



TITLE VI PROGRAM

Regional Transportation Authority of Middle Tennessee

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Chapter 1: Introduction

RTA Background

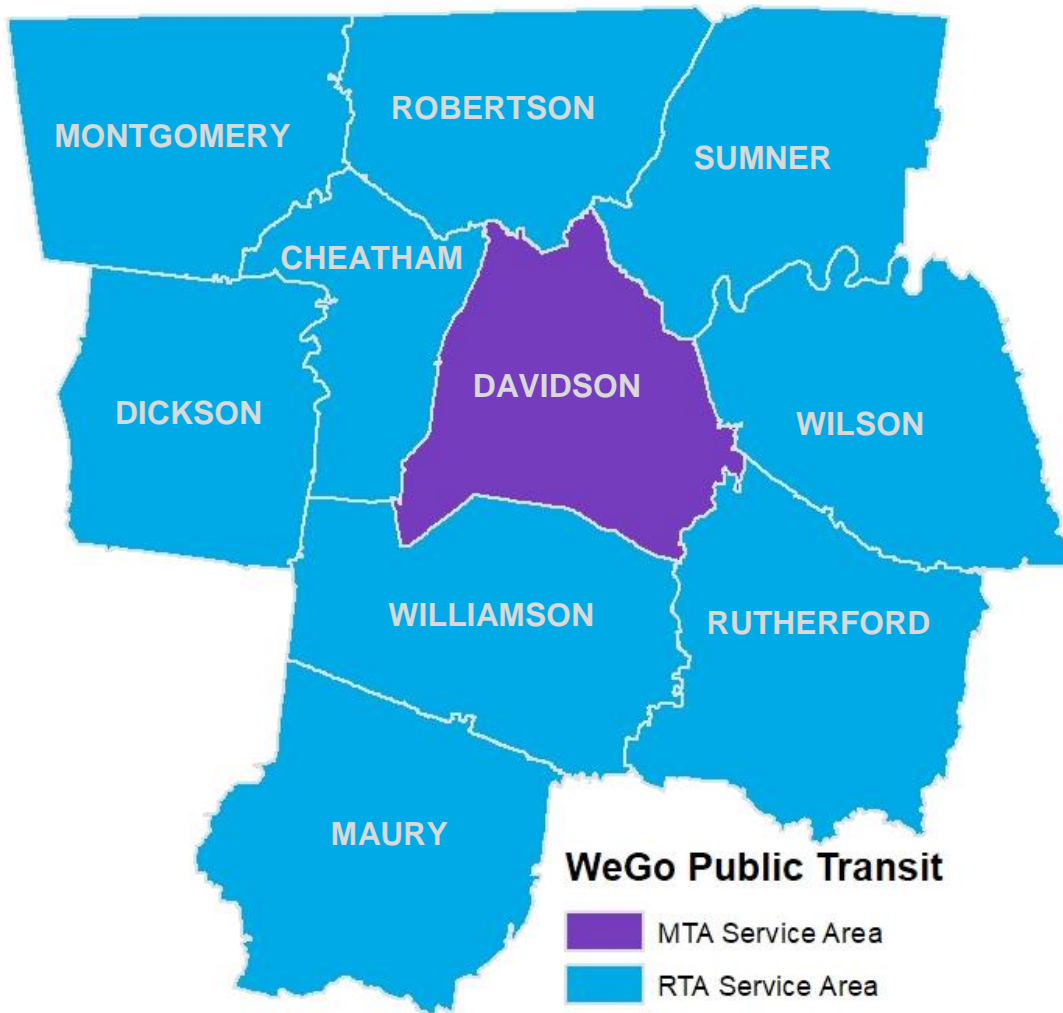
Established in 1988, the Regional Transportation Authority of Middle Tennessee (RTA) provides public transit services for the ten-county Middle Tennessee region. The Nashville Metropolitan Transit Authority (MTA) provides administration oversight. Formerly known to the public eye as two separate agencies, in 2018 the agencies launched a three-year rebranding process to consolidate the public facing entity with the formation of “WeGo Public Transit”. Although still separate entities, each providing different services, the consolidation of the agencies creates a cohesive brand for transit services of the Middle Tennessee region. The Davidson Transit Organization (DTO) manages the administrative function of Nashville MTA and RTA. Figure 1.1 shows the organizational function of these four entities and Figure 1.2 shows the Nashville MTA and RTA service areas.¹

Figure 1.1: Organizational Function



1. ¹ All three operating entities are still legally binding, which means in contractual and other legal forms of communication the operating entity will still be named.¹

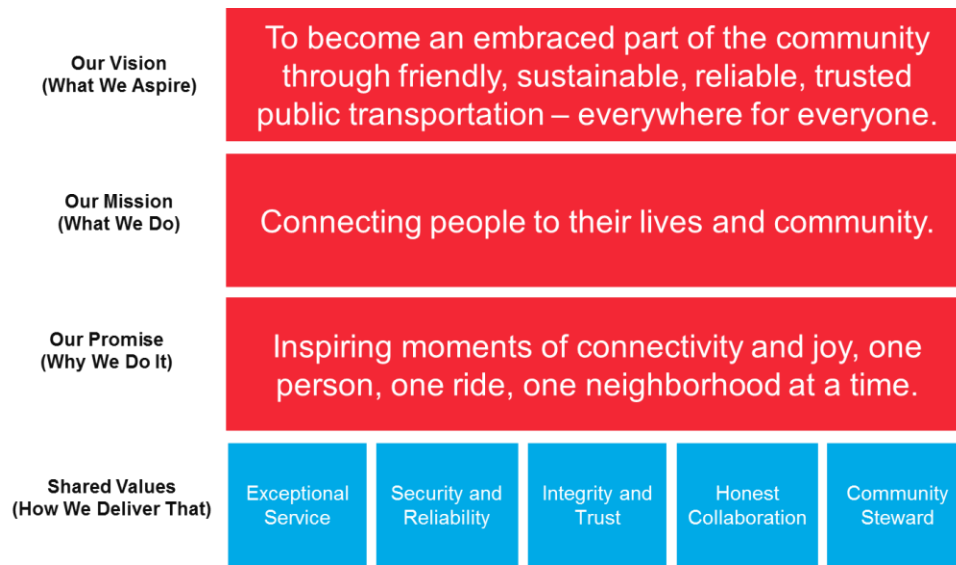
Figure 1.2: MTA and RTA Service Areas



WeGo Mission, Vision, and Promise

As part of the new branding, WeGo established a modern-day approach to how we provide our services, how that message is conveyed, and how we ensure equitable practice. Inclusivity is a common theme throughout the mission, vision, and passion as we strive to ensure our services, practices, and attitudes as an organization are executed in an equitable manner for all members of the Nashville community. Figure 3 details this idea through our vision, mission, and promise to our customers.

Figure 1.3: WeGo Public Transit Vision, Mission, and Promise



WeGo / RTA Organizational Background

The RTA is a 10-county regional agency created by state statute in 1988 to plan and develop a regional transit system to meet the growing commuter and travel demands of the region. The 10 member counties of the RTA are: Cheatham, Davidson, Dickson, Montgomery, Robertson, Rutherford, Sumner, Maury, Williamson, and Wilson. The county mayors, mayors of the cities are the board members of the RTA. The Commissioner of Tennessee Department of Transportation (TDOT) and six members appointed by the Governor also serve on the board.

RTA provides the following services:

- **Rideshare Program** – This program provides for the coordination of vanpools, carpools, regional bus routes known as Relax and Ride and the East Corridor Commuter Rail, the WeGo Star. RTA has an online ride match system available through the website at www.RTArelaxandride.com.
- **Commuter Bus** –RTA operates 10 regional bus routes between downtown Nashville and Smyrna, LaVergne, Dickson, Murfreesboro, Gallatin/Hendersonville, Franklin, Spring Hill, Springfield/Joelton, and Clarksville. RTA works closely with the Nashville MTA linking riders with 46 routes provided throughout Davidson County. In addition, RTA’s rideshare program organizes vanpools and carpools for commuters throughout Middle Tennessee.
- **Commuter Rail** – The RTA implemented service from Lebanon, Tennessee (Wilson County) into downtown Nashville in 2006. The commuter rail line RTA provides three peak commuting trips to downtown Nashville and three peak commuting trips from Nashville Monday through Friday serving commuters in Lebanon, Hamilton Springs, Martha, Mt. Juliet, Hermitage, and Donelson.

For administrative functions, Nashville MTA's management team, headed by a Chief Executive Officer (CEO), oversees the day-to-day operations. Five departments report to the CEO as follows:

1. Administration – *Human Resources, Information Technology, Training, Security, Procurement, and Legislative Relations*
2. Development – *Planning and Grants, Marketing and Communications, Customer Care, and Service Quality*
3. Finance – *Accounting, Payroll, and Sales*
4. Operations – *Operations, Safety, and Maintenance*
5. Engineering – *Facilities and Construction*

All personnel other than the CEO work for the DTO, a non-profit that is contracted by the Nashville MTA and RTA to maintain administrative support.

What is Title VI and What Does It Mean for RTA?

Title VI of the Civil Rights Act prohibits discrimination on the basis of race, color or national origin in programs or activities receiving federal financial assistance. Furthermore, Presidential Executive Order 12898 addresses environmental justice in minority and low-income populations.

With the rebranding to WeGo, RTA established a new outlook on how it engages with its customers and the general public with inclusivity as the common thread throughout its service platforms. Although law dictates that no individual or organization is excluded from participation in, denied the benefits of its programs, activities, or services, or subject to discrimination on the basis of race, color or national origin, WeGo approaches inclusivity in all forms. This pertains to income status, limited English speaking proficiency, marital status, gender identity, religion, veteran status, physical or mental disability and all other subclasses of a society. Simply put, WeGo is for everyone, everywhere.

Toward that end, every department, division, and employee of RTA is responsible for carrying out the WeGo brand of commitment to inclusivity, including the requirements of the Title VI Program. As an agency, we aspire to achieve the following goals:

- Ensure that the level and quality of public transportation services is provided in a nondiscriminatory manner;
- Promote full and fair participation in public transportation decision-making without regard to race, color, or national origin; and,
- Ensure meaningful access to transit-related programs and activities by persons with limited English proficiency.

RTA is proud of its longstanding policy to ensure that social impacts to communities and people are recognized early and continually throughout the transportation decision-making process. This

document sets forth the standards for every representative of the agency to guide decisions in a non-discriminatory manner.

Title VI Coordinator

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The functions of the Title VI Coordinator fall under the direction of the Chief Development Officer and overseen by the Nashville MTA's CEO. With the diverse range of responsibilities in Title VI compliance and our commitment to ensuring inclusivity within our brand, RTA recognizes the importance of interdepartmental collaboration. Where needed, the Title VI Coordinator will consult with representatives from the planning department to support the planning role of Title VI processes. These duties are broken down and described in further detail below:

General Title VI Coordinator Duties:

- **Complaints:** Review written Title VI complaints that may be received by RTA following the adopted guidelines (see Complaint Procedures). Ensure every effort is made to resolve complaints.
- **Inclusive Public Participation:** Ensure implementation of RTA's Public Participation Plan, disseminating public notices, and organizing public engagement activities in an inclusive manner.
- **Customer Relations:** Ensures diversity in public outreach in meeting locations and delivery tactics, ensures compliance with ADA accessibility arrangements, targets under represented communities to engage and be educated about our services and programs.
- **Information Dissemination:** Ensures that public notices for applicable events are accessible for those with Limited English Proficiency (LEP).

Title VI Planning Support:

- **Title VI Plan Update:** Review and update the RTA's Title VI Program as needed or required. Present updated Program to the CEO for approval.
- **Planning and Project Development:** Ensure that available census data are included as a part of all Title VI analyses for the planning and implementation of capital projects as well as all service and fare changes;
- **Program Administration:** Administer the Title VI Program and coordinate its implementation. Ensure compliance with the assurances, policy, and program objectives. Perform Title VI program reviews to assess administrative procedures, staffing, and resources; provide recommendations as required to the CEO.
- **Data Collection:** Review the statistical data gathering process performed by agency program staff periodically to ensure sufficiency of data for meeting the requirements of Title VI program administration.

- **Major Service and Fare Changes Analysis:** Evaluate Title VI impacts for major fixed route service changes and fare changes to the transit system.

Chapter 2: General Requirements and Guidelines

Notice to Beneficiaries of Protection under Title VI

In compliance with the Federal Transit Authority (FTA) regulations, RTA provides information to the public regarding our Title VI obligations to inform them of their protections against discrimination by posting a notice in both English and Spanish throughout WeGo Central as well as at the Riverfront Station. This notice is also at Park & Ride locations of the WeGo Star and includes the following main points:

- RTA operates its services without regard to race, color, and national origin;
- A description of the procedures that members of the public should follow in order to request additional information regarding our policy; and,
- A description of procedures that members of the public should follow in order to file a discrimination complaint.

The notice in English and Spanish can be found in Appendix A.

Title VI Complaint Policy

These procedures apply to all complaints filed under Title VI of the Civil Rights Act of 1964, relating to any program or activity administered by the RTA or its sub-recipients, consultants, and/or contractors. Intimidation or retaliation of any kind is prohibited by law.

These procedures do not deny the right of the complainant to file formal complaints with other State or Federal agencies, or to seek private counsel for complaints alleging discrimination. These procedures are part of an administrative process that does not provide for remedies that include punitive damages or compensatory remuneration for the complainant.

Every effort will be made to obtain early resolution of complaints at the lowest level possible. The option of informal mediation meeting(s) between the affected parties and the Title VI Coordinator may be utilized for resolution, at any stage of the process. The Title VI Coordinator will make every effort to pursue a resolution of the complaint. Initial interviews with the complainant and the respondent will request information regarding specifically requested relief and settlement opportunities.

Process

Any individual, group of individuals, or entity that believes they have been subjected to discrimination prohibited by Title VI nondiscrimination provisions may file a written complaint with RTA. A formal complaint should be filed within 180 calendar days of the alleged occurrence or when the alleged discrimination became known to the complainant. The complaint must meet the following requirements:

- Complaint shall be in writing and signed by the complainant(s);

- Include the date of the alleged act of discrimination (date when the complainant(s) became aware of the alleged discrimination; or the date on which that conduct was discontinued or the latest instance of the conduct);
- Present a detailed description of the issues, including names and job titles of those individuals perceived as parties in the complained-of incident;
- Allegations received by fax or e-mail will be acknowledged and processed, once the identity/identities of the complainant(s) and the intent to proceed with the complaint have been established. The complainant is required to mail a signed, original copy of the fax or e-mail transmittal for RTA to be able to process it;
- Allegations received by telephone will be reduced to writing and provided to complainant for confirmation or revision before processing;
- A complaint form will be forwarded to the complainant for him/her to complete, sign, and return to RTA for processing. This form is also available for download from the RTA website in both English and Spanish;
- Upon receipt of the complaint, the Title VI Coordinator will determine its jurisdiction, acceptability, and need for additional information, as well as investigate the merit of the complaint. In cases where the complaint is against one of RTA's sub-recipients of Federal funds, RTA will assume jurisdiction and will investigate and adjudicate the case; and
- If a discrimination complaint does not fall within the protection of Title VI (race, color, or national origin), the investigation will continue under the direction of the appropriate department.

In order to be accepted, a complaint must meet the following criteria:

- The complaint should be filed within 180 calendar days of the alleged occurrence or when the alleged discrimination became known to the complainant;
- The allegation(s) must involve a covered basis such as race, color, or national origin; and
- The allegation(s) must involve a program or activity of a Federal-aid recipient, sub-recipient, or contractor.

A complaint may be dismissed for the following reasons:

- The complainant requests the withdrawal of the complaint;
- The complainant fails to respond to repeated requests for addition information needed to process the complaint; or,
- The complainant cannot be located after reasonable attempts.

Once the complaint is accepted for investigation, the complainant and the respondent will be notified in writing within seven calendar days. The complaint will receive a case number and will then be logged into RTA's records identifying its basis and alleged harm.

In cases where RTA assumes the investigation of the complaint, RTA will provide the respondent with the opportunity to respond to the allegations in writing. The respondent will have ten (10) calendar days from the date of written notification of acceptance of the complaint to furnish his/her response to the allegations.

A final investigative report and a copy of the complaint will be forwarded to the FTA and affected parties within 60 calendar days of the acceptance of the complaint. RTA will then notify the parties of its final decision.

If complainant is not satisfied with the results of the investigation of the alleged discrimination and practices, the complainant will be advised of the right to appeal to the FTA.

The public may obtain a complaint form by request, through the RTA website, or from the information center at WeGo Central. The Title VI complaint process and form are both available in Spanish and English and referenced in Appendix B.

This procedure reflects the current process in place effective September 2016. In an ongoing effort to ensure the most relevant processes are put into place to reflect the diverse service needs of our customer base, revisions to the complaint procedure are currently in progress and will be distributed once finalized by the development team at WeGo Public Transit.

Title VI Investigations, Complaints, and Lawsuits

RTA maintains a list of all investigations, complaints, or lawsuits that allege discrimination on the basis of race, color, or national origin. Records will be kept for three years internally then archived for a period of ten years. This log can be found in Appendix B. There are no active complaints at this time.

Public Engagement

Overview

The RTA Title VI Program provides leadership, direction, and policy to ensure compliance with Title VI of the 1964 Civil Rights Act and environmental justice principles. RTA is proud of its longstanding policy to ensure that social impacts to communities and people are sought out and recognized early and continually throughout the transportation decision-making process for minorities, individuals with disabilities, and individuals with Limited English Proficiency (LEP).

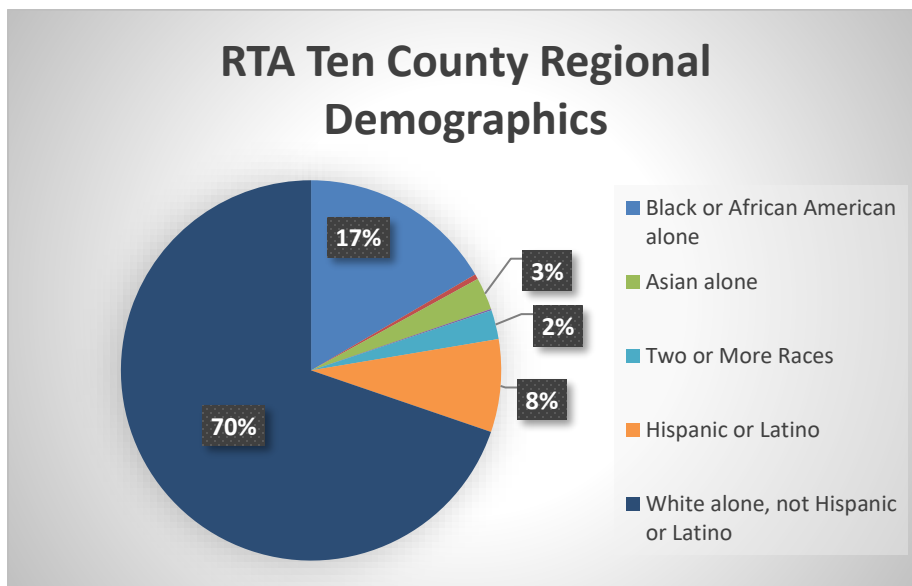
In order to better understand Middle Tennessee’s low-income, minority, and LEP communities RTA uses census data, as well as the most up to date five-year estimates from the American Community Survey in order to determine the demographic make-up of our service area. RTA also uses geographic information system (GIS) mapping in order to identify the minority block group communities within the RTA service area. By collecting this data RTA has been able to develop a comprehensive plan that will prevent any of our services from causing a disparate impact to those communities and ensures inclusivity in all engagement tactics.

Figure 2.1 provides an overview of the demographic makeup of the RTA 10 County region. As depicted below, the two largest minority groups within our service area are African Americans and Hispanics.

Table 2.1: Middle Tennessee: RTA 10 County Demographic Makeup

	Robertson County	Maury County	Dickson County	Davidson County	Cheatham County
Total County Population	71,012	94,340	53,446	692,587	40,439
Black or African American	5,397 7.6%	11,226 11.9%	2,191 4.1%	191,847 27.7%	809 2.0%
American Indian and Alaska Native	426 0.6%	472 0.5%	267 0.5%	3,463 0.5%	202 0.5%
Asian	497 0.7%	943 1.0%	321 0.6%	27,011 3.9%	202 0.5%
Native Hawaiian and Other Pacific Islander	71 0.1%	94 0.1%	53 0.1%	693 0.1%	40 0.1%
Two or More Races	1,136 1.6%	2,075 2.2%	1,015 1.9%	17,315 2.5%	687 1.7%
Hispanic or Latino	5,184 7.3%	5,755 6.1%	1,978 3.7%	72,029 10.4%	1,294 3.2%
White alone, not Hispanic or Latino	58,940 83.0%	74,529 79.0%	48,101 90.0%	387,849 56.0%	37,608 93.0%

	Wilson County	Williamson County	Sumner County	Rutherford County	Montgomery County
Total County Population	140,625	231,729	187,149	324,890	205,950
Black or African American	10,266 7.3%	10,428 4.5%	14,785 7.9%	51,333 15.8%	42,838 20.8%
American Indian and Alaska Native	703 0.5%	695 0.3%	749 0.4%	1,949 0.6%	1,442 0.7%
Asian	2,391 1.7%	10,891 4.7%	2,807 1.5%	11,371 3.5%	4,943 2.4%
Native Hawaiian and Other Pacific Islander	141 0.1%	232 0.1%	187 0.1%	325 0.1%	824 0.4%
Two or More Races	2,672 1.9%	3,939 1.7%	3,556 1.9%	8,772 2.7%	9,680 4.7%
Hispanic or Latino	6,328 4.5%	11,355 4.9%	9,545 5.1%	27,616 8.5%	21,213 10.3%
White alone, not Hispanic or Latino	119,109 84.7%	195,348 84.3%	156,831 83.8%	227,423 70.0%	129,337 62.8%



Source: U.S. Census Bureau, 2013 – 2017 American Community Survey Five -Year Estimates

Public Engagement and Participation Plan

Appendix C contains RTA’s formal public participation plan. What follows is a description of effective communication strategies when engaging various stakeholder groups and communities as identified by the Communications team during the rebranding process. As part of the rebranding to WeGo Public Transit and in an ongoing effort to ensure the most relevant processes are put into place to reflect the diverse service needs of our customer base, a revised Public Participation Plan is currently in progress and will be distributed once finalized by the development team. The revised plan will be developed based on the principles identified by the marketing and communications team as they work towards ensuring effectiveness, inclusivity, and meaningfulness. The following sections detail the current efforts of establishing this revised plan.

Communication Strategies

Establishing and understanding receptivity to the messaging is paramount when determining how to effectively communicate. Message efficacy with effective tactics will properly amplify a message without audience fatigue. Presently, WeGo Public Transit has numerous messaging tactics, both passive and active, that are utilized to reach various audiences.

These channels and tactics include:

- Facebook
- Twitter
- Instagram
- LinkedIn
- Website
- Outreach at WeGo Central
- Bus benches
- Bus shelters
- E-marketing lists
- Flyers
- Signage
- Printed materials
- Interior bus cards
- Print advertising
- Community events
- Stakeholder presentations
- Press Releases
- News stories/interviews
- Direct Mail
- On-board announcements
- Scrolling messaging
- Radio commercials
- Promotional events
- Partnerships
- Billboards

Rarely, if ever, is every tactic used. When messages don't resonate, we avoid leveraging other tactics to avoid message fatigue or potentially over-saturating channels. We have identified audiences consistent with various tactics/channels, and the messaging each responds to best.

Public engagement strategies are formulated based on the content of the message paired with available demographic statistics acquired through the United States Census Bureau and American Community Survey Five-Year Estimates. In using this data, we complete analyses through GIS of the most up to date data available to determine the areas in which traditionally underserved populations reside and determine tactics to reach those audiences.

Engagement Activities

Several scenarios exist where public engagement is included as a key step in decision making. As mentioned before, personalized public engagement tactics are developed for each scenario as not all channels and tactics are appropriate for every scenario. The following outlines the general direction of public engagement tactics for each type of activity.

Major Service and Fare Changes: RTA has defined a major service change when 25 percent or more of daily revenue miles for a specific route is being changed or eliminated². To this extent, public outreach involves both information dissemination as well as encouragement for feedback and suggestions. The tactics to achieve such interaction with the public varies with the extent in which changes are taking place and the severity of the impacts made. Title VI analyses are then completed for each service and fare change made during each triennial period. Appendix D contains the board documentation of approval of such changes accompanied with their respective Title VI disparate impact and disproportionate burden analysis completed. Beyond the minimum requirements of conducting a Title VI analysis when a service change meets the 25% of revenue miles threshold, RTA takes into consideration any negative impacts on minority and low-income groups during all phases of planning, design, and implementation of minor construction events, minor service changes, and community outreach events. A particular threshold does not exist to initiate a code of conduct, but rather the RTA remains cognizant to its actions and the impacts of those actions on the region's most vulnerable or underrepresented populations, including, but not limited to, minorities and low-income.

² Revenue miles may be impacted by frequency, span, and route alignment, all of which are considered when establishing the total percentage change in service.

Strategic Planning: Every five years, the Nashville MTA and RTA executes an updated comprehensive strategic plan for the next 25 years. During the planning phases, the public is encouraged to participate to provide feedback, offer suggestions, and voice concerns of the region's transit network. It is the agency's goal to create such plans for the people, by the people.

Image 2.1 Caption: Members of the community offer valuable input on the planning Middle Tennessee's transit future through workshops and focus groups.

Construction / Major Projects: For major capital projects, informational engagement is key in remaining transparent as well as adequately appropriating monies toward projects that will enhance the transit riders' experiences.

General Messaging: RTA uses many outlets to communicate with our customers and Middle Tennessee residents on a continual basis. RTA maintains a website (www.WeGoTransit.com), staffs an information center at WeGo Central, makes printed materials available such as brochures, schedules, and other information, utilizes an e-mail list for sending out notices, and operates a Customer Care Department to answer phone calls. The RTA Communications Department also works with social media (Facebook, Twitter) and local media (News Channels, Newspapers, and Radio) to send out press releases, notices, and other information, as well as placing notices inside the buses. RTA strives to make all of its published documents widely accessible and provides downloadable copies on our website.



Inclusion of LEP) Persons in Public Meetings

RTA follows US DOT's policy guidance concerning overcoming LEP barriers to public participation.

- RTA has two bi-lingual Customer Care representatives made available to the Spanish speaking community and rider base.
- If for some reason a translator cannot be present at a public meeting, staff uses the Language Line to assist customers (see Appendix E). The Language Line is an "over the phone" interpretation service that enables someone to communicate clearly with customers in more than 170 languages within a matter of seconds. The service is available 24 hours a day and seven days a week from any phone in any country. Representatives have this information at their desks to call for translation services on demand.
- RTA provides notices, announcements, survey forms, and other outreach materials in both English and Spanish.

- RTA provides a link to Spanish route schedules on its website and utilizes Google translation services which provide translation in Spanish and many other languages. By 2020 all routes will be made available in Spanish through the WeGo website.

Language Assistance Plan for Limited English Proficiency Populations

Introduction

This Language Assistance Plan (LAP) for LEP populations has been prepared to address RTA's responsibilities as a recipient of federal financial assistance as they relate to the needs of individuals with limited English language skills. The Plan has been prepared in accordance with Title VI of the Civil rights Act of 1964, 42 U.S.C. 2000d, et seq, and its implementing regulations, which state that no person shall be subjected to discrimination on the basis of race, color or national origin.

Executive Order 13166, titled Improving Access to Services for Persons with LEP, indicates that differing treatment based upon a person's inability to speak, read, write or understands English is a type of national origin discrimination. It directs each federal agency to publish guidance for its' respective recipients clarifying their obligation to ensure that such discrimination does not take place. This order applies to all state and local agencies that receive federal funds, including RTA which receives federal assistance through the FTA.

Plan Summary

RTA has developed this LAP to help identify reasonable steps for providing language assistance to persons with limited English proficiency who wish to access services provided by the transit authority. As defined in Executive Order 13166, LEP persons are those who do not speak English as their primary language and have limited ability to read, speak, write or understand English.

This plan outlines how RTA identifies persons who may need language assistance, the ways in which assistance may be provided, staff training that may be required, and how to notify LEP persons that assistance is available.

Language Assistance Plan

In order to determine how best to continue reaching persons with limited English proficiency in Middle Tennessee and improve current ongoing efforts, RTA conducts targeted needs assessments and gathers data to maintain an understanding of the language needs. In doing so, RTA utilizes the recommended "four-factor analysis" per the U.S. Department of Transportation LEP guidance. The four-factor analysis is a flexible and fact-dependent standard that is used to determine the appropriate language assistance services to ensure an LEP individual has meaningful access to RTA's programs and activities.

To monitor our agency's interactions with the LEP populations, we have referred to our 2017 Origin & Destination Survey conducted by ETC Institute to establish the best use of our resources to provide meaningful accommodations for our customer base. These surveys are conducted every five years allowing us the opportunity to continue monitoring the ever-changing demographic profile of Middle Tennessee and consequently, our riders.

RTA adheres to the FTA required Four-Factor Framework as described below.

The Four-Factor Framework

Factor 1: Determine the number of LEP persons eligible to be served or likely to be encountered by an RTA program, activity, or service.

As is seen in table 2.2 the significant proportions of non-English speaking populations reside within the RTA service area. Davidson county service is provided by the Nashville MTA whereas the RTA service is focused on providing commuter trips to the outlying areas in the ten county region. Services are based on the availability of funding from these communities to support the service.

RTA comes in contact with LEP persons through the following services:

- Regional fixed route bus services
- Information Center at WeGo Central
- Calling / emailing the Customer Care Department
- Ticket Sales windows
- Ticket Vending Machines
- RTA's Website
- Public Meetings
- Notices to the Public
- Ridership Surveys conducted by Nashville MTA/RTA
- Van Pools
- Facebook and Twitter
- Other Media Outlets

RTA provides vanpools, a local connector shuttle, ten commuter bus routes and a commuter rail service for the RTA ten-county region.

Table 2.2: RTA Commuter Bus Routes

<i>Route Number</i>	<i>Route Name</i>
84X, 86X, 96X	<i>Rutherford County</i>
88X	<i>Dickson Express</i>
87X, 92X	<i>Sumner County</i>
89X	<i>Springfield/Joelton Express</i>
91X	<i>Franklin Express</i>
93	<i>West End Shuttle</i>
94X	<i>Clarksville Express</i>
95X	<i>Spring Hill Express</i>

- Local and regional fixed route bus services
- WeGo Access Paratransit services for people with disabilities
- Information Center at WeGo Central
- Calling and emailing WeGo’s Customer Care Department

Identification of LEP Communities:

RTA has identified the number of people who speak English less than well for every census tract in our service area. The RTA service area is fairly large covering a nine-county region, and proportionally, the percentages of people speaking a language other than English are relatively low. The number of people that speak English “very well” or “well” offset this even more.

RTA has identified that the Hispanic community is the largest population that speak English “not well” or “not at all” in the RTA region and furthermore, the only minority population that exceeds the 1,000 person threshold.

Table 2.3 LEP Summary

System - Limited English Proficiency (LEP) Summary									
RTA 2017									
System Area	Total Population Affected	Speaks English Less Than Very Well	% Total LEP	% Spanish LEP	% Chinese LEP	% Creole LEP	% Korean LEP	% French LEP	% Without High School Diploma Over 25 Years Old
Service Area Total	1,629,856	79,726	4.9%	2.8%	0.1%	0%	0.1%	0%	6.8%
Within 0.5 mile Walk Distance	82,261	4,394	5.3%	2.7%	0.2%	0.1%	0.1%	0.1%	7.6%

Factor 2: Determine the frequency with which LEP persons come in contact with RTA programs, activities or services.

RTA’s Customer Care consults directly with LEP persons when conducting monthly surveys on commuter bus services and commuter rail on the WeGo Star. Customer Care utilizes surveys in both English and Spanish when conducting the interviews. If surveys in other languages are requested, Customer Care can take down the participants contact information and mail or email a translated survey on a later date.

As part of this Title VI Program update and reviewing the current LAP, we recognize the growing needs of the Middle Tennessee region due to rapid growth, especially relative to the cited increase in foreign-born populations (See Appendix J for the Metro Language Access Report). RTA recognizes this growth to impact how we interact with Limited English Proficient populations and is dedicated to ensuring equal access for current and future populations. In light of this, RTA in conjunction with the Nashville MTA is developing new reporting procedures for Customer Care, Operations, and Service Quality and will be updated as a revision to this document. For reporting purposes in this three-year period, verbal surveys and questionnaires with RTA departments such as Customer Care and Operations as well as referring to phone call records to the RTA and the

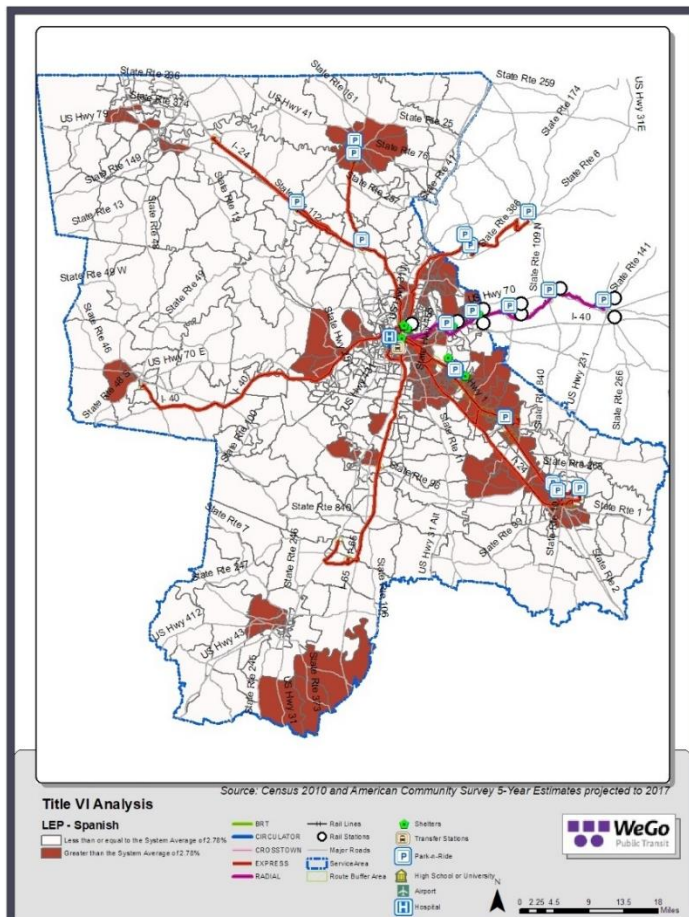
Language Line formed the results of this section. Below is a breakdown of how often and in what way LEP persons come into contact with the RTA and/or Nashville MTA's services:

- Customer Care phone services – 440 Spanish phone calls for fiscal year 2019
- Ticket Sales – an average of five LEP persons per week
- Fixed route transit services – an average of 11 LEP persons per week
- AccessRide paratransit –11 LEP persons ride on a regular basis
- Community and Sponsored Events – three to four events per year
- Public Participation and Community Engagement – accommodations for notifications about service and fare changes, translation services, outreach to targeted media outlets for the Spanish speaking community.

Factor 3: Determine the importance of the programs, activities, or services provided by RTA to the LEP population.

RTA provides vanpools, 10 commuter bus routes and a commuter rail service for the RTA 10-county region. Through ridership analysis, Customer Care Representative testimonials, and Customer Care surveys RTA has found that LEP persons come into contact with the RTA predominantly through our commuter fixed route bus services. Surveys show that this mode of service is used primarily for commuting to and from work. This service is also the least expensive and the most widely available.

Image 2.2: Map of Fixed-Route transit network in relation to LEP populations by census block.



In using the Transit Boardings Estimation and Simulation Tool (TBEST) we were able to determine the LEP population in relation to our fixed-route transit network. As shown in figure 2.3, nearly all census tracts that show higher than the service area average are currently serviced by several routes connecting this population to their home, work, and other vital services.

According to on-board surveys these passengers ride multiple times a week and are traveling primarily to and from work. RTA will continue to utilize survey information to better determine the importance of transit services to LEP persons.

RTA is also committed to affording LEP individuals affected by the lack of transit services an opportunity to participate in another transit alternatives process called the Mid-Cumberland Public Transit-Human Services Transportation Plan. The purpose of the plan is to improve transportation services for persons with disabilities, older adults and individuals with low incomes by ensuring that communities coordinate transportation resources provided through multiple federal programs. This plan applies to 15 counties in two states.

Factor 4: Determine the resources available to provide translation services and overall cost for LEP assistance.

RTA provides bus schedules, public notices, announcements, survey forms, and other outreach materials in both English and Spanish. By 2020 all routes schedules will be made available in Spanish through WeGo's website. RTA also has two bi-lingual Customer Care Representatives as well as access to the Language Line, which is a call-in service that assists Customer Care Representatives when communicating with non-English speaking customers. RTA provides all of its written and spoken translation services to LEP persons free of charge.

The estimated costs that RTA and/or Nashville MTA incurred in fiscal year 2019 (July 1, 2018 – June 30, 2019) in order to provide written and spoken translation services are as follows:

- Cost for printing: \$1,954
- Publishing Spanish public meeting notices in *La Campana* Newspaper: \$630
- Language Line: \$491.22

Language Assistance Plan: Goals

The purpose of this language assistance plan is to make reasonable efforts to eliminate or reduce limited English proficiency as a barrier to accessing RTA programs or activities. RTA is committed to providing language assistance services to LEP individuals who wish to access its programs.

The plan includes the following five goals:

1. Identifying LEP Individuals who need language assistance
2. Providing language assistance measures
3. Training staff
4. Providing notice to LEP persons
5. Monitoring and updating the plan

Identifying LEP Individuals who need language assistance

As described previously, RTA has used the Four Factor Analysis in order to identify LEP populations within our service area. The single prominent LEP population within Nashville-Davidson County is the Hispanic/Latino population whose predominant first language is Spanish. RTA's current processes accommodate for this population through the guidelines laid out in the agency's LAP.

Providing language assistance measures

There are numerous language assistance measures available to LEP persons in the RTA service area. RTA provides both written and spoken translation for Spanish speaking individuals as well as spoken translation for all other LEP persons through the Language Line. Below are ways that the RTA provides assistance to LEP persons:

- Written Material Translation for Spanish LEP persons including but not limited to:
 - Bus schedules, public meeting announcements, public notices, survey forms, and other outreach materials
- Spoken Translation:
 - Two bi-lingual (English-Spanish) Customer Care Representatives
 - Language Line service
 - Bus Operator Assistance – if a bus operator needs assistance with an LEP person, they can call dispatch who can then patch them to the language line or a Customer Care Representative who will be able to help bus operator communicate with the LEP person.
- Community outreach: through agency wide interactions at community events as well as regular participation through various organizations such as the Multicultural Alliance, RTA interacts with community, business, and church organizations whose members are often predominantly LEP. This allows us to provide education about the LEP services RTA provides and to get feedback from LEP persons on the effectiveness of our plan.

Training staff

As part of new hire training, the training department covers the LAP plan provisions of Title VI and is provided for all employees. During training all employees are made aware that RTA is required to take reasonable steps to ensure LEP persons are given meaningful access to all of our services. Employees are informed that RTA provides two Bi-lingual customer care representatives, provides bus schedules, brochures, notices, announcements, survey forms, and other material in both English and Spanish. We also train Customer Care on how to utilize the Language Line services. All employees receive training on Title VI upon hire. Other measures include but are not limited to:

- Title VI guidelines in departmental handbooks
- Title VI bulletin boards at MTA administrative buildings
- Operator sensitivity training for encountering LEP individuals

Providing notice to LEP persons

RTA provides notice to LEP persons of the availability of language assistance in many ways. The Title VI Policy public notice is printed in English and in Spanish and is posted at all of our facilities including WeGo Central. This notice informs individuals of their rights under Title VI and also gives contact information for questions, comments, complaints, or if a person is in need of Customer

Care assistance. The following is a list of other methods the RTA uses in order to notify the public of our LEP assistance programs:

- Printing of Public Meeting press releases and flyers in both English and Spanish;
- Provide Press Release and purchase advertisements for publication in *La Campana*; area newspaper marketed to Hispanics;
- Implement the use of an automated greeting in both English and Spanish, directing callers to select which language they prefer;
- Continued outreach to business, community, and church organizations whose members are predominantly LEP;
- Attend events where there is a high LEP population in order to provide information about RTA services.

RTA engages in broad and targeted community outreach to the Hispanic community each year and will continue to print and distribute route maps and schedules, as well as other appropriate materials. We understand that engaging the LEP community must be done through various mechanisms and approaches.

Monitoring and updating the plan

RTA understands that the need for language assistance services has expanded, the diversity of non-English languages encountered has grown nationally, and methods for providing language services has evolved.

The RTA is currently working towards a revised LEP plan to streamline data collection methodology in order to determine more accurately the changing needs of the customer service base. The following measures will be reported in order to update the plan in the coming months:

- The number of documented LEP person contacts encountered monthly.
- How the needs of LEP persons have been addressed.
- Determination of the current LEP population in the service area.
- Determination as to whether the need for translation services has changed.
- Determine whether local language assistance programs have been effective and sufficient to meet the need.

The 2020 census results will provide an up to date database to determine how demographic shifts have occurred in the service area and will provide a more accurate depiction of how modifications will need to be pursued.

Board Approval for Title VI Policy

Please see Appendix G for the signed Board Action Item for Approval of the RTA Title VI Program.

Chapter 3: Service Standards and Policies

Requirements Under Title VI : System-wide Service Standards

All fixed route transit providers shall set service standards and policies for each specific fixed route mode of service they provide. These standards must address how service is distributed across the transit system and must insure that the manner of the distribution affords users access to these assets.

In order to comply with Title VI the RTA has adopted quantitative system-wide service standards. The primary measures used to track the success of these services includes how well the ridership is performing, the vehicle loads, vehicle headways, and on-time performance.

- **Vehicle Load** – vehicle load or load factor is a ratio of the number of seats on a vehicle to the number of passengers. Load factor is an indicator of the extent of probable overcrowding or the need for additional vehicles. Load factor can also show us which levels of service on a particular route at a particular time are adequate to assure a level of service deemed appropriate for the transit system. For example on a 40-seat bus a vehicle load factor of 1.3 means all seats are filled and there are approximately 12 standees.

RTA Policy – RTA’s threshold for vehicle load for all commuter bus routes is 1. RTA does not permit standing loads on these long-distance commuter routes; therefore, when the load factor approaches 1 RTA needs to look for funding opportunities to provide additional trips. This goes for the train as well. RTA does not allow a standing load on the train trips.

- **Vehicle Headway** – vehicle headway is a measurement of the time interval between two vehicles traveling in the same direction on the same route. It measures the frequency of service which is a general indication of the level of service provided along a route. Vehicle headway is also a factor in the calculation of the amount of travel time expended by a passenger to reach his/her destination. Vehicle headways are calculated in minutes.

RTA Policy – vehicle headway for RTA commuter bus service during peak hours is 50 minutes or better. Vehicle headway for RTA commuter rail service during peak hours is 60 minutes or better.

- **On-time Performance** – On-time performance is a measurement of runs completed as scheduled. The transit agency must first define what is to be considered “on time.” For example it may be considered acceptable if a vehicle completes a scheduled run within five minutes of the established schedule. The percentage of times that vehicles on a particular route complete runs within this standard is then measured. Then an acceptable level of performance must be defined.

RTA Policy – RTA measures “on time” as departing a scheduled time point within five minutes of the time printed on the schedule. RTA’s goal is to provide 93 percent of all trips on time.

- **Vehicle Assignment** – vehicle assignment refers to the process by which transit vehicles are placed into service in depots and routes throughout the system.

RTA Policy – It is RTA’s policy to assign over-the-road coaches with comfortable seating and restrooms to all express commuter bus services. Bus routes travel every weekday between Nashville and surrounding areas with trips serving morning and afternoon peak commute times. Individual buses are not assigned to specific routes and vehicles are rotated through the system.

- **Transit Amenities** – Transit amenities refer to items of comfort and convenience available to the general riding public. Policies and standards in this area address how these amenities are distributed within a transit system. The manner in which such amenities and facilities are distributed determines whether transit users have equal access to them. More detail on guidelines for transit amenities and stop placement, please refer to WeGo’s Transit Design Guidelines published in February 2019 and available through the agency’s website: WeGoPublicTransit.com.

RTA Policy – RTA has adopted the Nashville MTA’s Bus Stop Policy in order to establish guidelines for how and when bus stops and transit amenities are allocated. The full Bus Stop Policy is available upon request.

All express commuter bus vehicles are over-the-road coaches with comfortable seating and restrooms. The downtown transit facility for transfers has climate controlled waiting areas, restrooms, an elevator, and two escalators. Traditionally there are no shelters for the express bus services; commuters usually wait in their vehicles at established Park & Ride lots.

The commuter rail service has comfortable padded seating. Each of the five outlying stations has shelters and at the downtown Nashville station there are benches, shelters, enclosed waiting areas, and restrooms.

Davidson County service is provided by the Nashville MTA while the RTA service is focused on providing commuter trips to the outlying areas, utilizing over-the-road coaches, and is only provided based on the availability of funding from these communities to support the service. Therefore, we only review the counties surrounding Davidson County.

Major Service and Fare Change Policy

RTA has established a definition of a fare or major service change, though the Public Meeting Requirements Policy for Transit Services (see Appendix I). These meeting policies are currently under review as part of the rebranding activities and will be updated once established. A fare or major service change is when:

1. There is a change in any fare or fare media related to all services of fixed route and WeGo Access.
2. There is any change in service of 25 percent or more of the number of daily revenue miles for a specific route computed on a daily basis for the day of the week for which the change is made³.
3. A new transit route is established or eliminated.

In an emergency situation, a service change may be implemented immediately. Evaluations and public meetings must be held if the change is in effect more than 180 days. Examples of emergency service changes include but are not limited to those made because of the inaccessibility of a bridge over which a bus route passes, major road construction, or inadequate supply of fuel.

Beyond the minimum requirements of conducting a Title VI analysis when a service change meets the 25% of daily revenue miles threshold, MTA takes into consideration any negative impacts on minority and low-income groups during all phases of planning, design, and implementation of minor construction events, minor service changes, and community outreach events. A particular threshold does not exist to initiate a code of conduct, but rather the MTA remains cognizant to its actions and the impacts of those actions on the region's most vulnerable or underrepresented populations, including, but not limited to, minorities and low-income

Experimental service changes may be instituted for 180 days or less. Evaluations and a public meeting will be required if the experimental service change exceeds 180 days.

Adverse Effects

An adverse effect is a geographical or temporal reduction in service which includes but is not limited to: elimination of a route; shortening a route; re-routing an existing line; and an increase in headways. RTA recognizes that additions to service may also result in disparate impacts and disproportionate burdens, particularly if the additions come at the expense of reductions in service on other lines.

When a major service change is proposed, RTA evaluates the impact of the service and/or fare change by assessing the adverse effects of those changes on the minority and low-income population.

Disparate Impact and Disproportionate Burden Policy

The FTA defines "disparate impacts" and "disproportionate burdens" as 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 lacks a substantial legitimate justification. The Disparate Impact Policy establishes a threshold for determining whether proposed fare or service changes have a disparate impact on minority populations versus non-minority populations. The Disproportionate Burden Policy establishes a threshold for determining whether proposed fare or service changes have an impact on low-income vs non-low-income populations.

³ Revenue miles may be impacted by frequency, span, and route alignment, all of which are considered when establishing the total percentage change in service.

The threshold is the difference between the burdens or benefits borne by minority or low-income populations compared to the non-minority or non-low-income populations. Exceeding the threshold means that a fare or service change either negatively impacts these protected populations more than the non-protected populations or that the change benefits non-minority and non-low income populations more than minority and low-income populations.

As an extension of Nashville MTA, RTA follows the same guidelines. The following is the Nashville MTA Disparate Impact and Disproportionate Burden Policy:

When a positive or negative change of greater than 5% is identified for minority or low-income populations, we are proposing to follow the Four Fifths Rule for both policies. The Four Fifths Rule states that there could be evidence of disparate impact or disproportionate burden if:

- Transit services are being provided to minority or low-income populations at a rate less than 80 percent (four-fifths) than the benefits being provided to non-minority or non-low-income populations
- Adverse effects are being borne by the minority or low-income populations at a rate more than 20 percent (one-fifth) of the adverse effects being borne by the non-minority or non-low-income populations

If a potential disparate impact is found, FTA requires that recipients analyze alternatives. A provider may modify the proposed change to avoid, minimize, or mitigate potential disparate impacts. A transit provider may also proceed with the proposed change if there is a substantial legitimate justification and no legitimate alternatives exist that still accomplishes the provider's legitimate program goals.

Monitoring

In order to comply with 49 CFR Section 21.5(b)(2), 49 CFR Section 21.5(b)(7) and Appendix C to 49 CFR part 21, RTA will monitor transit services provided throughout the RTA nine-county region. RTA will continue to monitoring services on a monthly bases using the following:

- Ridership, vehicle loads, and on-time performance are tracked each month.
- Commuter bus drivers and commuter rail conductors track passenger boardings, alightings, and on-time performance for each route.

These are reviewed regularly by planning staff and if individual trips are determined to be below the appropriate thresholds, then it is analyzed further to determine if some type of action is needed to improve the performance. This could include additional marketing, adding service, rerouting service, or any other number of approaches.

The Nashville MTA uses a classification system for its fixed-route service: *Most Frequent*, *Frequent*, *Commuter*, and *Other*. Different minimum service standards are set for each of these classes. *Most Frequent* is routes that have daytime frequencies less than 30 minutes. These key routes generally operate longer hours and at higher frequencies to meet higher levels of passenger demand in high-density travel corridors. The *Most Frequent* bus routes ensure basic geographic coverage of frequent service in the densest areas of the city's core and Davidson County. *Frequent* routes have daytime frequencies between 30 and 60 minutes. *Commuter and other* routes include limited service and express service.

Public Participation

In order to ensure awareness of the RTA Title VI policy proposals, RTA will discuss the Title VI changes at a total of two public meetings. These meetings will occur in August 2019 to gather information about the proposed Title VI policy. These meetings will be held at WeGo Central in downtown Nashville, which is a central location for all parts of the community and provides the easiest and best access for our riders.

Appendices

The appendices accompanying this document and listed in the Table of Contents are available upon request.