

TITLE VI PROGRAM

**MONROE TRANSIT AUTHORITY
MONROE , LA**

April 1, 2013

Updated: February 29, 2016

CHAPTER I

INTRODUCTION AND BACKGROUND

Update Prepared Based on Current FTA Title VI Circular

This Program Assessment of Monroe Transit System's Title VI Program has been done in accordance with the current FTA Title VI Circular, which is FTA C 4702.1B.

Serving an Urbanized Area with a Population Below 200,000

Monroe Transit System (MTS) serves the Monroe Urbanized Area, which is an urbanized area with a population of 48,815 (which is less than 200,000 for reporting importance).

As required in FTA C 4702.1B, all sections of the Circular which pertain to FTA recipients from urbanized areas with a population of less than 200,000 are taken into consideration and applied as applicable to this assessment. MTS has no sub-recipient(s) and all references in the Title VI Plan have been removed.

CHAPTER II

PROGRAM OVERVIEW

REPORTING REQUIREMENTS. FTA requires that all direct and primary recipients document their compliance by submitting a Title VI Program to their FTA regional civil rights officer once every three years. The Title VI Program must be approved by the direct or primary recipient's board of directors or appropriate governing entity or official(s) responsible for policy decisions prior to submission to FTA. MTS will submit a copy of the Board resolution and meeting minutes with the Title VI Program as evidence that the board of directors has approved the Title VI Program.

Contractors and subcontractors are responsible for complying with the Title VI Program of MTS with whom they are contracting. Contractors are not required to prepare or submit Title VI Programs. MTS is responsible for ensuring that contractors are following the Title VI Program, and complying with Title VI.

CHAPTER III

GENERAL REQUIREMENTS AND GUIDELINES

1. **REQUIREMENT TO PROVIDE TITLE VI ASSURANCES.** In accordance with 49 CFR Section 21.7(a), every application for financial assistance from FTA must be accompanied by an assurance that the applicant will carry out the program in compliance with DOT's Title VI regulations. This requirement shall be fulfilled when the applicant/MTS submits its annual certifications and assurances to FTA. The text of FTA's annual certifications and assurances is available on FTA's website.

2. **REQUIREMENT TO PREPARE AND SUBMIT A TITLE VI PROGRAM**
 - a. **Contents.** Every Title VI Program shall include the following information:
 - (1) A copy of the MTS's Title VI notice to the public that indicates MTS complies with Title VI, and informs members of the public of the protections against discrimination afforded to them by Title VI. The locations where the notice has been posted are: on the fixed route and paratransit buses, in the Downtown Terminal at 207 Catalpa Street and in the Administration/Maintenance Facility at 700 Washington Street. A copy of the Title VI notice is in Appendix B.
 - (2) A copy of MTS's instructions to the public regarding how to file a Title VI discrimination complaint, including a copy of the complaint form. MTS's complaint procedures are in Appendix C, and MTS's Title VI complaint form is in Appendix D.
 - (3) A list of any public transportation-related Title VI investigations, complaints, or lawsuits filed with MTS since the time of the last submission. Appendix E has the current list. This list will include only those investigations, complaints, or lawsuits that pertain to allegations of discrimination on the basis of race, color, and/or national origin in transit-related activities and programs and that pertain to the recipient submitting the report, not necessarily the larger agency or department of which the recipient is a part.
 - (4) A public participation plan that includes an outreach plan to engage minority and limited English proficient populations, as well as a summary of outreach efforts made since the last Title VI Program submission.
 - (5) A copy of MTS's LEP plan for providing language assistance to persons with limited English proficiency, based on the DOT LEP Guidance.
 - (6) N/A: Recipients that have transit-related, non-elected planning boards, advisory councils or committees, or similar bodies, the membership of which is selected by the recipient, must provide a table depicting the racial breakdown of the membership of those committees, and a description of efforts made to encourage the participation of minorities on such committees or councils.

- (7) N/A: Primary recipients shall include a narrative or description of efforts the primary recipient uses to ensure sub-recipients are complying with Title VI, as well as a schedule of sub-recipient Title VI program submissions.
 - (8) N/A: If the recipient has constructed a facility, such as a vehicle storage facility, maintenance facility, operation center, etc., the recipient shall include a copy of the Title VI equity analysis conducted during the planning stage with regard to the location of the facility.
 - (9) Additional information as specified in chapters IV, V, and VI, depending on whether the recipient is a fixed route transit provider, a State, or an MPO.
3. REQUIREMENT TO NOTIFY BENEFICIARIES OF PROTECTION UNDER TITLE VI. Title 49 CFR Section 21.9(d) requires MTS to provide information to the public regarding the recipient's obligations under DOT's Title VI regulations and apprise members of the public of the protections against discrimination afforded to them by Title VI. MTS will post a Title VI notice on the agency's website and in public areas of the agency's offices: Downtown Terminal at 207 Catalpa Street and in the Administration/Maintenance Facility at 700 Washington Street. A copy of the Title VI notice to the public is provided in Appendix B.
 - a. Contents. The Title VI notice shall include:
 - (1) A statement that the agency operates programs without regard to race, color, or national origin; (2) A description of the procedures that members of the public should follow in order to request additional information on the recipient's Title VI obligations; (3) A description of the procedures that members of the public shall follow in order to file a Title VI discrimination complaint against the recipient.
 - b. Effective Practices for Fulfilling the Notification Requirement.
 - (1) Dissemination. The locations where the notice has been posted are: on the fixed route and paratransit buses, in the Downtown Terminal at 207 Catalpa Street and in the Administration/Maintenance Facility at 700 Washington Street. A copy of the Title VI notice is in Appendix B.
 - (2) Document translation. Title VI obligations and complaint procedures shall be translated into languages other than English, as needed and consistent with the DOT LEP Guidance and MTS's language assistance plan.
4. REQUIREMENT TO DEVELOP TITLE VI COMPLAINT PROCEDURES AND COMPLAINT FORM. In order to comply with the reporting requirements established in 49 CFR Section 21.9(b), MTS has developed procedures for investigating and tracking Title VI complaints filed against them and make their procedures for filing a complaint available to members of the public. MTS has developed a Title VI complaint form, and the form and procedure for filing a complaint are available on the MTS's website, www.rideMTS.com. MTS will report information regarding their complaint procedures in their Title VI Programs in order for FTA to determine compliance with DOT's Title VI regulations. A copy of the

complaint procedures and complaint forms are located in Appendices C and D. See Chapter IX of this Circular for more information on complaints.

5. REQUIREMENT TO RECORD AND REPORT TRANSIT-RELATED TITLE VI INVESTIGATIONS, COMPLAINTS, AND LAWSUITS. In order to comply with the reporting requirements of 49 CFR Section 21.9(b), MTS will prepare and maintain a list of any of the following that allege discrimination on the basis of race, color, or national origin: active investigations conducted by entities other than FTA; lawsuits; and complaints naming MTS. This list shall include the date that the investigation, lawsuit, or complaint was filed; a summary of the allegation(s); the status of the investigation, lawsuit, or complaint; and actions taken by the recipient in response, or final findings related to, the investigation, lawsuit, or complaint. This list shall be included in the Title VI Program submitted to FTA every three years. See Appendix E for an example of how this information will be reported. UPDATE: As of February 29, 2016, MTS has had no investigations, complaints or lawsuits alleging discrimination during the past three years per Title VI.
6. PROMOTING INCLUSIVE PUBLIC PARTICIPATION. The content and considerations of Title VI, the Executive Order on LEP, and the DOT LEP Guidance has been integrated into MTS's public participation plan. MTS has determined how, when, and how often specific public participation activities should take place, and which specific measures are most appropriate. **Attachment A is the MTS Public Involvement Plan.**

MTS complies with the public participation requirements of 49 U.S.C. Sections 5307(b) (requires programs of projects to be developed with public participation) and 5307(c)(1)(I) (requires a locally developed process to consider public comment before raising a fare or carrying out a major reduction in transportation service).

7. REQUIREMENT TO PROVIDE MEANINGFUL ACCESS TO LEP PERSONS. Consistent with Title VI of the Civil Rights Act of 1964, DOT's implementing regulations, and Executive Order 13166, "Improving Access to Services for Persons with Limited English Proficiency" (65 FR 50121, Aug. 11, 2000), MTS takes reasonable steps to ensure meaningful access to benefits, services, information, and other important portions of their programs and activities for individuals who are limited-English proficient (LEP). **Attachment B is MTS's LEP Program.**
 - a. Four Factor Analyses. MTS's LEP program includes the Four Factor Analysis to determine the specific language services that are appropriate to provide. The Four Factor Analysis is an individualized assessment that balances the following four factors:
 - (1) **The number or proportion of LEP persons eligible to be served or likely to be encountered by the program or recipient.** This population will be program-specific. In addition to the number or proportion of LEP persons served, MTS's analysis identify:
 - (a) How LEP persons interact with the recipient's agency; (b) Identification of LEP communities, and assessing the number or proportion of LEP persons from each language group to determine the appropriate language services for each language group; (c) The

literacy skills of LEP populations in their native languages, in order to determine whether translation of documents will be an effective practice; and (d) Whether LEP persons are underserved by the recipient due to language barriers.

(2) The frequency with which LEP persons come into contact with the program.

MTS assesses major points of contact with the public, such as:

- (a) Use of bus service; (b) Purchase of passes and tickets through vending machines, outlets, websites, and over the phone; (c) Participation in public meetings; (c) Customer service interactions; (d) Ridership surveys; (e) Operator surveys.

(3) The nature and importance of the program, activity, or service provided by MTS to people's lives. The provision of public transportation is a vital service, especially for people without access to personal vehicles.

(4) The resources available to MTS for LEP outreach, as well as the costs associated with that outreach. Resource and cost issues can often be reduced by technological advances, reasonable business practices, and the sharing of language assistance materials and services among and between MTS, advocacy groups, LEP populations and Federal agencies.

- b. Developing a Language Assistance Plan. MTS has developed an assistance plan to address the identified needs of the LEP population(s) it serves.

MTS's LEP Plan includes:

- (a) the results of the Four Factor Analysis, including a description of the LEP population(s) served; (b) describe how the recipient provides language assistance services by language; (c) describe how the recipient provides notice to LEP persons about the availability of language assistance; (d) describe how the recipient monitors, evaluates and updates the language access plan; and (e) describe how the recipient trains employees to provide timely and reasonable language assistance to LEP populations.

To date there have been no requests for documents to be in a language other than English. MTS will continue to monitor community needs in regards to the translation of vital documents into the language of each frequently encountered LEP group eligible to be served and/or likely to be affected by MTS's programs and services. Vital written documents include, but are not limited to, consent and complaint forms; intake and application forms with the potential for important consequences; written notices of rights; notices of denials, losses, or decreases in benefits or services; and notices advising LEP individuals of free language assistance services. Examples of vital documents include an ADA complementary paratransit eligibility application, a Title VI complaint form, notice of a person's rights under Title VI, and other documents that provide access to essential services.

- c. Safe Harbor Provision. DOT has adopted DOJ's Safe Harbor Provision, which outlines circumstances that can provide a "safe harbor" for recipients regarding translation of written materials for LEP populations. The Safe Harbor Provision stipulates 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. Translation of non-vital documents, if needed, can be provided orally. If there are fewer than 50 persons in a language group that reaches the five percent (5%) trigger, the recipient is not required to translate vital written materials but should provide written notice in the primary language of the LEP language group of the right to receive competent oral interpretation of those written materials, free of cost.

These safe harbor provisions apply to the translation of written documents only. They do not affect the requirement to provide meaningful access to LEP individuals through competent oral interpreters where oral language services are needed and are reasonable. A recipient may determine, based on the Four Factor Analysis, that even though a language group meets the threshold specified by the Safe Harbor Provision, written translation may not be an effective means to provide language assistance measures. For example, a recipient may determine that a large number of persons in that language group have low literacy skills in their native language and therefore require oral interpretation. In such cases, background documentation regarding the determination shall be provided to FTA in the Title VI Program.

MTS sees the Bus Ride Guide as a vital document. MTS will provide the documents in translated form as requested. MTS conveys vital document information to persons with limited English proficiency by using Open Communication services or in-house person-to-person translation.

8. MINORITY REPRESENTATION ON PLANNING AND ADVISORY BODIES. Title 49 CFR Section 21.5(b)(1)(vii) states that a recipient may not, on the grounds of race, color, or national origin, "deny a person the opportunity to participate as a member of a planning, advisory, or similar body which is an integral part of the program." Currently MTS has no planning or advisory bodies.
9. DETERMINATION OF SITE OR LOCATION OF FACILITIES. Title 49 CFR Section 21.9(b)(3) states, "In determining the site or location of facilities, a recipient or applicant may not make selections with the purpose or effect of excluding persons from, denying them the benefits of, or subjecting them to discrimination under any program to which this regulation applies, on the grounds of race, color, or national origin; or with the purpose or effect of defeating or substantially impairing the accomplishment of the objectives of the Act or this part." Title 49 CFR part 21, Appendix C, Section (3)(iv) provides, "The location of projects requiring land acquisition and the displacement of persons from their residences and businesses may not be determined on the basis of race, color, or national origin". Facilities included in this provision include, but are not limited to, storage facilities, maintenance facilities, operations centers, etc. In order to comply with the regulations:

FTA C 4702.1B

- a. MTS will complete a Title VI equity analysis during the planning stage with regard to where a project is located or sited to ensure the location is selected without regard to race, color, or national origin. MTS will engage in outreach to persons potentially impacted by the siting of facilities. The Title VI equity analysis must compare the equity impacts of various siting alternatives, and the analysis must occur before the selection of the preferred site.
- b. When evaluating locations of facilities, MTS will give attention to other facilities with similar impacts in the area to determine if any cumulative adverse impacts might result. Analysis should be done at the Census tract or block group where appropriate to ensure that proper perspective is given to localized impacts.
- c. If MTS determines that the location of the project will result in a disparate impact on the basis of race, color, or national origin, MTS may only 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. MTS must show how both tests are met; it is important to understand that in order to make this showing, MTS must consider and analyze alternatives to determine whether those alternatives would have less of a disparate impact on the basis of race, color, or national origin, and then implement the least discriminatory alternative.
- d. MTS has not constructed any facilities the past 3 years.

10. REQUIREMENT TO PROVIDE ADDITIONAL INFORMATION UPON REQUEST. FTA may request, at its discretion, information other than that required by this Circular from a recipient in order for FTA to investigate complaints of discrimination or to resolve concerns about possible noncompliance with DOT's Title VI regulations.

CHAPTER IV

REQUIREMENTS AND GUIDELINES FOR FIXED ROUTE TRANSIT PROVIDERS

INTRODUCTION. The requirements in this chapter apply to all providers of fixed route public transportation (also referred to as transit providers) that receive Federal financial assistance. MTS currently has no bus service provider contracts. MTS will submit the information required in this chapter to FTA every three years.

MTS provides public transportation that operates fixed route and demand response service and are responsible for the reporting requirements in this chapter, but these requirements only apply to fixed route service.

Requirement	Transit Providers that operate fixed route service	Transit Providers that operate 50 or more fixed route vehicles in peak service and are located in a UZA of 200,000 or more in population
Set system-wide standards and policies	Required	Required
Collect and report data	Not required	Required: <ul style="list-style-type: none"> • Demographic and service profile maps and charts • Survey data regarding customer demographic and travel patterns
Evaluate service and fare equity changes	Not required	Required
Monitor transit service	Not required	Required

a. MTS is required to set system-wide standards and policies, as further described below.

1. **IMPLEMENTATION.** MTS must submit a Title VI Program that is compliant with this Circular by March 31, 2016.
2. **REQUIREMENT TO PREPARE AND SUBMIT A TITLE VI PROGRAM.** As stated in Chapter III of this Circular, in order to ensure compliance with the reporting requirements of 49 CFR Section 21.9(b), FTA requires that MTS document their compliance by submitting a Title VI Program to their FTA regional civil rights officer once every three years or as otherwise directed by FTA.
 - a. **Contents of the Title VI Program.** MTS must include the following information in its Title VI Program.
 - (1) All fixed route transit providers shall submit:
 - (a) All general requirements set out in Section 4 of Chapter III of this Circular; and

- (a) System-wide service standards and system-wide service policies, whether existing or new (i.e., adopted by the transit provider since the last submission) as described in this chapter.

3. REQUIREMENT TO SET SYSTEM-WIDE SERVICE STANDARDS AND POLICIES.

MTS has set service standards and policies for fixed route bus service. These standards and policies address how service is distributed across the transit system, and ensure that the manner of the distribution affords users access to these assets.

MTS has adopted system-wide service policies to ensure service design and operations practices do not result in discrimination on the basis of race, color, or national origin.

- a. Effective Practices to Fulfill the Service Standard Requirement. See Appendix G for more information on the following requirements.
 - (1) Vehicle load for each mode.
 - (2) Vehicle headway for each mode.
 - (3) On-time performance for each mode.
 - (4) Service availability for each mode.
- b. Effective Practices to Fulfill the Service Policy Requirement. See Appendix H for more information on the following requirements.
 - (1) Distribution of transit amenities for each mode.
 - (2) Vehicle assignment for each mode.

Marc Keenan

Marc Keenan – General Manager

02/29/2016

Date

APPENDIX A

TITLE VI PROGRAM CHECKLIST

Every three years, on a date determined by FTA, MTS is required to submit the following information to the Federal Transit Administration (FTA) as part of their Title VI Program.

General Requirements (Chapter III)

All recipients must submit:

- Title VI Notice to the Public, including a list of locations where the notice is posted
- Title VI Complaint Procedures (i.e., instructions to the public regarding how to file a Title VI discrimination complaint)
- Title VI Complaint Form
- List of transit-related Title VI investigations, complaints, and lawsuits
- Public Participation Plan, including information about outreach methods to engage minority and limited English proficient populations (LEP), as well as a summary of outreach efforts made since the last Title VI Program submission
- Language Assistance Plan for providing language assistance to persons with limited English proficiency (LEP), based on the DOT LEP Guidance
- A table depicting the membership of non-elected committees and councils, the membership of which is selected by the recipient, broken down by race, and a description of the process the agency uses to encourage the participation of minorities on such committees
- Primary recipients shall include a description of how the agency monitors its sub-recipients for compliance with Title VI, and a schedule of sub-recipient Title VI Program submissions
- A Title VI equity analysis if the recipient has constructed a facility, such as a vehicle storage facility, maintenance facility, operation center, etc.
- A copy of board meeting minutes, resolution, or other appropriate documentation showing the board of directors or appropriate governing entity or official(s) responsible for policy decisions reviewed and approved the Title VI Program.
- Additional information as specified in chapters IV, V, and VI, depending on whether the recipient is a transit provider, a State, or a planning entity (see below)

Requirements of Transit Providers (Chapter IV)

All Fixed Route Transit Providers must submit:

- All requirements set out in Chapter III (General Requirements)
- Service standards
 - Vehicle load for each mode
 - Vehicle headway for each mode
 - On time performance for each mode
 - Service availability for each mode
- Service policies
 - Transit Amenities for each mode
 - Vehicle Assignment for each mode

APPENDIX B

TITLE VI NOTICE TO THE PUBLIC (GENERAL REQUIREMENT)

Background

A Title VI Notice to the Public will be displayed to inform MTS’s customers of their rights under Title VI. At a minimum, MTS will post the notice on the agency’s website and in public areas of the agency’s office(s), including the reception desk, meeting rooms, etc. The Title VI Notice is a vital document. Currently, MTS is monitoring all Limited English Proficient (LEP) populations in Monroe LA that meet the Safe Harbor threshold. As a requirement “If information is needed in another language, then contact [phone number]”—has been added.

COPY of Title VI Notification to the Public

TITLE VI NOTICE TO THE PUBLIC:

Notifying the Public of Rights Under Title VI

THE CITY OF MONROE TRANSIT SYSTEM

- The City of Monroe Transit System operates its programs and service without regard to race, color, and national origin in accordance with Title VI of the Civil Rights act. Any person who believes he or she has been aggrieved by any unlawful discriminatory practice under Title VI may file a complaint with the City of Monroe Transit System.
- For more information on the City of Monroe Transit System’s civil rights program and the procedures to file a complaint contact (318) 329-2506: email Marc.Keenan@ci.monroe.la.us; or visit our Administrative Office at 700 Washington Street, Monroe, Louisiana 71201.
- 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

APPENDIX C

TITLE VI COMPLAINT PROCEDURE

Background

MTS's Title VI Program includes a copy of the agency's Title VI complaint procedure. The complaint procedure and complaint form is available on MTS's website, www.mtsbus.org. The Title VI Complaint Procedure is a vital document. At a minimum, the complaint procedure should include a notice—"If information is needed in another language, then contact [phone number]".

Title VI Complaint Procedure

Any person who believes she or he has been discriminated against on the basis of race, color, or national origin by the Monroe Transit System (MTS) may file a Title VI complaint by completing and submitting MTS's Title VI Complaint Form. MTS investigates complaints received no more than 180 days after the alleged incident. The Authority will process complaints that are complete.

Once the complaint is received, MTS will review it to determine if our office has jurisdiction. The complainant will receive an acknowledgement letter informing her/him whether the complaint will be investigated by our office.

MTS has 30 days to investigate the complaint. If more information is needed to resolve the case, MTS may contact the complainant. The complainant has 30 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 30 business days, MTS can administratively close the case. A case can be administratively closed also if the complainant no longer wishes to pursue their case.

After the MTS Title VI Coordinator reviews the complaint, she/he will issue one of two letters to the complainant: a closure letter or a letter of finding (LOF). A closure letter summarizes the allegations and states that there was not a Title VI violation and that the case will be closed. An 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, she/he has 30 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.

APPENDIX D

TITLE VI COMPLAINT FORM

Background

MTS has created and makes available a Title VI Complaint Form for use by customers who wish to file a Title VI complaint. The complaint form is available on MTS’s website, www.MTSbus.org. MTS’s Title VI Complaint Form specifies three classes protected by Title VI—race, color, and national origin—and allows the complainant to select one or more of those protected classes as the basis/bases for discrimination. The Title VI Complaint Form is a vital document.

MTS’s Title VI Complaint Form

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

APPENDIX E

LIST OF TRANSIT-RELATED TITLE VI INVESTIGATIONS, COMPLAINTS, AND LAWSUITS

Background

MTS will prepare and maintain a list of any of the following that allege discrimination on the basis of race, color, or national origin:

- Active investigations conducted by FTA and entities other than FTA;
- Lawsuits; and
- Complaints naming the recipient.

This list shall include the date that the transit-related Title VI investigation, lawsuit, or complaint was filed; a summary of the allegation(s); the status of the investigation, lawsuit, or complaint; and actions taken by the recipient in response, or final findings related to the investigation, lawsuit, or complaint. This list shall be included in the Title VI Program submitted to FTA every three years.

MTS List of Investigations, Lawsuits and Complaints

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

APPENDIX F

TABLE DEPICTING MINORITY REPRESENTATION ON COMMITTEES AND COUNCILS SELECTED BY MTS

Background

MTS currently does not have any transit-related, non-elected planning boards, advisory councils or committees, or similar bodies, the membership of which is selected by MTS. IF MTS forms such a committee, the membership of those committees will be broke down by race, and a description of efforts made to encourage the participation of minorities in Monroe.

Table Depicting Monroe LA Population and empty spaces for future Committees, Councils, Broken Down by Race

Body	Caucasian	Latino	African American	Asian American	Native American
Population 2011	33.4%	1.1%	63.9%	1.1%	.1%
Committee	%	%	%	%	%
Council	%	%	%	%	%
Committee	%	%	%	%	%

APPENDIX G

SERVICE STANDARDS (FIXED ROUTE)

Background

MTS has developed *quantitative* standards for the following indicators:

- *Vehicle load for fixed route (MB)*: Generally expressed as the ratio of passengers to the number of seats on a vehicle, relative to the vehicle’s maximum load point.
- *Vehicle headways for MB*: The amount of time between two vehicles traveling in the same direction on a given line.
- *On-time performance for MB*: A measure of runs completed as scheduled.
- *Service availability for MB*: A measure of the distribution of routes within Monroe LA.

MTS Standards

Vehicle Load Standards

1. Expressed in writing

The average of all loads during the peak operating period should not exceed vehicles’ achievable capacities, which is 29-seat buses, a vehicle load of 1.35 means all seats are filled and there are approximately 10 standees.

2. Expressed in tabular format

Vehicle Type	Average Passenger Capacities			
	Seated	Standing	Total	<u>Maximum Load Factor</u>
15’ ADA Bus	16	0	16	1.0
30’ Standard Bus	29	10	39	1.35
35’ Standard Bus	36	12	48	1.33
40’ Low Floor Bus	38	14	52	1.37

Vehicle Headway Standards

1. Expressed in writing

Service operates on every 45 minutes from 6:00am to 10:30pm, Monday through Saturday, excluding holidays.

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 13	Base 12	Evening 5
SATURDAY	9	9	4

On-Time Performance Standards

Expressed in writing

- Ninety-five (95) percent of the MTS’s transit vehicles will complete their established runs no more than 5 minutes early or late in comparison to the established schedule/published timetables. MTS continuously monitors on-time performance and system results on a daily basis

Service Availability Standards

Expressed in writing

MTS distributes transit service so that 85% of all residents in the service area are within a ½ mile walk of bus service and bus stops will be not more than 4 blocks apart.

APPENDIX H

SERVICE POLICIES (FIXED ROUTE)

Background

MTS has developed *qualitative* policies for the following procedures:

- Vehicle Assignment
- Transit Amenities

Vehicle Assignment Policy

Expressed in writing

Vehicles are assigned such that the average age of the fleet serving each route does not exceed 10 years. Low-floor buses are deployed on frequent service and other high-ridership lines, so these buses carry a higher share of ridership than their numerical proportion of the overall bus fleet. All buses are equipped with air conditioning.

Transit Amenities Policy

Expressed in writing

Installation of transit amenities, such as benches and bus shelters, along bus routes are based on the number of passenger boardings at stops along those routes.

Attachment A: Public Involvement Plan

Monroe Transit System

Public Comment Process for Fare and Service Changes

In order to encourage public involvement in the fare and service change process, the Monroe Transit System (MTS) will hold a public hearing for any increase in fare or major change in service.

For the purpose of this process, a major change in service shall be any change that reduces service hours by 10% or more of the total system service hours. Any change that affects 20% or more of the routing of a particular route shall be considered a major service change.

All public hearings will be held at a time and place so as to encourage public participation. The hearing dates, times, and locations shall be displayed at the main passenger terminal and advertised in two successive editions of the local newspaper. Hearings regarding fare increases will be held during the Monroe City Council meeting, as per the City of Monroe Charter.

Attachment B: Limited English Proficiency Plan (LEP)

**LIMITED ENGLISH PROFICIENCY PLAN
(Part of MTS’S Title VI Program)
Monroe Transit System**

This document serves as the plan for Monroe Transit System (MTS) to provide Services to Limited English Proficiency (LEP) individuals in compliance with Title VI of the Civil Rights Act of 1964 and Executive Order 13166: Improving Access to Service for Persons with Limited English Proficiency. The transit system has developed this Limited English Proficiency Plan to help identify reasonable steps to provide language assistance for LEP person seeking access to MTS services. This plan details procedures on how to identify a person who may need language assistance, the ways in which language assistance may be provided, training staff, providing notice to LEP person, and information for future updates.

FOUR FACTOR ANALYSES

In developing the LEP plan, MTS undertook the U.S. Department of Transportation policy guidance to utilize the four factors LEP analysis for assessing language needs and determining what steps should be taken to ensure access for LEP person. The four factors include: 1) number of LEP individuals in the service area, 2) frequency of contact with LEP individuals, 3) importance of the program, and 4) resources available and costs.

- 1) *The number of proportion of LEP person eligible in the service area who may be served or likely to encounter a transit program, activity, or service:* According to Census 2010 data, approximately 1,408 or 3.1% of Monroe’s population speaks a language other than English at home. Of that population, no individuals have been identified as speaks English ‘not at all’. The MTS service area is 1.1% Hispanic. MTS service area has a total minority population of 66.6%. The following tables provide racial makeup and language spoken at home for the MTS area.

Race and Hispanic or Latino

	<u>Number</u>	<u>Percent</u>
Total Population	48,815	100
White	16,312	33.4
Black or African American	31,162	63.9
American Indian and Alaska Native	84	0.2
Asian	518	1.1
Native Hawaiian and Pacific Islander	25	0.1
Some other races	154	0.3
Hispanic or Latino (any race)	560	1.1

Source: U.S. census Bureau, Census 2010

Language Spoken at Home

	<u>Number</u>	<u>Percent</u>
Population 5 year and over	45,000	92.2
English Only	43,716	96.9
Language other than English	1,408	3.1
Speak English less than "very well"	555	1.2
Spanish	813	1.8
Speak English less than "very well"	459	1.0
Asian and Pacific Island languages	217	0.5
Speak English less than "very well"	37	0.1
Other Indo-European languages	327	0.7
Speak English less than "very well"	38	0.1

Source: U.S. Census Bureau, Census 2010

- 2) The frequency with which LEP individuals come in contact with a MTS program, activity, or service: MTS assesses the frequency at which staff and operators have or could possibly have contact with LEP persons. This includes documenting phone inquiries, request for translated documents, and surveying drivers. To date, there has not been any request for assistance from LEP individuals or requests for translated documents. Staff and drivers have had very little to no contact with LEP individuals. Currently, the frequency of contact with LEP persons associated with local public transportation services has not transpired at this juncture. There is no large geographic concentration of any one type of LEP individuals in the transit service area either. MTS has identified one social, service, professional, or leadership organization that focuses on outreach or membership of LEP individuals. This is a new contact which will be continued.

- 3) *The nature and importance of the program, activity, or service provided by the transit system to the community:* Public transportation can be vital to many people's lives, especially those that have no other means of transportation. MTS provides that role in Monroe with twelve fixed routes buses and 3 ADA paratransit vans. ADA services are operated throughout the City of Monroe on a demand-response basis. MTS bus service is available 6 days a week with no Sunday service. Hours of operations are from 6:00 a.m. to 10:30 p.m.

Although the transit system does provide service to area hospitals, delay of access would not have life-threatening implications on LEP individuals, especially compared to the services provided by fire, police, and other emergency services.

It is also believed that any delay of access to information provided by MTS would not have serious implications on a LEP individual.

- 4) The resources available to MTS and the overall cost: Funds available for MTS for LEP services would be derived entirely from existing operating budgets and compete with other operational requirements on an annual basis. It is anticipated that the cost of providing transit services will continue to grow, with the major potential for cost increases in the foreseeable future due to national trends, such as insurance and fuel costs. No bilingual staff has been identified; however, oral interpreter and translation services have been established on an as-needed basis. MTS has also taken inventory of available organizations that the transit system could partner with for outreach and translation efforts.

LANGUAGE ASSISTANCE MEASURES

MTS's LEP program was established after review of the four factors in the DOT LEP Guidance. As a result of this analysis, the transit systems LEP process was based on the limited frequency of contact with different types of languages and the low percentage of identified LEP populations. As a public transportation agency serving very few LEP persons, the transit system does not maintain an extensive LEP plan but has taken reasonable steps to provide access to programs and activities for LEP persons. Considering the relatively small scale of the MTS area, the small number of LEP individuals in the service area, and the limited financial resources, it is necessary to limit language aid to the most basic and cost-effective services. Language assistance measures currently available to MTS customers include:

- 1) Use of "I Speak Cards" by transit operators and staff to assist in identifying LEP individuals who need language assistance.
- 2) Several local resources are available, and maintained on file, for assistance with individuals with limited English proficiency. These include the Monroe Police Department, colleges and universities that provide foreign language curriculums that will provide translation services with advanced notice. The University of Louisiana at Monroe is the major university that has a Spanish language program. Its faculty is available for help in communication with Spanish speakers.
- 3) Local services can be a valuable resource, however; a reasonable time delay can be expected in contacting the appropriate translator. For immediate assistance the Monroe Transit has downloaded "Speak & Translate"; the smartphone and tablet app designed to translate between languages. In addition, if there is an immediate need for more in-depth translation services, MTS has a relationship with Language Line Services to

provide 24/7 telephone support. All pertinent transit employees will be trained to proficiency.

Spoken language interpreters will be provided at no cost to transit riders who are “disabled in communication” when requested or the need becomes apparent.

STAFF TRAINING

It is important that staff members, especially those having contact with the public, know their obligation to provide meaningful access to information and services for LEP persons. Transit staff will be provided the LEP Plan and will be trained on procedures and protocols to follow. This information will also be part of the staff orientation process for new hires. Training topics include:

- 1) Understanding Title VI and LEP responsibilities
- 2) Use of the “Speak & Translate” app and “I Speak Cards”
- 3) How to access and use the oral interpretation services
- 4) Documentation of language assistance requests.

PROVIDING NOTICE TO LEP PERSONS

In order to advise the public on their rights under Title VI, and to provide notice to LEP persons that language assistance measures are available, the following options are available and will be incorporated, as appropriate:

- 1) Notices indicating that language assistance is available posted at the Administration Facility and at the Downtown Terminal.
- 2) Stating in documents and outreach materials that language services are available.
- 3) Working with community-based organizations and other Stakeholders to inform LEP individuals of available services.
- 4) Providing statements in public notices that services are available for person requiring special accommodations for disabilities or language assistance.

MONITORING AND UPDATING THE LEP PLAN

This plan is designed to be flexible and one that can be easily updated. At a minimum, MTS will follow the Title VI Program update schedule to review the LEP process. Each update should examine all plan components including:

- 1) How many LEP persons have been encountered?
- 2) What is the current LEP population in the service area?
- 3) Are the existing language assistance measures meeting the current needs?

- 4) Have available resources, such as technology, changed?
- 5) Were any complaints received?

DISSEMINATION OF THE LEP PLAN

MTS will post the LEP Plan on the transit page www.mtsbus.org. Copies of the plan will be provided to any person or agency requesting a copy and LEP persons may obtain copies/translations of the plan upon request. Any questions or comments regarding this plan should be directed to MTS staff at 318-329-2506 or Monroe Transit System's Title VI Coordinator at 318-329-3230.

Attachment C: Non-discrimination/Title VI information placed on Website

TITLE VI NOTICE TO THE PUBLIC:

Notifying the Public of Rights Under Title VI

THE CITY OF MONROE TRANSIT SYSTEM

- The City of Monroe Transit System operates its programs and service without regard to race, color, and national origin in accordance with Title VI of the Civil Rights act. Any person who believes he or she has been aggrieved by any unlawful discriminatory practice under Title VI may file a complaint with the City of Monroe Transit System.
- For more information on the City of Monroe Transit System's civil rights program and the procedures to file a complaint contact (318) 329-2506: email Marc.Keenan@ci.monroe.la.us; or visit our Administrative Office at 700 Washington Street, Monroe, Louisiana 71201.
- 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