



TITLE VI PROGRAM

Nashville Metropolitan Transit Authority

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Accessible Formats

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TABLE OF CONTENTS

Chapter 1: Introduction	P. 1
A. Nashville MTA Background	
B. WeGo Mission, Vision, and Promise	
C. WeGo / Nashville MTA Organizational Background	
D. What is Title VI and What Does it Mean for MTA?	
E. Title VI Coordinator	
Chapter 2: General Requirements and Guidelines	P. 7
A. Notice to Beneficiaries of Protection under Title VI	
B. Title VI Complaint Policy	
a. Process	
b. Investigations, Complaints, and Lawsuits	
C. Public Engagement	
a. Overview	
a. Public Engagement and Participation Plan	
b. Communication Strategies	
c. Engagement Activities	
d. Inclusion of Limited English Proficiency (LEP) Persons in Public Meetings	
D. Language Assistance Plan for Limited Proficiency Populations	
a. Introduction	
b. Plan Summary	
c. Language Assistance Plan	
d. Four Factor Framework	
e. Goals	
f. Identifying Individuals who need language assistance	
g. Providing language assistance measures	
h. Training Staff	
i. Providing Notice to LEP Persons	
j. Monitoring and Updating the Plan	
E. Subrecipient Policy	
a. Providing Assistance to Subrecipients	
b. Monitoring Subrecipients	
F. Environmental Justice Equity Analysis	
G. Board Approval for Title VI Policy	
Chapter 3: Collecting and Reporting Demographic Data	P. 25
A. Demographic and Service Profile Maps	
B. Demographic Ridership and Travel Patterns	
a. Onboard Survey 2017	
Chapter 4: Service Standards and Policies	P. 32
A. Vehicle Load	

- B. Vehicle Headway
- C. Service Performance
- D. Service Availability
- E. Transit Amenities
- F. Vehicle Assignment

Chapter 5: Monitoring Transit Service

P. 36

- A. Methodology
- B. Monitoring Service Standards
 - a. Vehicle Load Monitoring
 - b. Vehicle Headway Monitoring
 - c. On-Time Performance Monitoring
 - d. Service Availability Monitoring
 - e. Vehicle Assignment Monitoring
 - f. Transit Amenities Monitoring

Chapter 6: Evaluation of Fare and Service Changes

P. 45

- A. Major Service and Fare Change Policy
- B. Adverse Effects
- C. Disparate Impact and Disproportionate Burden Policy
- D. Public Participation
- E. Results of Service and Fare Equity Analyses

Appendices

- A. Notice to Beneficiaries of Protection under Title VI
 - a. English
 - b. Spanish
- B. Title VI Complaint Process, Form, and Log
 - a. English
 - b. Spanish
- C. Public Participation Plan
- D. 2017-2019 Service Changes Title VI Assessments with Signed Board Approval
- E. Language Line Brochure
- F. Subrecipient guidebook, site visit checklist, questionnaire
- G. MTA Board Title VI Policy Approval
- H. Transit Design Guidelines
- I. Public Meeting Requirements Policy
- J. Metro Language Access Report
- K. MTA & RTA System Wide Origin & Destination Survey (January 2018)

List of Tables, Figures, & Images

Figure 1.1	Organizational Function	P. 1
Figure 1.2	MTA and RTA Service Areas	P. 2
Figure 1.3	WeGo Public Transit Vision, Mission, and Promise	P. 3
Figure 2.1	Davidson County Demographic Makeup	P. 10
Image 2.1	Community Engagement for Strategic Planning	P. 13

Image 2.2	Hispanic Community Focus Groups	P. 16
Image 2.3	Fixed Route Network: LEP Population	P. 19
Table 3.1	Poverty Thresholds	P. 25
Figure 3.1	Base Map of MTA Service Area	P. 26
Figure 3.2	Demographic Map of MTA Service Area and Minority Population	P. 27
Figure 3.3	Demographic Map of MTA Service Area and Low-income Population	P. 28
Table 3.2	Race/Ethnicity of Riders	P. 29
Table 3.3	Fare Media Usage by Minority Group	P. 30
Table 3.4	Destination Type by Minority Group	P. 30
Table 3.5	Number of Vehicles in the Household by Minority Group	P. 30
Table 3.6	Top Ridership Routes for Black/African American Customers	P. 31
Table 3.7	Top Ridership Routes for Hispanic/Latino Customers	P. 31
Table 3.8	English as a Second Language by Ethnicity	P. 31
Table 4.1	Maximum Bus Load Standards	P. 32
Table 4.2	Minimum Frequencies by Service Class	P. 33
Table 5.1	Minority Route Designations / Sample Selection	P. 36
Table 5.2	Maximum Bus Load Standards	P. 38
Table 5.3	Vehicle Loads for Minority and Non-Minority Routes	P. 38
Figure 5.1	Vehicle Loads for Minority and Non-Minority Routes by Peak Period	P. 39
Table 5.4	Weekday Headways and Span of Service, for Minority and Non-Minority Routes	P. 39
Figure 5.2	On-Time Performance for April 2017 – September 2017	P. 41
Table 5.4	Population Characteristics: within 1/3 mile access to transit	P. 42
Figure 5.3	Shelters Installed Since 2018	P. 43
Figure 5.4	Stops and Shelters Distribution Map	P. 44
Figure 5.5	Shelter Distribution Map	P. 45

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Chapter 1: Introduction

Nashville MTA Background

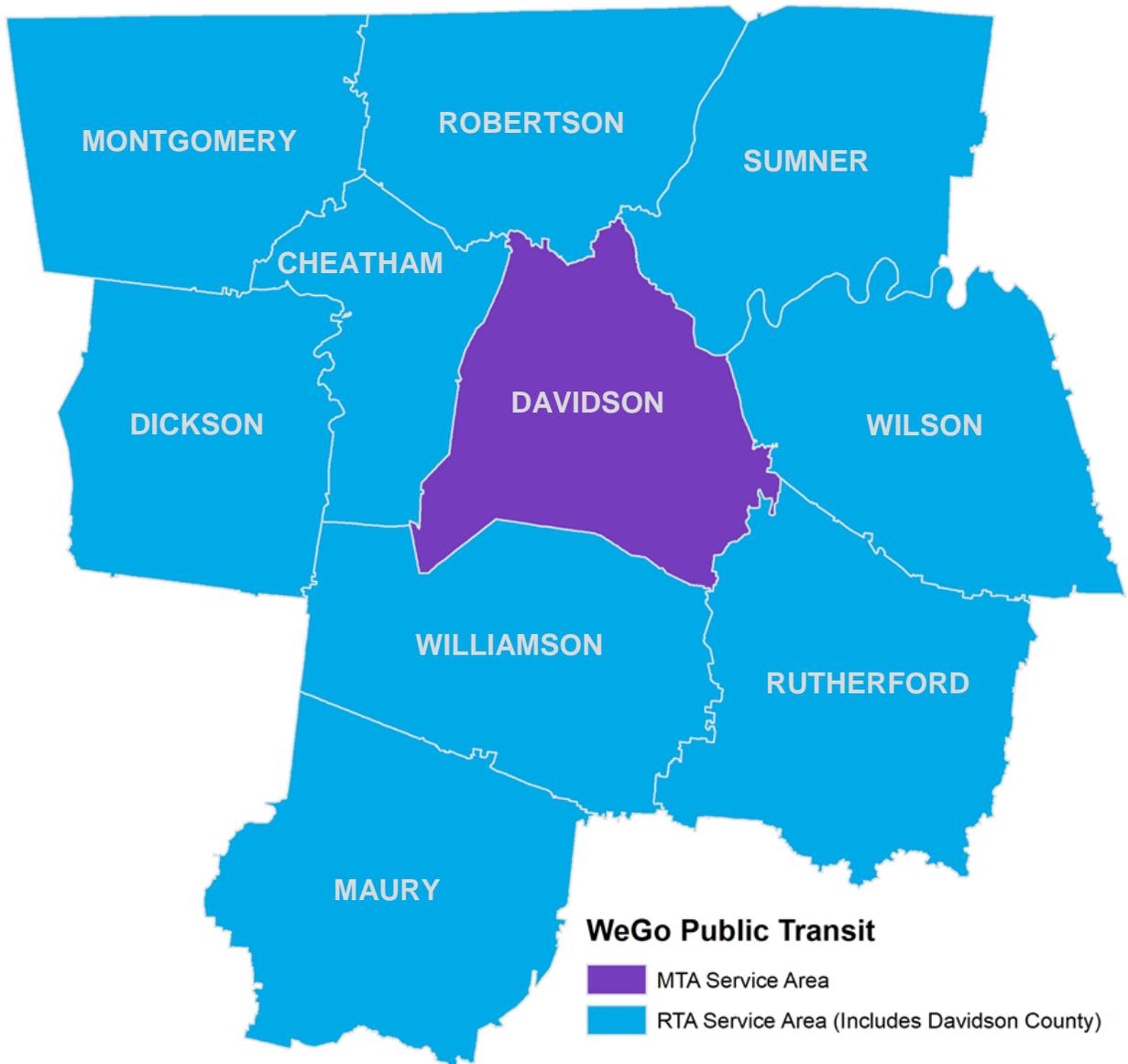
Established in 1973, Nashville Metropolitan Transit Authority (MTA) provides public transit services for Nashville-Davidson County. The agency also provides administration oversight for the Regional Transportation Authority of Middle Tennessee (RTA). Formerly known to the public as two separate agencies, 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 with each providing different services, the consolidation of the agencies creates a cohesive brand for transit services in Middle Tennessee. The Davidson Transit Organization manages the administrative functions of MTA and RTA. Figure 1.1 shows the organizational function of these four entities and Figure 1.2 shows the 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 entities will still be named.¹

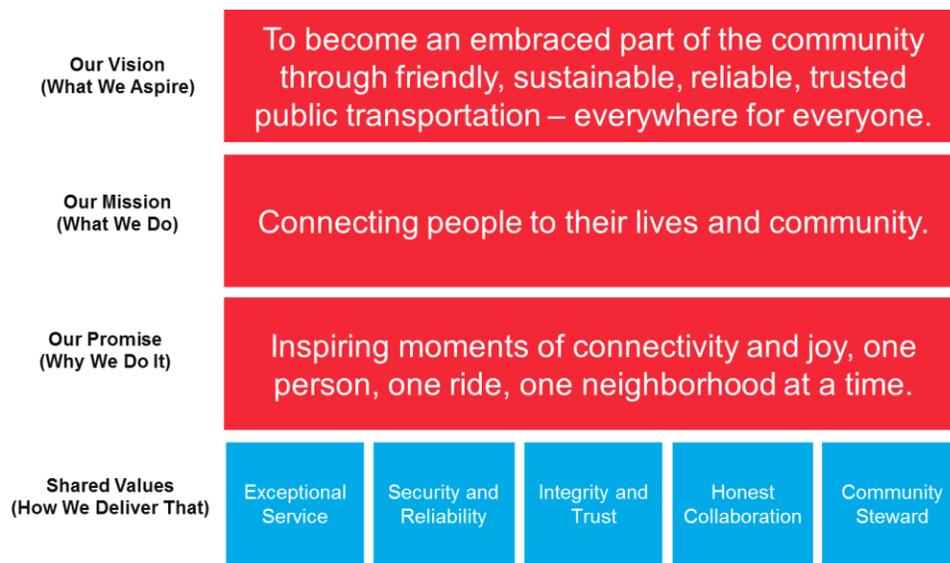
Figure 1.2: MTA and RTA Service Areas



WeGo Mission, Vision, and Promise

As part of the new branding, WeGo established a modern-day approach to how it provides its services, how that message is conveyed, and how it ensures equitable practices. Inclusivity is a common theme throughout the mission, vision, and passion as WeGo strives to ensure its 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 WeGo’s customers.

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



WeGo / Nashville MTA Organizational Background

WeGo Public Transit, a service of the Nashville Metropolitan Transit Authority (Nashville MTA), is the public transportation provider to Nashville-Davidson County and is an affiliated agency of the Metropolitan Government of Nashville & Davidson County. A five-member Board of Directors, appointed by the Mayor and approved by the Metro Council, governs the Nashville MTA. MTA Officers are appointed annually by the MTA Board of Directors and are responsible for seeing that the orders and resolutions of the MTA Board of Directors are carried into effect.

The demographic breakdown of the MTA Board of Directors is as follows:

White / Caucasian: 1 Male, 2 Female
 African America: 1 Male, 1 Female
 Total board members: 5

Additional committees of the board include the New Initiatives & Community Engagement (NICE) committee and the Operations & Finance Committee.

The demographic break down of those committees are described below:

NICE: White / Caucasian: 1 Female; African American: 1 Male
 Operations and Finance: White / Caucasian: 1 Male, 1 Female

APAC Committee

The AccessRide Policy Advisory Committee (APAC) serves in an advisory capacity to the Nashville MTA. Its purpose is to provide the MTA with recommendations on its compliance with the Americans with Disabilities Act (ADA), facilitate dialogue between the Nashville MTA and persons with disabilities, and increase the use of MTA services by people with disabilities.

The responsibilities of the APAC committee include:

- To represent the interests and diversity of people with disabilities
- To provide comment on MTA's current services, policies and practices

- To provide informed input on the development and assessment of future MTA projects and services that impact people with disabilities

APAC is guided by a chair, co-chair and secretary and is comprised of members from community organizations including; Support and Training for Exceptional Parents (STEP), Rochelle Center, Middle Tennessee Council for the Blind, Tennessee Council for the Blind, Tennessee Disability Pathfinder, Center for Independent Living of Middle Tennessee (CIL), Tennessee Disability Coalition, Greater Nashville Regional Council, Vanderbilt Medical Center, American Diabetes Association, Tennessee Association of Blind Athletes, Centennial AdultCare, Department of Intellectual Development Disabilities IT, Disability Law & Advocacy Center of Tennessee, and consumers. APAC meets in the WeGo Central Community Meeting Room. These groups individually appoint a member of their organization to participate and MTA does not intervene or overturn members. The demographic makeup of this committee is as follows:

White / Caucasian: 6 Male, 3 Female
 Black / African American: 2 Male, 1 Female
 Hispanic / Latino: 1 Female
 Declined to Answer: 1

MTA's management team, headed by a Chief Executive Officer, 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*

WeGo currently operates buses on 46 fixed routes and ADA complementary paratransit services (known as Access).

The RTA is the public transportation provider of regional commuter services for Cheatham, Davidson, Dickson, Maury, Montgomery, Robertson, Rutherford, Sumner, Williamson, and Wilson Counties. A Board of Directors comprised of mayors, Governor's appointees, and the Tennessee Department of Transportation governs the agency. Its management team, headed by the Chief Executive Officer and five departments, oversees day-to-day operations. The RTA currently operates one commuter rail (WeGo Star), nine commuter bus routes, vanpool, and carpooling services.

All personnel other than the CEO work for the Davidson Transit Organization, a non-profit that is contracted by the Nashville MTA and RTA to maintain administrative support. The CEO is an employee of the Metropolitan Government of Nashville & Davidson County.

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

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, the Nashville MTA established a new outlook on how it engages with its customers and the general public with inclusivity as the common thread throughout all 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 includes, but is not limited to, income status, limited English proficiency, marital status, age, gender identity, religion, veteran status, or physical or mental disability. Simply put, WeGo is for everyone, everywhere.

Toward that end, every department, division, and employee of Nashville MTA is responsible for carrying out the WeGo brand of commitment to inclusivity, including the requirements of the Title VI Program and Environmental Justice provisions. 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.

The Nashville MTA is proud of its longstanding policy to ensure that social impacts to individuals and communities 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

Title VI Coordinator:
Miriam Leibowitz, Community Outreach and Engagement Specialist
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miriam.leibowitz@nashville.gov

The functions of the Title VI Coordinator fall under the direction of the Chief Development Officer and overseen by MTA's Chief Executive Officer. With the diverse range of responsibilities in Title VI compliance and our commitment to ensuring inclusivity within our brand, MTA 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:

- **Title VI Compliance:** Ensures compliance of this document and related Title VI legislation in all agency activities. Oversees implementation of Title VI guidelines in all phases of public outreach and engagement.
- **Complaints:** Review written Title VI complaints that may be received by MTA following the adopted guidelines (see Complaint Procedures). Ensure every effort is made to resolve complaints.
- **Inclusive Public Participation:** Develop and ensure implementation of MTA'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 educate about MTA 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 Compliance:** Ensures compliance of this document and related Title VI legislation in all phases of project planning including conducting Title VI analyses for any activities that could pose a disproportionate burden or disparate impact to minority and low income populations of the service area and / or MTA riders.
- **Title VI Program Update:** Review and update the MTA's Title VI Program as needed or required. Present updated Program to the Chief Executive Officer 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 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, and provide recommendations as required to the Chief Executive Officer;
- **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 FTA regulations, the Nashville MTA provides information to the public regarding its Title VI obligations to inform them of their protections against discrimination by posting notices in both English and Spanish throughout WeGo Central, the main bus terminal, as well as at Riverfront Station where several bus routes currently serve. This notice is also on board all buses and includes the following main points:

- MTA 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 the Title VI 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 MTA 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 MTA. 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 MTA 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 MTA for processing. This form is also available for download from the MTA 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 MTA's sub-recipients of Federal funds, MTA 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 (7) calendar days. The complaint will receive a case number and will then be logged into MTA's records identifying its basis and alleged harm.

In cases where MTA assumes the investigation of the complaint, MTA 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 sixty (60) calendar days of the acceptance of the complaint. MTA 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 Nashville MTA website, or from Customer Care at the WeGo Central main bus terminal. 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 published once finalized by the development team at WeGo Public Transit.

Title VI Investigations, Complaints, and Lawsuits

MTA 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 (3) years internally then archived for a period of ten (10) years. This log can be found in Appendix B. There are no active complaints at this time.

Public Engagement

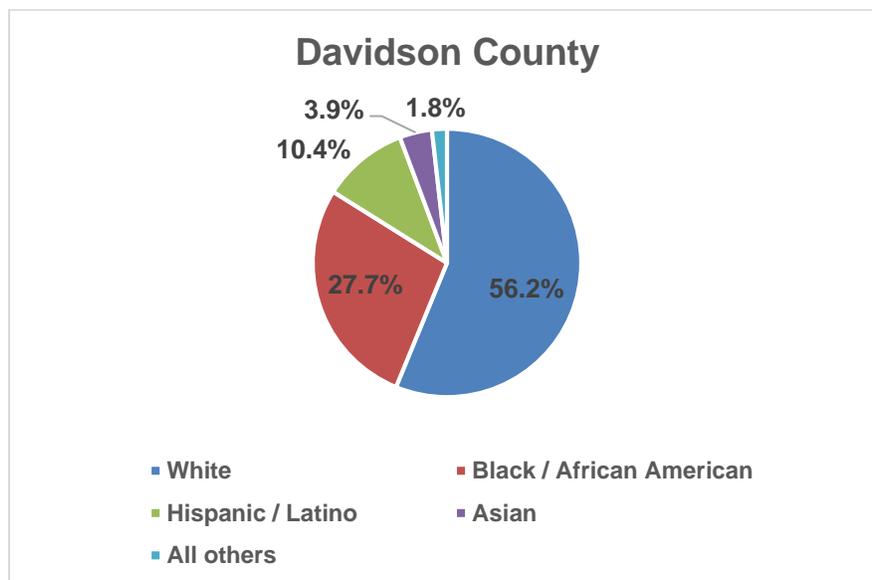
Overview

The Nashville MTA Title VI Program provides leadership, direction, and policy to ensure compliance with Title VI of the 1964 Civil Rights Act and environmental justice principles. Nashville MTA 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 Nashville's low-income, minority, and LEP communities MTA 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. MTA also uses geographic information system (GIS) mapping in order to identify the minority block group communities within the MTA service area. By collecting this data MTA 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 methods. Furthermore, ridership data provided through on-board surveys conducted every five years allows for targeted outreach as appropriate in public engagement, particularly for considerations that impact MTA riders more so than the community at large. The 2017 Onboard Survey is provided in Appendix K and summarized in chapter 3.

Figure 2.1 provides an overview of the demographic makeup of Davidson County. Chapter 3 of this document provides detailed information of minority and low-income communities served in the Nashville MTA service area. As depicted below, the two largest minority groups within our service area are African Americans and Hispanics.

Figure 2.1: Davidson County Demographic Makeup



Source: U.S. Census Bureau, 2013 – 2017 American Community Survey 5 -Year Estimates

Public Engagement and Participation Plan

Appendix C contains MTA's formal Public Participation Plan. What follows is a description of effective communication strategies when engaging various stakeholder groups and communities. 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 published once finalized by the development team. The revised plan will be developed based on the principles of ensuring effectiveness, inclusivity, and meaningfulness. The following sections detail the current efforts of establishing this revised plan.

Communication Strategies

Establishing and understanding receptivity to messaging is key when determining how to effectively communicate. Presently, WeGo Public Transit has numerous messaging methods, both passive and active, that are utilized to reach various audiences without creating audience fatigue.

These channels and methods 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, MTA avoids leveraging other tactics to limit message fatigue or potentially over-saturating channels. WeGo has identified audiences consistent with various methods/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 from the U.S. Census Bureau and American Community Survey 5-Year Estimates. In using this data, MTA completes analyses through GIS of the most up to date data available to determine the areas in which traditionally underserved populations reside and determine methods to reach those audiences.

Engagement Activities

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

Major Service and Fare Changes: MTA has defined a major service change when 25% or more of a particular route's daily revenue miles is being changed or eliminated². To this extent, public outreach involves both information dissemination as well as encouragement for feedback and suggestions. The methods to achieve such interaction with the public varies based on the extent to which changes are taking place, and the severity of the impacts made. Title VI analyses are completed for each service and fare change made during each triennial period. Appendix D contains the board documentation of approval of such changes accompanied by 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, MTA takes into consideration any negative impacts on minority and low-income groups during all phases of planning, design, and implementation of 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.

Example: In the summer of 2019, MTA was faced with a budget shortfall resulting in a reduction in service and increase in fares. Approximately 10% of overall service was reduced and was therefore considered a major change of service requiring an unprecedented level of community engagement for this particular type of scenario. The public was given an opportunity to provide comments, feedback, and suggestions by attending one of seven public meetings held in districts that were impacted the most by the service changes. Two of the seven meetings were held at WeGo Central, as a central location reaching the majority of our riders.

In addition to the public meetings, onboard engagement took place on 11 routes on multiple days for a total of 76 hours. Two informational Facebook live sessions took place during the lunch hour, giving an opportunity for questions to be answered through online comments. Bus operators were given an opportunity to provide feedback and speak on behalf of themselves as well as concerned riders who were unable to attend other outlets of engagement. Guidebooks were created and distributed to outline the service changes and provide adequate notice of the changes taking effect in August and September 2019. Articles were published in La Campana, the Spanish community's printed newspaper and a radio broadcasting session took place where one of MTA's Spanish speaking representatives was able to inform Spanish speaking riders of the changes to come.

Although a unique situation, the Nashville MTA executed a diverse strategy to reach as many customers as possible and did so through a collaborative marketing strategy with the intent to get the message out in as many effective ways as possible.

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, Nashville MTA 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 city's transit network. It is MTA's goal to create such plans for the people, by the people.

Example: In 2016, Nashville MTA produced the nMotion Strategic Plan outlining short term and long term goals for Nashville's transit future. The public engagement strategy was spearheaded by an advisory committee and collaboration amongst several internal MTA departments. Tactics included transit talks, surveys, interviews, public meetings, and civic engagement events. Furthermore, outreach included targeting Spanish speaking communities. Over the nine month rigorous engagement period, MTA received over 20,000 comments, more than 6,000 survey responses, and over 500 unique comments on the strategy reports.

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

Example: Nashville MTA began a multi-tiered communications plan prior to the groundbreaking on the Murfreesboro Pike Transit Signal Priority project. Initial communication was directed at businesses along Murfreesboro Pike most likely impacted by the project. A project introduction letter and frequently asked questions were sent to nearly 700 businesses along the pike. These materials were also shared with elected officials whose constituency would most likely be impacted. Concurrently, a press release was issued to news outlets to signify the beginning of the project resulting in several segments dedicated to the improvements. These messages were reinforced throughout the year as part of an improvements marketing campaign celebrating WeGo Public Transit's effort to help people to travel better, smarter, simpler, easier, and more affordably.

General Messaging: MTA uses many outlets to communicate with our customers and Nashville-Davidson County residents on a continual basis. MTA maintains a website (www.WeGoTransit.com), staffs an information window 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 and emails. The MTA Communications Department manages various social media outlets (Facebook, Twitter) and local media (News Channels, Newspapers, and Radio) to publish press releases, notices, and other information, as well as placing notices inside the buses and at WeGo Central. MTA strives to make all of its published documents widely accessible and provides downloadable copies on the agency website.

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



Public Meeting Locations: October 2016 – August 2019

- WeGo Central Meeting Room, 400 Dr. Martin Luther King Blvd
- Music City Center, 201 5th Ave S.
- Nashville Public Library, Downtown Branch, 615 Church St
- Nashville Public Library, Madison Branch, 610 Gallatin Pike S
- Hadley Park Community Center, 1037 28th Ave N.
- Lentz Public Health Center 2500 Charlotte Ave
- East Park Community Center, 700 Woodland Street
- Southeast Community Center, 5260 Hickory Hollow Pkwy #20

Inclusion of Limited English Proficiency (LEP) Persons in Public Meetings

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

- MTA 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 7 days a week from any phone in any country. Representatives have this information at their desks to call for translation services on demand.
- MTA provides notices, announcements, survey forms, and other outreach materials in both English and Spanish.
- MTA 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 Limited English Proficiency populations has been prepared to address MTA'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 Limited English Proficiency, indicates that differing treatment based upon a person's inability to speak, read, write or understand 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 MTA which receives federal assistance through the Federal Transit Administration (FTA).

Plan Summary

MTA 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 MTA 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 LEP persons in Nashville-Davidson County and improve current ongoing efforts, MTA conducts targeted needs assessments and gathers data to maintain an understanding of the language needs. In doing so, MTA 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 MTA's programs and activities.

MTA utilized data from the American Community Survey 2017 5-year estimates to determine the number of limited English proficient individuals along with their native languages to establish a baseline of communities within the service area. We then referred to a 2017 Metro Language Access Report conducted by the Metro Planning Department that identifies minority communities and their interaction with Metro agencies and extensions. The information contained in this report notes that Nashville has one of the fastest-growing immigrant populations in the country and that the share of the foreign born in Nashville was 13% in 2017, consistent with the national average. Over the next 25 years, Davidson County expects the Hispanic population will represent one-third of the total population whereas today they represent

about 10%. Furthermore, the Asian population is expected to increase from 3% of the total population to just under 7% by 2040. (See Metro Access Language Report, Appendix J).

To monitor our agency's interactions with LEP populations, MTA referred to the 2017 Origin & Destination Survey conducted by ETC Institute to establish the best use of available resources to provide meaningful accommodations for MTA customers. These surveys are conducted every five years allowing the opportunity to continue monitoring the ever-changing demographic profile of Davidson County and consequently, transit riders.

MTA 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 MTA program, activity, or service.

How LEP persons interact with the recipient's agency:

Nashville-Davidson County is roughly 535 square miles with an estimated 2017 population of 692,587 according to the American Community Survey 2017 5-year estimates. MTA provides local and express fixed route bus services for Nashville-Davidson County. MTA also provides door-to-door WeGo Access ADA-complementary paratransit services for people with disabilities and those who are unable to ride the fixed route service. Most recently, MTA launched a pilot program for Access on Demand allowing same day scheduled service for those who qualify under the Access program. LEP persons are likely to come into contact with MTA through the following services that provided:

- Local and regional fixed route bus services
- WeGo Access Paratransit services for people with disabilities
- Customer Service at WeGo Central
- Calling and Emailing the Customer Care Department
- Ticket Sales windows
- MTA's Website
- Social Media
- Public Meetings
- Notices to the Public
- Ridership Surveys
- Community Focus Groups for Strategic Plan



Image 2.2: Hispanic Community focus group meets with MTA representatives to envision Nashville's transit future.

Identification of LEP Communities:

Referencing data available through the American Community Survey 2015, MTA has identified the populations that meet both of the following criteria:

- Speak English less than "very well"

- Exceed the 1,000 person Safe Harbor threshold³

Spanish	28,437
Arabic	5,906
African	1,909
Vietnamese	1,839
Other Indic Languages	1,726
Other Indo-European Languages	1,539

From the Origin & Destination Survey collected in 2017, MTA was able to determine which populations are predominantly served to distinguish how the LEP population of Davidson County interacts with MTA services and representatives. From this survey, the only population that met the 1,000 person threshold AND spoke English less than very well was the Spanish speaking population. For reference, the top five minority groups from the origin destination survey reported the following figures:⁴

Spanish	1,116
French	266
Hindi	160
German	130
Arabic	111

In order to ensure effective and meaningful use of the limited resources available, MTA considers the Spanish speaking population as the only minority group to meet the Safe Harbor threshold for written translation services. To ensure equitable inclusivity for the agency moving forward, MTA will utilize similar processes every five years as the Origin Destination Survey results are made available.

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

MTA's Customer Care Department consults directly with LEP persons when conducting monthly surveys on local and express fixed route bus services. 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.

MTA engages regularly with the Metro Human Relations Commission, the Multicultural Alliance on Disability, the Urban League, and other local agencies and organizations that represent or advocate on behalf of LEP persons. MTA is a partner agency with the Multicultural Alliance on Disability, which is a group of community agencies serving people with disabilities and/or refugees and immigrants, administered by the Vanderbilt Kennedy Center/TN Disability Pathfinder which is tasked with identifying the barriers affecting service delivery to people with disabilities from other cultures. This relationship provides MTA with opportunities to identify these barriers across all services provided.

³ FTA's Safe Harbor Threshold identifies either 1,000 persons or 5% of the population, whichever is less. 5% of the MTA service area is over 34,000 so 1,000 will be utilized as the threshold.

⁴ The sample survey utilized an unlinked weighted value. The numbers represent average daily number of passengers based on historical data

As part of this Title VI Program update and reviewing the current Language Assistance Plan, we recognize the growing needs of the Nashville-Davidson County area due to rapid growth, especially relative to the cited increase in foreign-born populations (See Appendix J for the Metro Language Access Report). MTA recognizes this growth to impact how we interact with LEP populations and is dedicated to ensuring equal access for current and future populations. In light of this, 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 MTA departments such as Customer Care and Operations as well as referring to phone call records to the MTA 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 MTA's services:

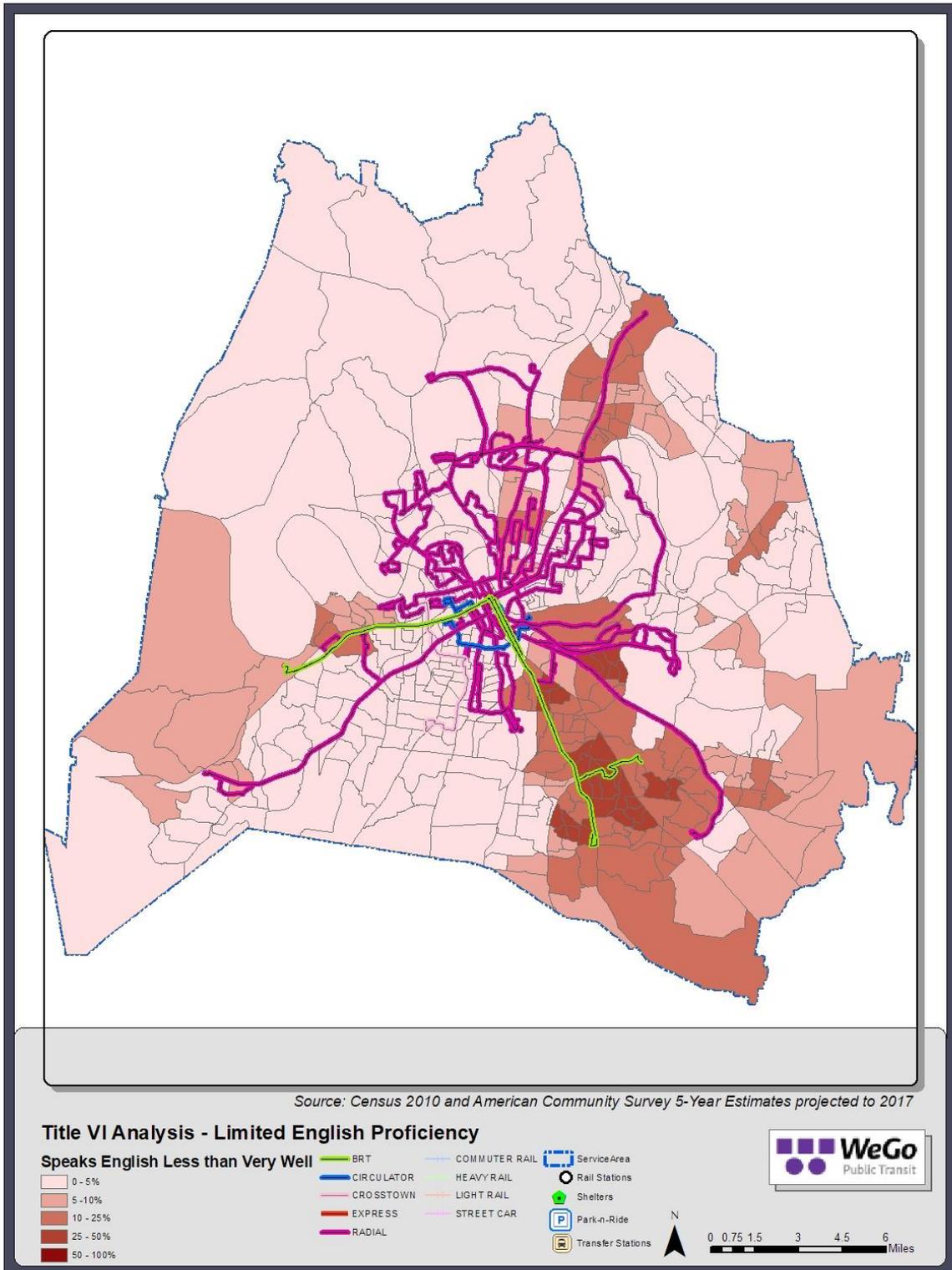
- Customer Care phone services – 440 Spanish phone calls for fiscal year 2019
- Ticket Sales – an average of 5 LEP persons per week
- Fixed route transit services – an average of 11 LEP persons per week
- AccessRide paratransit – 11 LEP persons ride on a regular basis
- Community and Sponsored Events – 3-4 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 MTA to the LEP population.

MTA provides local and express fixed route bus services for Nashville-Davidson County as well as door-to-door WeGo Access ADA-complementary paratransit services and most recently, Access on Demand. Through ridership analysis, Customer Care Representative testimonials, and Customer Care surveys MTA has found that LEP persons come into contact with the MTA predominantly through our local 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. There are many transit stops in neighborhoods that have been identified as having a high concentration of LEP persons.

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.

Image 2.3: Map of Fixed-Route transit network in relation to Limited English Proficient populations by census block.



According to on-board surveys these passengers ride multiple times a week and are traveling primarily to and from work. Other important trips that were noted were to and from doctor appointments and to and from grocery stores and other shopping centers. MTA will continue to utilize survey information to better determine the importance of transit services to LEP persons.

MTA 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 fifteen counties in two states.

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

MTA provides bus schedules, public notices, announcements, survey forms, and other outreach materials in both English and Spanish. Currently there are eighteen route schedules printed in Spanish. MTA also has two bi-lingual Customer Service 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. MTA provides all of its written and spoken translation services to LEP persons free of charge.

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

- Costs for printing: \$1,954
- Publishing Spanish public meeting notices in La Campana Newspaper: \$630
- Language Line: \$491.22
- Sign Language Interpretation: \$1,742

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 Nashville MTA programs or activities. Nashville MTA is committed to providing language assistance services to LEP individuals who wish to access MTA 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, MTA 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. According to the Origin & Destination Survey conducted in 2017, 38% of the Spanish

speaking population reported that they speak English less than very well. This population accounts for 4.5% of the total ridership on MTA fixed-route service and therefore MTA has determined that both written and spoken translation services are appropriate for Spanish speaking individuals. All other languages spoken by LEP persons do not meet the Safe Harbor Threshold⁵, however; we offer spoken translation services through the Language Line used by our Customer Care Department as well as equip bus operators with the ability to offer these services on board. If a Customer Care Representative does not recognize the language needed by the LEP caller the Language Line may also be utilized to identify the language needed. All customer care representatives are trained upon hire to ensure acceptable procedures and practices on day-to-day operations.

System - Limited English Proficiency (LEP) Summary									
MTA 2017									
System Area	Total Population Affected	Speaks English Less Than Very Well							% Without High School Diploma Over 25 Years Old
		% Total LEP	% Spanish LEP	% Chinese LEP	% Creole LEP	% Korean LEP	% French LEP		
Service Area Total	678,759	55,710	8.2%	4.5%	0.1%	0.1%	0.2%	0.1%	8.2%
Within 0.5 mile Walk Distance	490,448	44,228	9%	5.3%	0.1%	0.1%	0.1%	0.1%	9.3%

Providing language assistance measures

There are numerous language assistance measures available to LEP persons in the MTA service area. MTA 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 MTA provides assistance to LEP persons:

- Written Material Translation for Spanish LEP persons including but not limited to:
 - Bus schedules, WeGo Access, 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

⁵ DOT has adopted DOJ’s Safe Harbor Provision, which outlines circumstances that can provide a “safe harbor” for recipients regarding translation of written materials for LEP populations. The Safe Harbor Provision stipulates that, if a recipient provides written translation of vital documents for each eligible LEP language group that constitutes five percent (5%) or 1,000 persons, whichever is less, of the total population of persons eligible to be served or likely to be affected or encountered, then such action will be considered strong evidence of compliance with the recipient’s written translation obligations. Translation of non-vital documents, if needed, can be provided orally. If there are fewer than 50 persons in a language group that reaches the five percent (5%) trigger, the recipient is not required to translate vital written materials but should provide written notice in the primary language of the LEP language group of the right to receive competent oral interpretation of those written materials, free of cost.

These safe harbor provisions apply to the translation of written documents only. They do not affect the requirement to provide meaningful access to LEP individuals through competent oral interpreters where oral language services are needed and are reasonable. A recipient may determine, based on the Four Factor Analysis, that even though a language group meets the threshold specified by the Safe Harbor Provision, written translation may not be an effective means to provide language assistance measures. For example, a recipient may determine that a large number of persons in that language group have low literacy skills in their native language and therefore require oral interpretation. In such cases, background documentation regarding the determination shall be provided to FTA in the Title VI Program.

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, MTA interacts with community, business, and church organizations whose members are often predominantly LEP. This allows us to provide education about the LEP services MTA provides and to get feedback from LEP persons on the effectiveness of MTA's plan.

Training staff

As part of MTA new hire training, the training department covers the LAP plan provisions of Title VI and is provided for all MTA employees. During training all employees are made aware that MTA is required to take reasonable steps to ensure LEP persons are given meaningful access to all of our services. Employees are informed that MTA 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

MTA 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 MTA facilities including the main hub at 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 MTA uses in order to notify the public of LEP assistance programs:

- Printing of Public Meeting notices 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, churches, and organizations whose members are predominantly LEP
- Attend events where there is a high LEP population in order to provide information about MTA services

MTA 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

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

As a continuing effort to achieve the goals of this LAP, the Nashville MTA 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.

Sub-recipient Policy

The Department of Transportation (USDOT) requires the collection of data and other information to enforce the Title VI statute. Furthermore, the FTA as part of USDOT has established a program of grantee reviews assessing compliance with all Title VI regulations. The review includes an evaluation of each agency's policies, procedures, and record-keeping. As with most FTA requirements many elements are also passed through to grant Sub-recipients. It is Nashville MTA's responsibility to ensure that all Sub-recipients comply with the applicable parts of Title VI.

In order to ensure that our Sub-recipients are in compliance with Title VI the Nashville MTA has developed a system to provide assistance to Sub-recipients in creating a Title VI plan as well as a system for monitoring those Sub-recipients to make sure they stay in compliance. The following is the MTA's plan to assist and monitor Sub-recipients' Title VI plans.

Providing Assistance to Sub-recipients

Nashville MTA will take steps to ensure that potential Sub-recipients comply with Federal Title VI regulations. The potential Sub-recipient will receive a package of materials to help guide them in created a Title VI plan that meets the Federal standards set by the Federal Transit Administration (FTA), if they do not already have one.

Guidance materials include the following:

1. A section in the subrecipient guidebook informing Sub-recipients of their responsibilities under Title VI and how MTA will monitor their Title VI compliance. (See Appendix F)
2. Reference to the most up to date Title VI Circular from FTA

MTA and its staff are available to any Sub-recipient who needs further guidance.

Monitoring Sub-recipients

Nashville MTA will monitor its Sub-recipients in two distinct ways. First; before entering into a grant contract, MTA will review and either accept or reject the potential Sub-recipient's Title VI Program. If not accepted, MTA will provide them with further guidance on where they can make improvements. Once their Title VI Program is approved by MTA, a site visit will be scheduled. These site visits will happen at least once a year in order to verify the Sub-recipient's continued compliance. The site visit check list can be found in the Appendix F. The Sub-recipient will receive a questionnaire that is to be filled out and sent back to the MTA at least two weeks prior to the scheduled on-site visits. This questionnaire will help prepare both the Sub-recipient and the MTA for the visit. The questionnaire can be found in the Appendix F.

The Nashville MTA is responsible for ensuring that the contracted sub-recipient is able to document and/or verify the following items:

1. An adopted Title VI Plan
2. Annual Certifications and Assurances are signed and filed with the Nashville MTA
3. Sub-recipient has a written Title VI Complaint Procedure
4. Sub-recipient has a written record of Title VI investigations, complaints, or law suits
5. Sub-recipient has made an effort to review up to date demographic data of minority populations in their service area as well as Limited English Proficiency (LEP) populations and has taken reasonable steps to ensure that LEP persons have access to services.
6. Sub-recipient has notified beneficiaries of their rights under Title VI.

Note: (1) Sub-recipients change annually. (2) A complaint lodged against any Sub-recipient will trigger an automatic site visit.

Environmental Justice Equity Analysis

Since the last program update in 2016, the Nashville MTA has not taken part in any construction events and therefore has not prompted an Environmental Justice Equity Analysis.

Board Approval for Title VI Policy

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

Chapter 3: Collecting and Reporting Demographic Data

Demographic and Service Profile Maps

Figure 3.1 is a base map of the MTA service area that includes major streets and interstates, both WeGo Central station and MTA Myatt and Nestor administrative offices and garage locations, major activity centers and transit trip generators.

MTA utilized Transit Boardings and Estimation Simulation Tool's (TBEST) to calculate the average Census Block Group household size. For Davidson County, the data from the 2017 U.S. Census and American Community Survey (ACS), puts the minority percentage at 34.7%.

MTA also used the Department of Health and Human Services (DHHS) poverty-level guidelines to determine the poverty level for the average size household. The DHHS poverty income-level for the Block Group average household size is multiplied by 150% and all households where the income level is below the 150% threshold are considered to be low income. Table 3.1 lists the poverty thresholds for 2017. For Nashville-Davidson County the low-income population percentage is 25.6%. Figure 4.2 shades the minority population and Figure 3.3 shades the low-income population, while showing the information above in Figure 3.1.

Table 3.1: Poverty Thresholds

Persons in Household	Poverty Income	150% of Poverty Income
1	\$ 12,060	\$ 18,090
2	\$ 16,240	\$ 24,346
3	\$ 20,420	\$ 30,630
4	\$ 24,600	\$ 36,900
5	\$ 28,780	\$ 43,170
6	\$ 32,960	\$ 49,440
7	\$ 37,140	\$ 55,710
8	\$ 41,320	\$ 61,980

Figure 3.1: Base Map of MTA Service Area

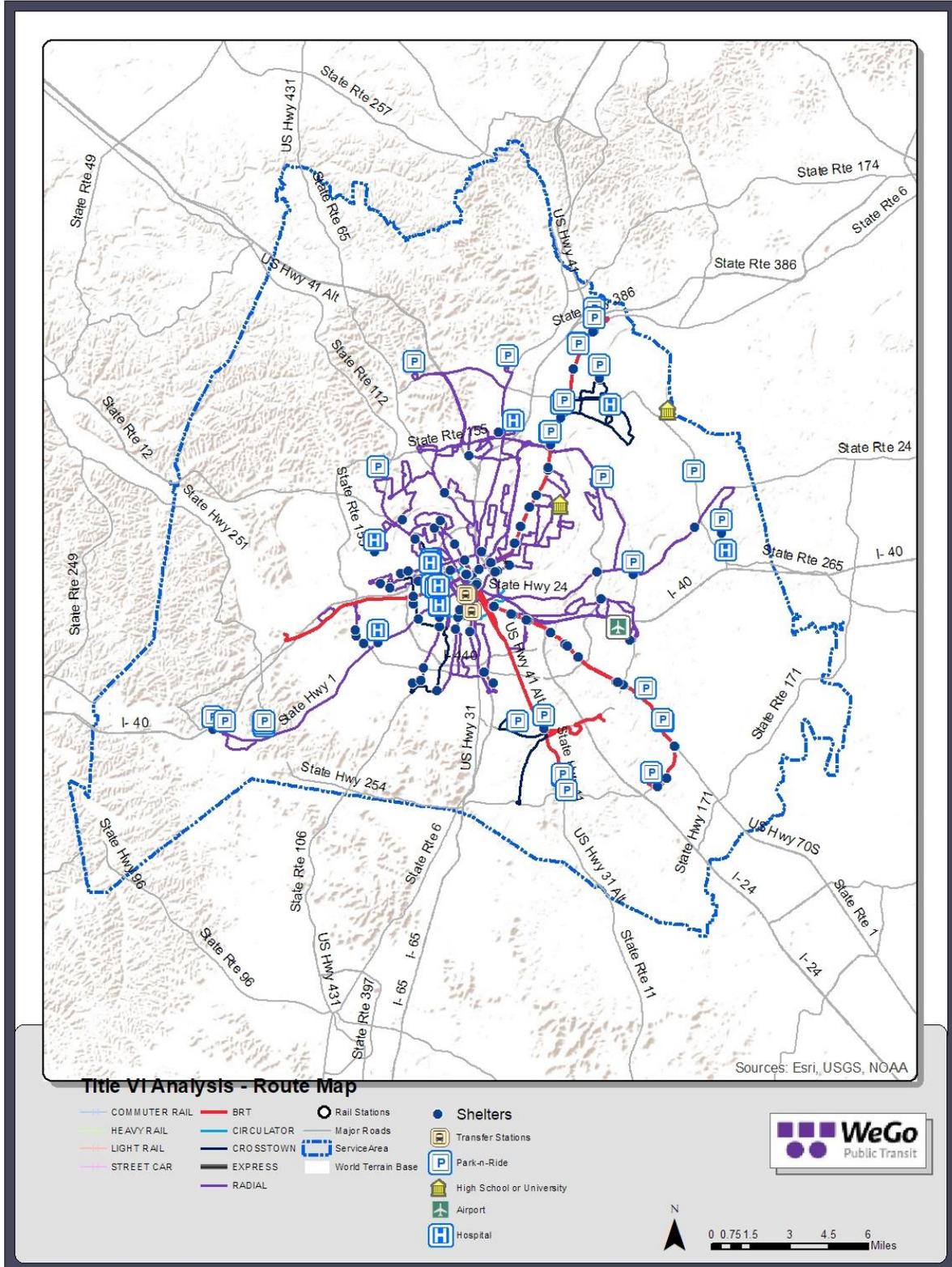


Figure 3.2: Demographic Map of MTA Service Area and Minority Population

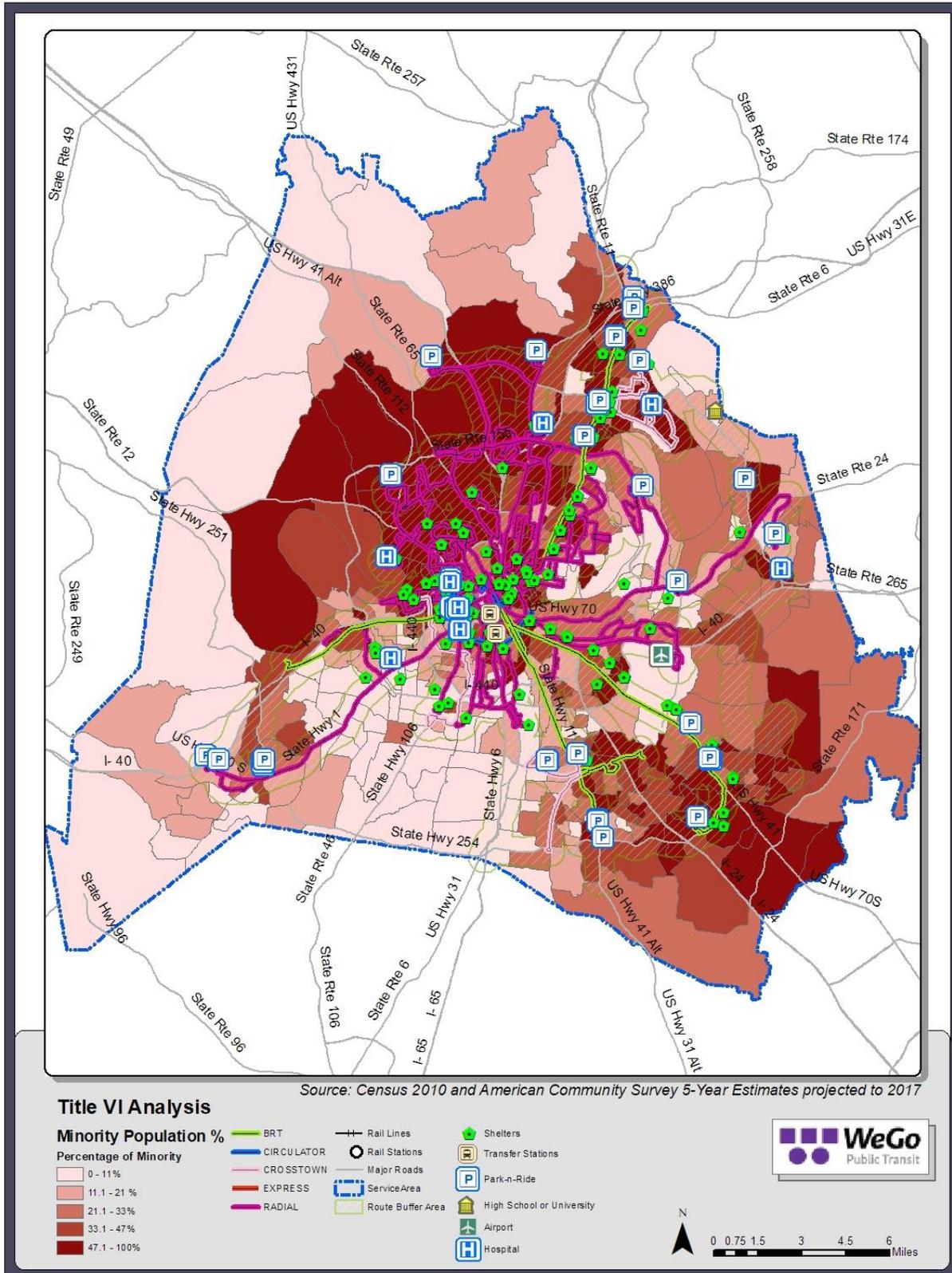
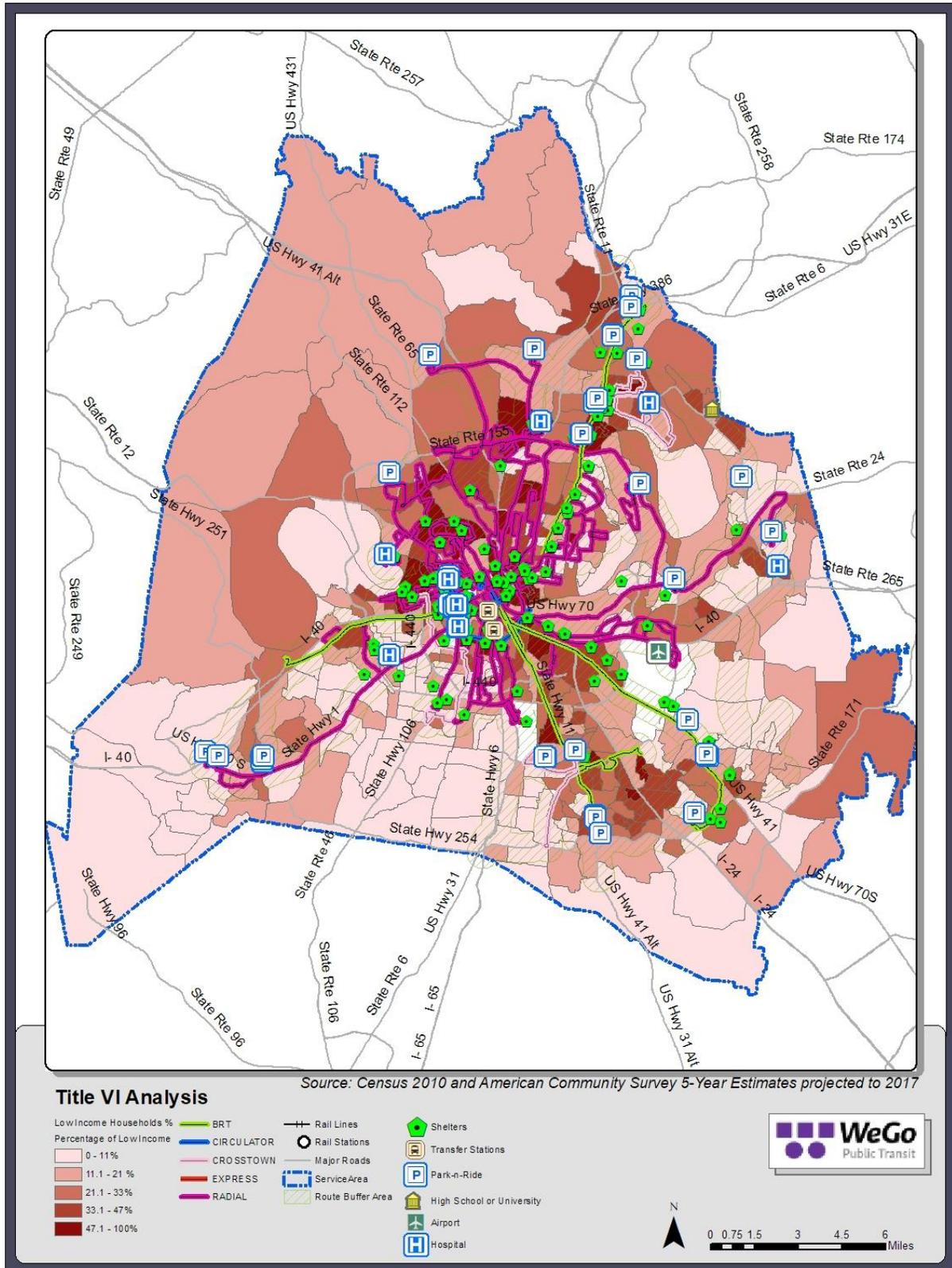


Figure 3.3: Demographic Map of MTA Service Area and Low-Income Population



Demographic Ridership and Travel Patterns

Onboard Survey 2017

According to FTA Title VI guidelines, the Nashville MTA must conduct onboard surveys of their riders every five years. The most current data available is from Spring 2017 and how MTA established the baseline for all service standards within this document. Although this does not reflect the current service in place, the 2017 data is what is most readily available and the next sequence will fall in 2022, in line with the next Title VI Program update.

The 2017 survey covered all 44 MTA routes current as of the date of this survey in 2017 and the WeGo Star regional commuter rail that the MTA and Regional Transportation Authority (RTA) operated at the time. The data collection period was from March 2017 to May 2017 and avoided all school breaks and holidays. The goal was to obtain usable surveys from at least 3,724 transit riders, which represented approximately 10% of the system ridership. The actual number of completed, usable surveys was 4,586.

The survey was administered as a face-to-face interview and was made available in Spanish as well as English. While most respondents completed the survey during their trip, postage-paid return reply envelopes were available for riders who did not have time to complete the survey during their trip. This was done to ensure that short-trips were captured in the survey administration. Each survey contained a serial number that was used by ETC Institute to track the route and sequence in which surveys were completed.

ETC Institute developed a sampling plan to ensure that the overall results of the survey would be statistically valid for the region as a whole. The sampling plan identifies the number of completed surveys that were needed from each route. The sampling plan was designed to obtain completed surveys on from approximately 10% of the ridership on each bus route.

The demographic ridership and travel patterns presented in tabular format below are for MTA routes operated in Nashville-Davidson County.

Table 3.2 Race/Ethnicity of Riders

<u>Ethnicity</u>	<u>Number</u>	<u>Percent</u>
White	1892	41.3 %
Black/African American	2285	49.8 %
Asian	79	1.7 %
Hispanic/Latino	125	2.7 %
<u>Other</u>	<u>205</u>	<u>4.5 %</u>
Total	4586	100.0 %

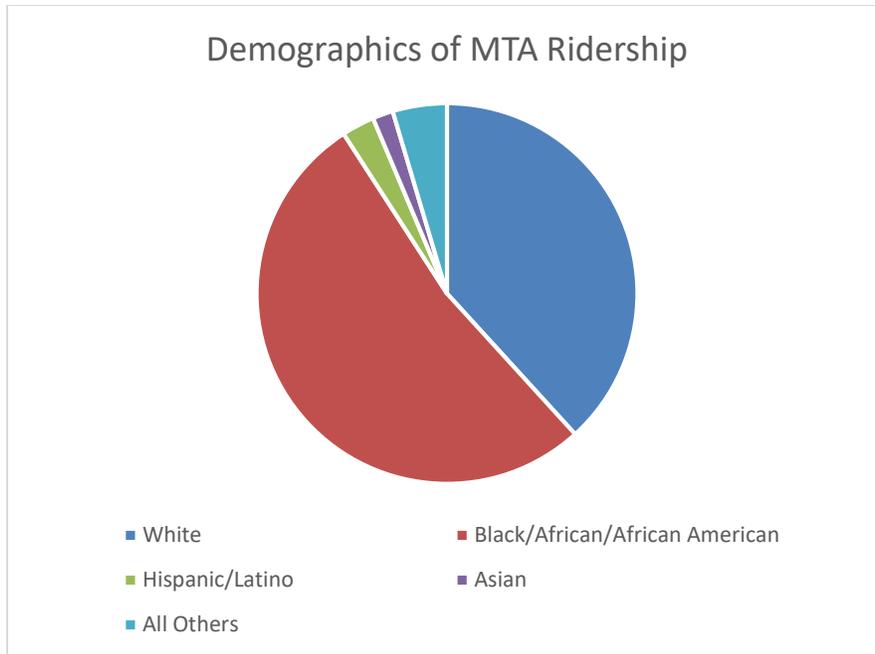


Table 3.3 Fare Media Usage by Minority Group

	Minority	Non-Minority	Overall
Cash Fare	39%	28%	34%
20-Ride Local	4%	5%	4%
All-Day Pass	13%	9%	11%
7-Day Pass	6%	5%	5%
31-Day Pass	14%	17%	15%
Other Media	26%	12%	34%
	100%	100%	100%

*Other Media includes student passes, EasyRide, and other media reported

Table 3.4 Destination Type by Minority Group

Destination Type	White		Black/African American		Hispanic/Latino		Asian		Other	
	Count	Percentage	Count	Percentage	Count	Percentage	Count	Percentage	Count	Percentage
Airport	2	0%	1	0%	0	0%	0	0%	0	0%
College/University	29	2%	28	1%	2	4%	6	8%	11	5%
Personal Business	144	8%	191	10%	10	0%	1	0%	17	8%

Medical Appointment	60	3%	77	3%	2	3%	0	0%	8	4%
Recreation/Site Seeing	85	4%	63	3%	8	2%	5	2%	11	5%
School (K-12)	18	1%	100	4%	8	2%	0	6%	4	2%
Shopping	110	6%	131	6%	7	7%	5	6%	12	6%
Social Visit	73	4%	138	6%	3	15%	3	4%	9	4%
Your Home	791	42%	923	40%	50	33%	31	39%	76	37%
Work	558	29%	598	26%	33	32%	28	35%	56	27%
Other	22	1%	35	2%	2	3%	0	0%	0	0%
Total	1892		2285		125		79		205	

Table 3.5 Number of Vehicles in the Household by Minority Group

Number of Vehicles in the Home	White		Black/African American		Hispanic/Latino		Asian		Other	
None	749	40%	1001	44%	45	36%	6	8%	88	43%
One	504	27%	719	31%	41	33%	19	24%	55	27%
Two	367	19%	342	15%	25	20%	14	17%	32	16%
Three	116	6%	111	5%	7	6%	0	0%	12	6%
Four or More	54	3%	51	2%	4	3%	5	6%	6	3%
Did Not Answer	102	5%	61	3%	3	2%	7	9%	12	6%
Total	1892		2285		125		79		205	

Table 3.6 Top Ridership Routes for Black/African American Customers – 2,285 Total Responses

Route	Number of Black/African American Respondents	
22 Bordeaux	154	6.7%
23 Dickerson Road	150	6.5%
56 Gallatin Pike BRT lite	148	6.47%
55 Murfreesboro BRT lite	147	6.43%
50 Charlotte BRT lite	134	5.9%

Table 3.7 Top Ridership Routes for Hispanic/Latino Customers – 125 Total Responses

Route	Number of Hispanic/Latino Respondents	
55 Murfreesboro BRT lite	21	16.8%
50 Charlotte BRT lite	16	12.8%

56 Gallatin Pike BRT lite	6	4.8%
15 Murfreesboro Pike	6	4.8%

Table 3.8 English as a Second Language by Ethnicity

Speaks a Language other than English at Home	White		Black/African American		Hispanic/Latino		Asian		Other	
	Yes	55	4%	83	5%	60	49%	30	49%	1
No	1176	88%	1555	89%	50	41%	27	44%	28	74%
Did Not Respond	100	8%	112	6%	13	11%	4	7%	9	24%
Total	1331		1750		123		61		38	

Chapter 4: Service Standards and Policies

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* are 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.

Vehicle Load

An appropriate ratio of passenger load to space available on a vehicle influences passenger comfort and environment aboard a vehicle. The vehicle load standard will be defined as the number of passengers as compared to the vehicle size. For example, as shown in Table 3.1, a 40 foot bus should have a maximum of 53 passengers during peak service. If a service routinely exceeds the load standards defined below, it may be appropriate to provide additional frequency or assign vehicles with a higher capacity on that service. In the event that additional vehicle sizes are introduced to the fleet, the load standards for those vehicles shall mimic these in terms of ratio of passengers permitted to available space.

Table 4.1 Maximum Bus Load Standards

Vehicle Size	Seating capacity	PEAK		OFF PEAK	
		Load Standard	Load Factor	Load Standard	Load Factor
25'	14	17	1.25	15	1.1
35'	28	36	1.3	31	1.1
40'	38	49	1.3	42	1.1
60'	63	82	1.3	69	1.1

There are a limited number of buses in the fleet that are not equipped for standing passengers. These buses are assigned to services where no passengers will be standing in order to maintain safe operations.

Vehicle Headway

The vehicle headway standard establishes a maximum waiting time (or headway) between buses. By most measures the cores of urban transit systems should have a maximum of 30 minutes for the headway. This means that weekday service on key routes should have buses arriving every 30 minutes or less.⁶ A goal for service should be 10-15-minute headways, depending upon the type of service. Passenger loads are the indicator of the need to increase service from the 30-minute headway towards a 15 minute headway. Outside the city's core and in hours other than daytime periods, headways could be longer, but in no case should be longer than 60 minutes. If ridership cannot support a 60-minute headway, another way of providing

⁶ Detroit Department of Transportation Service Standards, December 2007, p. 19
 Denver Regional Transit District Service Standards, November 2002, p. 6
 AC Transit Short Range Transit Plan FY 2003-FY 2012, May 2004, p. 3-8

service should be used, such as flexibly routed service or other non-fixed route options such as vanpools. The MTA standards are shown in Figure 3.2 by type of service. Please note that midday service is not offered on several “Frequent” routes. Currently, commuter frequency is 2-3 trips rather than frequency.

Table 4.2 Minimum Frequencies by Service Class

Service Class	Span of Service	Minimum Frequency	Frequency Goal
Most Frequent	Peak	30 minutes	15 minutes
	Midday	30 minutes	20 minutes
	Evening	60 minutes	30 minutes
	Weekends	60 minutes	30 minutes
Frequent	Peak	60 minutes	30 minutes
	Midday	60 minutes	45 minutes
	Evening	60 minutes (if service is provided)	30 minutes
	Weekends	60 minutes (if service is provided)	30 minutes
Commuter	Peak	30 minutes	30 minutes

Service Performance

Because there are many factors that effect on-time performance of buses operating in an urban environment, (including traffic, travel time variability, availability of bus priority measures, passenger activity, weather, scheduling and recovery time, on-time pullouts and reliefs, etc.), MTA monitors the following metrics proportional to the service offered on each route in conjunction with on-time performance to ensure equitable service delivery:

- Number of breakdowns by route
- Number of late pullouts from the garage by route
- Hours of cancelled or missed trips by route

A vehicle is considered on time if it departs a scheduled timepoint no more than 1 minute early and no more than 6 minutes late. The on-time performance goal for MTA is at least 80% of all runs on a particular route at a specified timepoint are completed within the allowed “on-time” window.

While on-time performance can be affected by many internal and external factors, these metrics are largely within agency control. For each metric listed above, the performance of any individual route should be within 4 percentage points of the system average.

Service Availability

MTA will strive to serve as much of Davidson County as possible as long as the service meets cost and service effectiveness standards. This part of the service policy is characterized as guidelines rather than standards because uniform geographic coverage cannot always be achieved due to constraints such as topographical and street network restrictions. In addition, coverage in some areas may not be possible due to the infeasibility of modifying existing

routes without negatively affecting their performance.

Distance to transit is the area within a reasonable walking distance to the bus stop. Since the MTA service area has an overall low density of 1,243 persons per square mile, the standard used for access to transit will be 1/3 mile. Another industry standard is that a population density of around 3 dwelling units per acre is needed to justify fixed route transit, which translates to around 5,000 people per square mile. MTA will strive to provide transit service within a ½ mile to residents of areas with a population density of over 5,000 persons per square mile. In determining whether such service can be offered, MTA will consider other factors such as the likely performance of the service that might be provided. Request for service from such areas can be another indication of whether such service is needed.

Pedestrian Access is the ability of customers on foot to access transit. The pedestrian environment is an important component of the availability of transit since in most bus systems, 75%-80% of riders walk to transit. Lack of pedestrian access lowers the area of service coverage and potential ridership. Excellent pedestrian environment means available sidewalks, protection from traffic, safe crossings for roadways and a pleasant walking environment. Because an excellent pedestrian environment will encourage transit ridership, the 5,000 persons per square mile standard cited above could be relaxed in areas with an excellent pedestrian environment. MTA will strive to provide service within a ½ mile to residents of areas with an excellent pedestrian environment with a population density as low as 2,500 persons per square mile. Service may be flexibly routed or fixed bus service.

Transit Supportive Areas are areas with densities and usage that support and encourage transit use, such as: universities, colleges, shopping centers, major employers, major destinations. MTA will strive to provide transit service within ¼ mile to all universities, medical centers, shopping areas and major employment centers.

Park-and-Ride Access expands ridership for routes in areas of low density. MTA will strive to provide park and ride lots every 5 miles outside the Briley Parkway/I-40/I-440 loop where MTA has *Commuter* service.

Transit Amenities

The Nashville MTA produced an up to date, living document outlining standards for the design of transit facilities. This document, *Transit Design Guidelines*, was adopted in January 2019 and posted on the WeGo website and distributed amongst Nashville Metro departments to create a seamless relationship to plan and execute such guidelines. This document can be found in Appendix H and is summarized below.

Amenities Overview

An investment in passenger amenities enhances the overall transit experience by making facilities more comfortable, safe, functional, and efficient. Strategically placed amenities have the potential to increase ridership and attract non-riders to the system by making transit more accessible and easier to use. However, due to limited investment resources, WeGo should utilize planning guidelines to maximize the impact and cost-effectiveness of their investment in passenger amenities. Selection of bus stops at which to install amenities takes into account the following factors:

- Total boarding activity

- Proximity to major trip generators
- Passenger transfer activity
- Wait times
- Feasibility of construction (site specific)
- Planned neighborhood improvements
- Transit corridor marketing efforts
- Equity among communities
- Community requests

Guiding Principles

Well-designed and cared for facilities reflect positively on the entire transit system. Good design incorporates two primary elements: customer experience and the life-cycle of the stop components. In choosing and applying amenities that improve the customer experience, the following guiding principles should be applied:

- Public Safety
- Accessibility
- Rider Comfort
- Signage

To determine amenities at the stop level, the following explains the general criteria in how shelters and benches are assigned to bus stops:

Shelters

Shelter stops should be applied where possible at locations that serve over 25 riders boarding daily, transfer points, stops in weather-exposed locations without nearby shelter, and stops with a relatively high use by seniors and youth passengers. Shelter locations are determined based on ridership, costs for installation and retrofitting, and availability of resources.

Benches

Bench stops are used at locations that serve over 25 riders boarding daily, locations that incur long wait times, or locations that are likely to attract riders with difficulty walking or standing. A bench stop should be installed adjacent to the ADA landing area and connected to pedestrian pathways.

Vehicle Assignment

All buses are equipped with air conditioning, wheelchair ramps or lifts, and automated stop announcement systems. MTA schedules transit vehicle types on each vehicle block according to the required capacity on a given service. On a daily basis, the Maintenance department identifies which vehicles in the fleet are available for service. Based on this information, the Operations department assigns the available vehicles in each subfleet to the blocks requiring that vehicle type. This assignment is completed on a random basis, which ensures that vehicles of different ages are rotated among routes and vehicle blocks.

Chapter 5: Monitoring Transit Service

MTA monitors the performance of our transit system relative to our system-wide service standards and policies discussed in chapter three. MTA selects a sample of minority and non-minority fixed bus routes to monitor not less than every three years. MTA also monitors any route subject to a proposed major change, as defined in the Public Involvement Policy discussed in chapter two. A minority transit route is defined by FTA as a route in which at least one-third of the revenue miles are located in a minority Census block group.

Methodology

For each bus line, we defined the geographic area of coverage by including all Census Block Groups within one-half mile walking distance of bus stops and routes, excluding those portions of routes that travel on interstates or are otherwise not accessible to be bordered. We utilized the MTA Strategic Plan as a guide which uses a one-half mile buffer to determine route access based on the low-density nature of Nashville-Davidson County. At that point we identified the revenue miles of each route that travelled through and served minority block groups. If a route provides more than 33% of its service in minority block groups it is classified as a minority route. See Table 5.1 for each route classification and their service level as reference for the remainder of this section.

For this monitoring period, we have selected $\frac{1}{4}$ of all routes within the MTA transit network of 44 total routes as of the date of this survey in 2017. We rounded this number up to 12 and to get an equal and fair representation of minority versus non-minority routes, six minority and six non-minority routes were selected through a random number generator for monitoring purposes in this six month period (April 2017 to September 2017).

Table 5.1: Minority Route Designations / Sample Selection

Route	Service Level	Minority Route	% of Revenue Service Miles in Minority Areas
◀ 1	Frequent		19.30%
◀ 2	Frequent		14.80%
3	Most Frequent		3.20%
◀ 4	Most Frequent	●	46.80%
◀ 5	Most Frequent		1.70%
6	Frequent		10.10%
7	Most Frequent		8.60%
◀ 8	Frequent		19.50%
9	Frequent	●	66.10%
10	Most Frequent	●	41.60%
14	Frequent	●	97.20%
15	Most Frequent	●	40.50%

Route	Service Level	Minority Route	% of Revenue Service Miles in Minority Areas
◀ 17	Most Frequent		21.20%
18	Frequent		21.80%
◀ 19	Most Frequent	●	82.10%
20	Frequent	●	36.40%
21	Frequent	●	44%
22	Most Frequent	●	80.60%
23	Most Frequent	●	94.60%
24	Commuter / Limited		23.10%
25	Frequent	●	56.90%
26	Most Frequent	●	48.30%
◀ 27	Other	●	35.90%
28	Most Frequent	●	83%
29	Most Frequent	●	76.50%
30	Frequent	●	76.90%
33	Commuter / Limited	●	55.60%
34	Frequent		30.20%
35	Commuter / Limited	●	65.10%
36	Commuter / Limited	●	71.80%
37	Commuter / Limited		25.70%
38	Commuter / Limited	●	56.80%
41	Commuter / Limited	●	90.70%
◀ 42	Frequent	●	78.20%
◀ 43	Frequent	●	81.90%
50	Most Frequent	●	38.20%
◀ 52	Most Frequent	●	49.10%
55	Most Frequent	●	41.60%
56	Most Frequent	●	48.30%
60	Other	●	68.50%
◀ 61	Other		28.60%
72	Other		19%
76	Other	●	67.60%

◀ Indicates routes selected at random for sample

Monitoring Service Standards

1) Vehicle Load Monitoring

Table 5.2 below shows the maximum load factors identified by MTA. For assessment, average weekday loads on each sample line were determined for AM Peak, Midday, and PM Peak. AM Peak is defined as 6:15-9:14am; Midday is defined as 9:15am-3:14pm, and PM Peak is defined as 3:15pm – 6:15pm for this analysis. Table 5.3 below shows the breakdown of vehicle loads for the sample of minority and non-minority bus routes by time of day.

Figure 3.1 Maximum Bus Load Standards

Vehicle Type	Peak Load Standard	Off Peak Load Standard
25' transit vehicle	20	16
35' transit vehicle	40	32
40' transit vehicle	53	42
60' transit vehicle	81	65

Table 5.3: Vehicle Loads for Minority and Non-Minority Routes

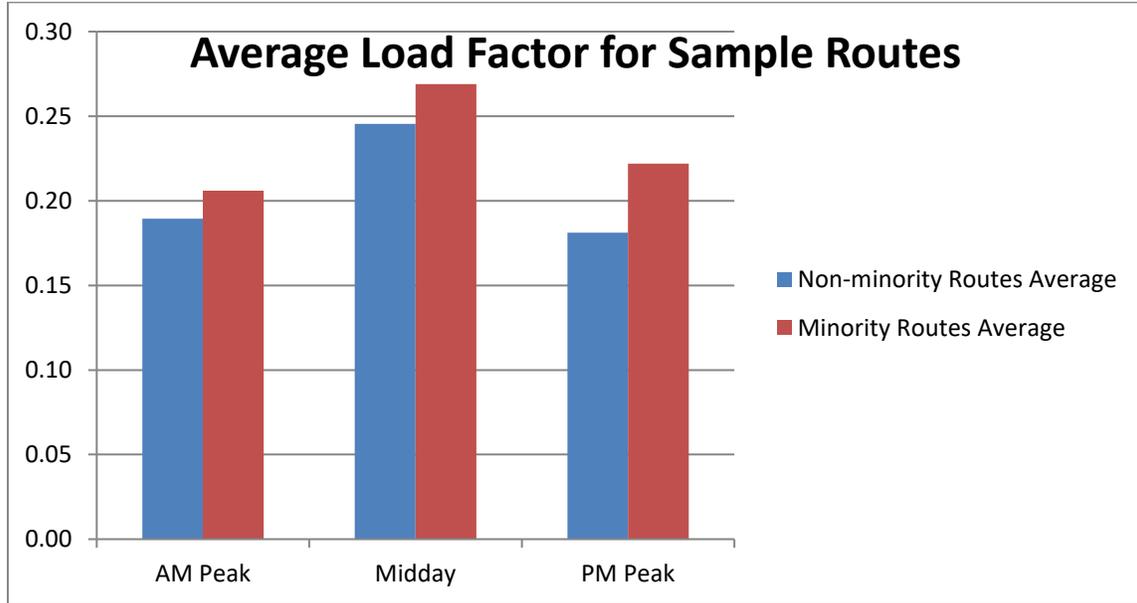
Route	AM Peak	Midday	PM Peak
Most Frequent Routes			
5 West End - Bellevue	0.26	0.31	0.23
17 12th Avenue South	0.21	0.27	0.20
<i>4 Shelby</i>	<i>0.23</i>	<i>0.25</i>	<i>0.24</i>
<i>19 Herman</i>	<i>0.28</i>	<i>0.32</i>	<i>0.25</i>
<i>52 Nolensville Pike BRT Lite</i>	<i>0.24</i>	<i>0.21</i>	<i>0.27</i>
Frequent Routes			
1 100 Oaks	0.15	0.13	0.12
2 Belmont	0.09	0.21	0.15
8 8th Avenue South	0.21	0.31	0.19
<i>42 St. Cecilia</i>	<i>0.25</i>	<i>0.27</i>	<i>0.23</i>
<i>43 Hickory Hills</i>	<i>0.21</i>	<i>0.29</i>	<i>0.15</i>
Commuter / Other Routes			
61 Green Circuit - Gulch	0.21	0.23	0.20
<i>27 Old Hickory</i>	<i>0.04</i>	<i>n/a</i>	<i>0.19</i>
Non-minority Routes			
Average	0.19	0.25	0.18
Minority Routes Average	0.21	0.27	0.22

Italicized cells indicate minority routes.

The figure below depicts the average loads for the sampled minority and non-minority routes for AM peak, midday peak, and PM peak across all service classes. The load is slightly higher for the non-minority routes in the AM, midday, and PM peak periods. However, it is important to

note that three of the non-minority routes (routes 1, 2, and 61) are being eliminated or significantly restructured in the fall of 2019 in part due to their relative performance.

Figure 5.1: Vehicle Loads for Minority and Non-Minority Routes by Peak Period



2) Vehicle Headway Monitoring

Table 5.4 shows the average headway in minutes for minority and non-minority lines for weekday AM peak, midday, and evening periods. The average span of service in hours and minutes is shown for sampled minority and non-minority lines for weekdays.

Table 5.4: Weekday Headways and Span of Service, for Minority and Non-Minority Routes

Route	Service Begins	AM Peak Headway	Midday Headway	PM Peak Headway	Service Ends	Span (Hours)
Most Frequent Routes						
5 West End - Bellevue	5:13	20	30	20	22:26	17:13
17 12th Avenue South	5:10	23	30	23	23:36	18:26
4 Shelby	4:40	20	25	20	23:56	19:16
19 Herman	4:39	20	30	20	24:00:00	19:21
52 Nolensville Pike BRT Lite	4:33	10	15	10	0:11	19:38
Frequent Routes						
1 100 Oaks	5:40	60	60	60	18:05	12:25
2 Belmont	5:34	40	40	40	18:50	13:16
8 8th Avenue South	5:08	40	40	40	20:12	15:04
42 St. Cecilia	4:55	30	55	30	20:00	15:05

<i>43 Hickory Hills</i>	5:50	45	117	60	19:00	13:10
Commuter / Other Routes						
61 Green Circuit - Gulch	6:54	60	15	15	22:59	18:05
<i>27 Old Hickory</i>	5:05	50	n/a	65	19:21	14:06
Non-minority Routes Average		40.5	35.83	33		15:44
Minority Routes Average		29.17	48.4	34.17		16:46

Commuter routes only run AM and PM Peak

Most Frequent

Of the sampled routes, the total average AM Peak Headway was 18.6 minutes; the average midday headway was 26 minutes; and the average PM Peak Headway was 18.6 minutes. The minority routes averaged lower headways throughout all three periods, and the non-minority routes were slightly higher. This indicates that minority routes have slightly more frequent service along the main corridors. Minority routes also had a higher average span of service, at an average of 19:25 for the day over 17:49 for non-minority routes, although this may have been impacted by the relatively small sample size.

Frequent

Of the sampled routes, the minority routes averaged slightly lower (better) headways in the morning and afternoon peaks. The minority routes averaged significantly higher headways in the midday (86 minutes for minority routes; 45 minutes for non-minority routes). Therefore, midday service on *frequent* routes should be monitored to ensure that there is no disparate impact in this service class. It is important to note that it could be a function of the sample, as there were only two minority routes in the sample and one of the minority routes had a significantly higher midday headway than the other routes. Minority routes had a slightly longer span of service over non-minority routes, with spans of 14:07 and 13:35 respectively.

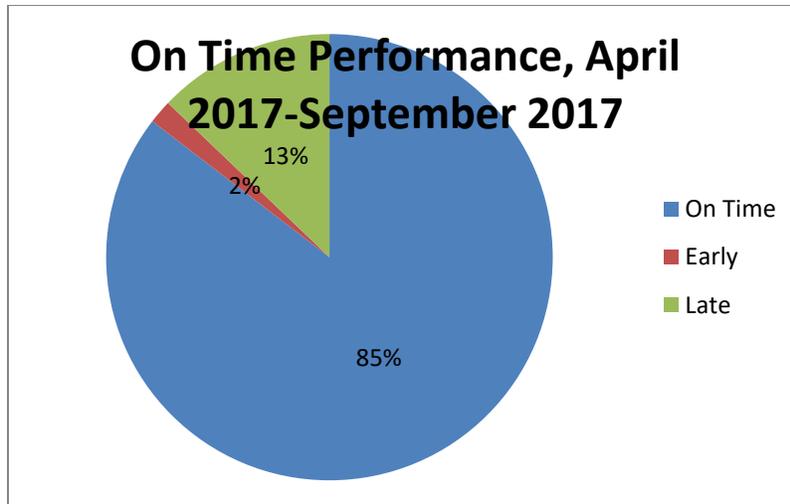
Commuter & Other Services

The commuter/other routes category showed that the non-minority route had lower headways and a higher span than the minority routes. However, there was only one route in each sample, which may have impacted the results. It should also be noted that both of the routes classified as commuter/other are being eliminated or significantly restructured in September 2019. The commuter and other routes should be evaluated again after these service changes to ensure no disparate impacts in these service classes.

3) On-Time Performance Monitoring

Figure 5.2 shows that 85% of transit vehicles passed time points on time, 2% passed time points early, and 13% passed time points late.

Figure 5.2: On-Time Performance for April 2017 – September 2017



The MTA uses Automated Vehicle Locator (AVL) data to assess on-time performance. On-time performance data is collected for all buses on all routes. Over this 6 month evaluation period, data from approximately 1.49 million timepoints was collected. Of the trips observed, approximately two (2) percent were found departing a schedule time point early (i.e., more than 59 seconds before the departure time in the printed schedule). Approximately thirteen (13) percent were found departing a schedule time point late (i.e., more than 5 minutes and 59 seconds after the departure time in the printed schedule).

The on-time performance standard for MTA routes is 80% on-time departures for all recorded timepoints on the route. From the selected sample, the recorded on-time performance for the routes is as follows. The routes highlighted in red did not meet the 80% on-time standard for the time period evaluated:

Route	On-Time Performance (% of timepoints on time)
Non-minority Routes	
1 100 Oaks	76.81%
2 Belmont	84.48%
5 West End - Bellevue	85.74%
8 8th Avenue South	84.37%
17 12th Avenue South	90.78%
61 Green Circuit - Gulch	71.48%
Minority Routes	
4 Shelby	88.30%
19 Herman	92.39%
27 Old Hickory	71.51%
42 St. Cecilia	92.68%
43 Hickory Hills	87.72%
52 Nolensville Pike BRT Lite	87.83%

One of the minority routes and two of the non-minority routes fell below the 80% on-time performance target. Therefore, similar numbers of minority and non-minority routes fail to meet the on-time performance standard. This indicates that these routes should be monitored for agency-controlled factors influencing on-time performance, but no disparate impact is present.

4) Service Availability Monitoring

Using available census data and GIS technologies most current as of the 2017 Origin Destination on board survey, 54.3% of the population within MTA’s service area was within ½ mile to the transit network. Furthermore, 80% of the service area’s jobs were within ½ mile to the transit network. Using the 1/3 mile standard for minority and low income populations, the following chart shows the percentage of each population that lives within the walk area. For example, 61.9% of the service area’s Hispanic population lives within 1/3 of a mile of transit which makes up 11.3% of the total population within the 1/3 mile buffer of MTA service.

Table 3.3: Population Characteristics: within 1/3 mile access to transit

Population Characteristics			
Population Share	Population	% of Walk Area	% of Service Area
Hispanic	42,643	11.3 %	61.9 %
Black	124,287	32.9 %	66.6 %
Poverty	79,614	21.1 %	67.3 %
Under 18	80,102	21.2 %	53.6 %
65 and Over	39,214	10.4 %	49.1 %
Workers	195,010	51.6 %	50.1 %
Spanish Speaking	19,402	5.1 %	55.8 %
Limited English Proficiency (LEP)	33,541	8.9 %	60.3 %

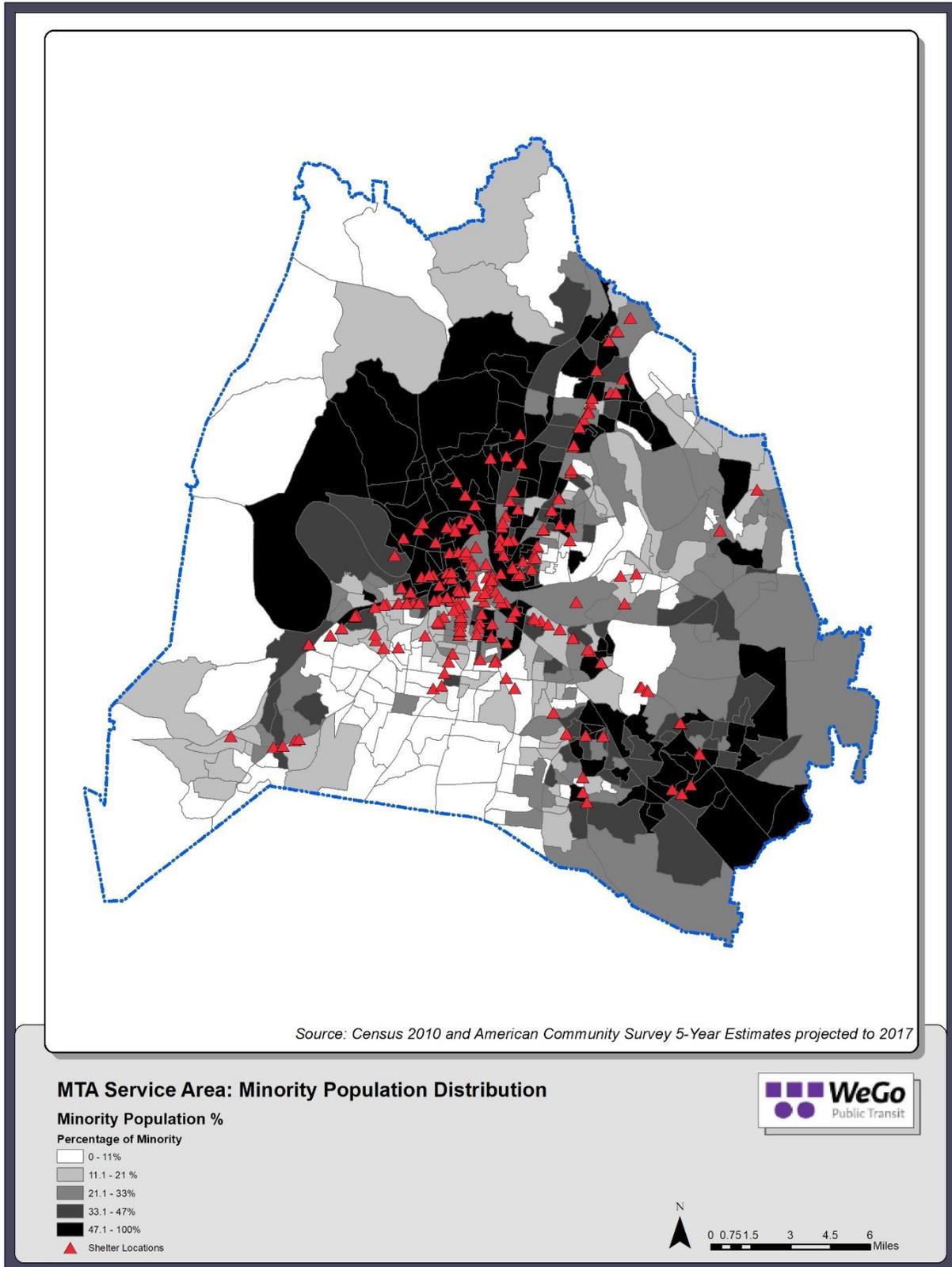
5) Vehicle Assignment Monitoring

All buses are equipped with air conditioning, wheelchair ramps or lifts, and automated stop announcement systems. MTA schedules transit vehicle types on each vehicle block according to the required capacity on a given service. On a daily basis, the Maintenance department identifies which vehicles in the fleet are available for service. Based on this information, the Operations department assigns the available vehicles in each subfleet to the blocks requiring that vehicle type. This assignment is completed on a random basis, which ensures that vehicles of different ages are rotated among routes and vehicle blocks.

6) Transit Amenities Monitoring

The overlay map below (Figure 5.4) shows the locations of shelters installed since 2018 and prior to 2018 relative to the minority and low-income population distribution above system

Figure 5.5 Shelter Distribution Map



Chapter 6: Evaluation of Service and Fare Changes

Service and Fare Equity Analysis

Major Service and Fare Change Policy

MTA has established a definition of a fare or major service change, through 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 twenty-five percent (25%) 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 made.¹
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 over 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.

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. MTA 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, MTA 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 Federal Transit Administration (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.

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.

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% (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% (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.

Public Participation

In order to ensure awareness of Nashville MTA Title VI policy proposals, MTA discussed the Title VI changes at a total of two public meetings. These meetings occurred in August 2019 to gather information about the proposed Title VI policy. These meetings were 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 MTA riders. The Draft Program was released for a 30-day public review and comment period beginning on August 1, 2019 and ending on September 1, 2019. The public was given the opportunity to provide comment via phone, email, and at two public hearings held at WeGo Central. Public notice was provided on the MTA website, media advisory, on social media and in three local newspapers, including one Spanish language publication. The document was made available online and hard copies were made available at the public hearings.

Results of Service and Fare Equity Analyses

For a Title VI evaluation of the most recent service and fare changes that MTA implemented, please see Appendix D. Please note that all service and fare changes analyzed utilized the FTA C 4702.1B circular as guidance.

Appendices

Appendices are accompanied separately from this document and available upon request.

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