restored in anticipation of the University of Wisconsin returning to partial attendance on campus. Weekday schedules were enhanced to bring daytime frequencies up to 30 minutes from the basic 60-minute weekend headways that had been operating seven days a week on core routes, and trips on other routes that had been suspended in March 2022 were restored on weekdays. Route 16, which operates between the East and South Transfer Points, with its daytime frequency enhanced to every 30 minutes (from hourly), was a service increase compared to the pre-pandemic hourly midday Route 16 schedules on weekdays. Route 10 also resumed service to provide extra capacity between the close in, east side neighborhoods and the UW campus. The campus circulators, routes 80-84, saw a significant increase in hours, as specified by the University of Wisconsin.

October 2020

- As Metro’s service began to stabilize, more traditional public input was solicited for service changes. A public hearing was held on October 14th, 2020 with the City of Madison Transportation Commission where Metro heard public feedback. Following this feedback, the Transportation Commission directed Metro to restore commuter service on Routes 28 and 38.

August 2021

- Service changes in response to public hearing held in October 2020. Routes 28 and 38 were restored and Routes 10 & 27 were eliminated. This brought Metro back to approximately 85% of its pre-COVID-19 service levels.

4. Quantitative Analysis

FTA Circular 4702.1B requires transit agencies to perform an analysis of the adverse effects of major service changes on minority and low-income populations. This analysis utilizes the 2% threshold established in Metro’s Disparate Impact Policy to make this determination. The methodology and results of this analysis are described below.

Methodology

This analysis utilizes the people-trips methodology to determine potential disparate impacts or disproportionate burdens. The people-trips methodology estimate the potential number of trips that could be made by the population served on a bus route, accounting for frequency and span of service. This is done using the following procedures:

- Population data is collected from the United States Census Bureau at the block group level for each demographic group. The population is assumed to be evenly distributed throughout the block group.
- The annual number of times a bus route runs is calculated for each route. Any block group that has a bus stop within ¾ mile is considered within Metro’s service area.
- The population of each block group is then multiplied by the number of times a bus trip serves that block group to get the number of people-trips within the block group.
- The people-trips for each block group are then summed and referred to as the total service area people-trips.
- This process is repeated for minority and low-income populations for both the pre-COVID-19 network (2019) and the post-COVID-19 network (2022).

Quantitative Results

The results of the quantitative analysis indicate that adverse effects were caused by Metro’s COVID-19 service reductions. Adverse effects occur any time service is reduced and were an expected result of this analysis. However, the results of this analysis indicate that the COVID-19 service reductions did not result in disparate impacts to minority populations or disproportionate burdens for low-income populations.

- Minority populations saw a 22.7% reduction in people-trips while non-minority populations saw a 22.9% reduction in people-trips.
- Low-income populations saw a 22.7% reduction in people-trips while non-low-income populations saw a 23% reduction in people.

Table 2 – Quantitative Analysis Results

	People-Trips within 3/4-mile of service				
	Total	Non-Low-Income	Low-Income	Non-Minority	Minority
2019 Network	16,745,704,030	9,142,368,661	7,603,335,369	12,451,232,750	4,294,471,280
2022 Network	12,920,419,490	7,043,997,211	5,876,422,279	9,600,829,840	3,319,589,650
Difference	-3,825,284,540	-2,098,371,450	-1,726,913,090	-2,850,402,910	-974,881,630
	-22.8%	-23.0%	-22.7%	-22.9%	-22.7%

