

Rides Mass Transit District

TITLE VI PLAN

Approved:

David W. Kendall

Chairperson

5-16-2019

Date

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.

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 explain why you have filed for a third party.

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

- 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.

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 2000 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.

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.

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

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 is 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% of the time. Monitoring on time performance occurs on an occasional sampling basis, or in response to specific requests/customer input.

Transit Amenities Distribution

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

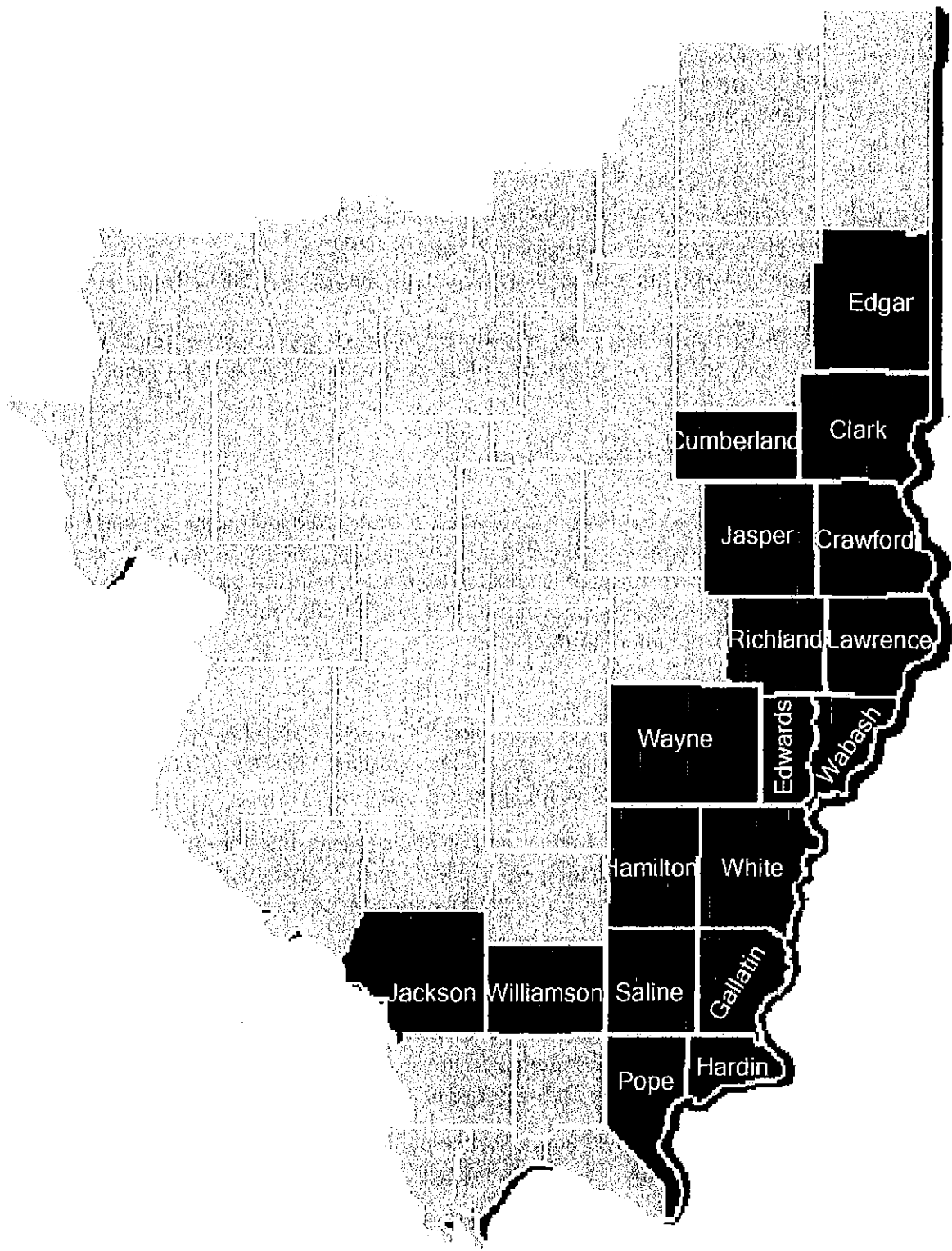
RMTD Service Area

RMTD Rural Vehicle Distribution

Population Density in the RMTD Service Area

Areas of Predominately Low-income Communities

Map I. RMTD SERVICE AREA



- 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%

- 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%.

- 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 (30 Veterans Dr. 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.

mailings are routinely used for meeting notices and for meeting-related communications with committee members and other interested parties.

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. 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

- 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	6
Harrisburg	Saline / Gallatin /Hardin / Pope	31,295	28
Marion	Williamson / Jackson	77,308	38
Carmi	Hamilton / White / Wabash	34,935	16
Robinson	Crawford / Jasper	19,333	17
Fairfield	Wayne / Edwards / Richland / Lawrence	22,710	14
Olney	Richland / Lawrence	15,173	11
Lawrenceville	Richland / Lawrence	14,590	3
Greenup	Cumberland / Jasper	10,538	11
Newton	Jasper	9,535	2
Paris	Edgar / Clark	34,567	12