

Rides Mass Transit District

TITLE VI PLAN

Approved:

Theresa Dance
Chairperson

August 11, 2022
Date

I. Purpose of Plan

Title VI of the Civil Rights Act of 1964, as amended, applies to U.S. Department of Transportation Federal Transit Administration (FTA) sub-recipients. The purpose of Title VI is to ensure that no person in the United States shall, on the grounds of race, color, or national origin, be excluded from participation in, be denied the benefits of, or be subjected to discrimination under any program or activity receiving federal financial assistance from the FTA. Later statutes extended the scope of Title VI to include prohibitions against discrimination on the basis of age, sex, and disability.

The program described herein describes Rides Mass Transit District's efforts to comply with the Title VI regulations issued by the U.S. Department of Justice and the U.S. Department of Transportation. The objectives of The Rides Mass Transit Title VI program are to:

- Ensure that the level and quality of transportation service is provided equitably and without regard to race, color, or national origin;
- Avoid, minimize, or mitigate disproportionately high and adverse human health and environmental effects, including social and economic effects of programs and activities on minority populations and low-income populations;
- Ensure the full and fair participation of all affected populations in transportation decision making;
- Prevent the denial, reduction, or delay in benefits related to programs and activities that benefit minority populations or low-income populations; and
- Ensure that persons with limited English proficiency have meaningful access to programs and activities that are administered by recipients and sub-recipients.

II. THE RIDES MASS TRANSIT DISTRICT TITLE VI PROGRAM

Rides Mass Transit District (RMTD) has established the following program to comply with the Department of Transportation (DOT) Title VI regulations.

ANNUAL SUBMISSIONS TO ILLINOIS DEPARTMENT OF TRANSPORTATION (IDOT)

RMTD ensures compliance with the requirements of the Illinois Department of Transportation (IDOT) Title VI Program. RMTD will submit an annual assurance to verify Title VI compliance as part of the standard assurances it submits to IDOT with grant applications. RMTD shall also collect Title VI Assurances from subrecipients prior to passing through FTA funds. Exhibit I on the following page is RMTD's Title VI assurance.

EXHIBIT I: RMTD TITLE VI ASSURANCE:

TITLE VI ASSURANCE TO FEDERAL TRANSIT ADMINISTRATION

Rides Mass Transit District hereby agrees that, as a condition to receiving any Federal financial assistance from the Department of Transportation it will comply with Title VI of the Civil Rights Act of 1964, and all requirements imposed by or pursuant to Title 49, Code of Federal Regulations, Department of Transportation, Subtitle A, Office of the Secretary, Part 21, Nondiscrimination in Federally-Assisted Programs of the Department of Transportation--Effectuation of the Title VI of the Civil Rights Act of 1964 and other pertinent directives, to the end and that in accordance with the Act, Regulations, and other pertinent directives, no person in the United States shall, on the grounds of race, color, or national origin, be excluded from participation in, be denied the benefits of, or be otherwise subjected to discrimination under any program or activity for which RMTD received Federal financial assistance from the Department of Transportation, including the Federal Transit Administration and, Hereby gives assurance that it will promptly take any measures necessary to effectuate this agreement. This assurance is required by subsection 21.7(a) of the Regulations.

More specifically and without limiting the above assurances, RMTD gives the assurances as listed in the "Verification of Level and Quality of Service," with respect to the Federal Transit Administration Grant Program.

This assurance is given in consideration of and for the purpose of obtaining any and all Federal grants, loans, contracts, property, discounts or other Federal financial assistance extended after the date hereof to the Recipient by the Department of Transportation under the Federal Transit Administration.

TRIENNIAL SUBMISSIONS TO IDOT

RMTD will report the information contained in this section to IDOT on a triennial basis with the first submission parceled as part of the plan. The following report addresses each of the eight primary Title VI considerations and the associated forms, policies, and activities of its Title VI program.

1. Title VI Complaint Procedures

In order to comply with 40 CFR Section 21.9 (b) RMTD has developed procedures for investigating and tracking Title VI complaints. The procedures for filing a complaint will be made available to members of the general public. The following measures will be taken in dealing with Title VI Complaints:

- 1) A formal complaint must be filed within 180 days of the alleged occurrence. Complaints shall be in writing and signed by the individual or his/her representative, and will include the Complainant's name, address, and telephone number; name of alleged discriminating official, basis of complaint (race, color, national origin, sex, disability, age), and the date of alleged act(s). A statement detailing the facts and circumstances of the alleged discrimination must accompany all complaints. Exhibit II provides RMTD's Title VI complaint form.
- 2) In the case where a Complainant is unable or incapable of providing a written statement, a verbal complaint of discrimination may be made to RMTD's Title VI Coordinator. Under these circumstances, the complainant will be interviewed, and the Coordinator will assist the Complainant in converting the verbal allegation into writing.
- 3) RMTD will investigate complaints filed against contractors, consultants, or other sub-recipients. Complaints filed directly against RMTD shall be forwarded to the IDOT Title VI Coordinator for investigation.
- 4) When a complete complaint is received, the Title VI Coordinator will provide written acknowledgement to the Complainant within five (5) days by registered mail. At the same time, the complaint will be forwarded to the State of Illinois for investigation.
- 5) If a complaint is deemed incomplete, additional information will be requested from the Complainant within 15 business days from receipt of the original complaint. The Complainant will be provided 60 business days to submit the required information. Failure to do so may be considered good cause for a determination of no investigative merit.

EXHIBIT II: RMTD TITLE VI COMPLAINT FORM

RIDES MASS TRANSIT DISTRICT TITLE VI COMPLAINT FORM

Name: _____

Address: _____

Telephone Numbers: (home) _____ (work) _____

E-Mail Address: _____

Accessible Format Requirements?

Large Print _____ Audio Tape _____ TDD _____ Other _____

The Federal Transit Administration (FTA) Office of Civil Rights is responsible for civil rights compliance and monitoring, which includes ensuring that providers of public transportation properly abide by Title VI of the Civil Rights Act of 1964, Executive Order 12898, "Federal Actions To Address Environmental Justice in Minority Populations and Low- income Populations," and the Department of Transportation's Guidance to Recipients on Special Language Services to Limited English Proficient (LEP) Beneficiaries.

In RMTD's complaint investigation process, we analyze the complainant's allegations for possible Title VI and related deficiencies by the transit provider. If deficiencies are identified, they are presented to the transit provider and assistance is offered to correct the inadequacies within a predetermined timeframe. The State of Illinois may also refer the matter to the U.S. Department of Justice for enforcement.

Section II

Are you filing this complaint on your own behalf? Yes _____ No _____ (*If you answered 'yes' to this question, go to section III*)

If the answer was 'no' please supply the name of the person for whom you are complaining:

Please confirm that you have obtained the permission of the aggrieved party if you are filing on behalf of a third party. Yes _____ No _____

Section III

Have you previously filed a Title VI complaint with RMTD or the FTA? Yes No

If yes, what was your FTA Complaint Number? _____

(Note: This information is needed for administration purposes; we will assign the same complaint number to the new complaint.)

Have you ever filed with any of the following agencies?

Transit Provider IDOT Department of Justice Equal Employment Opportunity Commission Other

Have you filed a lawsuit regarding this complaint? Yes No

If yes, please provide a copy of the complaint form.

(Note: The above information is helpful for administrative tracking purposes. However, if litigation is pending regarding the same issues, we will defer to the decision of the court.)

Section IV

What is the basis for the alleged discrimination (e.g., race, color, national origin)? _____

On separate sheets, please describe your complaint. You should include specific details such as names, dates, times, route number, witnesses, and any other information that would assist us in our investigation of your allegations. Please also provide any other documentation that is relevant to this complaint.

Section V

May we release a copy of your complaint to the Illinois Department of Transportation (IDOT)?

Yes No

May we release your identity to the IDOT? Yes No

(Note: We cannot accept your complaint without a signature)

Signature _____ Date _____

- 6) Within 15 business days from receipt of a complete complaint, RMTD will determine its jurisdiction in pursuing the matter and whether the complaint has sufficient merit to warrant investigation. Within five (5) days of this decision, the Complainant and Respondent will receive notification of the disposition by registered mail.
 - a. If the decision is not to investigate the complaint, the notification shall specifically state the reason for the decision.
 - b. If the decision is to be investigated, the notification shall inform the parties that their full cooperation will be required in gathering additional information and assisting the investigator.
- 7) When RMTD does not have sufficient jurisdiction, the complaint will be referred to IDOT for further investigation.
- 8) If the complaint has investigative merit, an investigator will be assigned. A complete investigation will be conducted, and an investigative report will be submitted within 45 days from the receipt of the complaint. The report will include a narrative description of the incident, summaries of all persons interviewed, and a finding with recommendations.
- 9) A letter of finding will be issued to the Complainant and Respondent. Where appropriate, these letters will include conciliatory measures. A copy of the investigative report shall be forwarded to IDOT within 60 days from recipient of the complaint. If the investigation is delayed for any reason, the investigator will notify the appropriate authorities, and an extension will be requested.
- 10) If the Complainant is dissatisfied with RMTD's resolution of the complaint, he/she has the right to file the complaint with the IDOT Title VI Coordinator directly.

2. Title VI Investigations, Complaint, and Lawsuit Record Keeping Procedures

In order to comply with 49 CFR Section 21.9 (b) RMTD has prepared and maintains a list of active investigations, lawsuits, or complaints naming RMTD that allege discrimination on the basis of race, color, or national origin. The list includes:

- The date the investigation, lawsuit, or complaint was filed;
- A summary of the allegation;
- The status of the investigation; and
- Actions taken in response to the investigation, lawsuit, or complaint.

RMTD has adopted Title VI record keeping procedures for complaints, lawsuits, and investigations. Exhibit III depicts this format. There are currently no active investigations, lawsuits, or complaints that allege discrimination by RMTD on the basis of race, color, or national origin.

EXHIBIT III TITLE VI COMPLAINT RECORD KEEPING

File Date	Summary of Allegation	Actions Taken in Response	Status of Investigation

3. Meaningful Access to LEP Persons

Title VI and its implementing regulations require that FTA subrecipients take reasonable steps to ensure meaningful access to the benefits, services, information, and other important portions of their program and activities that have Limited English Proficient (LEP) individuals. Circular 4702.1A states that LEP persons are *"persons for whom English is not their primary language and who have a limited ability to speak, understand, read, or write English. It includes people who reported to the U.S. Census that they do not speak English well, or do not speak English at all."*

RMTD has assessed the four main factors involved in developing a Language Implementation Plan as described in the Federal Transit Administration guidance entitled "Implementing the Department of Transportation's Policy Guidance Concerning Recipients' Responsibilities to Limited English Proficient (LEP) Persons: A Handbook for Public Transportation Providers." These steps are as follows:

- (1) Identifying the number or proportion of LEP persons eligible to be served or likely to be encountered by a program activity, or service of the recipient or grantee. Based on the 2010 U.S. Census, RMTD undertook an analysis of the languages spoken in its 18 County District and estimated the number of residents with Limited English Proficiency by language group. A summary of this data is provided below in Exhibit IV. As can be seen, the primary language spoken at home within the RMTD service area is English (96.78 %) followed by Spanish (1.46 %). Approximately 3.2 percent (%) of the

residents 5 years of age and older speak a language other than English at home and .43 percent (%) of the residents in the service area speak English "less than very well." Based on the LEP definition, a total of 1,216 of the 278,700 individuals in the RMTD service area, or .43 percent (%) of the total population were identified as having Limited English Proficiency. A detailed breakdown of the English Proficiency data obtained from the 2010 Census is provided in an appendix to this report.

Exhibit IV English and Non-English Speaking Residents of RMTD Area

Table of Data

Total Population	278,700	100%
Speak only English	269,734	96.78%
Speak Spanish:	4,059	1.46%
Speak English "very well"	2,741	.98%
Speak English less than "Very Well"	764	0.27%
Speak other Indo-European languages:	2,841	1.02%
Speak English "very well"	2,165	.78%
Speak English less than "Very Well"	235	0.08%
Speak Asian and Pacific Island languages:	1,434	0.51%
Speak English "very well"	646	0.23%
Speak English less than "Very Well"	217	0.08%

- (2) Determining the frequency with which LEP individuals come in contact with the program. RMTD has not received a ride request from any individual who had difficulty communicating in English. RMTD, however, is aware of individuals and agencies within the community that are able to provide translation services on an as needed basis and is committed to using these resources on a case by case basis as the need arises.
- (3) Defining the nature and importance of the program, activity, or service provided by the recipient to people's lives. The system brochures clearly state that RMTD service is open to all without discrimination based on race, creed, color, national origin, gender, sexual orientation, or disability. RMTD recognizes and is committed to the importance of access to transportation for all community residents.
- (4) Describing the resources available to the recipient and costs. Brochures and other rider literature provide this information.

Since the USDOT LEP Guidance identifies 1,000 individuals or 5 percent of the population eligible to be served falling within a specific LEP language group as a threshold above which vital documents should be provided in translation. Since the RMTD service area does not meet this threshold, a LEP Implementation Plan has not been established. However, RMTD has determined that the most cost-effective means of delivering competent and accurate language services is to address the need on a case-by-case basis. As such, RMTD will have available summaries of all vital documents translated upon request to suit the needs of each individual. In addition, qualified RMTD staff and community volunteers will be used when oral translation is needed. Any further requirement will be discussed individually on an as requested basis.

4. Beneficiary Notification Protection under Title VI

In order to comply with 49 CFR Section 21.9 (d), sub-recipients shall provide information to the public regarding their Title VI obligations and apprise members of the public of the protections against discrimination afforded to them by Title VI. RMTD disseminates this information to the public through measures that include posting on the transit system website, and flyers placed at county offices. The notice will be translated into languages other than English consistent with LEP Guidelines. Exhibit IV is RMTD's Title VI Protection Notice to the Public.

EXHIBIT IV: RMTD TITLE VI PROTECTION NOTICE TO THE PUBLIC

Rides Mass Transit District hereby gives public notice of its policy to uphold and assure full compliance with Title VI of the Civil Rights Act of 1964, the Civil Rights Restoration Act of 1987, and all related statutes. Title VI and related statutes prohibiting discrimination in Federally-assisted programs require that no person in the United States of America shall on the grounds of race, color, or national origin be excluded from the participation in, be denied the benefits of, or be otherwise subjected to, discrimination under any program or activity receiving Federal financial assistance. This notice is published annually in newspapers, RMTD literature, posted on the RMTD website and at RMTD facilities.

Any person who believes they have been aggrieved by an unlawful discretionary practice regarding RMTD's programs has the right to file a formal complaint. Any such complaint must be in writing and submitted to the RMTD Title VI Coordinator within one hundred eighty, (180) days following the date of the alleged occurrence. For more information regarding civil rights complaints, please contact:

**Adam Lach, CEO
Rides Mass Transit District
1304 Frank Leberman Drive
Harrisburg, IL 62946**

5. Additional information requests

RMTD fully understands that IDOT may request additional information to investigate complaints of discrimination or to resolve concerns about possible noncompliance with Title VI. RMTD will cooperate with IDOT, and all requested information would be provided in a timely manner.

6. Submission of Title VI Program

To ensure compliance with 49 CFR Section 21.9 (b), this report will serve as documentation of RMTD's Title VI compliance. RMTD will prepare and submit updates to this Title VI program to the IDOT on a triennial basis.

7. Conducting Analysis of Construction Projects

RMTD will integrate an environmental justice analysis into the National Environmental Policy Act (NEPA) document of construction projects. In the event that a construction project requires NEPA documentation, RMTD will complete IDOT's standard environmental assessment (EA) and will submit the EA as part of each triennial Title VI submission.

8. Promoting Inclusive Public Participation

In compliance with the DOT Order on Environmental Justice, RMTD conducts public outreach and involvement activities with minority and low-income populations.

RMTD undertakes public outreach activities including:

- Provide notice and affording members of the public, including minority and low-income populations, the opportunity to comment on proposed service and fare changes.
- Provide members of the public the opportunity to participate in the decision-making process for projects subject to the National Environmental Policy Act (NEPA).
- Provide members of the public, including minority and low-income populations, the opportunity to participate in or to comment on the agency's strategic plan or capital improvement program.
- Offers the public, including low-income and minority populations, routine opportunities to provide feedback or comment on the level and quality of service.

5. PUBLIC PARTICIPATION AND NOTIFICATION

Public participation, notifications of program changes and other public engagement is outlined in the RMTD Public Participation Plan (PPP). Included with the PPP is a summary of the public engagement efforts of RMTD for the last fiscal year and a schedule of public meetings for the current fiscal year. These meetings seek to engage the public and inform them of the District's activities. The PPP is incorporated herein as an attachment.

6. Subrecipient Monitoring

RMTD has no subrecipient providers.

III. SERVICE EQUITY ANALYSIS

MINORITY, LOW-INCOME, AND LIMITED ENGLISH PROFICIENCY POPULATION CONCENTRATIONS

Urban - RMTD operates fixed route services and complimentary paratransit within the Carbondale UZA. The fixed route service patterns and standards are explained in detail in the next section. Care is taken regarding route planning to ensure equitable access for minority, low-income and LEP populations.

RMTD provides door to door paratransit services to anyone requesting a ride 24 hours in advance. The RMTD ADA policy considers all individuals to be presumptively eligible for these paratransit services. These services are available throughout the entire Carbondale UZA.

Rural - RMTD provides rural transportation services via deviated route and point deviation services. Rider access and travel times vary with each request. Management ensures a balance of resources is available to meet specific demand at each of RMTD's operations centers. Vehicles and personnel are shared between centers when necessary to cover increased demand. Demand factors related to concentrations of persons with disabilities and households without access to a vehicle are also considered.

Included on the following pages are a resource distribution table and demographic profile maps that illustrate minority, low income and LEP populations in relation to RMTD's service area.

Urban Route Service Guidelines

Rides Mass Transit Districts (RMTD) Service Guidelines, as adopted from the Southern Illinois Metropolitan Planning Organization's (SIMPO) transit study, address the design, quality and efficiency of transit service. These Service Guidelines will achieve the following purposes:

1. Ensure that an acceptable level of service quality is provided to customers on all RMTD services;
2. Provide a consistent and fair basis for evaluating proposed changes to existing transit services and for considering new transit services; and
3. Balance improving the level of RMTD services with the need to use transit resources efficiently.

The Service Guidelines focus on these service goals.

- a. **Simple** – Services should be easy for customers to understand, ensuring consistency and ease of use across the system.
- b. **Comprehensive** – Transit service should be available within a short walking distance for most residents. Transit service should provide convenient access to major destinations in the service area.
- c. **Convenient** – Transit service should be available from early in the morning until the evening at least five days a week, especially on routes serving major destinations, or in high density neighborhoods. Transfers, if necessary, should be quick and convenient.
- d. **Comfortable** - While riding on transit vehicles, customers should be provided with adequate space for a comfortable ride and should not have to stand for long periods of time.
- e. **Reliable** – Services should be designed to ensure on time performance, avoiding being early and minimizing running late.
- f. **Efficient** – Transit service should be reasonably cost-efficient by providing appropriate levels of service for the level of customer demand. This ensures that the overall transit system can provide the most effective service within the available financial resources.

The Guidelines are applicable to both fixed route and point deviated routes unless otherwise noted.

Route Coverage

Route coverage refers to the availability of service within the geographic service area. The guideline for route coverage is often related to population density. High density areas will have bus routes spaced closer together than low density regions. A density of four residential units per acre is generally considered the minimum density required for fixed route service. For paratransit service, the Americans with Disability Act (ADA) regulations require the provision of complementary paratransit service within three-fourths mile of existing fixed route bus service.

Various types of transit service may be provided to meet the needs of the riding public. The type of transit service provided is related to ridership levels as well as the ability of customers to utilize the service. Demand response systems are at the low end of the ridership scale. When ridership on a demand response system grows to such an extent

that it exceeds capacity and no longer functions efficiently, a transit provider may transition to a Point Deviation or Route Deviation style of service.

Bus Stop Spacing

On fixed route services, optimal bus stop spacing balances the desire to offer a short walking distance to stops with the desire to speed transit service by stopping the bus less often. On local routes, it is recommended that bus stops be spaced one-fourth mile (1,320 feet) apart, unless the locations of major transfer points or major traffic generators require closer stop spacing in specific locations.

Span of Service

Span of Service refers to time periods during which service is provided on each day of the week. Span of service is often adopted as a minimum policy standard for all routes in the system, while individual routes may exceed the minimum based on ridership. For paratransit service, the Americans with Disabilities Act (ADA) regulations require that complementary ADA service is provided during the same hours and days as the fixed route service. Hours of transit service should serve the majority of residents traveling to school, work and other purposes. The minimum recommended span of service on weekdays is between the hours of 7 a.m. through 5 p.m. Some routes with very low levels of demand during the midday may only provide service during the peak periods. Service during the evening hours and on weekends is provided on routes with a demonstrated need based on ridership. A determination on whether the Span of Service should be expanded or reduced is based on ridership counts. As a general rule, if the number of riders on the first or last trip of the day is higher than the one or two adjacent trips, then additional service is warranted. Conversely, if the first and last trips have consistently low ridership, then elimination of that trip is usually justified.

Table 6-2 shows 15 riders per vehicle hour as the minimum cut off for fixed route service.

Table 6-2

Riders per Vehicles Hour	Frequency (in Minutes)	Riders per Bus per Vehicle Hour
<15	No Fixed route service	
15 -40	60	15 -40
41 – 70	30	21 – 35
71 -100	20	24 – 33
101 - 140	15	25 -35

These guidelines are applicable either as averages during the entire AM/PM Peak Period, midday, or evening on a given route. For Saturday or Sunday service, they are applicable for any period of four to six hours with relatively consistent ridership levels.

If ridership is during a time period below that level, the route should be considered for shortening hours of service and/or restructuring. Provision of fixed route Saturday or Sunday service will also expand provision of complementary ADA paratransit service to

those days and hours where fixed route service is expanded. This entails significant financial resources. When making the decision to expand service on Sundays, note that ridership and revenue from Sunday service may be less than 50 percent of Saturday service on the same route. Ridership and revenue on Saturdays typically are slightly less than weekday ridership and revenue.

Service Frequency

The frequency guideline establishes the scheduled interval between scheduled bus arrivals. The interval is determined by ridership levels. More riders per hour on a given route justify more frequent service. Paratransit service requires advance reservations, and therefore the frequency standard does not apply to this type of service. Service frequency is a function of ridership and vehicle capacity. A common maximum service frequency guideline is 60 minutes for fixed route service. More frequent service should be provided during the peak hours or when ridership is sufficient to warrant more frequent service. **Table 6-2** provides a guideline for the relationship between riders/hour and scheduled service intervals for fixed route service. Service frequency is also a function of vehicle size. When ridership at peak loading points exceeds vehicle capacity, then one of two steps must be taken. The most cost-efficient step is to assign higher capacity vehicles. If that is not an option, the number of buses serving the route must increase, improving frequency. Conversely, as ridership on a route declines, the number of vehicles required on the route, and therefore, the frequency, declines.

Vehicle Load

Vehicle Load refers to the maximum number of passengers scheduled on a bus at the route's busiest location. It is closely related to Service Frequency guidelines. This guideline is often related to the number of seats available and is expressed as the ratio of passengers to seats. The maximum scheduled vehicle load should not exceed the vehicle manufacturers' recommended capacity for passengers seated and standing. Higher capacity vehicles should be assigned to those routes with the highest passenger demand, and lower capacity vehicles to routes with low demand. The maximum load factor for paratransit service is 1.0, and standees are not permitted.

On Time Performance

Service reliability is essential to retain and attract transit customers. On time performance is one of the best indicators of service reliability. Typically, on time performance is defined as the vehicle arriving within a certain number of minutes of the scheduled time. Fixed route service is considered on time if the bus arrives not more than one minute early or more than five minutes late at established time points when compared to scheduled arrival times. The On-Time Performance Guideline is to provide on time service 90 percent of the time. Monitoring on time performance occurs on an occasional sampling basis, or in response to specific requests/customer input.

Transit Amenities Distribution

Transit Amenities include passenger shelters, benches, and bicycle racks. These amenities are distributed based on passenger volume and activity. Placement of amenities may be influenced by physical space requirements, safety concerns or pedestrian infrastructure. The Transit Amenities Distribution Guideline for each amenity is as follows:

Provision of a passenger shelter requires a minimum daily boarding of 30 passengers and adequate space in the right of way.

Benches are provided at locations with minimum daily boarding's of 30 passengers and adequate space in the right of way. Benches may also be provided upon request, and when resources are available, at bus stops serving medical facilities and trip generators patronized primarily by senior citizens.

The location of bicycle racks is evaluated on a case-by-case basis.

Public Participation

Public participation is an important component in the provision of service. Public participation ensures that service continues to meet the needs and expectations of its customers. Public participation includes direct, unsolicited feedback from customers, as well as outreach to individuals and groups to elicit comments on proposed adjustments. Certain population groups require special effort to obtain their input. These include low income groups, those with Limited English Proficiency (LEP) and minority populations. An inclusive public involvement plan is required to comply with the Department of Transportation Title VI regulations. An ongoing, regular dialogue with residents, businesses and elected officials should be the goal of any public participation process. In addition to ongoing communication, more formal and specific outreach efforts are suggested when major changes to service or fares are contemplated. The following circumstances are suggested definitions for major changes in fares, facilities or service.

Route changes that affect more than **20 percent** of any route or service's hours
Service changes that require new facilities and/or capital expenditures at a cost that requires city council approval;

A fare increase of **20 percent** or more on any fare type or media.

For major service changes or fare increases as defined above, a public meeting to present the proposed change(s) and obtain public comments is recommended. Schedule the public meeting at a time and place accessible and convenient for the general public to attend. Notify the public of the meeting at least 30 calendar days prior to the meeting through local media. Place notices on transit vehicles and on appropriate webpages. Social media is also a tool to disseminate service change information and seek public

input. A formal record of the public involvement should be prepared for consideration prior to making a decision on the final recommendation.

SERVICE MONITORING

The RMTD Operations Manager will monitor service level and service quality to ensure that no person or group of persons shall be discriminated against with regard to the route, scheduling, or quality of transportation service furnished by the RMTD system, on the basis of race, color, national origin, age, sex or disability. Frequency of service, age and quality of vehicles assigned, quality of facilities, and location of routes shall not be determined on the basis of race, color, national origin, age, sex, or disability.

RMTD ENVIRONMENTAL JUSTICE AND TITLE VI SUMMARY

Title VI of the Civil Rights Act prohibits discrimination on the basis of race, color, or national origin. IDOT and RMTD advance Title VI and environmental justice by involving the public in transportation decisions. Effective public involvement programs enable transportation professionals to develop systems, services, and solutions that meet the needs of the public, including minority and low-income communities.

There are three fundamental environmental justice principals. The three principals are:

1. To avoid, minimize, or mitigate disproportionately high and adverse human health and environmental effects, including social and economic effects, on minority populations and low-income populations.
2. To ensure the full and fair participation by all potentially affected communities in the transportation decision-making process.
3. To prevent the denial of, reduction in, or significant delay in the receipt of benefits by minority and low-income populations.

Attachments to Title VI Plan:

Public Participation Plan

RMTD Service Area

RMTD Rural Vehicle Distribution

Population Density in the RMTD Service Area

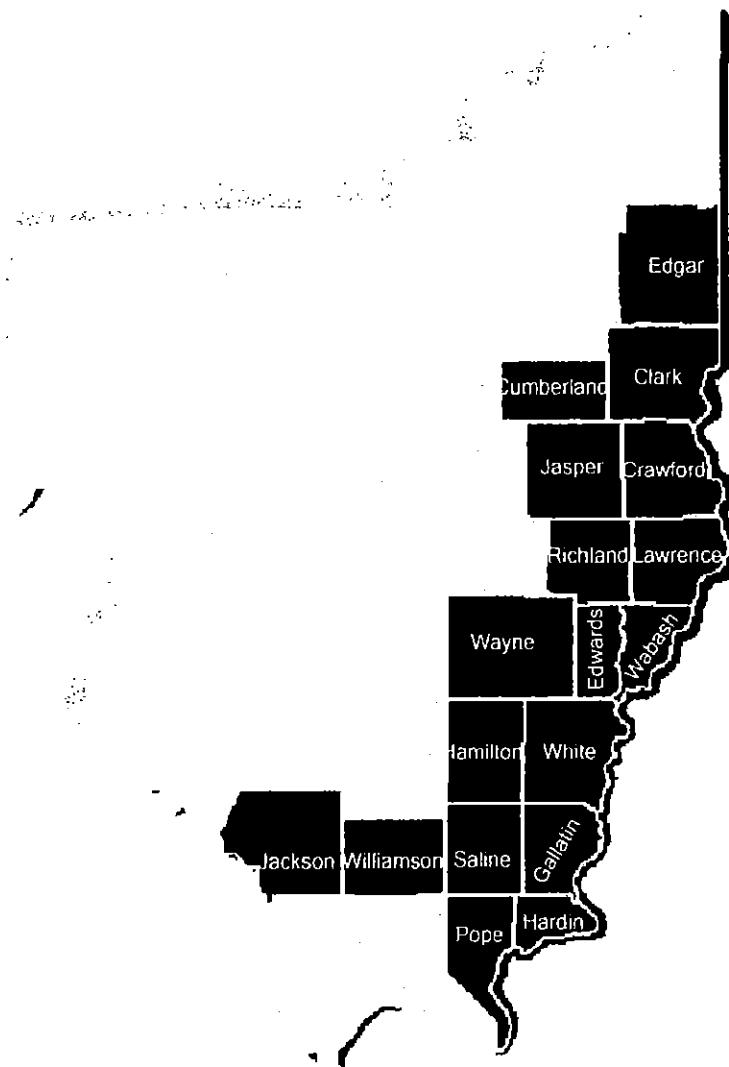
Areas of Predominately Low-income Communities

Minority Block Groups

Areas of Limited English Proficient Individuals

Demographic Maps – Disabled Persons, No Access to Vehicle

Map I. RMTD SERVICE AREA



Rides Mass Transit District Public Participation Plan

MAP-21 mandates earlier and more extensive public involvement. The RMTD public engagement process is designed to meet these goals for several key planning and programming areas:

1. In developing a long-range service plan (LRSP)
2. In developing the Transportation Improvement Program (TIP)
3. In developing an annual Program of Projects (POP)
4. In considering fare increases or service reductions greater than 20%.

The following section describes procedures for providing public participation related to these activities and provides general public involvement guidance for other RMTD activities.

1.1 Long Range Service Plan (LRSP)

The Long-Range Service Plan is a 10-year (or more) transportation investment and transit policy document. It provides the RMTD Board with guidance in making regional transportation investments and is updated by one year during the annual TIP and POP processes. The following steps will be taken to afford the public the opportunity to engage in the development of the LRSP:

- RMTD will utilize the Statewide 10-year Downstate Capital Needs Assessment conducted by the Illinois Department of Transportation and Rural Transit Assistance Center to determine proposed capital investment.
- RMTD will consult with agencies and officials responsible for other planning activities within the Metropolitan Planning Area (MPA) and the regions that are affected by transportation in order to coordinate the planning process functions.
- RMTD will seek input from low income and minority populations, persons with disabilities, persons with limited English proficiency (by special arrangement) and veteran's outreach groups.
- A legal public notice will be published in various regional and local newspapers no fewer than 15 days nor more than 30 days in advance of the public comment period.
- In addition to the published notice for the public comment period, meetings will be publicized by way of the Rides Mass Transit District website at www.ridesmtd.com.
- Make available the Draft LRSP at all offices of Rides Mass Transit District, post it to the website at www.ridesmtd.com.

- Provide a 30-day review and comment period on the Draft LRSP, generally to end one week prior to tentative plan adoption.
- Provide a public comment summary memo to the RMTD Board prior to the plan adoption and to IDOT or FTA as required.
- Provide public notification not fewer than 15 days nor more than 30 days in advance of consideration of action by the RMTD Board on the LRSP.
- If comments received during the designated comment period affect a significant change to the content of the LRSP, RMTD will provide additional 30-day opportunity for public comment.

1.2 Transportation Improvement Program (TIP) & Updates

The TIP is a financially constrained three-year program covering the most immediate implementation priorities for transportation projects and strategies from the LRSP for the urban area. It is the District's way of allocating its limited transportation resources among the various capital and operating needs of the urban area, based on a clear set of short-term transportation priorities.

The three-year TIP is updated annually with information for an additional year and submitted to the Southern Illinois Metropolitan Planning Organization (SIMPO). The annual submission and any updates are part of the regional multi-modal TIP. RMTD participates in and relies on the SIMPO public engagement process for any federal compliance requirements for the TIP process.

1.3 The Program of Projects (POP)

The Program of Projects (POP) lists the transportation projects, operating and capital, which would be the basis of grants submitted to the Federal Transit Administration (FTA). Since the POP is essentially a fiscal year program pulled from the active TIP, it will be available for public comment during the SIMPO TIP process and available for comment at the annual RMTD service plan hearing held annually prior to grant submission. All public notifications such as those in the newspaper, flyers or websites of the POP and service hearings shall explicitly list the amount of Federal funding and the funding program.

1.4 Fare increases or service reductions greater than 20 percent in service hours

- RMTD will consult with agencies and officials responsible for other planning activities within the Metropolitan Planning Area (MPA) and the regions that are affected by any service reduction or fare increase exceeding 20 percent in service hours

- RMTD will seek input from low income and minority populations, persons with disabilities, persons with limited English proficiency (by special arrangement) and veteran's outreach groups.
- A legal public notice will be published in various regional and local newspapers no fewer than 15 days nor more than 30 days in advance of the public comment period.
- In addition to the published notice for the public comment period, meetings will be publicized by way of the Rides Mass Transit District website at www.ridesmtd.com.
- Make available notices of service reductions or fare increases at all offices of Rides Mass Transit District, post it to the website at www.ridesmtd.com.
- Provide a 30-day review and comment period on the proposed service reduction or fare increase, generally to end one week prior to tentative adoption.
- Provide a public comment summary memo to the RMTD Board prior to the adoption and to IDOT or FTA as required.
- Provide public notification not fewer than 15 days nor more than 30 days in advance of consideration of action by the RMTD Board on any service reduction or fare increase exceeding the threshold.
- If comments received during the designated comment period affect a significant change to the content of the planned service reduction or fare increase, RMTD will provide additional 30-day opportunity for public comment.

2.1 Public Participation Plan (PPP) and Updates

The Public Participation Plan outlines strategies, techniques, and methods utilized to engage the public in the transportation planning and programming process.

2.2 Standard Public Involvement Items

RMTD conducts regular Board meetings, maintains a website, and may periodically hold public meetings for planning and programming activities. The following measures will be taken to encourage public engagement:

- A meeting notice will be provided via email to local news media at least 48 hours prior to each regular RMTD Board meeting.
- Meeting agendas will be posted at RMTD Facilities prior to meetings.
- Active plans, programs, and policies along with other relevant public information will be available for public consumption on the RMTD website at www.ridesmtd.com
- RMTD will utilize mapping and graphic displays as able to help convey plan and program information.

- Public meetings hosted by RMTD will be held at convenient locations and times

2.3 Outreach Methods

2.3.1 General Population

RMTD planning documents, information regarding past and future meetings, and RMTD activities in general, are available to the public through the RMTD website (www.ridesmtd.com) or at the RMTD office (1304 Frank Leberman Drive, Harrisburg, IL 62946). The public may call, visit or email RMTD staff at any time to voice concerns, opinions or ideas. A variety of outreach techniques will be used to proactively engage the general population and traditional stakeholders in the RMTD service area, according to the desired participation goal for the particular activity. These techniques include traditional outreach techniques that RMTD has utilized in the past to engage the regional population. Efforts will be made to promote understanding and engagement in the transportation planning process. For example, public notices and releases will be drafted in a manner that minimizes the use of technical terminology and public meetings or workshops will be held in convenient locations that are accessible and common gathering places, such as convention/community centers, pavilions, schools, libraries or Chambers of Commerce. The techniques and resources that RMTD will utilize in its general outreach activities may include, but will not be limited to the following:

- Websites (RMTD or MPO member communities), newsletters, or other displays (notices, articles, fliers)
- Public meetings/workshops
- Meetings
- Newspapers (legal notices, articles, community bulletin boards, interviews)
- Press releases to print media, radio, and television
- Email or written announcements to key stakeholders
- Questionnaires or opinion surveys
- Social media
- Mailing list

2.3.2 Target or Focus Groups

Much of the regional population can be informed of RMTD planning activities through general outreach methods. However, there are “traditionally under-served” segments of the population that may benefit from additional outreach efforts. The traditionally under-served in the general population have been defined by federal and state agencies to include those individuals who may have in the past been neglected in outreach activities or excluded during the planning process, such as the elderly; minorities; low-income households; persons with disabilities, those with Limited English Proficiency (LEP) and veteran’s outreach groups.

In addition to the general outreach techniques and resources previously described, RMTD will utilize the following additional resources in its targeted outreach activities:

- Outreach to residents, businesses and other affected groups within a focused area when the planning effort is specific to that area
- Timely notices by email or postal mail, and when reasonable by phone
- Fliers or other displays in high-volume locations including social activity centers, such as grocery stores, churches, community centers
- Festivals or other periodic events
- Outreach to specific organizations and inter-agency groups that aid or provide services to those who are:
 - Persons with disabilities
 - Low Income
 - Elderly
 - Minorities
 - Limited English Proficiency

2.3.3 Key Agencies, Stakeholders and Organizations

Many local governments, organizations, agencies, and stakeholders that are, or may be, uniquely impacted by transportation decisions in the RMTD service area are represented on the Technical and/or Advisory Committees of SIMPO. SIMPO will be a key point of contact for all planning and programming. Efforts will be made to engage other key agencies, stakeholders, and organizations, particularly those associated with Human Service Transportation Planning (HSTP) or service provision in the region. Agencies that are involved with public safety and security, such as fire departments, will also be identified for outreach activities.

3.0 Public Involvement Tools and Techniques

This section contains descriptions of the various public involvement tools and techniques that RMTD may use for outreach purposes.

3.1 Electronic Media

Electronic media such as the RMTD website, press releases, meeting minutes and electronic mailings will be utilized to engage and inform the public. RMTD's website is used as an informational/educational tool as well as to advertise opportunities for public involvement. The website contains background information about RMTD, meeting information, major planning documents or links to documents (TIP, POP, etc.), press releases, postings, and active consulting services requests. RMTD will periodically utilize the website to host surveys or post comment forms. Formal press releases are normally e-mailed to local media including newspapers, radio stations and local television outlets. They are used to announce upcoming public planning meetings and to provide information on specific issues related to ongoing planning efforts.

3.2 Print Media

Print media such as legal advertisements or notices; direct mailings; announcements/fliers; public opinion surveys; and comment forms are useful tools to engage and inform the general public. RMTD uses legal notices to announce pending major actions and, in certain cases, may use public hearings. Major actions may include a scheduled or proposed plan update (TIP, LRSP, POP). Legal notices are also used occasionally to advertise other activities. Fliers and other announcements are used to promote meetings and activities that are not regularly scheduled, such as workshops and public meetings. They may be posted at public meeting sites such as libraries and municipal offices, and in neighborhood activity centers such as grocery stores and churches, in priority focus areas for targeted outreach. Print questionnaires or surveys are sometimes used when specific input from the public is desired, although electronic surveys are more desirable and easier to manage. Surveys may be distributed at meetings, left for later collection in public places or actively distributed and collected, or they may be mailed, or collected electronically. Likewise, comment forms are sometimes used when specific input from the public is desired, particularly concerning plan development or adoption.

3.3 Meetings and Other Public Forums

RMTD anticipates using a variety of meeting and forum types to provide opportunities for the public to engage in the planning process, such as open houses, workshops, small group meetings and public hearings, as well as monthly Board meetings. RMTD utilizes these varieties of meeting types to achieve different public outreach objectives. Typically, meetings will be held, with either a workshop or an open-house type of orientation, to solicit input from the public during plan development and adoption stages. Efforts are made to hold public meetings at convenient times and at locations that are accessible to all community members. Multiple visualization tools may be employed to facilitate meeting discussion, such as graphic displays, aerials, internet-available mapping, and Geographic Information Systems portals.

Occasionally, RMTD may host federally required hearings on certain transportation planning efforts. These will be legally advertised meetings in which a formal, structured procedure is used to take public comment. The proceedings are recorded and transcribed for the record. The RMTD Board meetings are open to the public and notifications of meeting times are provided to local media outlets each month. Meeting agendas are posted at RMTD facilities prior to each meeting and on the RMTD website as soon after meetings as possible.

4.0 Use of Public Input

RMTD staff will provide a report on public outreach engagements with information such as, levels of participation, general points of discussion, and other relevant feedback from

the public at monthly meetings of the RMTD Board. The RMTD staff will consider public input and attempt to integrate that input into the decision-making process in the most appropriate way. For processes that require a public comment period the RMTD staff (or consultant) will create a memo listing all the comments received during the official comment period and deliver that to the RMTD Board prior to their taking action on any plan, program, fare increase or service reduction .

4.1 Public Participation Tracking

Also, in order to improve upon the participation process as a whole, and to improve upon the use of public input, the RMTD staff will track public involvement activities. The tracking information, (Relevant data collected below), captures key meeting information, notification methods, general summary of gathered information, follow-up steps and an assessment of ways to improve the engagement process. The data will help RMTD evaluate how chosen participation efforts have worked as well as allow them to continuously improve public outreach efforts.

RMTD Participation Tracking Relevant Data Collected:

1. Event

- a. Date
- b. Conducted by
- c. Number of attendees

2. How were participants notified of the event?

3. Summary of public comments/concerns/interests

4. How is information to be used?

5. Is there follow-up with the public?

- a. Specific contact necessary, who, by whom?
- b. Additional meetings?
 - Will plans, documents, follow-up information be made available to the public, where and when?

6. Process suggestions

- a. What worked well in this public participation activity?
- b. What would I change next time?
- c. Feedback from participants on ways to improve the process

5.0 Updating and Evaluation of the Public Participation Plan

The RMTD Public Participation Plan will be updated periodically, concurrent with the update of the Long Range Service Plan (LRSP), or sooner if it is determined necessary by RMTD. Evaluation of the plan will occur as a first step when the LRSP is being updated. The plan will be evaluated against performance on the three major objectives established in Section One. Additionally, staff will seek to identify specific areas for improving public involvement based on:

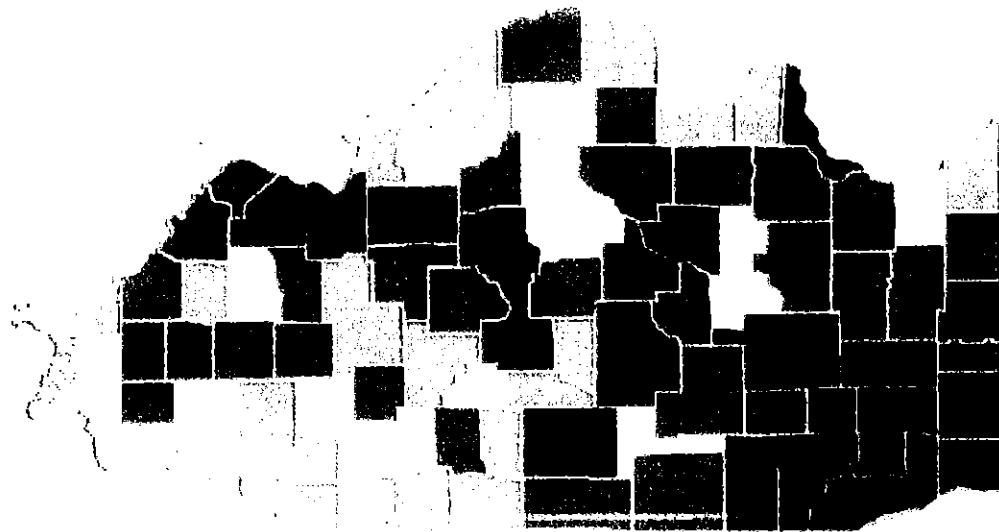
- Participation tracking performance

- Participant's assessments and suggestions
- Technical, Advisory and Policy Committee expectations

RMTD Vehicle Distribution

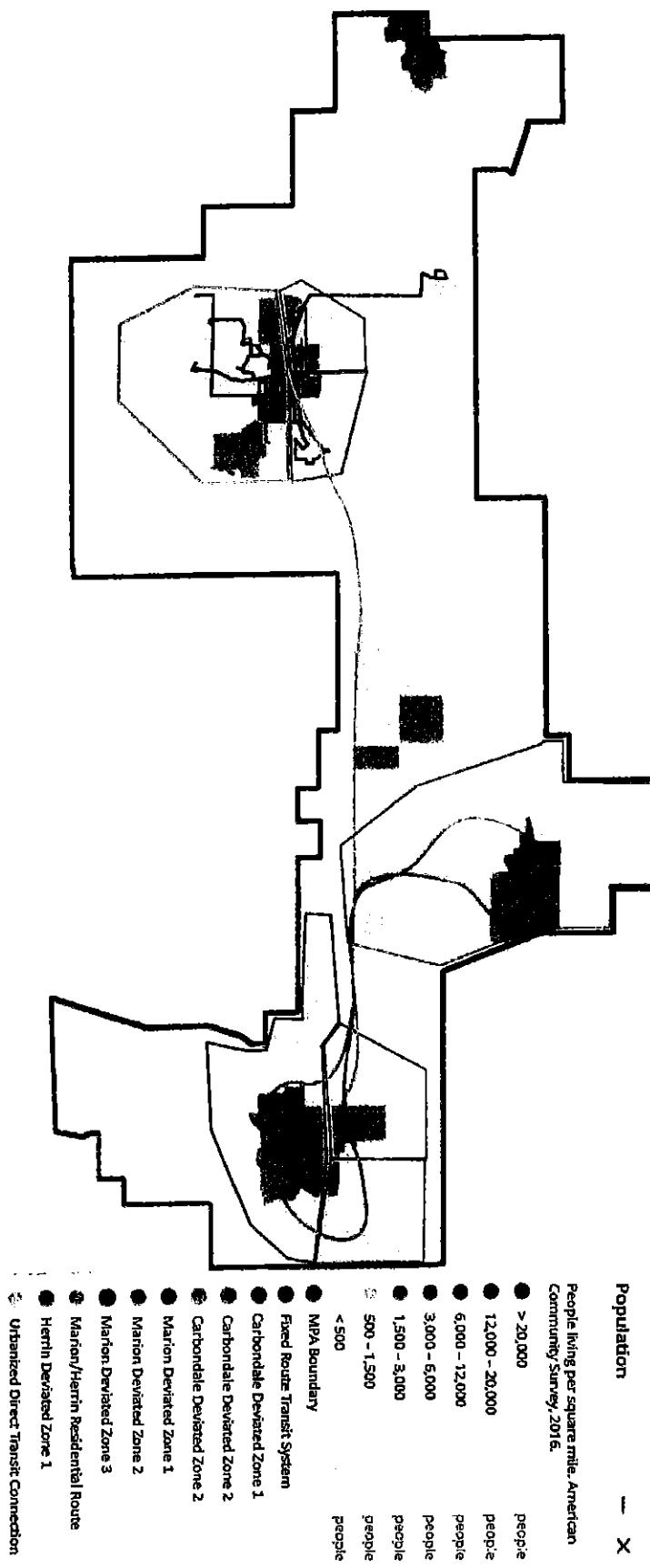
Operations Office	Counties Covered	Population	# of Vehicles Assigned
Rosiclare	Hardin/Pope	8,716	4
Harrisburg	Saline / Gallatin /Hardin / Pope	31,295	23
Marion	Williamson / Jackson	77,308	34
Grayville	Hamilton / White / Wabash	34,935	11
Robinson	Crawford / Jasper	19,333	24
Fairfield	Wayne / Edwards	22,710	11
Olney	Richland / Lawrence	15,173	13
Paris	Edgar / Clark / Cumberland	34,567	20

Illinois Population by County

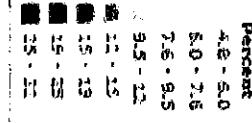
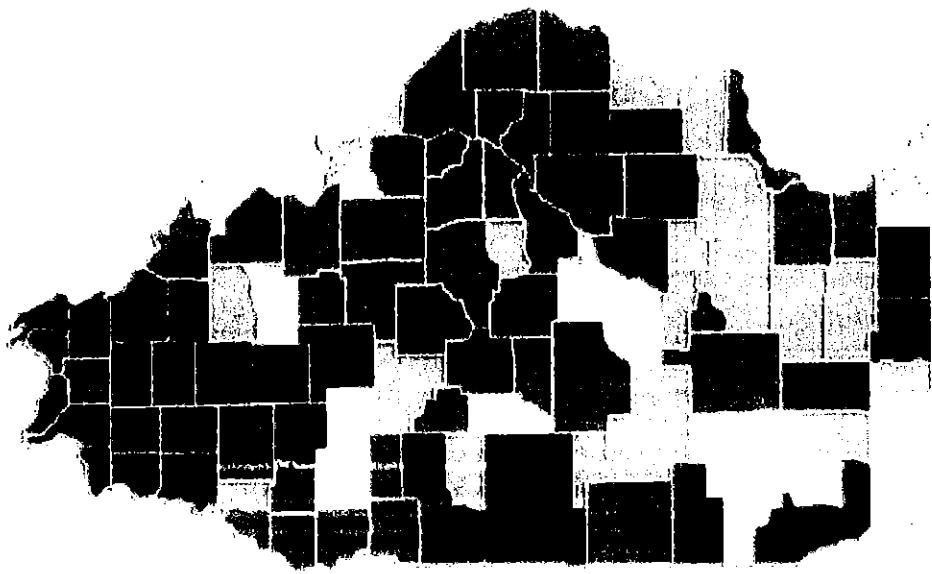


Number
4,125 - 6,450
6,450 - 9,345
9,345 - 15K
15K - 24K
24K - 50K
50K - 225K
225K - 1.4M
1.4M - 5.2M

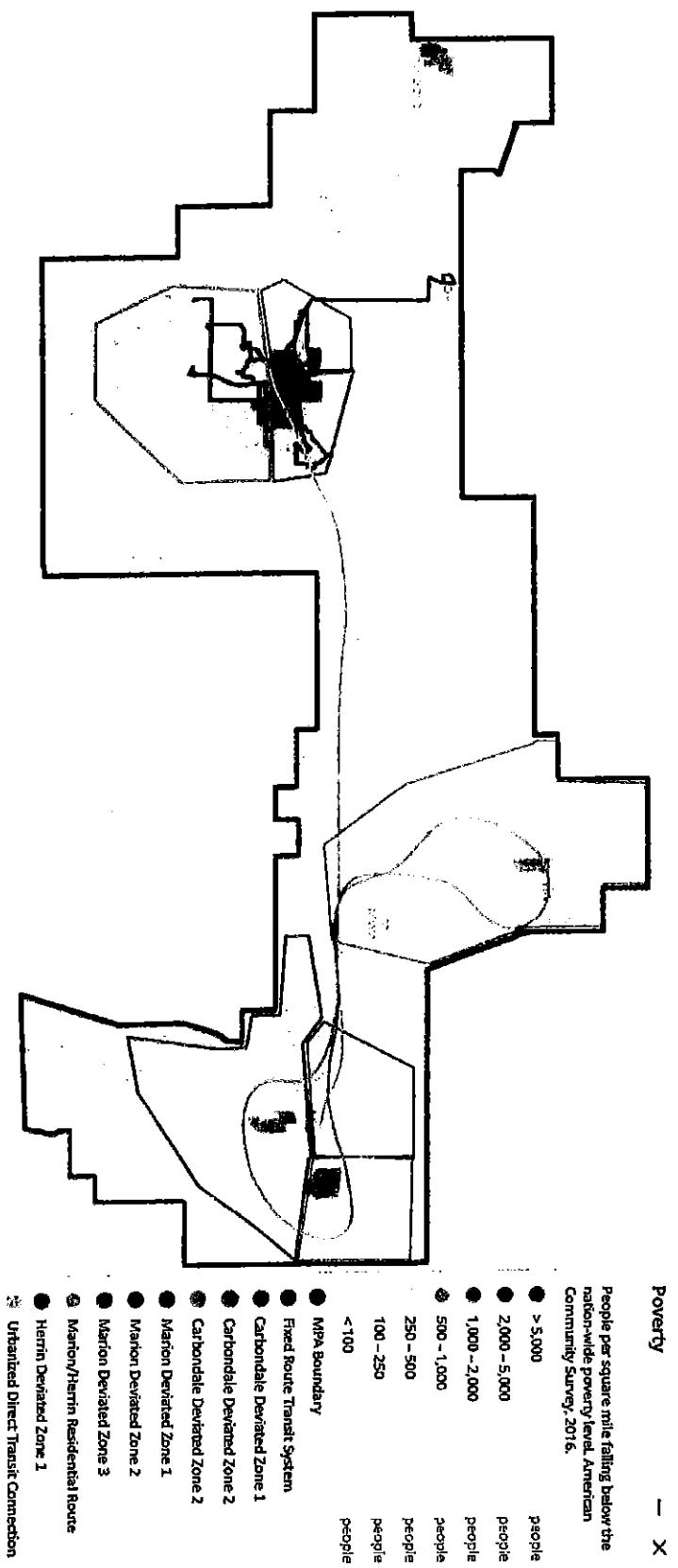
Population Area



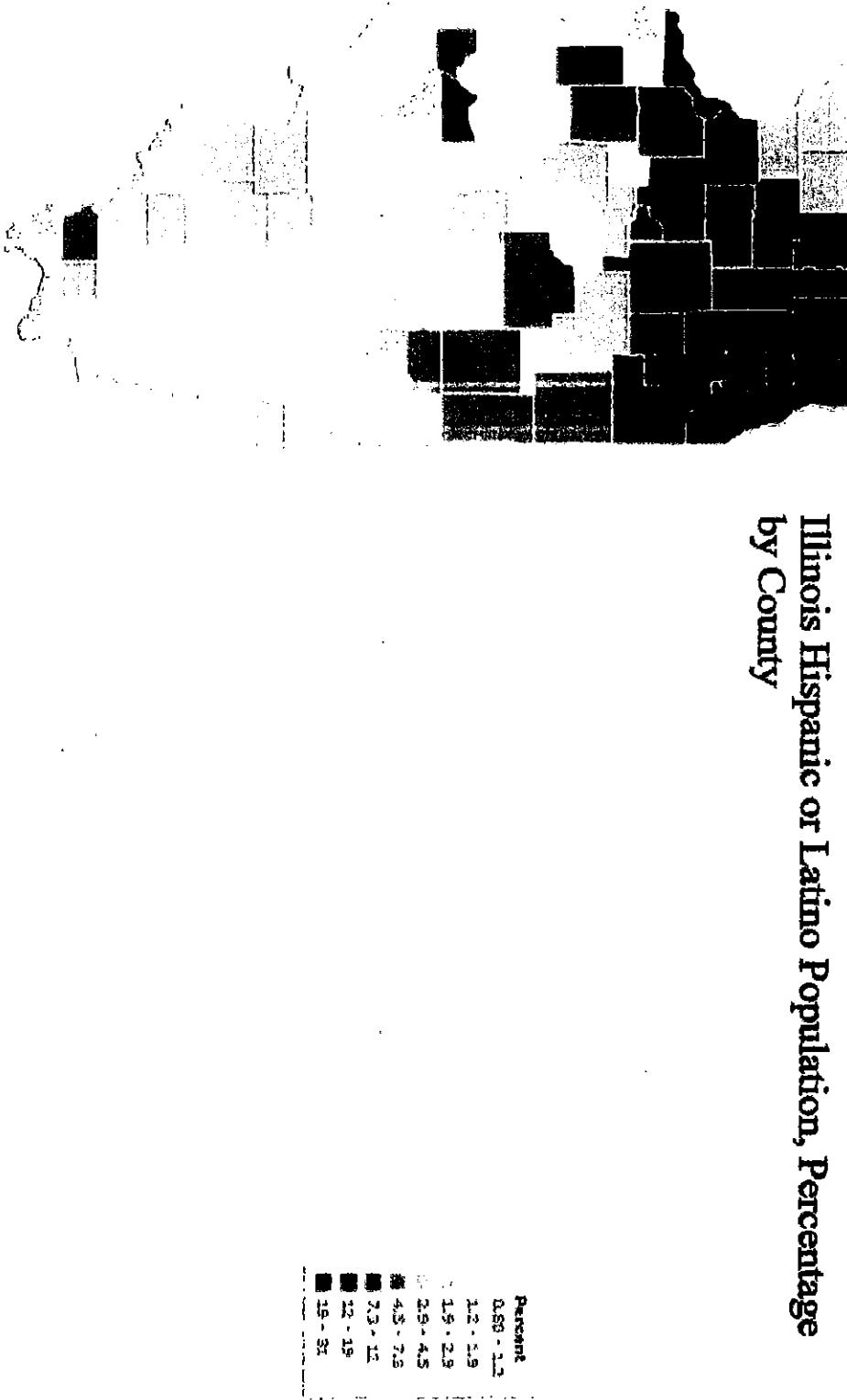
Illinois Poverty Rate by County



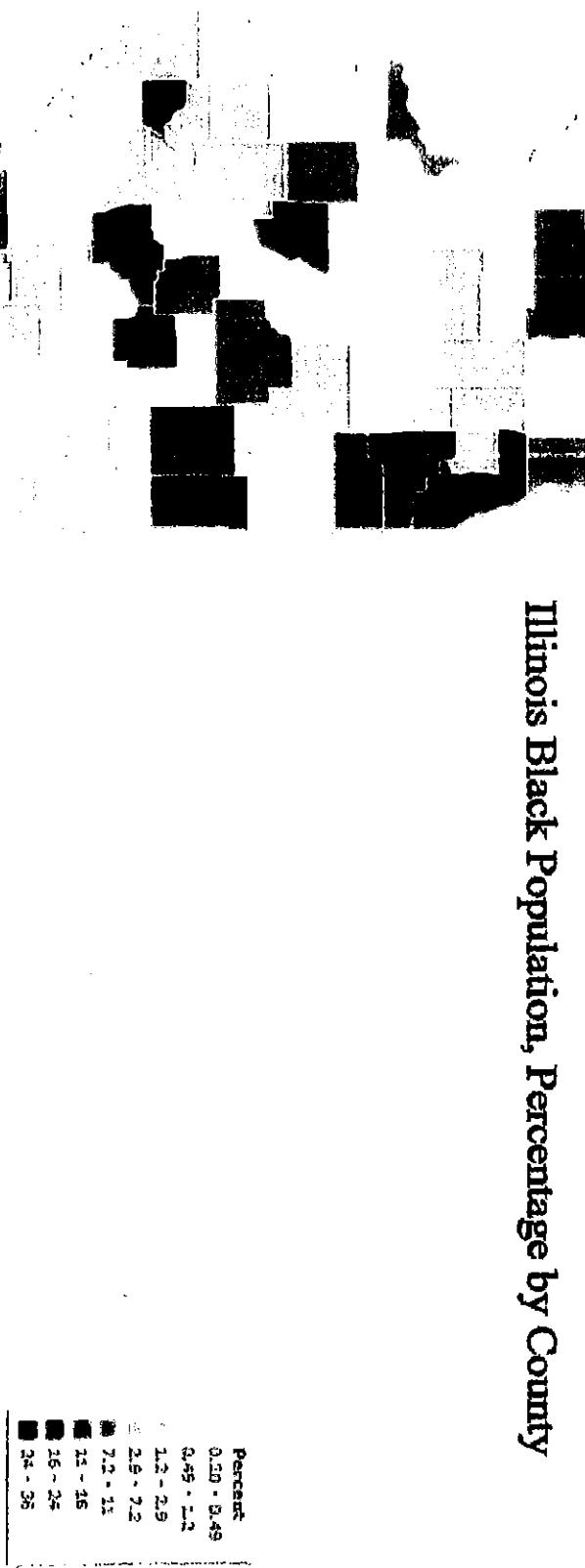
Populations in Poverty



Illinois Hispanic or Latino Population, Percentage
by County



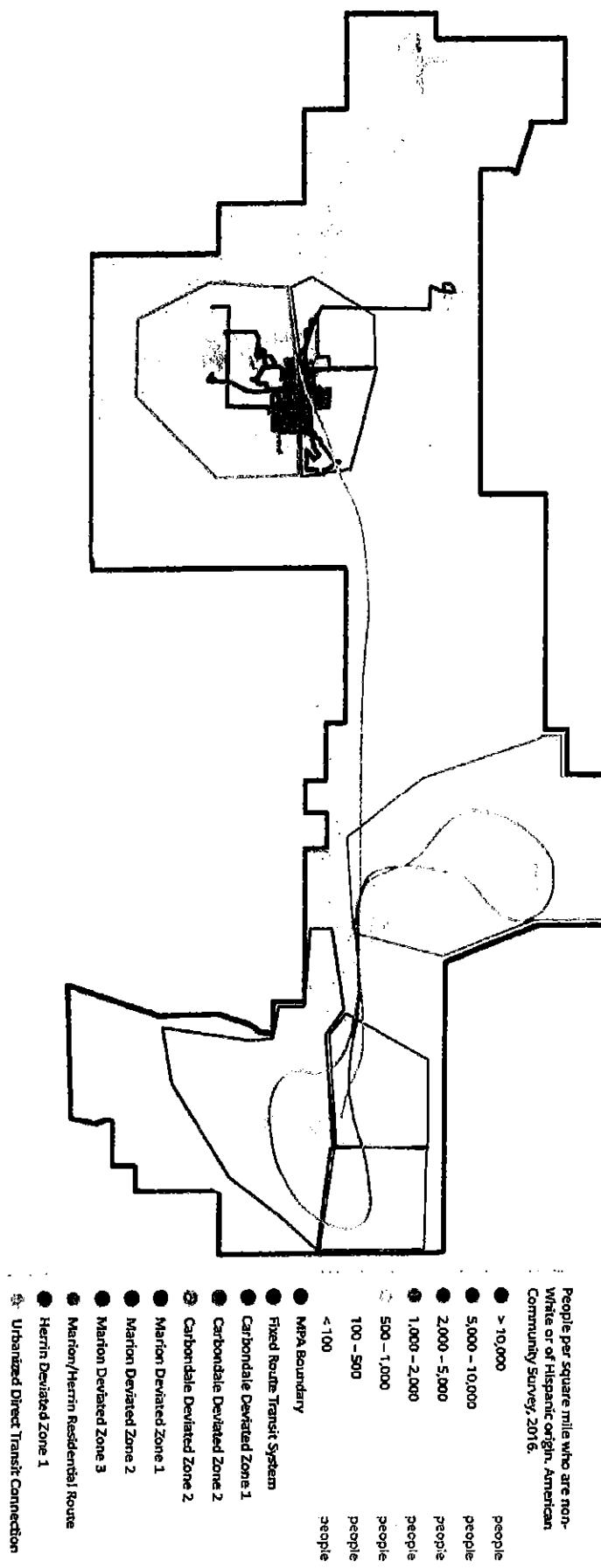
Illinois Black Population, Percentage by County



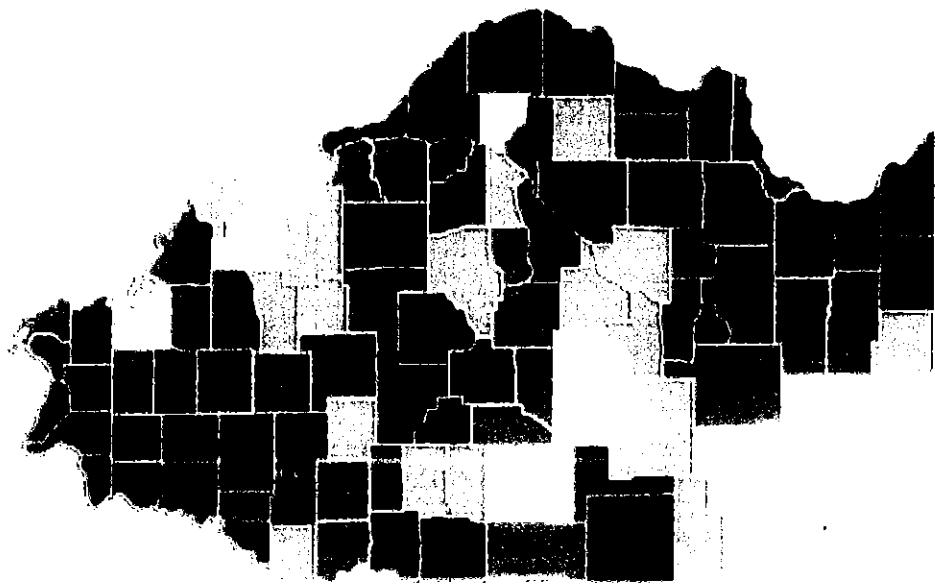
Minority Populations

Minority - X

People per square mile who are non-White or of Hispanic origin, American Community Survey, 2016.

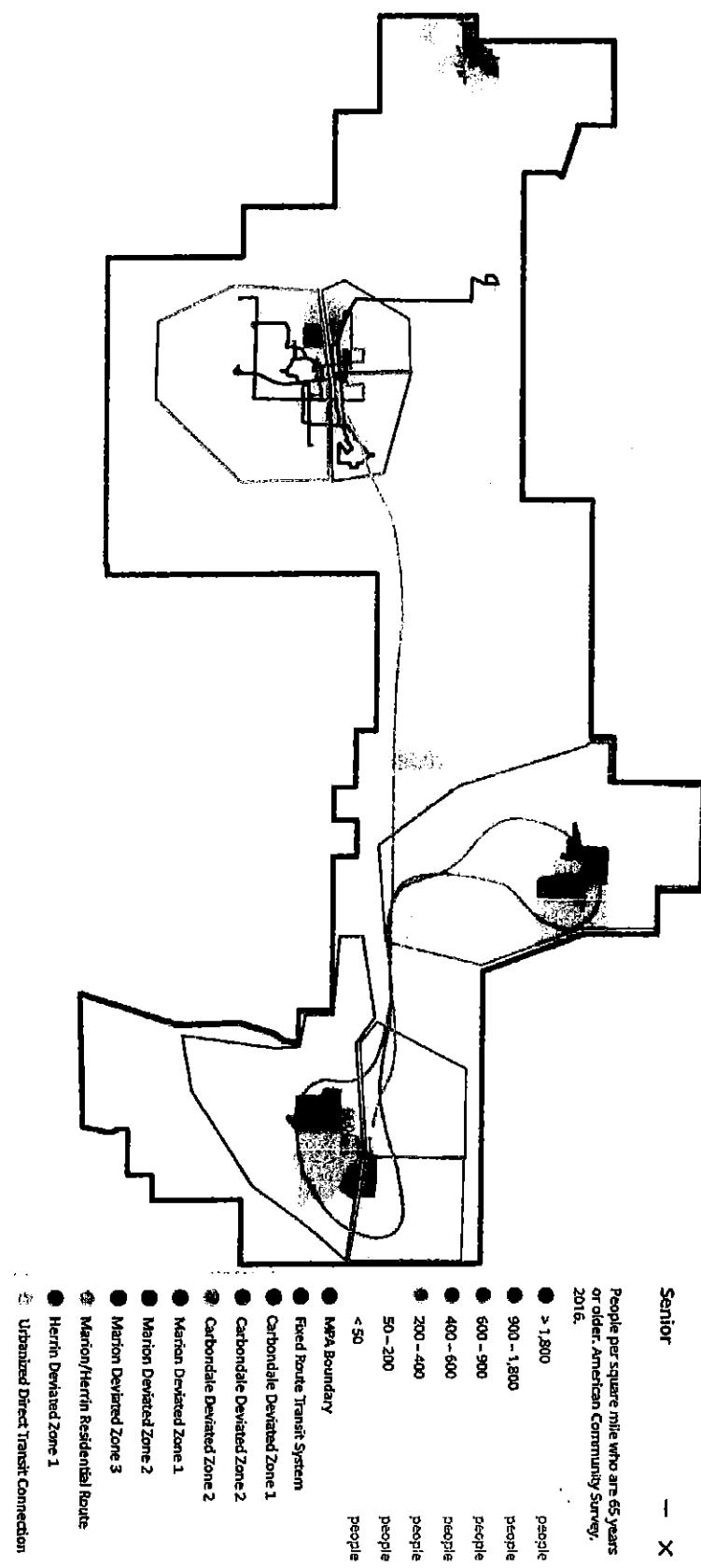


Illinois Population 65 years and over, percent by
County



Percent
8.7 - 10
10 - 12
12 - 14
14 - 17
17 - 19
18 - 20
20 - 22
22 - 24

Elderly Populations



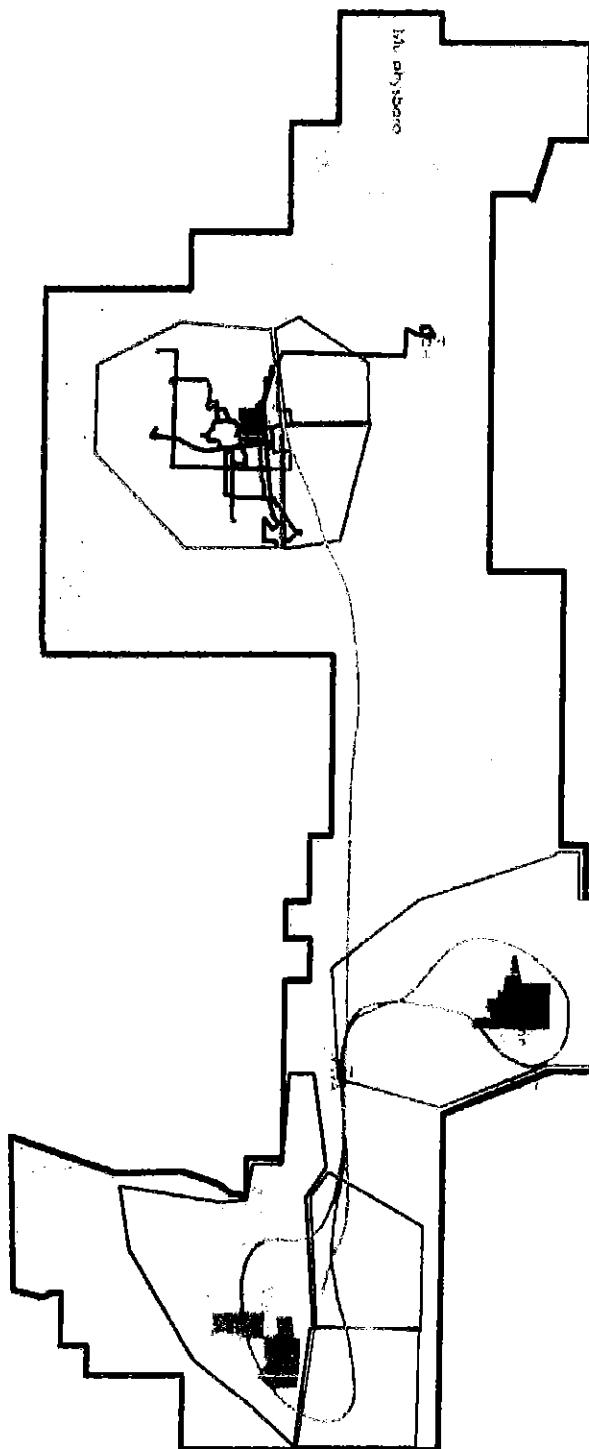
Populations with Disabilities

Disabled

— X

People per square mile who have a disability, American Community Survey, 2016.

- > 1,500 people
- 900 - 1,500 people
- 600 - 900 people
- 300 - 600 people
- 150 - 300 people
- 50 - 150 people
- < 50 people



- MPA Boundary
- Fixed Route Transit System
- Carbondale Deviated Zone 1
- Carbondale Deviated Zone 2
- Carbondale Deviated Zone 2
- Marion Deviated Zone 1
- Marion Deviated Zone 2
- Marion Deviated Zone 3
- Marion/Herrin Residential Route
- Herrin Deviated Zone 1
- Marion/Herrin Residential Route
- Urbanized Direct Transit Connection