# TITLE VI PROGRAM

MONROE TRANSIT AUTHORITY MONROE , LA

April 1, 2013

Updated: March 21, 2023

# **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 is conducted in accordance with 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, an urbanized area with a population of 47,906 (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 considered and applied as applicable to this assessment. MTS has no sub-recipient(s); all references in the Title VI Plan have been removed.

# **CHAPTER II**

#### PROGRAM OVERVIEW

<u>REPORTING REQUIREMENTS</u>. 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 MTS' Title VI program. Contractors are not required to prepare or submit Title VI Programs. MTS is responsible for ensuring that contractors follow the Title VI program and comply with Title VI.

#### CHAPTER III

#### **GENERAL REQUIREMENTS AND GUIDELINES**

 <u>REQUIREMENT TO PROVIDE TITLE VI ASSURANCES</u>. 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. <u>Contents</u>. Every Title VI Program shall include the following information:
  - (1) A copy of the MTS's Title VI notice to the public indicates that 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 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 includes an outreach plan to engage minority and limited English proficient populations and 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 comply with Title VI and 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. <u>REQUIREMENT TO NOTIFY BENEFICIARIES OF PROTECTION UNDER TITLE VI</u>. 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. <u>Contents</u>. The Title VI notice shall include the following:
    - 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) <u>Dissemination</u>. 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) <u>Document translation</u>. 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. <u>REQUIREMENT TO DEVELOP TITLE VI COMPLAINT PROCEDURES AND</u>

<u>COMPLAINT FORM</u>. 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 makes 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, https://monroela.us/services/bus-service-monroe-transit/policies. 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

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

- 5. <u>REQUIREMENT TO RECORD AND REPORT TRANSIT-RELATED TITLE VI</u> <u>INVESTIGATIONS, COMPLAINTS, AND LAWSUITS</u>. 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 alleges 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 March 31, 2022, MTS has had no investigations, complaints, or lawsuits alleging discrimination during the past three years per Title VI.
- <u>PROMOTING INCLUSIVE PUBLIC PARTICIPATION</u>. The content and considerations of Title VI, the Executive Order on LEP, and the DOT LEP Guidance have been integrated into MTS's public participation plan. MTS has determined how, when, and how often specific public participation activities should occur and which measures are most appropriate. MTS Public Involvement Plan is attached.

MTS complies with the public participation requirements of 49 USC 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. <u>REQUIREMENT TO PROVIDE MEANINGFUL ACCESS TO LEP PERSONS</u>. 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, August 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). MTS's LEP Program is attached.
  - a. <u>Four Factor Analyses</u>. 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 programspecific. In addition to the number or proportion of LEP persons served MTS's analysis identifies:

(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 MTS provide 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 and 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. <u>Developing a Language Assistance Plan</u>. MTS has developed an assistance plan to address the identified needs of the LEP population(s) it serves.

MTS's LEP Plan includes the following:

(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 regarding 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, a notice of a person's rights under Title VI, and other documents that provide access to essential services.

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c. <u>Safe Harbor Provision</u>. DOT has adopted the DOJ's Safe Harbor Provision, which outlines circumstances that can provide a "safe harbor" for recipients regarding written language translation 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 using Open Communication services or in-house person-to-person translation.

- 8. <u>MINORITY REPRESENTATION ON PLANNING AND ADVISORY BODIES.</u> 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. <u>DETERMINATION OF SITE OR LOCATION OF FACILITIES</u>. 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:

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- a. MTS will complete a Title VI equity analysis during the planning stage concerning 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 the 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 proper perspective on 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 in the past three years.

# 10. <u>REQUIREMENT TO PROVIDE ADDITIONAL INFORMATION UPON REQUEST</u>. 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**

<u>INTRODUCTION</u>. 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 is responsible for the reporting requirements in this chapter. However, these requirements only apply to fixed-route services.

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	<ul> <li>Required:</li> <li>Demographic and service profile maps and charts</li> <li>Survey data regarding customer demographic and travel patterns</li> </ul>
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. <u>IMPLEMENTATION</u>. MTS must submit a Title VI Program that is compliant with this Circular by March 31, 2022.

- <u>REQUIREMENT TO PREPARE AND SUBMIT A TITLE VI PROGRAM</u>. 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. <u>Contents of the Title VI Program</u>. MTS must include the following information in its Title VI Program.
    - (1) All fixed-route transit providers shall submit the following:
    - (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. <u>Effective Practices to Fulfill the Service Standard Requirement</u>. See Appendix G for more information on the following requirements.
  - (1) Vehicle load for each mode.
  - (2) <u>Vehicle headway for each mode</u>.
  - (3) <u>On-time performance for each mode</u>.
  - (4) Service availability for each mode.
- b. <u>Effective Practices to Fulfill the Service Policy Requirement</u>. See Appendix H for more information on the following requirements.
  - (1) Distribution of transit amenities for each mode.
  - (2) <u>Vehicle assignment for each mode</u>.

<u>Marc Keenan</u> Marc Keenan – General Manager

> <u>March 1, 2022</u> 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, resolutions, or other appropriate documentation showing the board of directors or appropriate governing entity or official(s) responsible for policy decisions reviewed and approved by 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
  - $\circ \quad \text{Vehicle load for each mode} \\$
  - 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 318-329-2506 has been added.

#### **COPY of Title VI Notification to the Public**

TITLE VI NOT	ICE 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, 5 <sup>th</sup> 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 are available on MTS's website, https://monroela.us/services/bus-service-monroe-transit/policies. 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 318.329.2506.

#### **Title VI Complaint Procedure**

Any person who believes she or he has been discriminated against based on 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 acknowledgment letter informing her/him whether our office will investigate the complaint.

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 the 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. A letter of finding summarizes the allegations and the interviews regarding the alleged incident and explains whether any disciplinary action, additional training of the staff member, or other action will occur. 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 a Title VI Complaint Form available for customers who wish to file a Title VI complaint. The complaint form is available on MTS's website, https://monroela.us/services/bus-service-monroe-transit/policies. 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):		Telephor	ne (Work):		
Electronic Mail Address:					
Accessible Format	Large Print		Audio Tape		
Requirements?	TDD		Other		
Section II:					
Are you filing this complain	int on your own behalf?		Yes*	No	
*If you answered "yes" to	this question, go to Sect	ion III.			
If not, please supply the na for whom you are complai	1	he person			
• •					
Please explain why you ha	ve filed for a third party	:			
Please confirm that you have obtained the permission of the Area aggrieved party if you are filing on behalf of a third party.				No	
Section III:					
I believe the discrimination	n I experienced was base	ed on (check	all that apply):		
[] Race [] Color [] 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.					

Section IV			
Have you previously filed a Title VI complaint with this agency?	Yes	No	
Section V			
Have you filed this complaint with any other Federal, State, or le or State court?	ocal agency, or v	with any Federal	
[] Yes [] No			
If yes, check all that apply:			
[] Federal Agency:			
[] Federal Court [] State Ag	ency		
[] State Court [] Local Agency			
Please provide information about a contact person at the agency, filed.	court where the	complaint was	
Name:			
Title:			
Agency:			
Address:			
Telephone:			
Section VI			
Name of agency complaint is against:			
Contact person:			
Title:			
Telephone number:			

You may attach any written materials or other information that you think is relevant to your complaint.

A signature and date are required below

Signature

Date

Please submit this form in person at the address below, or mail this form to: The City of Monroe Transit System Title VI Coordinator 700 Washington Street Monroe, Louisiana 71201

# 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.

	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.				

#### MTS List of Investigations, Lawsuits and Complaints

# 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 selected by MTS. If MTS forms such a committee, the membership of those committees will be broken down by race and a description of efforts made to encourage the participation of minorities in Monroe.

# <u>Table Depicting Monroe LA Population and empty spaces for future Committees,</u> <u>Councils, Broken Down by Race</u>

Body	Caucasian	Latino	African American	Asian American	Other
Population 2020	34%	1.8%	61.4%	1.15%	1.65 %
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 ten standees.

# 2. Expressed in tabular format

Vehicle Type	Average Passenger Capacities			
				<u>Maximum</u>
				<u>Load</u>
	<u>Seated</u>	<u>Standing</u>	<u>Total</u>	Factor
15' ADA Bus	16	0	16	1.0
35' Standard Bus	28	12	40	1.43

#### Vehicle Headway Standards

# 1. Expressed in writing

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

Scheduling involves the consideration of a number of factors, including ridership productivity, transit/pedestrian-friendly streets, the 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	<b>Peak</b> 10	<b>Base</b> 10
SATURDAY	8	8

#### **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 7 minutes early or late compared to the established schedule/published timetables. MTS continuously monitors on-time performance and system results daily.

#### Service Availability Standards

#### Expressed in writing

MTS distributes transit service so that 85% of all residents in the service area are within a <sup>1</sup>/<sub>2</sub>-mile walk of bus service, and bus stops will be no more than four blocks apart when applicable.

# 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 ten years. Low-floor buses are deployed on all lines and are equipped with air conditioning.

#### **Transit Amenities Policy**

# Expressed in writing

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

Attachment A:	Public Involvement Plan
Attachment B:	Limited English Proficiency Plan (LEP)
Attachment C:	Non-discrimination/Title VI information placed on MTS' website

#### APPENDIX I

### PUBLIC PARTICIPATION PLAN

#### Introduction

Monroe is the eighth-largest city in the US state of Louisiana and is located in the northeastern portion of the state. As of the 2020 census, the population was 47,906.

Monroe Transit desires and requests citizen input on the work, projects, and products proposed and created by the transit agency as part of this transportation planning process.

Since 1990, Monroe Transit has been provided under a transit management contract with First Transit, Inc. Monroe Transit provides service on ten fixed routes throughout Monroe and a complementary ADA paratransit service.

Monroe Transit recognizes the importance and necessity of the public participation process.

The following groups govern the activities of the Monroe Transit:

The mayor of Monroe has full responsibility for the total operation of all departments based on general directives provided by the State of Louisiana. The City Council operates under the City Charter adopted by the citizens of Monroe. The Council enacts policies, adopts ordinances and resolutions, establishes the annual budget to provide services to the public, and sets the city tax rate and water, electric, and wastewater rates for the City of Monroe. It comprises five part-time Councilmembers elected from separate City districts for four years.

All meetings of the City Council are open to the public. Members of the public may request time on the agenda of the City Council to comment on specific subjects of interest to the City Council members.

#### **Goals and Objectives**

The public participation process required by 23 CFR 450 should "... provide complete information, timely public notice, full public access to key decisions, and support early and continuing participation of the public in developing plans and Transportation Improvement Programs...."

Monroe Transit is committed to the availability of timely, complete information; to the notification of and public access to the decision-making process; and ongoing public participation throughout the transportation planning process, including, but not limited to, the development of the Transit Development Plan, the Transportation Improvement Program, review of transit services, fares and operating perimeters and Federal Transit Administration civil rights issues such as Title VI, Disadvantage Business Enterprise (DBE), Equal Opportunity Program (EEO), Americans With Disabilities Act (ADA), program of projects and the Public Participation Process. Through this *Public Participation Process*, Monroe Transit aims to identify methods for obtaining public input and encouraging public participation in the transportation planning process.

# FTA C 4702.1B

#### **Stakeholders and Public Groups**

Monroe Transit has identified the following groups and individuals as those having potential interest in public input and participation opportunities:

- Neighborhood organizations;
- Homeowner associations;
- Chamber of Commerce and other business groups;
- Groups representing travel modes transit, bicycle, pedestrian, freight;
- Advocacy groups for the disadvantaged and/or minority groups;
- Media newspapers, television, radio;
- Governmental agencies;
- Educational Institutions (school districts, community colleges, private schools, State universities;
- Organizations or individuals who have been notified of public hearings for major projects, or organizations and individuals who have submitted written comments relating to public hearings for major projects, service changes, and plans. These individuals and organizations would remain on the mailing list as long as the major project is under development.

#### **Information Access**

All planning and programming information of Monroe Transit is available for public review. The information can be viewed at the Monroe Transit offices, 700 Washington, Monroe, Louisiana 71201. Additional information is posted online at www.mtsbus.org.

#### **Outreach Techniques**

Notification about all Public Transit meetings is distributed to local newspapers. It is placed on Monroe Transit's buses at the downtown passenger terminal a minimum of seventy-two (72) hours before the meetings.

Meeting information, when needed, is included in press releases, social media (Facebook and Twitter), and email blasts as appropriate. Regular meetings and special activities related to transit planning, Title VI, and project development are included.

Press releases to area newspapers, television stations, and radio stations are used to notify citizens of the upcoming activities of Monroe Transit.

Monroe Transit's website, www.mtsbus.org, is being used to provide information about Monroe Transit's activities, including information about the development of the Transit Development Plan, the Transportation Improvement Program, the program of projects, and Federal Transit Administration civil rights documents such as Title VI and others. Monroe Transit's representatives are listed along with contact information.

Formal notices for public input meetings are published in the local newspaper.

Monroe Transit posts transit schedules and rider information on its website in English and is available upon request in Spanish. Access to bilingual (English and Spanish) services through Language Line is provided during operating hours to answer questions for Monroe Transit's limited English proficiency passengers.

#### **Public Meetings**

Monroe Transit reaches out to the community directly through meetings with agency and community staff and their clients, as needed. Information regarding Monroe Transit's services is disseminated at these meetings. Information is available throughout the community, including Monroe Transit, on buses, and Monroe Transit's website at www.mtsbus.org.

Monroe Transit General Manager also participates in the development of the "Public Involvement Plan" and the Coordinated Public Transit and Human Services Transportation Plan. The plan was last updated by North Delta Regional Planning & Development District in 2020. When the plan was developed, a series of meetings were conducted countywide with participants throughout the Parish. Recommendations to maximize community involvement are reflected in these plans and adopted by the MPO and Monroe Transit.

#### **Input Mechanisms**

Monroe Transit accepts input and comments from the public through a variety of means:

- a) Monroe Transit's website at www.mtsbus.org
- b) By mail to 700 Washington Street
- c) By emailing monroe.transit@ci.monroe.la.us
- d) By calling 318-329-2207 or 318 329-2506

Comment can also be obtained at www.mtsbus.org, by calling 318-329-2207 or 318 329-2506 to have one mailed, or by emailing a request to monroe.transit@ci.monroe.la.us.

Comments on Monroe Transit services, plans, reports, and programs may be made at public input meetings. Monroe Transit ensures that all public input meeting locations are accessible in accordance with the Americans with Disabilities Act.

Members of the public, or a representative of a group, with expressed comments on a particular topic may request to the Monroe Transit General Manager an appointment to serve as a citizen representative on an appropriate subcommittee if one is activated.

Monroe Transit considers and responds to all public input received during the planning and program development processes. If significant written of oral comments are received on transit services, FTA civil rights, or plans, a summary, analysis, and report on the disposition of the comments is made a part of the conclusion of the public participation process.

#### Schedule

Notification and announcement of all upcoming public meetings are made approximately one week before the scheduled meeting through the methods described in the Outreach Techniques section of this plan. Legal notice of a scheduled public input meeting is published in the News Star approximately 7 to 10 days before the meeting.

Public meetings occur on an as-needed basis based on specific subject matter such as the development of the Transit Development Plan, the Transportation Improvement Program, the review of transit services, fares and operating perimeters, the program of projects, Federal Transit Administration civil rights issues such as Title VI, Disadvantage Business Enterprise, Equal Opportunity Program and Americans With Disabilities Act. Other public input meetings are held throughout the year, as necessary.

Updates and revisions to Public Participation Plan require a 10-day public comment period. Monroe Transit's General Manager will approve this plan following the completion of the public comment period if revisions are needed after the initial adoption of the plan.

#### Evaluation

Monroe Transit will review this Public Participation Plan periodically to monitor the effectiveness of the procedures outlined in this document. Following the evaluation of the outputs and outcomes of the Public Participation Plan, Monroe Transit may revise these methods to incorporate new and innovative ways to involve the public in the transportation decision-making process.

# **Summary of Public Participation Activities**

During Fiscal Years 2019-2022, the following is a summary of Title VI policy planning activities that took place:

Date	Public Outreach Description
04/29/19	Public hearing to discuss applying for a 5339 grant to replace the Downtown Terminal
06/10/19	Discuss potential bus purchase – City Council Meeting Hearing
06/18/19	Community meeting to discuss City transit issues. Sponsored by a City Council member
12/2/19	Council Meeting Hearing to Accept Change Order on ETA Transit System
01/14/20	Council Meeting Hearing to Accept Bus Wash Bid
03/04/20	Fiscal Year 2020-2021 Budget Hearing
4/14/20	Council Meeting Hearing to Waive Bus Fares - COVID
5/26/20	Council Meeting Hearing to Adopt Transit's Safety Plan
9/8/20	Council Meeting Hearing to Rescind the Waiver of Bus Fares - COVID
9/22/20	Council Meeting Hearing to Renew Transit Liability Insurance
9/22/20	Council Meeting Hearing to Purchase 3 Cutaway Duty Bus
11/10/20	Council Meeting Hearing to Purchase 1 Heavy-Duty Bus
02/22/21	Fiscal Year 2021-2022 Budget Hearing
4/14/21	Council Meeting Hearing to Apply For 5339 Grant to Replace the Downtown Terminal
08/24/21	Council Meeting Hearing to Apply for Transit Operational Analysis Study
03/03/22	Fiscal Year 2022-2023 Budget Hearing