

**2009 TITLE VI PROGRAM  
UPDATE RESPONSE TO  
FTA C4702.1A**

**PROGRAM REQUIREMENTS - SUPPLEMENT  
ACTION PLAN**

**MIAMI-DADE TRANSIT  
MIAMI-DADE, FLORIDA**



July, 2010

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- Attachment A 2000 Census data by tract on the number of persons who indicated that they spoke English "very well," "well," "less than well," and "not at all".
- Attachment B Geographic Information System (GIS) map containing 2000 Census data by Census Tract on the number of persons who indicated that they spoke English "very well," "well," "less than well," and "not at all".
- Attachment C 2005 ACS data on ability to speak English for Miami-Dade County
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# MIAMI-DADE TRANSIT TITLE VI - PROGRAM REQUIREMENTS ACTION PLAN

## Overview

This supplements Miami-Dade Transit's (MDT), updated Title VI program submittal on October 30, 2009.

MDT had not previously undertaken a four factor analysis as a basis of developing an LEP Plan. MDT developed and submitted a Plan of Action to FTA on 6/15/2010. The Plan of Action was accepted and MDT immediately began to work on following that plan. Specifically, MDT concentrated on conducting an LEP needs assessment based on the four-factor framework in Section V of the DOT LEP Guidance.

The following section sets forth Miami-Dade Transit's (MDT) Title VI Four-Factor Analysis Framework for conducting an Limited English Proficiency (LEP) needs assessment, including:

1. Identifying and Measuring the Number and Proportion of LEP Persons Served or Encountered in the Eligible Service Population
2. Identifying the Frequency with which LEP Individuals Come Into Contact with MDT's programs, activities, and services
3. Identifying the Importance of LEP persons to MDT's Program, Activities and Services, and
4. Evaluating Costs and Available Resources

## Factor 1: Identifying and Measuring the Number and Proportion of LEP Persons Served or Encountered in the Eligible Service Population

The Guidance states "*The greater the number or proportion of LEP persons from a particular language group served or encountered in the eligible service population, the more likely language services are needed*".

In order to determine the number and proportion of LEP persons served or encountered within MDT's service area, MDT made an assessment of this number through a mix of data sources, including the following: 1) data from the U.S. Census; 2) County Website, (3) County's 311 Call Center, (4) Contacts with Transit Operations (Field) Supervisors; (5) Metropolitan Planning Organization (MPO) data, and (6) Attendance at Community Meetings and Public Hearings. Census tract data was also utilized to define the geographical areas MDT serves, which assisted in identifying the LEP populations tract by tract.

**a. Data from the 2000 Census**

Data from the 2000 Census and the Census Bureau's American Community Survey (ACS) provided statistics on the number of people who speak English less than well for every Census tract in MDT's service area. The 2000 Census included data on the number of persons who indicated that they spoke English "very well," "well," "less than well," and "not at all". MDT concentrated in obtaining the information for those people whose English proficiency was "less than well". This information was accessed at the Census tract level to be able to provide and analyze the information, not only on a table format, but also a visual Census tract map. This information is provided in attachment A in table format and in Attachment B in a Geographic Information System (GIS) map. The GIS map easily identifies geographical areas of high concentrations of LEP persons. The data shows that out of 2,312,898, there are 449,943 (19%) of the population in the county that speak English "less than well".

MDT also utilized the data found in the ACS. In 2005 the ACS produced a period estimate of the characteristics of the population and housing for the period from January through December of 2005. However, unlike the 2000 Census, the 2005 ACS did not include data at the Census tract level. As of April, 2007, data on ability to speak English was available for Miami-Dade County as a whole. Using the County's Geographic Information System (GIS), MDT extrapolated an ACS table for Miami-Dade County that delineates non-English speaking persons by levels of English proficiency. MDT is providing this information in Attachment C which shows a slight difference from the numbers shown on the 2000 Census tract data, due to the year difference and having the data compiled by county total versus the data provided in the 2000 Census by tract. We can see that the highest language concentration of LEP people fall under Spanish speaking people, which amount to 31.5 % of the total county population. The second highest percentage falls under the group which speaks French Creole, coming in at 2.24%. Based on the LEP Guidance, MDT only needs to provide written material/information to LEP groups which exceed 5% of the total population. This means that Spanish language qualifies with this requirement, but none of the other LEP groups qualify. However, MDT does exceed this requirement by providing much of the materials in French Creole, to properly serve our Haitian population.

Additionally, the ACS Census data also provides information on the poverty levels of LEP persons. Using the GIS Census tract information on minority levels and low income levels, MDT maps depicting this information. These maps also have the bus transit routes displayed also shown in Attachments D and E. MDT also prepared two tables; one showing which routes were determined to be minority routes and another one analyzing which routes served the low income population. See Attachments F and G.

**b. County website**

MDT has met most of the requirements of the Title VI Program by adding the transit information in Spanish to the website. However we are developing a Website Action Plan as follows:

- Miami-Dade Transit currently provides Spanish language content regarding route changes. [http://www.miamidade.gov/transit/bus\\_route\\_updates\\_sp.asp](http://www.miamidade.gov/transit/bus_route_updates_sp.asp) See screen capture images included as Attachment H.
- A general information Spanish language information page will be added in the near future.
- In addition, web visitors are directed, in Spanish, to call the County's Transit dedicated line, 305-891-3131, for one-on-one personal customer service to help riders plan their trip.

#### **Measurement of LEP Persons Served or Encountered**

- Miami-Dade Transit will provide key metrics, on quarterly basis, regarding web pages containing Spanish Language content. Utilizing a web analytics software tool, the report will reflect:
  - Page visits - A visit is a series of actions that begins when a visitor views the first page from the server, and ends when the visitor leaves the site or remains idle beyond the idle-time limit.
  - Page views - Number of times this page was viewed by visitors.
  - Average time viewed - Average length of time the specified page was viewed.

#### **c. County's 311 Call Center**

Miami-Dade County has a non-emergency information system where by dialing 3-1-1 the person will receive information on any of the County services. The 3-1-1 system lets you report a problem or request a service in your neighborhood. The volume of calls receive in the system are tracked by English or Spanish calls.

The 3-1-1 system also is designed to track what type of service or question is being required. That is, Transit related services, whether a question or complaint is tract separately. The table below shows the number of monthly calls to the Transit line. Table 1 shows the number of calls received by month distributed by English and Spanish calls. We can see that for the year 2008, the average number of Spanish calls by month was 24%, and this number increased for 2009 to 29% and it continues to increase as shown in the data to-date for 2010 which shows an average of 31%. This may be due to Spanish speaking people learning about this system for information and complaints.

TABLE 1  
Volume of calls to the 3-1-1 System Distributed by English and Spanish Calls, March 2008 - June 2010

Year	Month	DN Language	ACD Calls	% of Sp.
2008	Mar	English	72812	
2008	Mar	Spanish	19665	0.21
2008	Apr	English	69922	
2008	Apr	Spanish	19103	0.21
2008	May	English	69121	
2008	May	Spanish	19929	0.22
2008	Jun	English	66191	
2008	Jun	Spanish	19374	0.23
2008	Jul	English	73938	
2008	Jul	Spanish	24036	0.25
2008	Aug	English	74232	
2008	Aug	Spanish	22971	0.24
2008	Sep	English	85152	
2008	Sep	Spanish	26798	0.24
2008	Oct	English	85308	
2008	Oct	Spanish	27850	0.25
2008	Nov	English	71588	
2008	Nov	Spanish	26256	0.27
2008	Dec	English	74098	
2008	Dec	Spanish	26537	0.26
Average				0.24
2009	Jan	English	83562	
2009	Jan	Spanish	27077	0.24
2009	Feb	English	82038	
2009	Feb	Spanish	27137	0.25
2009	Mar	English	89787	
2009	Mar	Spanish	31274	0.26
2009	Apr	English	78950	
2009	Apr	Spanish	31085	0.28
2009	May	English	76047	
2009	May	Spanish	30208	0.28
2009	Jun	English	64211	
2009	Jun	Spanish	31258	0.33
2009	Jul	English	74262	
2009	Jul	Spanish	34692	0.32
2009	Aug	English	77006	
2009	Aug	Spanish	35088	0.31
2009	Sep	English	76033	
2009	Sep	Spanish	35285	0.32
2009	Oct	English	74237	
2009	Oct	Spanish	34488	0.32
2009	Nov	English	59909	
2009	Nov	Spanish	26751	0.31
2009	Dec	English	77663	
2009	Dec	Spanish	34531	0.31
Average				0.29
2010	Jan	English	70843	
2010	Jan	Spanish	29678	0.30
2010	Feb	English	60826	
2010	Feb	Spanish	28319	0.32
2010	Mar	English	76833	
2010	Mar	Spanish	34457	0.31
2010	Apr	English	71318	
2010	Apr	Spanish	33035	0.32
2010	May	English	63125	
2010	May	Spanish	30633	0.33
2010	Jun	English	67884	
2010	Jun	Spanish	32426	0.32
Average to-date				0.31

Miami-Dade Transit's (MDT) Public Involvement Manager will develop and coordinate a training workshop for MDT's Senior staff and Government Center Information (GIC) 311's Call Center Management on Title VI Program Requirements for improving access to services for persons with Limited English Proficiency (LEP) within MDT's service area.

Additionally, the County's GIC 311 Call Center will monitor and track the number of LEP calls placed for assistance within MDT's service area. This will ensure that MDT meets the requirements of the Title VI Program.

**d. Contacts with Transit Operations (Field) Supervisors**

MDT will be using the following notice and form to distribute to Transit Operations (Field) Supervisors:

**MIAMI-DADE TRANSIT  
TITLE VI PROGRAM  
FOUR FACTOR ANALYSIS**

**Factor 1: Identifying and Measuring the Number and Proportion of LEP Persons Served or Encountered**

As previously reported, MDT will utilize a mix of data resources to identify and measure the number and proportion of LEP persons served or encountered in the eligible service population. Among MDT's internal resources shall include data collected by field operations staff, Transit Operations Supervisors (TOS).

In addition to ensuring high quality transit services, safe, reliable and efficient, TOS perform myriad customer service activities through direct customer interactions.

Attached is a copy of a data collection form which will be implemented system wide effective August 1, 2010. The sheets will be collected, tallied and submitted weekly to the Office of Civil Rights and Labor Relations for appropriate review and analysis, pursuant to Title VI Program guidelines and requirements.



**e. Metropolitan Planning Organization (MPO) data**

The Miami-Dade County Metropolitan Planning Organization (MPO) recently conducted an on-board survey of the Metrorail System. The survey was designed to capture information on origin and destination data, as well as, determining the mode of transportation used to get to the station and to their final destination after using the train. The survey also requested information from the rider on their age, race, zip code of residence and car availability. This survey was conducted in English, Spanish and Creole. A copy of this instrument is provided as Attachment I.

Because this information was gathered in three languages, we were able to determine the number of riders which felt more comfortable in responding on the language of choice. The survey was conducted on the hours from 6 a.m. to 6 p.m., which did not capture the entire ridership for that day, but provide a good sample of the riders.

**Table 2:  
Metrorail Survey Response and Ridership**

<u>Attribute</u>	<u>Value</u>
Surveys Collected	17,862
Ridership on day of survey (6am to 6pm)	34,463
April 2009 Average Daily Ridership	58,908

The information received regarding race distribution is shown in the following Table 3.

**Table 3  
Race Distribution in Raw Survey Data**

<u>Race</u>	<u>Frequency</u>	<u>Split</u>
American Indian	82	0%
Asian	491	3%
Black	3,828	21%
White	2,830	16%
Hispanic	8,189	46%
Other	202	1%
Refused*	2,240	13%
Total	17,862	100%

Note: \* Indicates the number of surveys that did not have information on race

The information collected clearly shows that the majority of the riders on that day, who responded to the survey, are of Hispanic origin and chose to respond to the questionnaire in Spanish.

#### **f. Attendance at Community Meetings and Public Hearings**

Miami Dade Transit will revise and update its current information collection methods to better serve persons with Limited English Proficiency (LEP) within MDT's service area. MDT's Public Involvement Manager will coordinate the collection of information for all Community Meeting and Public Hearings organized by MDT. Additionally, all Press Releases, Media Advisories, Public Hearings Notices and Promotional Ads will be translated in Spanish and some to Creole.

In order to capture both the race and LEP ability of those persons attending transit meetings, workshops, etc. MDT has recently developed sign-in sheets and comment cards that are being provided in three languages, English, Spanish and Creole. These have been recently used in MDT's outreach program with some success. See Attachment J & K for copies of these forms.

#### **Factor 2: Identifying the Frequency with which LEP Individuals Come Into Contact with MDT's programs, activities, and services**

MDT has, in the past, utilized on-board surveys to gather information from passengers. The surveys were conducted in English, Spanish and Creole; however, the final report was completed in English. The 2004 on-board Metrobus survey was a self-administered survey and included questionnaires in Spanish. A copy of the 2004 Metrobus on-board survey final report is provided in Attachment L. This report provides socioeconomic information on all existing Transit routes at the time of the survey. The report was very comprehensive and contained the information gathered related to age, race, nationality, economic background and overall ridership profile

MDT also conducted the 2007 Tracking Study of transit users and non-users in Miami-Dade County. This 2007 Tracking Study was conducted with English and Spanish speaking interviewers via telephone interviewing. The Executive Summary and final report of the 2007 Tracking Study are provided, respectively, in Attachments M and N. These reports reflect mostly the attitudinal information, which also include information in demographic shifts in Dade-County based on gender, age and ethnicity.

Table 4 provides a look at the attitudinal questions on the 2007 Tracking Study showing how the minority and non-minority groups responded to the questions, providing an average number where 1 is very dissatisfied and 4 is very satisfied. Minority groups rated safety and shuttle service from rail stop to final destination the highest with a 2.5 rating; while non-minority rated shuttle service from rail stop to final destination the highest (2.8) followed by the number of transfers to make in a typical trip (2.7).

Table 4

2007 MDT Tracking Study Rider Attitudinal Questions

Question	Minority (Avg.)	Non Minority (Avg.)
Using transit to get to your destination in about the same or less time as it would have taken if you drove.	2.1	2.2
The cost to ride transit.	2.2	2.1
Buses and trains being cleaned and well-lighted.	1.9	2.1
How frequently the trains and buses come.	2.3	2.4
Buses and trains arriving on time and getting you to your destination on time.	2.2	2.3
Number of transfers you have to make on a typical trip.	2.2	2.7
Courtesy of the bus drivers.	1.9	1.8
Feelings of personal safety when you are riding the bus.	1.6	2.0
Reliability of the buses, in that they don't break down.	1.9	2.2
Information on signs at bus stops.	1.8	2.6
Cleanliness and lighting of bus stop shelters.	2.2	2.4
Safety of bus stops and shelters.	2.5	2.2
Cleanliness and lighting of Metrorail stations.	2.0	2.0
Metrorail security personnel are courteous and helpful.	1.7	1.9
Metrorail stations are safe places to be while you are waiting for the train.	1.9	1.8
Bus or shuttle service from the rail stop to where you want to go.	2.5	2.8
Feelings of personal safety when you are riding Metrorail.	1.8	1.9

- 1 = Very Dissatisfied
- 2 = Mostly Dissatisfied
- 3 = Mostly Satisfied
- 4 = Very Satisfied

Similarly the 2007 Tracking Study provided information on how the people paid their fare. Table 5 provides the distribution of minority versus non-minority riders and how they paid their fare to use the system. The majority of the minority rider paid cash (about 40%) followed by those who used the Golden Passport (free ride), at about 18%. The non-minority group had a more equally distributed distribution. That is, 29% paid with cash and another 29% used a discounted monthly pass, followed by the use of a regularly price monthly pass at 17%.

**Table 5**  
**Fare Analysis Minority versus Non-minority**

How do you normally pay for your fare? Do you normally...	Minority (Avg.)	Non Minority (Avg.)
Pay with cash?	40%	29%
Buy tokens?	10%	7%
Use a discounted monthly pass?	15%	29%
Use a regular monthly pass?	15%	17%
Use a Golden Passport or Patriot Pass?	18%	13%
Other Reason	2%	5%

Future market research such as a Tracking Study or on-board surveys of our passengers on all modes will include questions to gather information as follows:

- Whether those being surveyed speak and understand English not well or not at all
- Perception of the availability of language services at MDT
- Trip cost, fare payment and transfer information
- Opinion of service quality and impact of service changes or fare increases.
- Travel time of most common trips

MDT will utilize a combination of varied surveys to collect data regarding the frequency with which LEP persons come into contact with the agency's services. These surveys will continue to include questions on income, race, color, or national origin. The information to be gathered will come from different sources including on-board passenger surveys, customer service surveys, 311 follow-up contacts, website surveys and joint community organization initiatives.

Through MDT's Marketing, and Customer services Division, the Agency provides information in the three languages: English, Spanish and Creole. All "Rider's Alert" fliers which provide information to the rider regarding route changes, service changes, new services and fare information changes are also provided in three languages. Service Guides, such as the Special Transportation Services' Guide (STS) is also provided in three languages, as are any updated information to this service. Attachment O provides several samples of MDT's Rider's Alert and other publications.

The 311 Transit Service Request (TSR) applications was created to capture and report on issues called in by the riding public dealing with two main categories, either Service Efficiency and Restructuring Initiative (SERI) or Automated Fare Collection Service (AFCS). SERI complaints deal with Metrobus as it relates to stops and routes / service reinstatement requests. SERI issues are also capturing those that come in directly to the Director's office or the Commissioner's office. Alternative options are provided to the caller, all depending on the complexity if the issue / request. AFCS complaints deal with issues with EASYCard / EASYTicket from defective cards/tickets, missing/incorrect balances, lost / stolen cards, improper charges, and request for refunds. All issues are handled on the spot, or the patron is called at a later time to provide them with status on the issue/complaint submitted.

MDT went through the SERI towards the end of 2009. As a result of the changes made to the Metrobus system a total of 817 calls were received from the period of January 1, 2009 through July 16, 2010. Of these calls, 72.8% or 595 were English language inquiries; 27.05% or 221 calls were from Spanish speaking people and only one call was received requiring Creole speaking staff. See Attachment P for copy of report. Also provided is a couple of samples of the SERI Issue report which provide a look at the type of complaints people have called about.

Similarly, through the AFCS, a total of 10,378 calls were received between January 1, 2009 and July 16, 2010, to the AFCS System. Of this number of calls, 8,163 or 78.6% were from English speaking patrons; 2,170 or 20.9% were from Spanish speaking patrons; 43 or less than 1/2% were from Creole speaking patrons; and two calls were received under the category of other language. See attachment Q for copy of the report.

### **Factor 3: Identifying the Importance to LEP persons of MDT's Program, Activities and Services**

MDT is the 14<sup>th</sup> largest public transit system in the nation and the largest in Florida. The main product or service MDT provides is the delivery of public transit services via four transportation modes: Metrobus, Metrorail, Metromover and Paratransit.

Providing public transportation access to LEP persons is a critical component of MDT's organizational mission and strategic plan. An LEP person's inability to access and effectively utilize public transportation may adversely affect his ability to access and maintain gainful employment, obtain health care services, education and training, legal assistance, housing, and overall quality of life.

### **Factor 4 –: Evaluating Costs and Available Resources**

MDT's proposed cost of implementation including planning, marketing, technical support, marketing consultant and administrative oversight is \$355,000. Table 6 shows a brake down of the distribution of the staff to properly support the Title VI program for

MDT. The salaries shown reflect only that portion which would be allocated to the Title VI program.

Table 6

<b>Staff cost for developing the Title VI Report</b>	
<b>Staff person</b>	<b>Amount Allocated to Title VI</b>
AO3	\$60,000.00
Chief-Civil Rights Division	\$30,000.00
SPA1	\$20,000.00
Tech-GIS Support	\$10,000.00
Principal Planner	\$20,000.00
Chief-Scheduling Division	\$10,000.00
Tech-Planning-Scheduling	\$5,000.00
Monica - PMC staff	\$10,000.00
Marketing Staff (2 people)	\$40,000.00
Marketing Consultant (surveys)	\$150,000.00
<b>TOTAL</b>	<b>\$355,000.00</b>

## EVALUATING SERVICE AND FARE CHANGES

To comply with 49 CFR Section 21.5 (b)(2), 49 CFR Section 21.5 (b)(7), MDT shall implement formalized procedures which require that no later than 90 days prior to the implementation of any significant service changes or fare increases, MDT shall conduct a preliminary disparity analysis of the proposed impacted routes and/or schedules. For the purpose of this review, significant service changes shall be defined as any service changes which adjusts headways and/or route length by 25% or greater. Service Changes also include: a change in the interval between peak period transit services on a route of more than 10 minutes; a change in the interval between off-peak period transit services on a route of more than 30 minutes; route changes of 25% or greater within a year; and, establishing a new transit service or abolishing an existing service.

As previously mentioned, according to the 2000 Census the minority population in Miami-Dade County is 81.9%. A minority tract is defined as a geographical area in which the minority demographics is 81.9% or higher. A survey conducted by the American Community Survey (ACS) in 2007 estimated that that figure had grown to 88%. A low income tract is defined as a geographical area in which the low income or poverty level of the demographic group is 15.7% or higher. A minority route is described as a route which has more than 33% of its alignment travelling through minority Census tracts.

Similarly, the 2000 Census showed that the low income or poverty level in Miami-Dade County is 15.7%. A low income tract is defined as a geographical area in which the low income or poverty level of the demographic group is 15.7% or higher. A low income route would be a route that has more than 33% of its alignment travelling through low-income areas.

As a part of the disparity analysis, MDT shall generate the following reports from Miami Dade County's Geographical Information System (GIS): Minority Population by Census tract and Low Income Population by Census tract and by routes.

MDT's Service Planning and Scheduling staff shall review the results of the analysis, in conjunction with MDT's Office of Civil Rights and Labor Relations, to ascertain any disparate impacts. The purpose of the analysis and review is to make a determination as to whether the service changes and/or fare increase would have disproportionately high and adverse effects on minority and low income riders. Should the results of the analysis indicate any potential disparate impact, the report must include a detailed non-discriminatory justification to include a full review of any viable service change options to mitigate any adverse effects. A formalized summary report of the analysis, findings and recommendations shall be submitted to the MDT Director, for his review and approval, prior to implementation of the service changes and/or fare increase.

### **Service Changes Analysis**

As an exercise or practice for any future service changes, MDT has performed a similar analysis of past line up changes. A series of tables are included as attachments which show the change in service miles by both minority routes (Attachment R) and by low income or poverty areas (Attachment S).

In Attachment R, the spreadsheet lists all 98 Metrobus routes. The first column shows the designation of the route as either minority or non-minority route. This designation was based on the number of miles travelled by that particular route over minority Census tracts. If more than 33% of the route alignment travelled through minority Census tracts, the route was designated as a minority route. The following columns show the route number, the miles travelled through minority Census tracts and the miles travelled through non-minority Census tracts. On the last column of that first section a grand total of miles travelled by the individual route is provided. This is shown for the November 2008 Line-Up, in the first section and the June 2009 Line-Up in the second section. The third section contains those columns which show the difference between these two Line-Ups. Also shown in this spreadsheet (highlighted routes) are those routes that had a net decrease in service miles.

Overall, when comparing the November 2008 line-up to the June 2009 line-up, Table 7 below shows and an increase in service miles (for all routes) of 295.2 miles.

Further analysis of the Spreadsheet in Attachment R showed that the greatest increase in miles was applied, as part of the Welfare to Work Project, to Route 301 which serves Monroe County from Florida City located in South Dade County. This route was extended from Mile Marker 74 in Islamorada to Mile Marker 50 to provide service to Marathon in the Florida Keys, all within Monroe County. Therefore this route should really not be counted as an increase of service miles to our Dade County residents.

After removing Route 301 from the analysis, we see that service increases and decreases were equally distributed throughout Miami-Dade County. Table 7 also showed that non-minority areas received greater decrease/cuts in service miles and when adding/increasing service, the net change favored minority areas by 55.58 miles.

In conclusion, the analysis showed that in connection to the November 2008 and the June 2009 Service Line-Ups, no discriminatory impacts on minority areas occurred within Miami-Dade County.

**Table 7**  
**Minority vs. Non-Minority - number of service Miles**

Total Miles Decreased		Total miles increased		Net Miles
Minority	Non-Minority	Minority	Non-Minority	Increased
-63.24	-105.98	146.98	317.36	295.12
When Route 301, which accounts for 183.22 increase is not accounted for, the results are quite different:				
-63.24	-105.98	146.98	134.14	111.9

The same exercise was done for those sections of the County where people are living in low income or poverty areas as shown in Attachment S.

The first column shows the designation of the route as either Low Income or non-Low-Income. This designation was based on the number of miles travelled by that particular route over a Low-Income Census tract. A Low-Income Census tract is defined as a geographical area in which Low-Income or poverty level of the demographic group is 15.7% or higher. If more than 33% of the route alignment travelled through a Low Income Census tract, the route was designated as a Low Income route. The following columns show the route number, the miles travelled through a Low Income Census tract and the miles travelled through a Non-Low Income Census tract. On the last column of that first section a grand total of miles travelled by the individual route is provided. This exercise is shown in the same format for the November 2008 Line-Up in the first section and the June 2009 Line-Up in the second section. The third section contains those columns which show the difference between these two Line-Ups. Also shown in this spreadsheet (highlighted routes) are those routes that had a net decrease in service miles.

**Table 8**  
**Poverty vs. Non-Poverty Areas - number of service Miles**

Total Miles Decreased		Total miles increased		Net Miles
Non-Poverty	Poverty	Non-Poverty	Poverty	Increased
-66.74	-111.69	309.04	164.51	295.12
When Route 301, which accounts for 183.22 increase is not accounted for, the results are quite different:				
-66.74	-111.69	125.82	164.51	111.9

Table 8 shows that Poverty areas had a greater decrease in service miles, by 44.95 miles, than Non-Poverty areas. However, when increasing service miles (discounting the anomaly created by Route 301), the Poverty areas also show a greater increase of service miles, by 38.69 miles, resulting in low-income areas having a net decrease in service miles of 6.26 miles. In Line-Ups where changes total +/-4,200 miles of service a six mile overall decrease in service is almost insignificant.

In conclusion, the analysis showed that in connection to the November 2008 and the June 2009 Service Line-Ups, no discriminatory impacts on Low-Income areas occurred within Miami-Dade County.

**Fare Increase Analysis**

For future fare increases, MDT will analyze alternative fare structures and payment media. The analysis will also include a comparison of the proposed fare changes with any viable options. Ridership surveys will also be utilized during the programming stage as an additional resource for customer outreach.

As an additional initiative to ensure fair and equitable transit service, following implementation, MDT will closely monitor all customer feedback received on the service changes and/or fare increases. No later than 45 days following implementation of the service changes and/or fare increases, MDT shall conduct ridership surveys to further assess any unanticipated disparate impacts, as well as re-evaluate any recommendations for viable service change options.

Miami-Dade Transit's Corporate Discount Program (CDP) currently allows participants to save on commuting costs through group discounts and pre-tax savings by obtaining monthly public transportation through a tax deduction from their employer under IRS Code 132(f). It allows employees to pay for their transit rides using pre-tax dollars -- up to \$230 per month (\$2,760/year).

Additionally, MDT's Corporate Discount Program (CDP) allows groups of four to 99 employees to purchase passes for \$ 90. Groups of 100 or more pay only \$ 85 per monthly pass.

MDT is scheduled to begin a Spanish radio campaign in the South Florida Region to familiarize the community of the many benefits of using Transit.

Below is a summary that shows the overall difference in boardings by fare category in bus, 2 months before & after the Dec 2008 lineup.

Weekdays						
Month	Full and Discount Fares	Paid Passes	Golden+Patriot	Transfers	Employee/Other	TOTAL BDGS
10/1/2008	37.0%	22.3%	24.8%	14.5%	1.4%	6,740,625
2/1/2009	36.0%	22.2%	26.6%	14.1%	1.1%	5,088,345

Additionally, Attachment V shows by routes a complete analysis of the fare media distribution and total boardings for the period that encompasses two months after the June 2009 line-up. Attachment V contains two consecutive tables; one reflects the April

2009 data and the second one reflects the August 2009 data. For both tables the first column designates a route as Minority Route or Non-Minority Route. The second column displays the designation of Low Income or Non-Low Income Route. The third column shows the route number or name. These three columns remain the same for both tables. The columns four through eight shows the raw data as collected depending on the type of fare. The last column provides a summary of total boardings by each individual route. The types of fares for which data was collected for each route included: the sum of full and discounted fares, sum of paid passes, sum of both Golden Pass and Patriot Pass riders, sum of transfer riders, and the sum of others such as Transit employees. It would be prudent to state that those riders utilizing a Golden Pass, a Patriot Pass, and the Transit employees do not pay fare. Additionally, transfers from bus to bus also do not incur a cost to the rider if trip is done within 3 hours in the same direction of travel.

Systemwide when finding the difference between the service in April 2009 versus the service in August 2009, we see that the amount of full fares and discount fare riders increased by 85.2%. There were 27 routes in total that showed a decrease in usage of full and discount fares; of these, 15 were minority routes. When comparing the Low income versus the Non-Low Income routes, we see that 24 of the 27 routes are low income routes.

When reviewing the amount of paid individual passes we note that the number of riders decreased by -224% as 80% of the routes show a decrease in usage of the paid pass. Of the 20 routes that showed an increase in usage 9 were minority route and when comparing the Low income versus the Non-Low Income routes, 16 out of the 20 were Low Income routes. The amount of riders using Golden Passes and Patriot Passes increased by 119.6% favoring those rider older than 65 years old and those in Social Security and the veterans for which Patriot Passes are issued.

Additionally, when comparing August ridership for all routes with the April ridership for all routes we see a decline in ridership totaling 873,195 trips. All routes except for eight routes suffered a decline in the number of boardings. Of these eight routes that had an increase in boardings, five were minority routes; and when comparing the Low income versus the Non-Low Income routes, seven were Low Income Routes.

## MONITORING TRANSIT SERVICE

To comply with 49CFR Section 21.5 (2), 49 CFR Section 21.5 (b) (7), MDT's primary means of monitoring transit service will be based on an overall analysis and review of all routes and schedules system-wide. This review will be initiated no later than 60 days following the conclusion of each line-up period. Line-ups occur, pursuant to the terms and conditions of the Collective Bargaining Agreement, in June and November of each year.

MDT will produce comprehensive scheduling reports route by route and GIS maps tract by tract, to evaluate the quality of service comparing the headways of Minority routes comparative to Non-minority routes; and, routes which primarily serve Low-Income persons, comparative to those which serve higher income levels.

MDT's Service Planning and Scheduling staff shall review the results of the analysis, in conjunction with MDT's Office of Civil Rights and Labor Relations, to ascertain any disparate impacts. The purpose of the analysis and review is to make a determination as to whether the headways of routes which primarily serve minority and/or low income persons are of comparable quality. A formalized summary report of the analysis, findings and recommendations shall be submitted to the MDT Director, for his review.

As an exercise to see how MDT had performed when changes were conducted for the June 2009 Line-up a similar analysis, as that performed for the evaluation of the service, was performed by route headways to determine if the changes made to the peak headways of those routes serving minority or low-income persons were equally comparable to the non-minority and non-low-income areas. This analysis covered minority routes vs. non-minority routes (Attachment T) and low income routes vs. non low-income routes (attachment U). Again, this exercise was conducted by comparing the November 2008 line-up to the June 2009 line-up. The highlighted areas show where a decrease in service frequency occurred.

When comparing the minority routes versus non-minority routes for the two line-ups, there were a total of 25 routes or 25%, out of the fleet of 98 routes, which had a decrease in service. Of these 25, 16 were minority routes (64%) and nine were non minority routes (36%). Similarly 5 routes received an improvement or increase in service frequency and these were all minority routes (100%). Systemwide, a decrease in service frequency is shown. This means that a rider would experience a longer period of waiting time when waiting for a bus service. Again, this simple analysis for minority routes shows that increases/decreases in services were also distributed equally across the county.

Attachment U shows the same exercise was done for low-income routes. When comparing low-income routes to non low-income routes for the two Line-Ups, there were a total of 27 routes out of 98 routes that had a service frequency decrease (27%); of these 21 were low income routes (77%). Additionally, there were three routes that received service improvements; two of these were minority routes (66%). Overall, a decrease in

service frequency is shown. Again this means that a rider would experience a longer period of waiting time when waiting for a bus service. This analysis for low-income versus non low-income routes shows that more attention would need to be given on this category for future line-ups, so that a more equitable distribution among the low income versus non-low income areas is achieved.

To supplement future service analysis, MDT shall conduct Passenger Surveys in three languages throughout all transit modes, triennially.

MDT will compare the responses from individuals who identified themselves as members of minority groups and/or low income brackets, and the responses of those who identified themselves as white and/or in middle and upper income brackets.

MDT will also evaluate whether the different demographic groups report significant differences in the travel time, number of transfers, and overall cost of the trip. An analysis will also be conducted regarding whether the different demographic groups gave substantially divergent responses regarding quality of service, such as their satisfaction with the system, willingness to recommend transit to others, and value for fare paid.

If MDT determines that different demographic groups gave significantly different responses, it shall initiate the appropriate corrective action to address the disparities. A full report, to include findings and recommendations, shall be submitted to the MDT Director, no later than 60 days following the conclusion of the survey period.



MIAMI-DADE TRANSIT



TITLE VI PROGRAM REQUIREMENTS

# Implementation Plan on Language Assistance

# MIAMI-DADE TRANSIT TITLE VI - PROGRAM REQUIREMENTS

## IMPLEMENTATION PLAN ON LANGUAGE ASSISTANCE

### Task 1 : Identifying LEP Individuals Who Need Language Assistance

The guidance states, *"There should be an assessment of the number or proportion of LEP individuals eligible to be serviced or encountered and the frequency of encounters pursuant to the first two factors in the four-factor analysis."*

As a requirement of the four-factor analysis, MDT conducted the following assessment to determine the number or proportion of LEP individuals eligible to be served or encountered and the frequency of those encountered in the eligible service population.

### What the Data Tells Us

The LEP Guidance tells us that MDT is required to provide written material/information to LEP Groups which exceed 5% of the total population.

Based on the information provided from the sources listed below, was determined that the highest language concentration of LEP persons are Spanish speaking individuals, which account for 31.5 % of Miami-Dade County's population. The next highest concentration is French Creole speaking individuals, which account for 2.24% of the total county population. Based on the LEP guidance provided, MDT is required to focus their collective efforts regarding the Spanish speaking population; however, MDT has committed to exceed the language requirement by providing meaningful access to the Miami-Dade County's French Creole (Haitian) speaking population.

### Resource Specifics

MDT was able to make the determination listed above based on data obtained from the following sources: 1) *the U.S. Census*; 2) *the County Website*; 3) *County's 311 Call Center*, 4) *Contacts with Transit Operations (Field) Supervisors*; 4) *Contacts with Transit Operations (Field) Supervisors*; 5) *Metropolitan Planning Organization (MPO) data*, and 6) *Attendance at Community Meetings and Public Hearings*. *Census tract data was also utilized to define the geographical areas MDT serves, which assisted in identifying the LEP populations tract by tract.*

## **Task 2: Language Assistance Measures**

The guidance states, *“An effective LEP plan would likely include information about the ways in which language assistance will be provided”*.

MDT is committed to ensuring that the LEP population’s needs are appropriately met. Key mechanisms for information exchange include, but are not limited to the following:

**MDT’s County Website** – Transit information in Spanish that includes information pertaining to general / route information, in addition to direction for Spanish speaking web callers to MDC’s dedicated line. (**Attachment 1 - Website**)

**Community Meetings and Public Hearings** – In order to capture race and LEP ability of those persons attending transit meetings and workshops have been revised to include sign in sheets and comment cards in English, Spanish and Creole. (**Attachment 2 – Comment Card**)

**Marketing and Customer Service** – Through MDT’s Marketing and Customer Services Division, the Agency provides information in the three languages: English, Spanish and Creole. This information includes “Rider Alerts”, fliers, service change announcements, new services and fare information changes. Service guides are also provided in the three languages as necessary. (**Attachment 3 - Placard**)

### **Title VI Limited English Proficiency Public Information Policy Transit Administrative Policy & Procedure (TAPP)**

In an effort to address the Language Assistance Measures, MDT has implemented the attached (see **Attachment 4- LEP TAPP**) TAPP which details how language assistance will be provided.

Specifically, the TAPP details the roles and responsibilities, as well as specific instruction for all persons involved in ensuring that LEP individuals receive appropriate assistance.

Notification Instructions include guidance regarding Community Organizations, Telephone Messages, Notices in local newspapers/local radio stations, Presentations, Oral Language Services, Translation of Written Materials, Outreach Materials and Websites (MDC and MDT).

**Task 3: Training Staff**

The guidance states, “*Staff members should know their obligations to provide meaningful access to information and services for LEP persons, and all employees in public contact positions should be properly trained.*”

**Task 3, Step 1:** *Identify agency staff that are likely to come into contact with LEP persons as well as management staff.*

In collaboration with the MDT Training personnel regarding the development of comprehensive training efforts regarding the LEP, it was determined that the individuals most likely to benefit from a training on the requirements for improving access to services for persons with Limited English Proficiency (LEP) include: *MDT's Senior Staff, EASY Card Center Staff, Bus Operators and Government Center Information (GIC) 311 Call Center Management.*

**Task 3, Step 2:** *Identify existing staff training opportunities*

Title VI Training workshops will be given during the following instances: New Hire Orientation, Bus Operator Refresher Training, MDT (Senior Staff) Steering Council Meetings, as well as quarterly to stakeholders (EASY Card Center Staff, GIC Call Center Management) .

**Task 3, Step 3:** *Design and implement LEP training for agency staff*

In collaboration with MDT Training, the attached standard presentation will be used at all training workshops. **Attachment 5 – Training Presentation**

#### **Task 4: Providing Notice to LEP Persons**

The guidance states, "Once an agency has decided, based on the four factors, that it will provide language services, it is important that the recipient notify LEP persons of services available free of charge".

#### **Task 4, Step 1: Inventory the existing public service announcements and community outreach the agency currently performs.**

See attached TAPP - Title VI Limited English Proficiency Public Information Policy for complete details

*Specifically :*

#### ***Signage***

MDT Advertising and Media Relations division will post signs indicating a need for providing language services in the most common areas visited by patrons and LEP persons to include:

1. All buses and rail cars (Posters) **Attachment 6 - Sign**
2. Metrorail Stations (Windscreens)
3. MDT retail and customer service outlets (Government Center Kiosk, Overtown Transit Village)

#### **Task 4, Step 2: Incorporate notice of the availability of language assistance into existing outreach methods**

#### ***Community Organizations***

MDT will work with community-based organizations and other stakeholders to inform LEP persons of MDT services and the availability of language services through the use of the following:

1. Participation in Community Outreach Activities
  - a) Career and Health Fairs
  - b) Sporting Events
  - c) Golden Passport Enrollment
  - d) Elected Official Sponsored Events
  - e) Homeowners' Association Meetings

#### **Telephone Messages**

MDT will provide announcements on all of its customer service lines of the availability of LEP Services.

#### **Notices in Local Newspapers and on local radio stations**

1. Local Media outlets will be used to inform the public of LEP services:

- a) Notices will be placed in El Nuevo Herald, Haiti en Marche and other community papers as needed.
- b) The public will be informed of LEP services through the use of PSA (Public Service Announcement) and or paid advertisements as well as talk radio.

**Task 4, Step 3: Conduct targeted community outreach to LEP populations**

***Presentations***

MDT staff will include in its presentations that LEP services are available. Presentations are generally offered to the following:

1. Chambers of Commerce
2. Civil Organizations
3. Elder Services
4. Education Institutions
5. Advisory Boards
6. Human Service Organizations

***Statement of Intent***

Currently, MDT translates most of its major publications into two English and Spanish. Procedures have been implemented to include a statement advising the Title VI requirements and informing that language services and translated documents are available and will be listed on all publications.

**Task 5: Monitoring and Updating the LEP Plan**

*“Recipients should, where appropriate, have a process for determining, on an ongoing basis, whether new documents, programs, services, and activities need to be made accessible for LEP individuals, and they may want to provide notice of any changes in services to the LEP public and employees”.*

MDT has identified designated Title VI staff to ensure information is categorized and that changes to newly created processes are identified and maintained. A Transit Administrative Policy and Procedure (TAPP) (**Attachment 7 – Title VI Service and Fare Changes**) has been created to ensure all requirements of Title VI are met.

**Transporte Público de Miami-Dade**

**METROBUS**

**new:** **Ajustes al servicio de Metrobus en vigor a partir del 28 de noviembre del 2010**

El transporte público de Miami-Dade proporciona servicio de autobús a lo largo del Condado de Miami-Dade. El servicio está disponible desde Miami Beach hasta Miami-Dade Oeste, y desde los Cayos Intermedios al sur del Condado de Broward.

Además, Metrobus se conecta con Metrorail y Metromover. Con casi 900 autobuses, hay más de 90 rutas de Metrobus acumulando más de 29 millones de millas recorridas por año.

**Horario de servicio**  
 Varias rutas de autobuses operan 24 horas al día y hay tres rutas que proporcionan servicio nocturno entre las 11 p.m. y las 6 a.m. Fíjese en los horarios individuales de las rutas para averiguar las horas de operación.

Mapa de la red (1 MB) (Disponible en inglés)

**Rutas de autobús**

Select Route to Preview  
 (Por ahora esta búsqueda solo está disponible en inglés.)

Como pagar su tarifa de Metrobus

El costo por viaje en el Metrobus es de \$2.00

Para facilitar su viaje, compre y cargue una tarjeta EASY Card o un boleto EASY Ticket en cualquier estación de Metrorail, o en cualquiera de más de 80 sucursales de venta que se encuentran a lo largo del condado. Los boletos EASY Ticket también pueden ser obtenidas y cargadas o auto-cargadas por Internet, (disponible en inglés). Simplemente tope la tarjeta recargable EASY Card o el boleto EASY Ticket sobre el dispositivo de pago.

**ENLACES EN ESPAÑOL**

- [Metrobus - Autobús](#)
- [Metrorail - Tren elevado](#)
- [Metromover - Tren ligero elevado](#)
- [STS - Transporte para discapacitados](#)

**CONTACTENOS**

- Para obtener más información por favor llame 305-891-3131 De lunes a viernes 7 a.m. a 8 p.m. Sábados de 8 a.m. a 5 p.m.
- Usuarios de TTY 305-499-8971

## Title VI Comment Card



**NAME:** \_\_\_\_\_

(Nombre)

**ZIP CODE** (Código Postal): \_\_\_\_\_

**RACE** (Raza):

**White**   
(Blanco)

**Black**   
(Negro)

**Hispanic**   
(Hispano)

**Other**   
(Otro)

**DO YOU SPEAK ENGLISH?** Yes  No   
¿Habla inglés? (si) (no)

**PREFERRED LANGUAGE:** \_\_\_\_\_

¿Qué idioma prefiere?

**COMMENT** (Comentarios): \_\_\_\_\_

**Requested information is optional and will be used to address the transportation needs of our community.**

(La información que aquí se solicita será utilizada para mejorar las condiciones del transporte público en nuestra comunidad y es opcional proporcionarla.)



# Metrobus Rider Alert

EFFECTIVE FRIDAY, JULY 22, 2011

**SERVICE TO  
THIS BUS  
STOP WILL BE  
DISCONTINUED**

**THE BUS STOP  
WILL BE REMOVED**

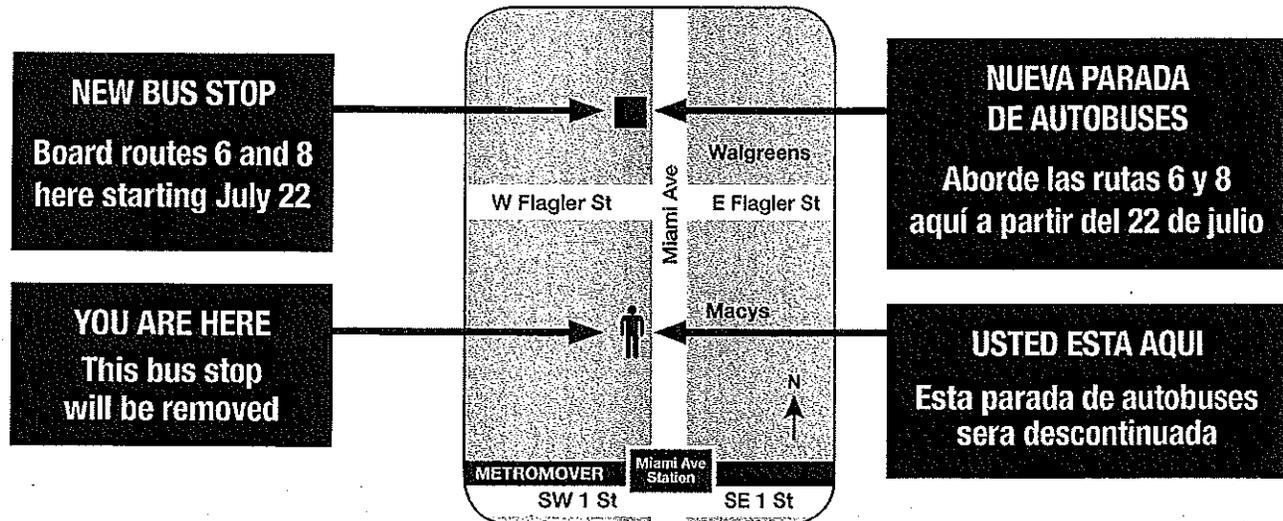
Routes 6 and 8 will serve  
a new bus stop on Miami Ave just  
north of Flagler St

EFFECTIVO EL VIERNES  
22 DE JULIO DEL 2011

**EL SERVICIO A  
ESTA PARADA DE  
AUTOBUSES SERA  
DESCONTINUADA**

**LA PARADA  
SERA REMOVIDA**

Las rutas 6 y 8 servirán a una  
nueva parada en Miami Ave justo  
al norte de la Flagler St



[www.miamidade.gov/transit](http://www.miamidade.gov/transit) • 3-1-1 (1-888-311-3233) • TDD: 305-468-5402

Pou enfòmasyon an Kreyol rele 3-1-1

MIAMI-DADE  
COUNTY

**TRANSIT ADMINISTRATIVE POLICY & PROCEDURES (TAPP)**

No: POL-AD-005

\*(Ref POL-AD-001 for Doc Source No.)

Issue Date: 11/09/11

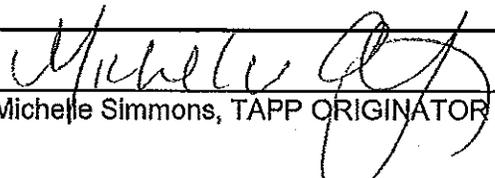
Revision: original issue

Posted by: Information Technology Services

Section: Governmental Affairs

Title: Title VI Limited English Proficiency Public Information Policy

Date Posted:

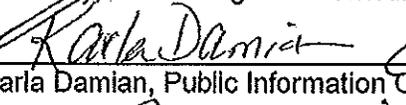
  
Michelle Simmons, TAPP ORIGINATOR

12/29/11  
Date

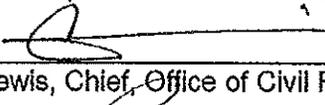
\*Note: Reference TAPP Policy POL-AD-001 (Appendix – A) for the Document Source Number and assign TAPP No. to this document. See the following example: (Rail Services: POL-RS-001)

**REVIEWER SECTION:**  
  
Julio Rey, Advertising and Marketing

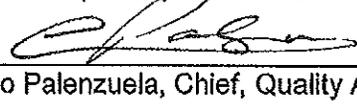
11/29/11  
Date

  
Karla Damian, Public Information Officer

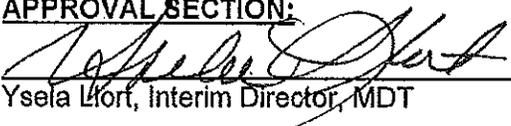
12/12/11  
Date

  
Cathy Lewis, Chief, Office of Civil Rights & Labor Relations

12/28/11  
Date

  
Lazaro Palenzuela, Chief, Quality Assurance

12/29/11  
Date

**APPROVAL SECTION:**  
  
Ysela Lfort, Interim Director, MDT

1-25-12  
Date

Issue Date: 11/09/11

Section: Governmental  
Affairs

Revision: original issue

Posted by: Information Technology Services

Title: Title VI Limited English  
Proficiency Public Information  
Policy

Date Posted:

**Policy Change Justification***(Give a brief description of the reason for change)*

- Original issue of the TAPP

**Revisions**

The Policy is a dynamic document. As major revisions occur, the revisions and/or the entire policy will be distributed. For minor revisions, only the affected pages will be issued. Upon receipt, previous revisions of the policy shall be destroyed. Include all policies that are superseded in the description of revision block below.

Revision	Approval Date	Pages	Description of Revision
Rev. 0		New Document	

**1.0 Authority:**  
MDT Director

**2.0 Purpose:**

To provide an efficient procedure for ensuring that Limited English Proficiency guidelines, as required by Title VI of the Civil Rights Act of 1964, are adhered to and reflected within the activities of the department's Public Involvement Program.

**3.0 Policy & Scope**

This TAPP applies to MDT staff within the Advertising and Media Relations and External Affairs divisions, who develop, implement and monitor public involvement activities.

Issue Date: 11/09/11

Revision: original issue

Posted by: Information Technology Services

Section: Governmental Affairs

Title: Title VI Limited English Proficiency Public Information Policy

Date Posted:

**4.0 Cross Referenced Documents**

Type	Number	Title
Plan	2009 Title VI Program Update Response to AFT C4702.1A	MDT Title VI Program Requirements Action Plan
Law	Pub. L. 88-352, 78 Stat 241	Title VI of the 1964 Civil Rights Act
Guidelines	Chapter 49, CFR Part 21	Department of Transportation Title VI Regulations

**5.0 Definitions**

Term	Definition
LEP	Limited English Proficiency
PSA	Public Service Announcement
Customer Service Outlets	A location where MDT sells fare media exclusively

**6.0 Roles & Responsibilities**

Individual	Roles & Responsibilities
Public Involvement Manager (PIM)	<ul style="list-style-type: none"> <li>Review all publications for inclusion of Title VI language in required languages.</li> <li>Provide sign-in sheets, comment cards and other documents in required languages.</li> </ul>
Manager, Advertising and Media Relations  Graphics Staff, Advertising And Media Relations	<ul style="list-style-type: none"> <li>Review and provide preliminary approval of all publications for inclusion of Title VI language in required languages.</li> <li>Coordinate the placement of signage at rail and mover stations, within buses &amp; other locations as designated.</li> <li>Provide approval for all media buys.</li> </ul>
GIC/IT Liaison	<ul style="list-style-type: none"> <li>Oversee placement of LEP content on website.</li> </ul>

# TRANSIT ADMINISTRATIVE POLICY & PROCEDURES (TAPP)

No: POL-AD-005

*\*(Ref POL-AD-001 for Doc Source No.)*

Issue Date: 11/09/11

Section: Governmental Affairs

Revision: original issue

Title: Title VI Limited English Proficiency Public Information Policy

Posted by: Information Technology Services

Date Posted:

Senior Executive Assistant	<ul style="list-style-type: none"><li>• Provide final approval of TAPP for LEP Public Information Policy.</li></ul>
MDC Office of Records Management	<ul style="list-style-type: none"><li>• Shall follow the procedures as outlined in Administrative Order 7-24 on Records Management and guidelines set forth by the State of Florida, Department of State, Division of Library Information Services.</li></ul>

## 7.0 Requirements

### Notice of Language Services to LEP Persons

The US DOT guidance indicates that once an agency, based on the four factor analysis, determines a need for providing language services, it is important that the agency notify LEP persons that these services are available and are free of charge.

### *Signage*

MDT Advertising and Media Relations division will post signs in the most common areas visited by patrons and LEP persons to include:

1. All buses and rail cars (Posters)
2. Metrorail Stations ( Windscreens)
3. MDT retail and customer service outlets (Government Center Kiosk, Overtown Transit Village)

### *Community organizations*

MDT will work with community-based organizations and other stakeholders to inform LEP persons of MDT services and the availability of language services through the use of the following:

1. Participation in Community Outreach Activities
  - a) Career and Health Fairs
  - b) Sporting Events
  - c) Golden Passport Enrollment
  - d) Elected Official Sponsored Events
  - e) Homeowners' Association Meetings

Issue Date: 11/09/11

Section: Governmental  
Affairs

Revision: original issue

Title: Title VI Limited English  
Proficiency Public Information  
Policy

Posted by: Information Technology Services

Date Posted:

***Telephone Messages***

MDT will provide announcements on all of its customer service lines of the availability of LEP services.

***Notices in local newspapers and on local radio stations***

1. Local media outlets will be used to inform the public of LEP services:
  - a) Notices will be placed in Diario Las Americas, Haiti en Marche and other community papers as needed.
  - b) The public will be informed of LEP services through the use of PSA (Public Service Announcement) and/or paid advertisements as well as talk radio.

***Presentations***

MDT staff will include in its presentations that LEP services are available. Presentations are generally offered to the following:

1. Chambers of Commerce
2. Civic Organizations
3. Elder Services
4. Educational Institutions
5. Advisory Boards
6. Human Service Organizations

**Language Assistance Measures**

There are numerous language assistance measures available to LEP persons including both oral and written language services. Language assistance will be provided for LEP individuals through the use of oral interpretation as well as through the translation of key materials when necessary.

***Oral Language Services***

MDT will offer oral services to LEP individuals and will provide these services through the use of the following:

1. Language Interpreters
  - a) Upon request and as determined necessary based upon the LEP population, an interpreter will be provided at public meetings and hearings held by MDT.

Issue Date: 11/09/11

Section: Governmental  
Affairs

Revision: original issue

Posted by: Information Technology Services

Title: Title VI Limited English  
Proficiency Public Information  
Policy

Date Posted:

- b) Bilingual staff will serve as interpreters at community events, public meetings and hearings.
2. Automated Telephone Services
- a) When contacting MDT's customer service patrons will be provided with a menu offering information in English or Spanish. If, based on the results of the 2010 Census, the Haitian population exceeds the mandatory 20% of Miami-Dade County's population; a prompt for Creole will be added.

### ***Translation of Written Materials***

Currently MDT translates most of its major publications into two other languages, Spanish and Creole. Moving forward the following procedures will be implemented:

1. Route Guides, System Maps, Fare Media Publications and Rider Alerts
  - a) A statement advising of Title VI requirements and informing that language services and translated documents are available will be listed on all publications.
  - b) When economically feasible, information will be translated in Spanish and Creole and included in the same document as information in English.
2. Outreach Materials
  - a) All materials will be translated in Spanish and/or Creole to include:
    1. Public meeting and hearing notices (advertisements and flyers)
    2. All signage announcing public meetings and hearings
    3. Sign-in sheets
    4. Comment and speakers cards
    5. All presentation materials to include fact sheets, newsletters, etc.
3. Website
  - a) MDT will continue to provide route information in Spanish on its website. This feature may be updated in the future to offer services in Creole.
  - b) MDT will post its Title VI Policy and LEP Plan on the agency website.

### **Rider Alerts**

Issue Date: 11/09/11

Revision: original issue

Posted by: Information Technology Services

Section: Governmental  
AffairsTitle: Title VI Limited English  
Proficiency Public Information  
Policy

Date Posted:

Rider Alerts serve as a tool to inform all passengers of any deviations in transit service due to pre-planned route changes, special events or emergencies.

### ***Pre-planned Route Changes/Adjustments***

MDT conducts bi-annual changes and/or adjustments to its bus service. Such changes are a part of long-range (12 months) planning and therefore afford the agency the opportunity to advertise and provide detailed information to the public in a timely manner.

The following procedures will be used to disseminate information when changes or adjustments to service are made:

1. Changes and/or adjustments will be added to website in English and Spanish. A number will be available for Haitian Creole speakers to call for more information.
2. Signage will be placed in buses and Metromover and Metrorail cars announcing changes and/or adjustments.
3. Public Service Announcements will be made through the use of Spanish and Haitian Creole radio outlets.
4. As needed, and based on the extent of the changes and/or adjustments advertisements will be run in all major local periodicals.
5. MDTV, Miami-Dade County's cable television station will be used to advertise changes
6. The use of cable television to provide information is currently being explored.
7. Press releases will be disseminated to the local media.

### ***Advance Notice Changes/Adjustments***

Changes and/or adjustments that occur due to special events or temporary impacts such as road closures due to construction will be announced at a minimum of 72 hours prior.

The following will be implemented:

1. Changes and/or adjustments will be added to website in English and Spanish. A number will be available for Haitian Creole speakers to call for more information.
2. Signage will be placed in buses and Metromover and Metrorail cars announcing changes and/or adjustments.
3. Press releases will be disseminated to the local media.

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***Short Notice Changes/Adjustments***

Changes and/or adjustments that occur within an 24 hour window will be announced through the distribution of flyers and the posting of signage at all rail stations and buses that service the impacted route. As soon as route information becomes available, the following will be implemented:

1. Changes and/or adjustments will be added to website in English and Spanish. A number will be available for Haitian Creole speakers to call for more information.
2. MDT staff will distribute flyers at major bus terminals, transfer points and at rail stations.
3. Signage will be placed on buses that service the impacted route announcing the changes.
4. Press releases will be sent to the local media.

**Alternate Methods of Informing Passengers**

If feasible, MDT will create an audio announcement that can be played on buses announcing that a service change or adjustment is forthcoming and providing a number that passengers can call to receive more information.

**Archived Materials**

All collateral materials will be archived through the EDMS for inclusion in FTA Title VI report. Items will be scanned and forwarded to the Office of Civil Rights.

**TRANSIT ADMINISTRATIVE POLICY & PROCEDURES (TAPP)**

**No: POL-AD-005**

*\*(Ref POL-AD-001 for Doc Source No.)*

Issue Date: 11/09/11

Revision: original Issue

Posted by: Information Technology Services

Section: Governmental  
Affairs

Title: Title VI Limited English  
Proficiency Public Information  
Policy

Date Posted:

For more details, see TAP Policy and Format No. POL-AD- 001, posted on the TAPP's.

Title IV of the  
Civil Rights Act of 1964  
& Limited English  
Proficiency  
For MDT Senior Staff

Principles & Policies  
DOT Regulations  
Miami-Dade Transit Administrative  
Policy  
Providing Access for LEP Persons

## **Non-Discrimination**

“...Direct discrimination by Federal, State, or Local Governments is prohibited by the Constitution. But indirect discrimination through, the use of Federal funds, is just as invidious; and it should not be necessary to resort to the courts to prevent each individual violation. Congress and the Executive have their responsibilities to uphold the Constitution also...”

## **Section 601 of Title VI**

- “No person in the United States shall, on the ground of race, color or national origin, be excluded from participation in, be denied the benefits of, or be subjected to discrimination under any program or activity receiving Federal Financial assistance.”

--42 U.S.C. Section 2000d

## **Title VI Applies to “Persons”**

- Title VI Protections are not limited to citizens.
- Individuals may bring a cause of action under Title VI if they are an intended beneficiary of, an applicant for, or a participant in a federally assisted program.

## **Race, Color, National Origin**

- Persons of any race can file a Title VI complaint.
- We rely on U.S. Census categories to define race.
- Title VI prohibits discrimination on the basis of skin color or complexion.
- National origin means being from a country other than the United States or having ancestors from a country other than the United States.

## **Federal Financial Assistance**

- Financial assistance can be in nonmonetary form. It can include use of Federal land or property, Federal training, or a loan of Federal personnel.

## **Recipients**

- Recipients are any entity to whom Federal financial assistance is extended.
- Many recipients enter into a relationship with the Federal government akin to contract. Federal financial assistance is received under a condition of assurance of compliance with Title VI.
- Both primary recipients and sub-recipients must conform their actions to Title VI.

## **Recipients v. Beneficiaries**

- Beneficiaries do not enter into an agreement with the Federal government where compliance with Title VI is a condition of receiving aid.
- Recipients are covered under Title VI Beneficiaries are not.

## **Program or Activity**

- Title VI's prohibitions are meant to apply institution-wide, not just to the limited aspect of the institution's operations that receive the Federal funding.

## **Title VI Regulations**

- Section 602 of Title VI authorizes Federal agencies "to effectuate provisions of [Section 601]...by issuing rules, regulations, or orders of general applicability."
- The Department of Justice and Department of Transportation regulations prohibit disparate impact discrimination as well as intentional discrimination.

## **Disparate Treatment vs. Disparate Impact Discrimination**

- Disparate treatment—The recipient, in violation of the statute, intentionally discriminates against beneficiaries.
- Disparate impact—The recipient, in violation of agency regulations, uses a neutral procedure or practice that has a disparate impact on minority beneficiaries, and such practice lacks a substantial legitimate justification.

## **Examples of Actions with Potentially Disparate Impacts**

- Installing bus shelters on the basis of their potential to generate advertising revenue.
- Assigning clean-fuel vehicles and facilities to routes that do not serve predominantly minority communities.
- Implementing service reductions or fare increases that disproportionately effect minority communities.
- Planning a fixed guideway project that travels through predominately minority communities but does not include stations in these communities.

## **When can recipients take actions that have disparate impacts?**

- In the cases when the policy is supported by a “substantial legitimate justification” *and*
- There are no comparably effective alternative practices that would result in less disparate impacts *and*
- The justification for the action is not a pretext for discrimination.

## **Alexander v. Sandoval**

- In this 2001 decision, the Supreme Court ruled that plaintiffs can sue under the intentional discrimination provisions in Section 601 of Title VI.
- However, plaintiffs cannot bring lawsuits under the disparate impact regulations promulgated by Federal agencies under Section 602 of Title VI.
- Persons may still file administrative complaints with Federal agencies under the Title VI regulations.

## **DOT Title VI Regulations--49CFR 21.5(b)**

### **Discrimination Prohibited**

- Recipients may not, on the grounds of race, color, or national origin:
  - Deny any individual service, financial aid, or benefit under the program.
  - Provide any service, financial aid, or benefits that is different from that provided to others.
  - Subject an individual to segregation or separate treatment.
  
- Restrict an individual in the enjoyment of any advantage or privilege enjoyed by others.
- Treat individual differently in terms of whether they satisfy admission, eligibility, or membership.
- Deny an individual the opportunity to participate in the provision of services.
- Deny a person the opportunity to participate as a member of planning or advisory body.

## **Dot Title VI Regulations**

- Recipients may not use criteria or methods of administration that have the effect of subjecting individuals to discrimination (49 CFR 21.5(b)(2)).
- In determining the location of facilities, recipients may not make decisions with the purpose or effect of subjecting persons to discrimination(49CFR 21.5(b)(3)).
- Recipients are expected to take affirmative action to assure non-discrimination (49 CFR 21.5(b)(7)).
- Recipients shall submit a Title VI compliance reports to U.S. DOT.(49 CFR 21.9(b)).
- Recipients shall apprise beneficiaries of the protections afforded to them by Title VI(49CFR21.9(d)).
  
- Discrimination with regard to the routing, scheduling, or quality of transit service is prohibited.
- Frequency of service, age and quality of vehicles assigned to routes, quality of stations serving different routes, and location of routes must not be determined on the basis of race, color, national origins. (Appendix C to 49 CFR 21)

## **Residential Segregation and the Potential for Disparate Impacts**

- Residential segregation persists in many metropolitan are as, due to:
  - Personal preferences
  - Discrimination in the real estate/ lending industry
  - Lack of affordable housing
  - Residential segregation creates the potential for disparate provision of services due to imbalance of political clout or indifference (i.e., "out of sight, out of mind").

## **National origin discrimination**

- Need to provide language access to services for persons with limited English proficiency.
- Transportation and transit security needs to be provided on a non-discriminatory manner.

## **Providing Language Access to Persons with Limited English Proficiency and Low Literacy Who Is a Limited Proficient English Individual**

- Individuals who do not speak English as their primary language and who have a limited ability to read, write, speak, or understand English can be limited English proficient.
- Households where no one over age 14 speaks English well are linguistically isolated.

## **LEP Population in the United States**

- More than 10 million people in the U.S. reported to the 2000 Census that they do not speak English at all or do not speak English well.
- The number of persons who do not speak English well or not at all grew by 65% from 1990 to 2000.
- The most common languages other than English are Spanish, Chinese, Vietnamese, and Korean.
- Over 11% of LEP persons aged 16 years & over reported taking transit to work, compared with 4% of English speakers.

## **Recent Arrivals and Transit Ridership**

- 13% of people who have arrived in the U.S. since 1995 report that they commute by public transportation (4.5% of the general public commutes by transit).
- Among arrivals to the U.S., transit use declined over time:
  - 8.9% of people who have been here less than 5 years take bus transit to and from work.
  - 3.46% of people who have been here for 20 + years take bus transit to and from work.

\_ Source: Commuting in America III

## **What Constitutes Low Literacy**

- Literacy is "an individual's ability to read, write, and speak English and compute and solve problems at levels of proficiency necessary to function on the job and in society, to achieve one's goals and develop one's knowledge and potential," ( The National Literacy Act)
- U.S. Department of Education created scales for prose literacy, document literacy, and quantitative literacy and defined five levels of literacy, with level 1 reflecting the lowest skills.
- The National Adults Literacy Survey found that 21% of adults had level 1 literacy skills and 27% of adults had levels 2 literacy skills.

## **Executive Order 13166**

- Each Federal agency shall examine the services it provides and develop and implement a system by which LEP persons can meaningfully access those services.
- Clarify the existing responsibilities under Title VI.
- Failing to ensure that LEP persons can participate is a form of national origin discrimination covered by Title VI.

## **DOT LEP Guidance**

What steps a recipient takes to provide "meaningful access" depends on this four-factor analysis:

1. The number and proportion of LEP persons in a recipient's area.
2. The frequency of contact between LEP persons and the recipient's services.
3. The importance of the service provided to the recipient.
4. The resources available to the recipient and costs.

## **Ways to Reduce the Costs of Providing Language Assistance**

- Training bilingual staff to serve as interpreters or translators.
- Using telephone interpretation services.
- Using qualified community volunteers to provide interpretive services.
- Using qualified translators and interpreters to make sure documents don't need to be corrected later.

## **Providing Language Assistance Also Has Benefits**

- Costs for existing language access activities are generally not seen as burdensome. One of the reasons for this is that providing services to LEP populations makes sound business sense. LEP populations represent a significant portion of the current and potential ridership. Thus, making services accessible to LEP persons could increase ridership."

## **Guidance on Oral Language Services**

- The competency of interpreters must be considered.
- When interpretation is needed, it should be provided in a timely manner to be effective.
- Determine how to make best use of bilingual staff.

- Contracting with interpreters is effective when there is no regular need for a particular language skill.
- Also consider using telephone interpreter services.

### **Guidance on Written Language Services**

- The competency of interpreters must be considered.
- When interpretation is needed, it should be provided in a timely manner to be effective.
- Determine how to make best use of bilingual staff.
- Contracting with interpreters is effective when there is no regular need for a particular language skill.
- Also consider using telephone interpreter services.

### **Guidance on Written Language Services**

- Translate vital written materials.
- The number of languages into which a document should be translated depends on the four-factor analysis.

### **Elements of an Effective Language Assistance Plan**

- Conducting a needs assessment.
- Providing language assistance measures.
- Training staff.
- Providing notice to LEP persons.
- Monitoring and updating the plan.

### **What Language Assistance Is Currently Being Providing?**

- Publishing timetables and route maps in languages other than English.
- Multilingual phone lines and use of multilingual staff in information booths.
- Multilanguage announcements.

### **Common Complaints from the LEP Community-**

- Station announcements and ticket vending machine instructions are difficult to understand.
- People experienced difficulty trying to get oral information from bus drivers or train station staff.
- Driver sensitivity is a problem.
- Lack of transit service to places where LEP persons want to go.



**Miami-Dade Transit is committed to providing equal access to its services regardless of race, color or national origin, in accordance with Title VI of the Civil Rights Act.**

If you feel you have been discriminated against because of any of these conditions, you may contact the Office of Civil Rights & Labor Relations at 3-1-1 or 305-468-5900. Evenings and weekends call 305-375-1952. (For TDD Service, call 305-468-5402.)

**La Agencia de Transporte Público de Miami-Dade se compromete a observar el Título VI de la ley de derechos civiles y proporcionar igualdad de acceso a sus servicios sin consideración de raza, color u origen nacional.**

Si a usted le parece que han discriminado en su contra debido a alguna de estas condiciones, usted puede ponerse en contacto con la Oficina de Derechos Civiles y Relaciones Laborales por el 3-1-1 o el 305-468-5900. Noches y fines de semana llame al 305-375-1952. (Para obtener servicio de OTS [Dispositivo de Telecomunicación para el Sordo] sírvase llamar al 305-468-5402.)

**Miami-Dade Transit angaje li a bay aksè ekkitab a sevis li yo san fe regadans sou ras, koulè, oswa orijin nasyonal, an akò ak Tit VI nan Lwa Dwa Sivil la.**

Si w panse w te viktim diskriminasyon poukay youn nan kondisyon sa yo, w ka kontakte Bivo Dwa Sivil ak Relasyon Travay nan 3-1-1 oswa 305-468-5900. Nan aswè ak fin semèn rele 305-375-1952. (Pou abitye TDD, rele 305-468-5402.)



**TRANSIT ADMINISTRATIVE POLICY & PROCEDURES (TAPP)**

**No: POL-CL-001**

*(Ref POL-AD-001 for Doc Source No.)*

Issue Date: 9/19/11

Section: OCR/LR

Revision: initial TAPP

Title: Title VI Service and Fare Changes

Posted by: Information Technology Services

Date Posted:

*Allison Aristide*

Allison Aristide, TAP ORIGINATOR

*12/20/11*

Date

\*Note: Reference TAPP Policy POL-AD-001 (Appendix -- A) for the Document Source Number and assign TAPP No. to this document. See the following example: (Rail Services: POL-RS-001)

**REVIEWER SECTION:**

*[Signature]*

Cathy Lewis, Chief, Office of Civil Rights & Labor Relations

*12/21/11*

Date

*[Signature]*

Rosie Perez, Sr. Chief, Information Technology & Support Services

*12/20/11*

Date

*[Signature]*

Michelle Simmons

*12/22/11*

Date

*[Signature]*

David Ritchey, Interim Assistant Director, Financial Services

*12/29/11*

Date

*[Signature]*

Lazaro Palenzuela, Chief, Quality Assurance

*12/22/11*

Date

*[Signature]*

Albert Hernandez, Assistant Director, Eng. Planning & Development

*12/23/11*

Date

*[Signature]*

Hugh Chen, Deputy Director of Operations

*12.29.11*

Date

**APPROVAL SECTION:**

*[Signature]*

Ysela Efort, Interim Director, MDT

*1-25-12*

Date

Issue Date: 9/19/11

Section: OCR/LR

Revision: Initial TAPP

Title: Title VI Service and Fare Changes

Posted by: Information Technology Services

Date Posted:

**Policy and Procedure Change Justification**

*(Give a brief description of the reason for change)*

Original Issue of the TAPP.

**Revisions**

The Policy is a dynamic document. As major revisions occur, the revisions and/or the entire policy will be distributed. For minor revisions, only the affected pages will be issued. Upon receipt, previous revisions of the policy shall be destroyed. Include all policies that are superseded in the description of revision block below.

Revision	Approval Date	Pages	Description of Revision
Rev. 0		New Document	

**1.0 Authority:**

MDT Director

**2.0 Purpose:**

To ensure MDT, a recipient of federal assistance, and its staff at all levels are fully informed on the implementation of and compliance with MDT's obligation under the Title VI of the Civil Rights Act of 1964 42.US c2000d and U.S. Department of Transportation Title VI Regulations at 49 CFR 21.

**3.0 Policy & Scope**

This TAPP applies to all entities within MDT, which is inclusive of, but not limited to the MDT Director, MDT Staff within OCR/LR (Title VI), MDT staff within MDT's Planning and Scheduling Division, MDT staff within MDT's IT Division, MDT staff within MDT's Marketing and External Affairs Office, MDT's Construction and Finance Divisions.

Issue Date: 9/19/11

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**4.0 Cross Referenced Documents**

Type	Number	Title
Plan	2009 Title VI Program Update Response to AFT C4702.1A	Program Requirements-Supplemental Action Plan
Law	Pub. L. 88-352, 78 Stat 241	Title VI of the Civil Rights Act of 1964
Guidelines	49 CFR Section 21.5 (b)(2), 49 CFR Section 21.5 (b)(7)	Department of Transportation Title VI Regulations
Code of Miami-Dade County Chapter 2-Administration	Article XIX MDT Section 2-150 (b)	Fixing and changing fares, service, rates or charges
Resolution	No. R-179-09	Resolution recommending changes to the Miami-Dade Transit Schedule of Transit Fares, Rates and Charges
Outline		Outline for disparity analysis
Collective Bargaining Agreement (MDT and TWU)	V24 Line Ups	
FTA Guidance		Title VI Service and Fare Equity Analysis Questionnaire
LEP TAPP	POL-AD-005	Title VI Limited English Proficiency Public Information Policy

Issue Date: 9/19/11

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Posted by: Information Technology Services

Date Posted:

**5.0 Definitions**

<b>Term</b>	<b>Definition</b>
Title VI Program	The Title VI Program refers to a document developed by a Federal Transportation Authority (FTA) recipient to demonstrate how the recipient is complying with Title VI requirements. Direct and primary recipients must submit their Title VI Programs to FTA every three years. The Title VI Program must be approved by the recipient's board of directors or appropriate governing entity prior to submission to FTA. For State DOT's, the appropriate governing entity is the State's Secretary of Transportation.
Major Service Change	Any service changes which adjusts headways and/or route length by 25% or greater. Service changes also include 1) A change in the interval peak period transit services on a route of more than 30 minutes; 2) a change in the interval between off-peak period transit services on a route of more than 30 minutes; 3) route changes of 25% or greater within a year 4) establishment of a new transit service or abolishment of an existing service.
Fare Increase	Any increase (value amount) applied to an established fare.
Discrimination	Any act or inaction, whether intentional or unintentional, in any program or activity of a Federal aid recipient, sub recipient, or contractor that results in disparate treatment, disparate impact, or perpetuating the effects of prior discrimination based on race, color, or national origin.
Disparate Impact	Facially neutral policies or practices that have the effect of disproportionately excluding or adversely affecting members of a group protected under Title VI, and the recipient's policy or practice that lacks a substantial legitimate justification.
Disparate Treatment	Actions that result in circumstances where similarly situated persons are treated differently (i.e. less favorably) than others because of their race, color, or national origin.
Low-Income	Person whose median household income is at or below the Department of Health and Human Services' poverty guidelines.
Low-Income Population	Any readily identifiable groups of low-income persons who live in geographic proximity, and, if circumstances warrant, geographically dispersed/ transient persons (such as migrant workers or Native Americans) who will be similarly

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	affected by a proposed DOT program, policy, or activity.
Minority Person	<ol style="list-style-type: none"> <li>1) American Indian and Alaskan Native, which refers to people having origins in any of the original peoples of North and South America (including Central America), and who maintain tribal affiliation or community attachment.</li> <li>2) Asian, which refers to people having origins in any of the original peoples of the Far East, Southeast Asia, or the Indian subcontinent.</li> <li>3) Black or African American Populations, which refers to peoples having origins in any of the Black racial groups of Africa.</li> <li>4) Hispanic or Latino Populations, which includes persons of Cuban, Mexican, Puerto Rican, South or Central American, or other Spanish culture or origin, regardless of race.</li> <li>5) Native Hawaiian or Other Pacific Islander, which refers to people having origins in any of the original peoples of Hawaii, Guam, Samoa, or other Pacific Islands.</li> </ol>
Minority Population	Any readily identifiable group of minority persons who live in geographic proximity and, if circumstances warrant, geographically dispersed/transient populations (such as migrant workers or Native Americans) who will be similarly affected by a proposed DOT program, policy or activity.
National Origin	The particular nation in which a person was born, or where the person's parents or ancestors were born.
Predominantly Minority Area	The geographic area, such as a neighborhood, Census tract, or traffic analysis zone, where the proportion of minority persons residing in that area exceeds the average proportion of minority persons in the recipient's service area.
Predominantly Low-Income Area	A geographic area, such as a neighborhood, Census tract, or traffic analysis zone, where the proportion of low-income persons residing in that area exceeds the average proportion of low-income persons in the recipient's service area.

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**6.0 Roles & Responsibilities**

<b>Individual</b>	<b>Roles &amp; Responsibilities</b>
Title VI Manager	Responsible for coordinating, conducting and disseminating necessary research regarding disparity analysis for proposed service changes/fare increases, and formulating all policy related recommendations regarding Title VI (Proposed Service and Fare Changes, Marketing Materials for the Public). Information transmitted to MDT Director via OCR/LR Chief. Reviews all related documents regarding Title VI. Serves as Department liaison with Federal Transit Administration (FTA) regarding Title VI.
MDT Director	Agency Head
Chief, Office of Civil Rights and Labor Relations (OCR/LR)	Oversees all efforts regarding the dissemination of necessary research regarding the disparity analysis for proposed service changes/fare increases, in addition to overseeing the formulation of all policies and recommendations regarding Title VI (Proposed Service and Fare Changes & Marketing Materials for the Public).
Assistant Director, MDT Financial Services	Provides input regarding schedule of Transit Fares, Rates and Charges.
Principal Planner	Reviews, edits and provides input regarding development of Disparity Analysis (Service and Fare Changes).
Planning and Scheduling	Assists with data collection, reviews, edits and provides input regarding development of Disparity Analysis (Service and Fare Changes).
Senior Chief, Information Technology	Provides appropriate staff to collect data and conduct preliminary analysis.
Title VI Planning Committee	Meets monthly unless project requires more frequent meetings. Representatives include (Representative from OCR/LR, Planning, Scheduling, IT, Marketing, Finance, External Affairs).
LEP Guidelines	MDT will, based on US DOT guidance notify LEP Persons that language assistance services are available free of charge
MDT Marketing	Review and provide preliminary approval of all publications for inclusion of Title VI language in required languages in addition to coordinating the placement of signage at rail and mover stations, within buses and other locations as designated.

Issue Date: 9/19/11

Section: OCR/LR

Revision: Initial TAPP

Title: Title VI Service and  
Fare Changes

Posted by: Information Technology Services

Date Posted:

## 7.0 Requirement

### I. INTRODUCTION

According to the provisions of Title VI, Civil Rights Act of 1964, No person in the United States shall, on the grounds of race, color, or national origin, be excluded from, be denied the benefits of, or be subjected to discrimination under any program or activity receiving federal assistance.

To comply with 49 CFR Section 21.5 (b)(2), 49 CFR Section 21.5 (b)(7), MDT will implement the following procedures regarding a preliminary disparity analysis of proposed impacted routes and/or schedule changes prior to the implementation of any significant service changes or fare increases, in addition to a Ridership Satisfaction Survey that will be dispersed on the day the service change goes into effect. Results of the Ridership Survey will be tabulated and provided to all stakeholders.

A mandated Service Change (TWU Local 291, CBA V24) Line Up occurs no more than twice a year, unless necessitated by service adjustments and or other operational requirements.

- The General Line Up.
- Divisional Line Up June of each year (if necessary).

### II. PROCEDURE for MAJOR SERVICE CHANGE (*either General Line Up, Divisional Line Up or necessitated by need*)

*(Note \* Title VI Manager, and the Chief, OCR/LR to be copied on all information from Planning and Scheduling Office regarding all line ups). Title VI Manager will attend all line up meetings. All activities regarding Title VI Preliminary Disparity Analysis and Ridership Satisfaction Surveys will commence in August of each year.*

- a.) On or about the second week in August the Title VI Manager will notify Transit Planning Section Supervisor through electronic message with a form letter (**see Attachment 1**) indicating if the scheduled line up meets the definition of a Major Service Change.

**Major Service Change** - 1) A change in the interval peak period transit services on a route of more than 30 minutes; 2) a change in the interval