

**Appendix A: Notice to Beneficiaries
(English and Spanish)**

Notice to the Public of Rights under Title VI

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

WeGo Public Transit

- WeGo Public Transit (WeGo) operates its programs and services without regard to race, color, and national origin in accordance with the Title VI of the Civil Rights Act. Any person who believes he or she has been aggrieved by any unlawful discriminatory practice under Title VI may file a complaint with WeGo.
- For more information on WeGo Public Transit's Title VI Policy and the procedures to file a complaint, contact the Title VI Administrator at (615) 862-5950; email customercomments@nashville.gov; or write to the Title VI Administrator at 430 Myatt Drive, Madison, TN 37115. For more information visit the Title VI section of our website at www.wegotransit.com.
- A complainant may file a complaint directly with the Federal Transit Administration by filing a complaint with the Office of Civil Rights, Attention: Title VI Program Coordinator, East Building, 5th Floor-TCR, 1200 New Jersey Ave., SE, Washington, DC 20590.

*If information is needed in another language, contact (615) 862-5950
~Si necesita información en otro idioma /llame al (615) 862-5950~*



Notificación al Público de los Derechos bajo el Título VI

"Ninguna persona en los Estados Unidos, por motivos de raza, color u origen de nacionalidad, será excluida de participar, se le negarán los beneficios ni será sujeto a discriminación en ningún programa o actividad que reciba asistencia financiera federal"

WeGo Public Transit

- WeGo Public Transit opera sus programas y servicios, sin distinción de raza, color y origen de nacionalidad, de acuerdo con el Título VI del Acta de Derechos Civiles. Cualquier persona que crea que ha sido perjudicada por una práctica discriminatoria ilegal bajo el Título VI puede presentar una queja ante WeGo.
- Para más información sobre el Título VI de la Política de WeGo Public Transit y los procedimientos para presentar una queja, comuníquese con el administrador del Título VI al (615) 862-5950; por correo electrónico a customercomments@nashville.gov o escribiendo al administrador del Título VI a 430 Myatt Drive, Nashville, TN 37115. Para más información, visite la sección del Título VI de nuestro sitio web www.wegotransit.com.
- Un demandante puede presentar una queja directamente con la Administración Federal del Tránsito mediante la presentación de una queja ante la Oficina de Derechos Civiles, Atención: Coordinador del Programa Título VI, East Building, 5th Floor TCR, 1200 New Jersey Ave, SE, Washington, DC 20590.

Si la información se necesita en otro idioma llame al (615) 862-5950



**Appendix B: Title VI Complaint Procedures, Complaint Form,
and Complaint Log (2022-2025)
(English and Spanish)**

WeGo Public Transit Title VI Complaint Procedures

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 WeGo 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.

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

- a. The complaint should be filed within 180 calendar days of the alleged occurrence or when the alleged discrimination became known to the complainant.
- b. The allegation(s) must involve a covered basis such as race, color, national origin.
- c. 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:

- a. The complainant requests the withdrawal of the complaint.
- b. The complainant fails to respond to repeated requests for additional information needed to process the complaint.
- c. The complainant cannot be located after reasonable attempts.

Please fill out the following Title VI complaint form and submit it to the Title VI Coordinator. As per the instructions at the bottom of the form you may fax or email your completed form; however, an original form with the original signature must be mailed or hand delivered. You will be notified within 7 days if your complaint meets the above criteria and an investigation will be initiated. WeGo will send a final report no more than 60 calendar days from the date the investigation was initiated detailing the findings of the investigation and the final decision.

Procedimientos de Denuncia de Título VI de WeGo Public Transit

Estos procedimientos aplican a todas las denuncias presentadas en virtud del Título VI de la Ley de Derechos Civiles de 1964, en relación con cualquier programa o actividad administrada por WeGo Public Transit o sus sub-receptores, consultores y/o contratistas. La ley prohíbe la intimidación o represalia de cualquier tipo.

Estos procedimientos no niegan el derecho del denunciante a presentar denuncias formales con otras agencias estatales o federales, ni a buscar asesoría privada para denuncias que aleguen discriminación. Estos procedimientos son parte de un proceso administrativo que no contempla reparaciones que incluyan daños punitivos o una remuneración compensatoria para el denunciante.

Se hará todo lo posible para obtener una resolución temprana de las denuncias al nivel más bajo posible. La opción de reuniones de mediación informal entre las partes afectadas y el Coordinador del Título VI pueden utilizarse para la resolución, en cualquier etapa del proceso. El Coordinador del Título VI hará todo lo posible para buscar una resolución de la denuncia. Las entrevistas iniciales con el denunciante y el denunciado solicitarán información con respecto a las oportunidades de alivio y solución específicamente solicitadas.

Para ser aceptada, una denuncia debe cumplir con los siguientes criterios:

- a. La denuncia se debe presentar dentro de los 180 días calendario posteriores a la supuesta ocurrencia o cuando la supuesta discriminación sea conocida por el denunciante.
- b. La alegación o alegaciones deben involucrar una de las bases cubiertas bajo Título VI, como raza, color y/u origen nacional.
- c. La acusación o acusaciones deben involucrar un programa o actividad de un receptor de ayuda federal, sub-receptor o contratista.

Una denuncia puede ser desestimada por las siguientes razones:

- a. El denunciante solicita el retiro de la denuncia.
- b. El denunciante no responde a las solicitudes repetidas de información adicional necesaria para procesar la denuncia.
- c. El denunciante no puede ser localizado después de intentos razonables.

Por favor complete el siguiente formulario de denuncia de Título VI y envíelo al Coordinador de Título VI. De acuerdo con las instrucciones en la parte inferior del formulario, puede enviar por fax o correo electrónico su formulario completo; sin embargo, un formulario original con la firma original debe ser enviado por correo o entregado personalmente. Se le notificará dentro de un período de 7 días si su denuncia cumple con los criterios anteriores y se iniciará una investigación. WeGo enviará un informe final no más de 60 días calendario a partir de la fecha en que se inició la investigación detallando los hallazgos de la investigación y la decisión final.

WEGO PUBLIC TRANSIT TITLE VI COMPLAINT FORM

Title VI of the 1964 Civil rights Act requires that "no person in the United States shall, on the ground of race, color or national origin, be excluded from participation in, be denied the benefits of, or be subjected to discrimination under any program or activity receiving federal financial assistance."

Note: The following information is necessary to assist us in processing your complaint. Should you require any assistance in completing this form, please contact the Title VI Coordinator (see below).

Section I:

Name:

Address:

Telephone (Home)

Telephone (Work)

E-mail Address:

Accessible Format
Requirements?

Large Print
Braille

Section II:

Are you filing this complaint on your own behalf?

Yes*

No

*If you answered "yes to this question, go to Section III.

If not, please supply the name and relationship of the person for whom you are complaining:

Please explain why you have filed for a third party:

Please confirm that you have obtained the permission of the aggrieved party if you are filing on behalf of a third party.

Yes

No

Section III:

I believe that the discrimination I experienced was based on (check all that apply):

Race

Color

National Origin

Date of Alleged Discrimination (MM/DD/YYYY):

Please explain as clearly as possible what happened and why you believe you were discriminated against. Describe all persons who were involved. (If known) Include the name and contact information of the person(s) who discriminated against you as well as names and contact information of any witnesses. If more space is needed please use the back of this form:

Section IV

Name of agency or department with which you are filing your complaint:

Name of individual your complaint is against (if known):

Title of individual your complaint is against (if known):

Contact information of individual your complaint is against (if known):

Have you previously filed a Title VI complaint with this agency? Yes No

Section V

Have you filed this complaint with any other Federal, State, or Local agency or with any Federal or State Court?

Yes No

If yes, check all that apply:

Federal Agency: State Agency:

Federal Court: Local Agency:

State Court:

Please give the contact information for a person at the agency/court where the complaint was filed.

Name:

Title:

Agency:

Address:

Telephone:

You may attach any written materials or other information that you think is relevant to your complaint.

Attachments: Yes No

Signature and date are required below:

Signature Date

Submit form and any additional information by mail:
WeGo Public Transit
Felix Castrodad, Title VI Coordinator
430 Myatt Drive
Nashville, TN 37115

Note: This form may be emailed or faxed, however an original copy with the original signature must also be provided.
Fax: (615) 862-4127 attn Felix Castrodad
Email: felix.castrodad@nashville.gov

WEGO PUBLIC TRANSIT FORMULARIO DE DENUNCIA DE TITULO VI

El Título VI de la ley de Derechos Civiles establece que "ninguna persona en los Estados por motivos de raza, color u origen de nacionalidad, será excluida de participar, se le negarán los beneficios ni será sujeto a discriminación en ningún programa o actividad que reciba asistencia financiera federal."

La siguiente información es necesaria para ayudarnos a procesar su denuncia. Si necesita ayuda para completar este formulario, comuníquese con el Coordinador de Título VI (vea a continuación).

Sección I:

Nombre:

Dirección:

Teléfono (Casa)

Teléfono (Trabajo)

Correo electrónico:

¿Necesita un formato
accesible?

Letra Grande

Braille

Sección II:

¿Está presentando esta denuncia en su propio nombre?

Sí*

No

*Si contestó "Sí" a esta pregunta, vaya a la Sección III.

Si contestó "No", por favor provea el nombre y la relación de la persona por que presenta la denuncia:

Por favor explique por qué ha presentado una denuncia en nombre de otra persona:

Por favor confirme que ha obtenido el permiso de la parte perjudicada si está presentando un denuncia en nombre de otra persona.

Sí

No

Sección III:

Creo que la discriminación que experimenté se basó en (marque todas las respuestas que apliquen):

Raza

Color

Origen Nacional

Fecha en que sucedió la alegada discriminación (Mes/Día/Año):

Por favor explique con la mayor claridad posible qué sucedió y por qué cree usted que fue discriminado. Describa todas las personas que estuvieron involucradas. Si lo sabe, incluya el nombre y la información de contacto de la persona o personas que lo discriminaron, así como los nombres y la información de contacto de cualquier testigo. Si necesita más espacio, utilice la parte de atrás de este formulario:

Sección IV

Nombre de la agencia o departamento contra el que está presentando esta denuncia:

Nombre de la persona contra la que presenta su denuncia (si lo sabe):

Título de la persona contra la que presenta su denuncia (si lo sabe):

Información de contacto de la persona contra la que presenta su denuncia (si lo sabe):

¿Ha presentado anteriormente una denuncia de Título VI con esta agencia? Sí No

Sección V

¿Ha presentado esta queja ante cualquier otra agencia federal, estatal o local o ante cualquier tribunal federal o estatal?

Sí No

Si contestó "Sí", marque todas las apliquen:

Agencia Federal:

Agencia Estatal:

Tribunal Federal:

Agencia Local:

Tribunal Estatal:

Por favor provea la información de contacto de una persona en la agencia / tribunal donde se presentó la denuncia.

Nombre:

Título:

Agencia:

Dirección:

Teléfono:

Puede adjuntar cualquier material escrito u otra información que considere relevante a su queja.

Material adjunto: Sí No

Firma y fecha son requeridas a continuación:

Firma

Fecha

Envíe el formulario y cualquier información adicional por correo a:

WeGo Public Transit

Felix Castrodad, Title VI Coordinator

430 Myatt Drive

Nashville, TN 37115

Este formulario puede enviarse por correo electrónico o por fax, sin embargo, también se debe proporcionar una copia original con la firma original.

Fax: (615) 862-4620 atención: Felix Castrodad

Email: felix.castrodad@nashville.gov

Complaints submitted to MTA were received, investigated, and resolved by MTA staff. In some cases, complaints may be referred to the Metro Nashville Human Relations Commission for assistance in investigating. The table below lists the complaints received during the reporting period.

The Action Taken/Findings category is designated in accordance with the following:

- Cleared: The investigation concludes there was no violating conduct by the employee.
- Confirmed: Sufficient information has been obtained to determine the complaint as valid.
- Incomplete: There is insufficient information to make a finding of “Cleared” or “Confirmed”.
- Inconclusive: An irresolvable discrepancy exists between the employee’s and the customer’s account and no witness or evidence is available to corroborate either account.

Date Filed	Summary	Status	Actions Taken /Findings
11/24/2022	Complaint filed against an outside institution in another state and with no Title VI basis.	Closed	Cleared
5/19/2023	Customer Care complaint related to bus not stopping at bus stop.	Closed	Cleared
6/5/2023	Customer Care complaint related to customer not being allowed to place electric scooter on bus bike rack due to safety hazards. No Title VI basis.	Closed	Cleared
6/10/2023	Anonymous complaint from passenger about not being dropped off at the bus stop. Video on bus reviewed and showed no incident.	Closed	Cleared
6/29/2023	Customer Care complaint about driver not communicating to white passengers. Video on bus reviewed showing no wrong doing from driver.	Closed	Cleared
8/8/2023	Customer Care complaint related to passenger not being picked up at the correct point.	Closed	Cleared
8/22/2023	Customer Care complaint alleging operator did not dropped him off at safe location. Video reviewed showing no wrong doing.	Closed	Cleared
11/15/2023	Customer Care complaint alleging driver being rude and discourteous. Not Title VI. Referred to Operations.	Closed	Cleared
12/14/2023	Customer Care complaint related to customer alleging driver not allowing female passengers exit the rear door.	Closed	Incomplete
12/29/2023	Customer Care complaint related to customer alleging driver only treats Caucasian passengers with respect. Investigated and found invalid.	Closed	Cleared
2/19/2024	Customer Care complaint alleging discrimination based on looks.	Closed	Incomplete
3/25/2024	Anonymous complaint related to bus not stopping at bus stop.	Closed	Cleared

Date Filed	Summary	Status	Actions Taken /Findings
4/5/2024	Customer Care complaint alleging being charged more fare based on race. Complaint investigated and issue clarified.	Closed	Cleared
4/24/2024	Customer Care complaint stating that bus was late to pick customer's son. A delay was confirmed but no indication of Title VI basis found.	Closed	Cleared
8/3/2024	Customer Care complaint about driver not deploying bus ramp. No Title VI basis found. Referred to Operations Dept.	Closed	Cleared
11/4/2024	Customer Care complaint alleging discrimination based on sexual orientation. Complaint referred to Metro Human Relations Commission. HRC investigated and resolved complaint.	Closed	Cleared
12/26/2024	Customer Care complaint about driver being rude and not deploying bus ramp. Alleged discrimination based on race. Driver attitude confirmed. No evidence of Title VI discrimination.	Closed	Confirmed
1/29/2025	Customer Care complaint alleging driver not allowing black passengers on the bus. Investigated and not found Title VI basis	Closed	Cleared
2/4/2025	Customer Care complaint alleging operator was discriminatory because passenger was in a wheelchair. Complaint referred to ADA.	Closed	Cleared
6/17/2025	Customer Care complaint alleging operator frequently stopping the bus to threaten to call police on black riders.	Closed	Incomplete

Appendix C: Public Participation Plan

WeGo Public Transit

Public Participation Plan

Effective Date: January 1, 2021

Glossary of Terms

To ensure consistent use of terminology throughout the document, the following definitions are provided.

Adverse Effect

A geographical or temporal reduction in service which includes but is not limited to the elimination of a route; shortening of a route; re-routing of an existing line; and an increase in headways. WeGo 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. As part of our Title VI analysis, we shall consider the degree of adverse effects and analyze those effects when planning major service changes.

Agency

Refers to WeGo Public Transit and its subsidiaries; both the Nashville Metropolitan Transit Authority (Nashville MTA) and the Regional Transportation Authority of Middle Tennessee (RTA). This document applies to programs and activities of both entities that are executed under the parent title of WeGo Public Transit.

WeGo Public Transit is the transit services provider of the Nashville MTA and RTA. WeGo Public Transit is the umbrella, public-facing name associated with transit services in Middle Tennessee but is not legally named as the operating bodies.

Nashville MTA is a component unit of the Metropolitan Government of Nashville and Davidson County responsible for public transit services within Metro Nashville-Davidson County and funded with federal, state, and local subsidies, as well as farebox revenue.

The Nashville MTA is responsible for operating local transit services within Metropolitan Nashville-Davidson County. These services consist of 31 bus routes and a network of smaller ADA-accessible vans for its Access program for people with disabilities. The Nashville MTA is contracted to manage RTA services under a fee-for-service agreement. The two authorities share facilities, staff, and a chief executive officer (CEO).

The RTA provides commuter service on the WeGo Star regional rail and a network of regional bus routes. The system includes a number of park-and-ride lots and other support for commuters, such as an Emergency Ride Home Program. The agency contracts with the Nashville MTA, linking riders with Davidson County bus routes.

In addition, RTA provides a rideshare program that organizes commuter vanpools throughout Middle Tennessee through a contract with the Transportation Management Association (TMA) Group. The TMA Group provides insurance, maintenance, repairs, licenses, and registrations for the vans.

The WeGo Star receives Federal Transit Administration (FTA) funding but operates under the safety regulatory authority of the Federal Railroad Administration (FRA) and has its own FRA-approved safety plan. Per 49 CFR §673.11(f), the Star is not included in this Public Participation Plan (PPP).

Community Partners

Any organization or group that desires to work with WeGo to help facilitate participation by their members in a WeGo-sponsored participation strategy method. Community partners are also stakeholders and play a critical role in helping to reach target audiences.

Language Assistance Plan (LAP)

A tailored plan that describes WeGo's self-assessment which identifies appropriate language assistance measures needed to improve access to WeGo services and benefits from limited English proficient persons.

Limited English Proficient (LEP)

Persons for whom English is not their primary language and who have a limited ability to speak, understand, read, or write English. This includes people who reported to the United States Census that they do not speak English well or do not speak English at all. The single prominent LEP population within Metro Nashville-Davidson County is the Hispanic/Latino population whose first language is Spanish. Of the nearly 47,000 Hispanics/Latinos, 57 percent reported that they did not speak English well. Overall, this represents eight percent of the Nashville MTA service area and four percent of the RTA service area.

Low income

WeGo characterizes low income consistent with the poverty thresholds as defined by the Department of Health and Human Services. Any household whose income is below 150 percent of these poverty thresholds by household size is considered low income. To define low-income percentage within the service area, WeGo utilizes a GIS-based methodology to determine low-income census blocks. For the Nashville MTA service area, this includes blocks within a half mile of existing fixed-route service. Based on socioeconomic and demographic data from the most recent U.S. Census American Community Survey (ACS) five-year estimates, 25 percent of the population is considered low-income. Being a regional service provider, the RTA service area includes the entire boundary of the 10-county region and has a low-income percentage of 21 percent.

Marginalized Population

A group of people who are traditionally underserved or underrepresented. This includes minority, low income, LEP, seniors, the disabled, and youth.

Minority

To determine minority population within the service area, WeGo utilizes the same GIS-based analysis as stated above for low income. The 2017 minority percentages for the Nashville MTA and RTA service areas are 38 percent and 23 percent, respectively. This includes persons who self-identified as Black or African American, Asian or Pacific Islander, Native American or Alaska Native, Hispanic or Latino, and those persons who identified themselves as some other race or two or more races.

Outreach

An effort by individuals in an organization or group to share its ideas or practices, to educate or inform, and to engage and seek input from other organizations, groups, specific audiences or the general public.

Outreach Methods

Strategies that identify and invite target audiences and stakeholders to participate in a public participation opportunity.

Public Information

A one-way communication from WeGo to the public with the goal of providing clear and objective information about a policy, project, program, or activity.

Public Input

Participation methods that seek community feedback on a policy, project, program, or activity. A response is requested from the public.

Public Outreach Strategy

A specific program of participation methods tailored to meet the unique needs and preferences of a specific geographic area or group and/or issue at hand.

Public Participation

Any process that seeks to inform, collect input from, or involve the public in decision-making processes. Public participation is an umbrella term that describes methods including public information, education, outreach, input, involvement, collaboration and engagement, and communication from the public to WeGo.

Public Participation Plan (PPP)

A tailored program and plan that describes how WeGo will undertake public involvement, information, education, participation, and/or outreach methods.

Public Relations

The dissemination of information to the media and the public with an emphasis on the promotion of a particular policy, program, project, or activity.

Target Audience and Participants

Any demographic, socioeconomic, or other group in the WeGo service area impacted by proposed service, fare, or policy changes under consideration and necessary for public comment, including marginalized populations such as low-income, minority, and LEP populations.

Chapter 1: Introduction

WeGo Public Transit (WeGo) has committed to an identity of inclusivity, equity, and diversity in its day-to-day operations and its role in Nashville-Davidson County and Middle Tennessee. Our approaches, strategies, and attitudes in how we engage with our riders and the general public should reflect this identity and begin with building policies that support those ideals.

This document serves as a framework for how the agency intends to facilitate conversation with the broader community and summarizes a comprehensive approach to effective community engagement. As a living document that is aimed to reduce barriers to participation and respond to feedback, staff will use each outreach opportunity to inform any necessary changes and will update this document as appropriate.

This PPP has been prepared to:

- Outline WeGo’s public outreach strategy;
- Support two-way dialogue with customers;
- Supplement customer research feedback;
- Incorporate customer and non-customer input into decision-making; and,
- Fulfill the obligations under Title VI of the Civil Rights Act of 1964.¹

Purpose of the Plan

WeGo’s plan has been developed to guide outreach efforts and enhance the involvement of the general public, particularly the targeted audience, in WeGo’s decision-making process. Consistent with the Metropolitan Planning Organization’s (MPO) PPP and based on a review of other industry participation programs, collected input from previous public participation efforts, and WeGo personnel’s collective experiences, the PPP describes the overall goals, guiding principles and tactics used to reach out to the general public, WeGo customers, and the targeted audience.

Goals

The PPP broadly strives to achieve four goals when including the public in the planning and project development process:

1. **Inclusivity:** Actively facilitate the involvement of those affected by the planning and project development process. Every effort is made to ensure that opportunities to participate are physically, geographically, temporally, linguistically, and culturally accessible.
2. **Collaboration:** Work jointly with those affected throughout the planning and project development process. WeGo recognizes that comments received are useful, relevant and constructive, contributing to better plans, projects, strategies, and decisions.
3. **Responsiveness:** Document public feedback to the planning and project development process in order to reflect the needs and opinions of the public and build trust through active participation strategies.
4. **Consistency:** Ensure established guidelines from this plan are followed throughout the planning and project development process. This involves communicating regularly, developing trust with communities, and building capacity to provide public input.

¹ Title VI of the Civil Rights Act of 1964 states that “no person in the United States shall, on the grounds of race, color or national origin, be excluded from participation in, be denied the benefits of, or be subjected to discrimination under any program or activity receiving Federal financial assistance (42 USC Section 200d).

Guiding Principles

To achieve these goals and effectively engage all populations, a set of guiding principles has been established to advance all reasonable efforts for reaching groups affected by the planning and project development process. Outreach strategies should reflect these principles to the greatest extent possible, with the understanding that they may not be feasible in all cases.

- **Principle 1: To involve affected groups, go where they are.**
Provide convenience and encourage participation of the targeted audience by holding events where groups frequent or congregate. This could include transit centers, community-based organizations (CBOs), community centers, shopping centers, houses of worship, and festivals.
- **Principle 2: Demonstrate cultural sensitivity.**
Know your audience and bring the appropriate staff (subject matter experts, cultural liaisons, and linguistic expertise) to events and meetings.
- **Principle 3: Tailor event formats to the preferences of groups whose input is sought.**
Meeting formats should be tailored to the preferences of individual groups or communities. Surveys, open discussion, and question and answer sessions are generally accepted meeting formats. Electronic voting with senior citizens is not as successful. One size does not fit all.
- **Principle 4: Translate materials and use graphics.**
Informational materials should be available in the target population's native language and should be designed with graphics and minimal text, as guided by the WeGo LAP.
- **Principle 5: Newspaper advertising still works.**
Not everyone hears about events via the internet or has access to it. Using community newspapers or culturally relevant forms of media and distribution are important tactics in reaching specific populations. This does not limit the use of other forms of media as a communication tool.
- **Principle 6: Acknowledge and use input.**
It should be explicitly evident how the public input will be used in decision-making and communicated back on how it was used.
- **Principle 7: Use pilot programs to collect feedback.**
Some policies or programs require first-hand experience in order to collect adequate feedback. In these circumstances, pilot programs are not only useful for establishing internal policies but also to collect how users interact with, benefit from, or are burdened by specific components of a policy or program.

Federal Requirements

As a recipient of federal funds and per Title VI of the Civil Rights Act of 1964, WeGo must submit a PPP to the FTA that details the agency's intentions and strategies to engage the public broadly, but more specifically, to disadvantaged groups such as low income, minorities, and those with limited English proficiency, when advancing planning and programmatic activities. Under this direction, WeGo must:

- Ensure that the level and quality of public transportation service is provided in a non-discriminatory manner;
- Promote full and fair participation in public transportation decision-making without regard to race, color, or national origin;

- Ensure meaningful access to transit-related programs and activities by persons with limited English proficiency;
- Ensure its programs and policies do not disproportionately impact the environmental and human health conditions in minority and low-income communities;²
- Ensure persons with disabilities have equal access to services and public involvement activities, including materials presented and methods for providing feedback; and,
- Ensure public participation activities are designed and planned through an inclusive process.

Below is a list of activities federally mandating a proactive public participation effort, requirements of FTA Title VI Circular 4702.1B. Planning and project development activities not detailed below are at the discretion of the agency to effectively engage and provide outreach to customers and users of transit services.

- Modification to fares, fare media, or fare policy;
- Instituting a major change in service, including but not limited to, removal or addition of a route;
- Major capital projects and investments.

The contents of this Plan describe the public outreach policies when these activities are initiated by the agency. The following sections outline the minimum requirements and are compliant with the agency's Title VI Program.

² Executive Order 12898 (59 FR 7629) dictates that each Federal agency shall make achieving environmental justice part of its mission by identifying and addressing, as appropriate, disproportionately high and adverse human health or environmental effects of its programs, policies, and activities on minority populations and low-income populations.

Chapter 2: Stakeholders

This document provides guidance to ensure outreach and engagement practices are inclusive of all stakeholders, particularly the targeted audience within our service area, and more narrowly, those who depend on our services.

In order to better understand those communities, WeGo staff uses a combination of census data and the most up-to-date origin and destination onboard survey data collected by WeGo staff every five years. Per the most recent data, the following breaks down the demographic profile of the service areas and our riders:

<u>Targeted Community</u>	<u>Nashville MTA Service Area</u>	<u>RTA Service Area</u>	<u>Nashville MTA Riders</u>	<u>RTA Riders</u>
Minority	38%	23%	55%	16%
Low Income	25%	21%	44%	6%
LEP	8%	4%	N/A ³	N/A

Using this information along with additional geographic analysis allows tailored strategies so staff can be effective, inclusive, and comprehensive in engaging with all stakeholders.

All activities stated in this document will be developed to accommodate languages other than English and Spanish when a minimum of 20 percent of the impacted population speaks a language other than English or Spanish.

Partnerships with CBOs

WeGo has an established relationship with many local community-based organizations and agencies. The list below is a sampling of a cross section of these organizations, groups, and agencies.

- Amalgamated Transit Union
- Mayors, Metro Council, state legislators, regional governing bodies, and other elected officials
- Tennessee Department of Transportation, Greater Nashville Regional Council, Nashville Area Metro Planning Organization
- Neighbor2Neighbor, neighborhood associations and homeowner associations
- Access Passenger Advisory Committee and disability organizations
- Nashville Chamber of Commerce, regional and affinity group chambers of commerce
- The Urban League, Stand Up Nashville, Conexión Américas, and advocacy groups for marginalized groups
- Newspapers, television, radio, and non-traditional media
- Alignment Nashville, StrIDe advisory committee, WeGo Youth Action Team, Metro Nashville Public Schools (MNPS), and other K-12 schools
- Interdenominational Ministers' Fellowship, American Muslim Advisory Council, Catholic Charities and other faith-based organizations
- Metro Parks, Nashville Public Library, Metro Nashville Public Health, Metro Planning, Metro Arts, Homeless Impact Division, and other Metro departments
- Rotary Clubs, Kiwanis, League of Women Voters, and other civic groups
- Music City Riders United, Walk/Bike Nashville, Transit Now Nashville, Transit Alliance of Middle Tennessee, and other transit advocacy groups
- Downtown Partnership, Nashville Convention and Visitor's Corporation, Greater Nashville Hospitality Association, Concierge Association
- Colleges and universities
- Healthcare and technology industry groups

³ Insufficient data from Origin Destination Survey to determine an estimated percentage of Limited English Proficient riders.

Relationships with CBOs are essential to building ties with community members WeGo may not otherwise have access to for feedback and dialogue essential to public participation. Rather than relying on the public to come to WeGo, CBOs provide the opportunity for more organic outreach from the organizations themselves as conduits for information sharing and gathering and developing trust through partnership.

WeGo is working to establish a Community Partner Network in order to create a structured feedback model and reporting mechanism to bring information to the Nashville MTA and RTA Boards. This network will be in addition to ongoing and project-based outreach to established and new community partners and will operate under the guiding principles of the PPP.

Chapter 3: Public Participation Implementation

Public Participation Policies

It is WeGo's intent to ensure actions are considerate of public comment in its mission to provide transit services for the convenience of residents and visitors within the operating service area of Metro Nashville-Davidson County and Middle Tennessee.

It shall be the policy to inform and involve the public in the planning and implementation of new services, service adjustments, fare adjustments, planning activities, new facility construction and other capital projects, further referred to as major event, in accordance with federal and state regulations.

Description of Major Events

Major service changes occur when WeGo makes modifications to the existing fixed-route bus and rail system by additions or reductions in service as defined by WeGo's Adopted Major Service Change Policy (Nashville MTA and RTA Title VI Programs, 2019). A major service change is defined by WeGo as meeting one of the following criteria:

- The establishment of new fixed-route bus or rail service;
- The elimination of fixed-route bus or rail service without alternative service or a replacement route within three-quarters of a mile of the existing service;
- A reduction of service for an existing route or set of routes serving a similar transit market or service area, with net decreases of more than 25 percent in route configuration (route directional miles), or 25 percent of daily revenue service hours and 1,000 annual revenue hours;
- A major modification of an existing route or set of routes serving a similar transit market or service area, with net increases or decreases of more than 25 percent in route configuration (route directional miles), or 25 percent of daily revenue service hours and 1,000 annual revenue hours, or rerouting an existing route, or system-wide restructuring of transit service greater than five percent of total revenue service hours;
- Any proposed service modification that results in a disparate impact or disproportionate burden as defined by WeGo's adopted Disparate Impact and Disproportionate Burden Policy.

Fare increases and decreases are changes in any of WeGo's fare structure. When the fare is increased or decreased, discount fares, fare media, premium services, and paratransit fares may change at the same time. WeGo staff will evaluate information such as revenue forecast, expected shortfalls, and fare studies to determine if a fare increase or decrease is warranted. While some fare changes may be unavoidable, public feedback is essential in determining rates of change.

Planning activities occur when the agency submits its strategic plan that is updated every five years. Staff will engage with members of the community to guide the development of a strategic plan which holds the 25-year vision of the agency. A publicly informed plan will ensure future planning and development practices are in line with the vision from the community and updated regularly to establish new recommendations and solicit feedback on progress made.

Capital investment and/or improvement projects are programmed into the MPO's Transportation Improvement Program (TIP). The MPO has an adopted PPP that guides the public outreach and engagement for all the transportation planning activities and decision-making process in the MPO-planning area as well as all their planning documents including the TIP. WeGo coordinates with the MPO and relies on the locally adopted public participation requirements for the TIP for the development

of the transit Program of Projects (POP) to satisfy the POP's public participation requirements. WeGo also conducts public outreach activities as part of the planning process for major capital projects. ⁴

For projects that will substantially affect a community or the public transportation service of a community, WeGo will strive to:

1. Provide an adequate opportunity for public review and comment on the project;
2. Provide an opportunity to schedule a public hearing on the project if the project affects significant economic, social, or environmental interests;
3. Consider the economic, social, and environmental impacts of the project; and,
4. Find that the project is consistent with official plans for developing the community.

Public Outreach Strategy

At the onset of any of the above major events, a tailored public outreach strategy will be created by the Community Outreach and Engagement Specialist in collaboration with the Planning, Communications and Marketing, Engineering, Legislative Relations, Customer Care, and other WeGo departments as appropriate. Staff will create a plan of action for each public involvement event including the following:

- Inclusive methods of communicating with the riding public, non-riding public, member jurisdictions, private sector partners, and state and federal agencies, in particular strategies to reach the targeted audience;
- Identification of specific and potentially affected public and other stakeholder groups;
- Identification of possible barriers to participation among the targeted population and strategies to reduce such barriers;
- A defined strategy that addresses all seven guiding principles;
- Various outreach techniques appropriate to the proposed action to be taken;
- Procedures that will be proactive in organizing information for full public access to key decisions;
- Opportunities for continuing public participation;
- Reasonable approaches and techniques to provide public information, input, and agency consideration in response to public concerns;
- A clearly defined timeline of activities in accordance with the public notice procedures as detailed in the following section; and
- Direction from the Community Outreach and Engagement Specialist and approval from the CEO and/or board of directors.

Public Notice Procedures

Should a major event occur that requires a public outreach strategy, the following series of events are required prior to the change taking place:

- Administer a public notice and provide adequate time for public input
 - Public notices should be written in both English and Spanish and posted at a minimum in at least three formats which can include newspapers of general circulation, WeGoTransit.com, onboard vehicles, social media, and at WeGo Central.
 - Public notice should be available in accessible formats in compliance with the Americans with Disabilities Act (ADA) and in languages other than English and Spanish by request.
 - Public comment period should be no less than 21 calendar days.
- Provide information on how to submit comments
 - Where materials for public review are available;
 - How to submit public comments; and,
 - Beginning and ending dates for the public comment period.
- Meeting information

⁴ The Nashville Area MPO's Public Participation Plan was last updated in 2019 and can be found by visiting: <https://www.gnrc.org/DocumentCenter/View/651/Public-Participation-Plan>

- Advertise and/or offer an opportunity to share the meeting schedule;
- Provide the time and place of meetings;
- State the purpose of meetings; and,
- Publish a notice of meetings at least 10 calendar days in advance of the first taking place.
- Summarize and package all public comments received for presentation to the Nashville MTA and/or RTA Boards and for record keeping purposes
 - Review comments for final policy recommendations;
 - Provide a summary report of public comments in board item and for documentation purposes of the Title VI Triennial update; and,
 - Get Board approval no less than 10 calendar days prior to the change taking place.
- Include notice of board meeting to the public where recommendations will be voted on
 - Public access to the Nashville MTA and RTA Boards is maintained by providing public notice of every regularly scheduled board meeting and any special meeting at which Board action will take place. Public comment is available at all regularly scheduled board meetings.

When deemed appropriate and reasonable, WeGo may also conduct other activities to solicit public comment, including but not limited to:

- Hold public meetings and/or workshops in communities affected by the event;
- Make presentations to elected officials and local jurisdictions;
- Make presentations to business and community groups; and,
- Publicize the event through marketing promotions using local media, such as radio, television and social media in both English and Spanish.

Other activities that do not fall into the category of a major event may warrant public participation as determined by the CEO in coordination with the Title VI Officer or when a disparate impact is identified that exceeds the adopted policy or threshold. When this occurs, a tailored public outreach strategy may be developed under the direction of the Community Outreach and Engagement Specialist and approved by the CEO.

Chapter 4: Ongoing Engagement

Outside of the major event requirements, WeGo provides continual opportunities for members of the community to engage with our staff and provide feedback. This section addresses the day-to-day engagement that is just as crucial to providing an inclusive environment for our riders, non-riders, and the general community.

Public Meetings and Public Hearings

Public meetings differ from public hearings in that they are less formal and handled with greater flexibility to accommodate when information is to be shared or quick feedback is needed outside of what is required for major events. A public hearing is an opportunity for the public to submit public comments directly to WeGo staff or board members without responses, much like at a board meeting – this can be done with a stenographer to fully capture public feedback. Public hearings are required for major events.

Public meetings allow for a more conversational approach, presentations, polls, workshops, online videos and webinars, charettes, and creative methods of collecting public feedback on project or proposal, or simply a dialogue with WeGo staff. Public meetings do not have to have a goal in mind, other than to listen to what the public has to say.

For example, public hearings were held prior to adoption of the nMotion strategic plan; public meetings were held to gain feedback during development of the nMotion strategic plan.

Public Comments

WeGo solicits public input regarding transit services, amenities, routing, fare structure, and fare media on a continual basis. In order to maximize the public's opportunity to comment and become part of the dialogue in programs, practices, and policies, opportunities are made available on an ongoing basis to provide feedback that is documented and recorded for official purposes. Comments may be submitted in the following manner:

- Via the WeGo website at WeGoTransit.com;
- In person at public meeting(s) or hearing(s);
- Via comment cards;
- To a Customer Care Representative by calling 615-862-5950 during regular Customer Service business hours, or TTY at 711;
- Via regular mail or delivery service to 430 Myatt Drive; Nashville, TN 37115; Attn: Public Comments; or,
- Via email to WeGoTransit@nashville.gov.

In addition to the above methods for submitting public comment, comments posted on social media, videos, or online presentations in response to WeGo announcements for public comment may be collected as part of the official record.

The Customer Care line provides a two-way engagement tool to communicate upcoming projects and plans as well as general information on bus, rail, and paratransit services. Customer Care staff is informed of all major projects underway, public meetings and impending service or fare changes to answer any questions callers may have. If a caller would like someone else from WeGo to return their call, Customer Care staff will log their comment and assign it to the correct department for follow-up. The public is also afforded the opportunity to comment on all proposed actions taken by the WeGo at regularly scheduled board meetings.

Other Public Outreach Activities

WeGo uses a variety of communication methods to solicit public input. These methods are continually evaluated for effectiveness and built upon to ensure messaging is consistent and in line with the goals

of this document. The following methods of engagement have been identified as effective ways to reach members of the targeted audience:

- **Speaker's Bureau** – WeGo key staff members may present to community groups, chambers of commerce, business organizations, elected officials, and neighborhood/community associations. Speakers Bureau presentations may also be requested at large.
- **Information Awareness Program** – This includes marketing promotions targeted toward promoting the WeGo image throughout the community to both riding and non-riding customers.
- **Internet/Web Access** – The WeGo website is currently accessible providing information on WeGo service, policies, projects, service modifications, job opportunities, and more. The WeGo website includes a Title VI Statement, procedures for filing a complaint, and the Title VI complaint form. WeGo staff also responds to email inquiries.
- **WeGo Committees** – These committees were established by WeGo to assist with obtaining governmental and citizen input on the business of WeGo. Outreach activities through committees are listed below and may also cease when committees are no longer in existence or have ceased to serve their intended purpose.
 - Access Passenger Advisory Committee (APAC) – Committee comprised of users with disabilities and their advocates to represent the view of persons with disabilities.
 - Better Bus Advisory Committee – CBOs interested in transit growth and advocacy
 - StrIDe Advisory Committee—WeGo staff, MNPS, and community partners who gather to identify ways to grow student ridership
- **Press Releases** – WeGo sends press releases to the media and posts press releases on its website to announce service modifications, upcoming events, and other outreach activities.
- **Flyers, Posters, and Banners** – WeGo uses these media to inform the general public of upcoming events to notify citizens and encourage public participation.
- **Social Media** – WeGo uses social media feeds to make announcements regarding service proposals, modifications, delays, upcoming events, and other outreach activities.
- **Comment Cards** – WeGo may opt to assign staff, where appropriate and available, to notify the public and to distribute comment cards.
- **Surveys** – WeGo may conduct surveys by mail, in person, or online- to obtain public input or gauge public opinion regarding WeGo services or actions to be taken.

Measures of Effectiveness

At the close of each public involvement event, a report of the planning and engagement activities and a summary of public comments and recommendations is compiled and submitted to appropriate staff. That report is often used to inform recommendations to the Board and to answer questions that arise in response to proposals.

Wherever possible, along with public input, demographics information is also collected in order to assess whether target audiences have been reached, and if the principles of this policy have been followed. This information is voluntary and is collected with comment cards at public meetings and hearings.

Conclusion

In conclusion, WeGo is dedicated to providing the public with opportunities to weigh in on major and minor projects and proposals and to give feedback outside of official information gathering efforts. WeGo seeks to do this work in an equitable and inclusive manner, making every effort to reach marginalized communities and ensure that the voices of targeted audiences are heard. This is a living document and will continue to be updated as appropriate and as new and/or additional information is available (i.e. 2020 Census, Title VI Program triennial updates).

**Appendix D: Board Action Items: Fare Policy Change
and Spring 2024 Service Changes with Title VI Analysis**

Nashville Metropolitan Transit Authority

of Nashville & Davidson County, Tennessee

Information Item Committee Discussion Item Committee Action Item Board Discussion Item

Item Number:	NICE-D-23-006	Meeting Date:	8/24/2023
Item Title:	Fare Policy Title VI Analysis		

BACKGROUND:

The implementation of the QuickTicket fare collection system achieves, among other things, the elevation of WeGo's service, the provision of cost-saving opportunities for riders when paying their fare, and an improvement of the overall riding experience of our passengers. The system enables WeGo to meet the following primary project goals:

- Make the fare payment process **simpler** (for customers as well as bus operators)
- Enable **seamless** transactions and payments between different services and between MTA and RTA services.
- Ensure that fare payment structures and options are **equitable** for all customers.
- Establish a fare system that is **accessible** for all customers, including customers with disabilities and those without access to bank accounts, credit cards, or smartphones.
- To the extent possible, target a **revenue-neutral** fare structure (compared to current revenues)

In support of the above goals, in June 2019, the Board approved the following policy items related to Quick Ticket:

- Discontinue all magnetic media, including:
 - Paper transfers (replaced with automated transfers on smartcards)
 - Change cards.
 - Onboard sale of day passes.
- Retain support for all existing fare products on the new system.
- Introduce stored value as a new fare product.
- Require all customers using reduced fare products to obtain a reduced fare card after an application process.
- Design the system to support 3rd party payment systems such as Apple Pay and Google Wallet.

In February 2020, staff presented to the Board a series of additional policy items for adopting the fare policy by the Board. The policies provide guidance on implementing the new fare collection system to further support overall project goals while addressing specific decision items associated with introducing an account-based system. Those policies are summarized in the table below:

Item	Recommendation
Card Price	Charge customers \$3.00/card, with the option to receive the \$3.00 back in the form of stored value after registering the card. Change the current \$10.00 cost for Special Services Cards to match. Credits will be applied automatically within 24 hours of card registration.

Item	Recommendation
Minimum reload	Establish a minimum stored value reload of \$5.00 for 3rd party retailers and customer websites. Minimum stored value reloads of \$1.00 at TVMs and Central Ticket Office. The general requirements of 3rd party retailers drive the \$5.00 minimum.
Maximum balance	Establish a maximum account balance for a stored value of \$500.00.
Limited Use Ticket Price	Charge customer \$0.25 per ticket for limited-use smart tickets (issued at TVMs and customer care or via bulk/online sales).
Minimum 'autoload' amount	Establish a minimum stored value reload threshold of \$15.00 for the account 'autoload' feature.
Paratransit guest fare	Discontinue charging the full Access paratransit fare for non-PCA (Personal Care Attendant) companions. Maintain existing policy regarding a maximum of two guests per Access reservation.
Paratransit Account-based transactions	For customers using an account to pay for Access paratransit rides, a debit account at the time of booking. If a trip is canceled for any reason, the customer receives a credit back immediately.
Access customers and fixed route fare	Access customers with a card or phone registered for paratransit automatically qualify for discount fare products on their accounts.

The above policies were subject to public feedback, and staff conducted a Title VI equity analysis of the policies to ensure that the changes did not have a disparate impact based on race, color, or national origin or if low-income populations would bear a disproportionate burden of the changes. At the time, some areas were identified as concerns for disparate potential impacts, and recommendations were presented to help mitigate those impacts. The following mitigation recommendations were presented:

1. Continue the issuance of day passes on the bus for an overlapping period once the new fare system has been launched.
2. Implement fare capping for day passes.
3. Implement temporary promotional incentives for customers getting smart cards for the first time.
4. Pursue options for additional locations for reloading cards with less than \$5.00 at one time (such as partnerships with libraries or community centers)
5. Rather than setting a specific date for the discontinuation of current products in wide use by disadvantaged populations, sustain these products until staff can demonstrate that overall migration to the new system has been successful and that mitigations designed to address potential disparate impacts on disadvantaged riders are working, and that the adoption of new products by disadvantaged riders is sufficiently high to demonstrate that these new products meet the overall equity goals of the system.

CURRENT STATUS:

Since the adoption of the Fare Policy by the Board, staff has been implementing different strategies to ensure a positive and seamless transition to the QuickTicket system. As the elimination of magnetic and charge cards approaches, the following provides an update on the status of the mitigation strategies.

1. Continue the issuance of day passes on the bus for an overlapping period once the new fare system has been launched.
Status: Since the official launch of QuickTicket in early 2021, day passes have been available on the bus. This overlapping period has lasted for approximately two and a half years.

2. Implement fare capping for day passes.
Status: Fare capping, known as "Best Value," allows customers to not pay for any additional trips after they reach the equivalent of the cost of a daily pass (\$4.00). The feature was not only implemented for daily passes but also for monthly passes (\$65.00).

3. Implement temporary promotional incentives for ***value through December 31, 2023.***
Status: Discounts remain in effect today and will be sustained through December 31, 2023.

4. Pursue options for additional locations for reloading cards with less than \$5.00 at one time (such as partnerships with libraries or community centers)
Status: An extensive network of retailers has been implemented to facilitate customer access to locations where they can buy QuickTicket cards and load value to their cards, including cash. No passes are being sold at those. Staff continues efforts to add additional locations and establish community partnerships. Some of those have been more challenging due to staff and resources shortages. The transit propensity data will continue to be used by staff to identify gaps in the system to expand resources for QuickTicket access.

5. Rather than setting a specific date for the discontinuation of current products in wide use by disadvantaged populations, sustain these products until such time as staff can demonstrate that overall migration to the new system has been successful and that mitigations designed to address potential disparate impacts on disadvantaged riders are working, and that the adoption of new products by disadvantaged riders is sufficiently high to demonstrate that these new products meet the overall equity goals of the system.
Status: Since the launch of QuickTicket in early 2021, other payment products have been used to allow customers to comfortably migrate to QuickTicket while still having access to other options. Different efforts have been implemented to assist customers with the transition, realize the convenience and benefits the new system offers, and mitigate accessibility concerns. As more accessible options continue to be identified, as discussed above, and adoption rates increase, advancing the next steps for implementation becomes critical for the complete effectiveness of the system.

For over two and a half years, staff has been promoting and helping riders transition to the new fare collection system. Progress has been made in different areas to make products, savings, and overall benefits more accessible to riders. Unlike other transit systems, cash is still allowed in our system, understanding the need to provide equitable fare payment options. Implementation of these changes takes time, but staff has a commitment to continue to monitor existing measures and expand opportunities for access to benefits to ensure the simplicity, seamlessness, equity, accessibility, and revenue-neutrality goals of the system. This has been reflected through the increasing penetration of QuickTicket products as a means of fare payment.

As a result of all these efforts, WeGo Public Transit is moving forward to eliminate all magnetic media on the system, effective October 1, 2023. Effective on that date, all riders paying with cash will be required to pay with exact change for each boarding and will no longer be able to purchase day passes on Board the bus.

APPROVED:

Director of Planning & Grants

8/24/2023

Date

Nashville Metropolitan Transit Authority

of Nashville & Davidson County, Tennessee

Board Action Item

Item Number:	M-A-24-001	Meeting Date:	1/25/2024
Item Title:	Spring 2024 Service Changes and Title VI Analysis		

BACKGROUND:

The proposed Spring 2024 service changes continue with the trend from previous recent service changes to implement Better Bus recommendations for extension of hours of operation on frequent and local routes, improving frequency on routes with a focus on evenings and weekends, and establishing new services to improve transit access and connections.

Most of the proposed changes center around the opening of the Dr. Ernest "Rip" Patton, Jr. North Nashville Transit Center (NNTC) later this year, marking a new milestone for service improvements. The center will help decrease reliance on WeGo Central by providing connections between 7 different routes in this part of town while widening options for faster and better access to jobs and opportunities. The FY2024 Metro budget provided additional resources to continue implementing the Better Bus plan.

The changes include routing adjustments to seven routes, improving frequency and hours of operation, schedule adjustments to several routes, and adding two new crosstown routes. The WeGo Link program's expansion is also proposed with a new zone addition.

The specific details on the proposed changes and the outreach process are included in subsequent sections of this item.

The item outlines information on the following areas:

- Operator & Fleet Availability
- Public Outreach Process
- Service Changes Recommendations
- Service Change Equity Analysis
- Request for Authorization to Implement Service Changes

OPERATOR AND FLEET AVAILABILITY

With every service change, staff reviews the current workforce and fleet levels to ensure WeGo provides reliable customer service. The number of operators required to be fully staffed for Spring service changes is **475** full-time operators. WeGo Transit has 428 operators and 22 newly recruited operators currently in training.

Staff continues to emphasize recruiting efforts to fill in operator and maintenance positions. A focus on community partnerships is helping with reaching individuals looking to build a career in transit. The community partnerships range from trade schools for our skilled workforce needs within our maintenance departments to

working with other recruiting firms to find quality candidates that meet our needs regarding operators and other positions within the organization.

The number of vehicles utilized on fixed routes (peak times) for Fall service changes will be 146, an increase of approximately ten vehicles compared to the current service. WeGo currently has an active bus fleet consisting of 168 active buses (mixed with 40ft and 60ft buses) and 86 Cutaways.

Supply chain issues continue to be a factor, but bottlenecks are loosening up. Eight (8) WeGo Access cutaway buses were placed into service in December, and forty (40) more cutaways will start arriving within the next two weeks and will continue to arrive through mid-April. For fixed route service, twenty-eight (28) 40ft buses are on order and will start arriving approximately in mid-April. The arrival of all these vehicles will be a great addition to the fleet and allow staff to dispose of old equipment beyond their useful life properly.

PUBLIC OUTREACH PROCESS

To coincide with the North Nashville Transit Center (NNTC) opening and continued implementation of the Better Bus plan initiatives, several routes were redesigned to serve the NNTC and provide new and extended service. Extensive public outreach was completed to gather feedback on the proposed Spring 2024 route changes. The public comment period opened on November 27th and ran through December 22nd.

The following principles guided the service change proposal presented to the public for review and comment:

- Assuring social equity of service changes
- Providing high-quality service on major routes carrying the most riders
- Balancing needs and resources to ensure service is deployed cost-effectively
- Continuing to advance service design principals from Better Bus where feasible
- Maintaining flexibility to respond to changing conditions and trends

Four public meetings were held throughout the community, focusing on hosting meetings in locations that would be impacted most by the proposed changes. These meetings were held at the McGruder Family Resource Center (November 28th and December 5th), Trinity Community Commons (December 7th), and a virtual meeting on November 30th. Additional community outreach was conducted via coordination with Dream Streets Mobile Food Delivery. Staff attended three delivery sessions into communities throughout North Nashville and were allowed to announce the changes and upcoming public meetings, pass out informational flyers, and interact with attendees. Staff also hosted information sessions at tables in WeGo Central near bus bay 10 to increase awareness of the proposed changes and provide an opportunity for feedback and discussion. These outreach efforts were conducted over multiple days and weekends as well as various times to provide broad coverage as indicated below:

- Thursday, November 30th at 2:30 p.m. Dream Streets
- Saturday, December 2nd at 11:30 a.m. and 2:30 p.m. Dream Streets
- Tuesday, December 12th from 7:00 a.m. to 9:00 a.m. WeGo Central Bay 10
- Tuesday, December 12th from 2:00 p.m. to 4:00 p.m. WeGo Central Bay 10
- Wednesday, December 13th from 5:00 p.m. to 7:00 p.m. WeGo Central Bay 10

Staff presented the proposed service changes, fielding questions and comments for the record, at these outreach events. Public members were also informed about the anticipated opening of the Dr. Ernest Rip Patton, Jr. North Nashville Transit Center at 26th Ave and Clarksville Highway and its corresponding route changes. Additional information was provided on the Fall 2023 transition to QuickTicket or exact cash only, eliminating change cards

and transfers. Public meeting and route change information were posted at WeGo Central, on social media channels, at impacted bus stops, and via public notice on WeGoTransit.com. All information was provided in English and Spanish, and the public could comment via email, Customer Care, meetings, and tabling.

Of the several comments received, many were positive in relation to the opening of the Dr. Ernest Rip Patton, Jr. North Nashville Transit Center. Passengers expressed excitement for the increased frequency along routes connecting to the transit center, the introduction of the new crosstown Trinity Lane route, and the extension of Route 70 Bellevue to accommodate James Lawson High School ridership. General questions and comments not directly related to the proposed service changes were also accounted for.

Additional comment topics included: connector route between Murfreesboro Road along Bell Road, concerns around the efficiency of Uber for WeGo Link, including difficulties in getting a ride, pedestrian and safety concerns near the Dr. Ernest Rip Patton, Jr. North Nashville Transit Center, an extension of Route 52A Nolensville beyond Old Hickory Boulevard to pick up at Walmart, connector route between WeGo Star stations, Route 18 Airport, and Donelson Pike, concern over elimination of the 38 Express route in Nashboro Village/Una Antioch area, and the need for additional service down Antioch Pike.

A summary of route-specific comments on proposed changes is provided below:

Route 9 MetroCenter: Additional weekend service needed.

Route 14 Whites Creek: Positive feedback on frequency improvements.

Route 22 Bordeaux: Confusion on naming of split routes 22A and 22B. There are multiple concerns around relying on Uber and ride-sharing in the Bordeaux area to replace the elimination of service on Kings Lane. Some cited the need for frequency improvements if some areas are no longer served.

Route 41 Golden Valley: Concerns about rerouting; additional frequency welcomed.

Route 42 St. Cecilia/Cumberland: Concerns about eliminating service on the southern portion of the route.

Route 70 Bellevue: Positive feedback on route extension.

Route 71 Trinity Lane: Positive feedback on introducing the crosstown route.

Route 75 Midtown: Support for improved frequency. Concerns about productivity based on current numbers.

Route 77 Thompson/Midtown: Positive feedback on frequency improvements. Would like to see it run later in the day, increase service, extend to Elm Hill Pike, and connect to WeGo Central.

SERVICE CHANGES RECOMMENDATIONS

Most of the proposed changes for Fall 2023 are Better Bus-driven changes to continue improving and expanding riders' options across the system, including better connections outside of downtown. There are also routing and schedule adjustments to improve on-time performance and service reliability. Expanding the WeGo link zones is a major proposed change, adding five new zones to help improve access to transit in lower-density areas. Below is a summary of the service change recommendations presented to the public during the public comment period, followed by a detailed explanation of each change. All public comments were reviewed and fully considered in making final recommendations.

Route Modifications		Schedule Adjustments	
9 MetroCenter	42 St. Cecilia-Cumberland	9 MetroCenter	42 St. Cecilia-Cumberland
14 Whites Creek	75 Midtown	14 Whites Creek	75 Midtown
22 Bordeaux	77 Thompson-Wedgewood	22 Bordeaux	77 Thompson-Wedgewood
41 Golden Valley		41 Golden Valley	
Improved Frequency		New Service	
9 MetroCenter	42 St. Cecilia-Cumberland		70 Bellevue
14 Whites Creek	75 Midtown		71 Trinity
22 Bordeaux	77 Thompson-Wedgewood		Bordeaux/Buena Vista WeGo Link Zone
41 Golden Valley			

Following is a breakdown of the recommended changes for the fall:

- **Routing Modifications – To improve on-time performance, reliability, and safety**
 - **9 MetroCenter**
Extend the route to the North Nashville Transit Center. Changes to the route through the Metrocenter area include French Landing Dr., Athens Way, Great Circle Rd., and Rosa L. Parks Blvd.
 - **14 Whites Creek**
Extend the route to the North Nashville Transit Center. Route to serve Creekwood N., Timothy Dr., and E. Fairview Dr.
***Note: This proposed routing was changed during the public comment period in response to public feedback to provide coverage in this neighborhood.**
 - **22 Bordeaux**
Connect to extended Route 14 Whites Creek and new Route 71 Trinity. Route to travel via Clarksville Pike to and from Kings Ln. Instead of via E. Fairview Dr., Timothy Dr., and Creekwood N. Route will no longer travel to County Hospital Road, and Route 77 Thompson-Wedgewood will serve that area.
 - **41 Golden Valley**
The route will directly serve UPS on Whites Creek Pike and FedEx off Knight Dr.
***Note: In the original proposal, the route was connecting to Gallatin Pike in East Nashville and not traveling to downtown. Based on public feedback, this was changed during the public comment period to have the route begin and end at Central Downtown.**
 - **42 St. Cecilia-Cumberland**
Discontinue the south portion of the route between 26th Ave N. and south of Buchanan St. Portions, which Route 75 Midtown will cover. Service will operate in both directions on the north portion of the route.
 - **75 Midtown**
Discontinue the portion of the route that extends to Hermitage Ave and Nestor St. facility. The route will serve the Osage/North Fisk area via Osage St., 25th Ave N., Delk Ave., and 26th Ave N.
***Note: The section of the route going to Hermitage Avenue and the Nestor Street garage will be maintained until the fall to provide a place for restroom breaks for operators. Additionally, the addition of the routing around the Osage/North Fisk area was changed**

during the public comment period based on public feedback to provide coverage in this area due to the elimination of this section from Route 42 St. Cecilia-Cumberland.

- **77 Thompson-Wedgewood**

Extend the route to Camilla Caldwell Lane to cover a portion of Route 22 Bordeaux.

- **Schedule Adjustments**

- **9 MetroCenter**

- **14 Whites Creek**

- **22 Bordeaux**

- **41 Golden Valley**

- **42 St. Cecilia-Cumberland**

- **75 Midtown**

- **77 Thompson/Wedgewood**

- **Improved Frequency**

- **9 MetroCenter**

Improving frequency to every 20 minutes.

- **14 Whites Creek**

Improving weekday frequency to every 30 minutes during peak and midday and every 40 minutes on nights and weekends.

***Note: The proposed peak frequency was changed from 20 to 30 minutes to align resources with anticipated demand.**

- **22 Bordeaux**

Improved frequency to every 10 minutes during peak and midday and every 20 minutes nights and weekends.

***Note: The proposed midday frequency was changed from every 15 to every 10 minutes to improve reliability and provide more consistency throughout the day.**

- **41 Golden Valley**

Improving frequency to operate hourly from 6:00 a.m. to 6:00 p.m.

- **42 St. Cecilia-Cumberland**

Improving frequency to operate every 30 minutes on weekdays from 6:00 a.m. to 6:00 p.m.

- **75 Midtown**

Improving weekday frequency to 20 minutes peak and 30 minutes midday, nights, and weekends.

- **77 Thompson/Wedgewood**

Improving weekday frequency to 30 minutes peak and 45 minutes off peak.

- **Service Span Improvements (Frequent Network)**

- **14 Whites Creek**

Extending service later at night until 12:15 a.m.

- **41 Golden Valley**

Adding midday service. Routes currently operate at peak time only.

- **75 Midtown**

Extending service later at night seven days a week until 11:00 p.m.

- **New Service**

- **Route 70 Bellevue**

- New crosstown route connecting the Charlotte Pike Walmart and the James Lawson High School and Bellevue Park and Ride via Old Hickory Blvd and Highway 70.*

- **Route 71 Trinity**

- New crosstown route connecting the North Nashville Transit Center and Gallatin Pike via Trinity Lane.*

- **WeGo Link**

- Add new Bordeaux/Buena Vista zone.*

SERVICE CHANGES EQUITY ANALYSIS

The Federal Transit Administration (FTA) requires transit agencies to demonstrate consideration, awareness, and approval of Title VI equity analysis for major service or fare changes. The Major Service Changes thresholds that require Title VI review are:

1. Any change in service of 25 percent or more of the number of a transit route's revenue service miles computed daily of the day of the week for which the change is made.
2. A new transit route is established or eliminated.
3. Emergency service changes that meet either of these definitions and have been in effect for over one year.

Proposed service changes are compared to current service levels in order to evaluate any potential adverse effects on minority or low-income communities in the service area. With service improvements, this means that the benefits of the service cannot disproportionately benefit non-minority or non-low-income populations. Based on the WeGo Title VI Policy, and consistent with Federal law, adverse effects of changes are borne disproportionately by minority populations when the impacts to minority populations are more than 20% greater than impacts to non-minority populations. Similarly, adverse effects of changes are borne disproportionately by low-income populations when the impacts on low-income populations are more than 20% greater than those on non-low-income populations.

Major Changes

The major changes identified for the Spring 2024 proposal include the following: routing adjustments to routes 9 MetroCenter 14 Whites Creek, 77 Thompson-Wedgewood, 41 Golden Valley, 42 St. Cecilia-Cumberland, and 75 Midtown; frequency improvements to the 9 MetroCenter 14 Whites Creek, 22 Bordeaux, 42 St. Cecilia-Cumberland, 75 Midtown, and 77 Thompson-Wedgewood; and span improvements on the 14 Whites Creek, 77 Thompson-Wedgewood, 41 Golden Valley, and 75 Midtown. There are also two new crosstown routes, 70 Bellevue and 71 Trinity, and a new WeGo Link zone in Bordeaux.

Using the Transit Boardings Estimation & Simulation Tool (TBEST), staff evaluated the impacts of the proposed fixed-route changes by comparing the change in trips available for minority and low-income populations in comparison to non-minority and non-low-income populations. For the WeGo Link expansion, staff reviewed the population served by the proposed zone. It looked at the presence of low-income and minority populations within the zones in relation to the entire service area of Davidson County.

The proposed route nine changes involve extending service to the NNTC, improving frequency, and adjusting routing through the MetroCenter area to allow connections to other routes without going downtown. These changes showed benefits to both minority and low-income passengers. For route 14, proposed improvements

include extending service to the new transit center, adjusting the routing, improving frequency, and running until midnight on weekdays and Saturdays. These improvements allow customers to go downtown as they currently do or access destinations on Clarksville Pike without transferring. Connections at the NNTC, reduced wait times, and better access to destinations will also be possible. Overall, this showed a benefit to minority and low-income passengers. The changes to Route 22 include improved frequency from downtown to the new transit center. Analysis of this route showed a disparate impact. However, this is due to large parts of the 22 now being continued by the 14 and 71, as well as the 77 providing service to and from the NNTC for passengers of the 22A to the County Hospital Road area. The new WeGo Link zone in this area will also help ease any changes in access. Overall, this will allow more customers to catch the bus without going downtown. Route 41 is proposed to experience a routing and span adjustment to allow more access to jobs and other destinations along the route. The analysis showed a benefit to both low-income and minority passengers. The changes to route 42 include a routing adjustment and improved frequency. This route's analysis showed a disparate impact; however, changes to the southern portion of the route will be eased by the changes to routes 22, 75, and 77. The two-way service and additional frequency will also give customers more options and reduce travel times on Route 42. Route 75 is proposed to experience improved frequency and span, as well as a routing adjustment, to continue to create a robust transit system without the need to travel downtown, thus reducing passengers' overall travel time.

These changes show only a slight difference in access between minority/low-income and non-minority/non-low-income. Proposed changes to Route 77 include improved frequency and a route extension to cover a portion of the current 22A. The analysis showed a modest benefit to minority and low-income passengers from these changes. Overall, the benefits of these changes are believed to be substantial for passengers. After analyzing these changes, any disparate impact found on a given route is offset when looking at the changes as a whole, where improvements to other routes help to make up for that change. Many of the proposed improvements address passengers' desire for faster travel times and access to more destinations by creating more connections between routes and reducing the need to travel downtown.

Additionally, routes 70 Bellevue and 71 Trinity are new crosstown routes. Route 71 will operate along Trinity Lane from the NNTC to the Greenfield Station on Gallatin Pike. It will operate every 30 minutes at peak and midday and every 40 minutes on nights and weekends. Connections include Routes 9 MetroCenter, 14 Whites Creek, 23 Dickerson Pike, 28 Meridian, 41 Golden Valley, 42 St. Cecilia, 56 Gallatin Pike, 75 Midtown, and 77 Thompson-Wedgewood. These new connections will help customers reach destinations more quickly and reduce the need to travel downtown. Route 70 operates along Old Hickory Blvd and Highway 70 between the Charlotte Walmart and James Lawson High School. Its connections include routes 3 West End/3B West End Bellevue and 50 Charlotte, with a 60-minute frequency.

Route	Change in Low-Income People Trips	Change in Non-Low Income People Trips	Low Income: Non-Low Income Total Trip Percent Difference
9	100.2%	54.1%	85.1%
14	93.6%	93.5%	0.1%
22	12.4%	15.8%	-21.4%
41	340.1%	274.5%	23.9%
42	16.1%	29.5%	-45.4%
75	88.1%	89.7%	-1.8%
77	49.4%	48.8%	1.2%
All Routes	11.8%	9.1%	29.67% Difference

Route	Change in Minority People Trips	Change in Non-Minority People Trips	Minority: Non-Minority Total Trip Percent Difference
9	120.2%	37.05%	224.43%
14	101.5%	73.82%	37.50%
22	4.6%	21.32%	-78.43%
41	322%	274.04%	17.51%
42	11.7%	36.32%	-67.79%
75	89.4%	89.13%	0.40%
77	55.8%	46.67%	19.57%
All Routes	13.36%	7.40%	80.54% Difference

When reviewing the proposed WeGo Link Expansion, staff found that the new zone has a higher percentage of minority and low-income populations than that of Davidson County. This new zone would also provide coverage for impacts felt due to changes to route 22.

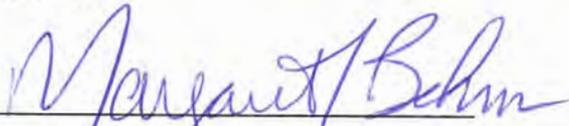
WeGo Link Zone	% Minority	% Low Income
Bordeaux	84.0%	26.1%
Total New Zones	84.0%	26.1%
Davidson County	40.6%	14.9%
<i>Disparate Impact/ Disproportionate Burden</i>	-51.7%	-43.0%

Based on the factors discussed above, staff have concluded that there is no disparate impact or disproportionate burden as part of this service proposal.

RECOMMENDATION:

Staff requests approval by the Board of the proposed Spring 2024 service changes as documented in this item for implementation to take effect on March 31st, 2024.

APPROVED:



 Board Secretary

1/25/2024

 Date

Appendix E: Language Line Brochure



Language Line Services

Interpretation and Translation in more than 150 languages

LANGUAGE LINE® DOCUMENT TRANSLATION SERVICE

Questions and Answers

Listed below are frequently asked questions.

What is translation?

Translation is the transmittal of written text from one language into another. Although the terms *translation* and *interpretation* are often used interchangeably, by strict definition, translation refers to the written language, and interpretation to the spoken word.

Who are your translators?

Language Line Services' translators are highly skilled professionals, with advanced degrees in a wide range of disciplines. As a rule, translations are performed by the native speakers of the foreign language translated.

How do I know if my translation is good?

A good translation should clearly convey the meaning of the original text, read smoothly, and be free from spelling or grammatical errors. Naturally, if you are unable to have an independent professional translator examine both documents, you will not be able to check this. That is why selecting a professional translation service is critical. Every completed transaction is checked for quality by a proofreader or editor before delivery to the customer. If you are not completely satisfied with the result, there will be no charge.

Do you use any translation software?

No. Language Line Services does not use translation software. To make certain of the quality, professional human translators perform all translations.

What about confidentiality?

All Language Line Services translators are bound by confidentiality agreements. To increase confidentiality, customer information is removed from the text given to a translator whenever possible.

What are typical applications for Language Line® Document Translation Service?

Language Line® Document Translation is ideal for documents covering a wide range of routine business needs:

- **General Business:** Manuals, brochures, books, letters, e-mails, memorandums, surveys, personnel announcements, payroll records, education transcripts, magazine or newspaper articles, labels, standard forms, notices, signs, job descriptions, receipts, form letters, instructions, articles, menus, warranties;
- **Financial Services:** Account information, credit histories and reports, financial statements, loan documents, contracts, mortgage papers, pension records, correspondence, financial applications;
- **Healthcare:** Hospital release forms, patient billing and instructions, medical and immunization records, informed consent forms, medical claims, patients' rights;
- **Insurance:** Accident and medical reports, claims information and forms, receipts, statements, death certificates, release forms;
- **Law Enforcement:** Police statements and reports, investigations, public records;
- **Court/Legal:** Complaints, statement of charges, summons, documents, divorce papers, contracts, advice of rights;
- **Public Service/Government:** Notices and public service announcements, voter information, forms, signage;
- **Transportation:** Security questionnaires and general passenger information and more.

What languages do you translate?

We provide service in more than 150 languages. Please refer to our "Language List" for specific details. Languages are added and removed based on customer demand.

How much does translation cost?

Please refer to our "Customer Charges" sheet for specific pricing information. In general, prices are lower for more commonly requested languages, since there are more translators available. Prices are generally higher for less requested languages as well as for languages that require special software to accommodate the characters.

Can I receive a cost estimate before I order the translation?

You can easily estimate the cost if you know what foreign language is involved, using the "Customer Charges" sheet. If you need a more exact estimate, simply mark the "SEND QUOTE BEFORE PROCEEDING WITH TRANSLATION" box on the document translation order form. You will be contacted with a quote. Keep in mind, preparing a quote may delay your translation request.

How long will a translation take?

Language Line Services will do all it can to ensure a speedy turn-around time for your document. A short document translation of one or two pages will take less than two business days, on average. Length and difficulty of the original text, as well as method of transmission and delivery, will affect turnaround time of each project. Language Line Services is able to offer "EXPEDITED" translation at an additional cost.

What will my translated document look like?

Several options are available. Standard translations are delivered as unformatted, word-processed documents or e-mails. If requested, your document can be formatted to look like the original. Nominal formatting charges apply. Any special formatting needs can be reviewed with a document translation representative by calling 1 888 763-3364.

How will I be billed?

If you have an existing account for **Language Line** Over-the-phone Interpretation Service, translation fees will appear in the "Miscellaneous Charges" section of your regular Language Line Services monthly bill. If you do not have an account with Language Line Services, the translation can be charged to a major credit card.

How do I get a document translated?

If you are an existing customer, use your Language Line Services Client ID number on your document translation service order form. If you have mis-

placed your Client ID number, contact us by calling customer service at 1 800 752-6096, option 1 or e-mail customerservice@LanguageLine.com. If you do not have an account with Language Line Services, you may use a major credit card to charge the document translation. All documents must be accompanied by a document translation order form. To receive an order form:

- **On-line** at www.LanguageLine.com fill out the order form on-line or print it out
- **Call** 1 888 763-3364 and a form will be faxed to you

To submit your document for translation, complete your order form and:

- **On-line** submit your order with an attachment of the document to be translated to www.LanguageLine.com
- **Fax** to 1 800 648-0170; or
- **E-mail** the text or document (in MS Word 6.0 or higher) to translation@LanguageLine.com

While most documents can be faxed easily, certain languages (Chinese, Japanese, Cambodian, for example) do not fax well, especially if the original is a second or third generation fax. If a document is not completely clear and legible, Language Line Services may request that a more legible copy of the original document be sent by mail or courier service.

More questions?

Contact our Document Translation Department toll free at 1 888 763-3364.



One Lower Ragsdale Drive, Monterey CA 93940-5747 • www.LanguageLine.com
Document Translation Phone: 1 888 763-3364 • Fax: 1 800 648-0170

Appendix F: Sub-Recipient Guidebook Title VI Policy

Section 6: Title VI Policy

CIVIL RIGHTS COMPLAINT STATUS

- *Successful Applicants will be required to sign a Certification for Civil Rights Complaint Status certifying that the applicant does or does not have any pending Title VI (Civil Rights) complaints of discrimination filed against its transit program. The Proposer agrees to comply with all applicable requirements of the Title VI of the Civil Rights Act of 1964, 42 U.S.C. § 2000d et seq. and FTA Circular 4702.1B*
 - *A Title VI sample plan can be made available on request*

In order to receive funding:

- You have identified that you have a Title VI Plan that meets the guidelines required by FTA. *Give copy to Philip.Randall@nashville.gov and keep original on file.*

Appendix G: 2025 Title VI Program Adoption - Signed Board Item

Appendix H: Transit Design Guidelines

**Transit Design Guidelines available upon request or on-line at:*
www.wegotransit.com

Appendix I: Public Hearing Policy

Nashville Metropolitan Transit Authority

PUBLIC HEARING REQUIREMENTS POLICY

Public participation, through both the awareness and the opportunity for input, into the decision making process is a critical element to the success of the varied transit services that MTA provides. This document has been updated to reflect the agency's updated Public Participation Plan, effective January 1, 2021.

I. PURPOSE

The purpose of these requirements is to obtain feedback from all interested and concerned citizens when the Metropolitan Transit Authority proposes changes to its services or fares. The guidelines below indicate when, as a matter of policy, a public hearing must be held, and how the comments are considered through the process. These guidelines are in no way intended to limit public hearings but are meant to provide a minimum set of standards.

II. PUBLIC NOTICE

A public notice of an intended public hearing meeting must be conveyed to the general public at least ten (10) days prior to the intended meeting date. In addition, the final public hearing must be scheduled a minimum of twenty-one (21) days prior to the proposed implementation of the change. The notices will convey information about the public hearing in English as well as in Spanish (the predominant language of the Nashville-Davidson County LEP population). The notice will include the statement: "If information is needed in another language, then contact (615) 862-5950" in English and in Spanish.

1. A detailed description of the purpose of the meeting(s)
2. The date(s) and time(s) of the meeting(s)
3. The meeting location(s)

Notice of public hearings must contain a detailed description of the proposed change and be publicly advertised in at least three (3) of the following manners as well as at least one (1) predominately Spanish or other LEP language publication:

1. The Nashville MTA website
2. Any local area newspaper that will be directly affected by the proposed changes
3. Informational signs at the Nashville MTA's major transit centers

- (WeGo Central)
4. A local Spanish or other LEP language publication, such as La Campana newspaper
 5. Other local television or radio channel
 6. Social media outlets
 7. On board transit vehicles

The time and place of the public hearing must coincide with the MTA fixed route service area. This provision may be waived in the event that multiple meetings are established with at least one meeting being in a location that is serviced by transit. Public meetings will be held when there is a major service change.

III. SERVICE DEVELOPMENT AND PUBLIC COMMENT CONSIDERATION PROCESS

Public comments may be provided to Nashville MTA at any time through contacting Customer Care, via phone, email, written letter, or fax. In addition, comments are accepted at all public hearings as well as other such times where Nashville MTA staff interacts with the public, including coordination and interaction with institutions and organizations, as well as at MTA board meetings, and through customer surveys. These comments are collected and reviewed on an ongoing basis.

The bi-annual service development process occurs in the following manner:

1. Funding status is determined, which guides whether funding is available for service expansion or whether service reductions are needed.
2. The Master Plan is reviewed to identify opportunities for project implementation.
3. Data analysis is conducted to determine areas where service improvements can be maximized.
4. Customer comments are reviewed to identify potential service improvements to be considered and to identify areas where the master plan and current customer comments coincide.
5. A service change proposal is assembled based on information from the Master Plan, Data Analysis, and Customer Comments.
6. Public meetings are held in accordance with the Public Hearing and Major Service Change policies and feedback from the public is received and reviewed during this timeframe and prior to the service implementation. If there is significant public input (either positive or negative) received during this time, this information is factored into the final service proposal and an overview summary of the comments received is provided to the MTA Board as part of the service proposal.
7. The service changes are implemented and the process is repeated prior

to the next round of changes.

IV. MAJOR SERVICE CHANGE POLICY

Except where provided elsewhere, a public hearing must be held when:

1. There is a change in any fare or fare media related to our core services of fixed route and AccessRide.
2. There is any change in service of twenty-five percent (25%) or more of the number of a transit route's revenue service miles computed on a daily basis for the day of the week for which the change is made.
3. A new transit route is established.
4. Service frequency (headway adjustments) of over five (5) minutes during peak hour service or over fifteen (15) minutes during non-peak hour service.
5. In an emergency situation, a service change may be implemented immediately without a public hearing being held. A public hearing must be held if the change is in effect over one (1) calendar year. Examples of emergency service changes include but are not limited to those made because of inaccessibility of a bridge over which a bus route passes, major road construction, or inadequate supply of fuel.
6. Experimental service changes may be instituted for one (1) calendar year or less without a public hearing being held. A public hearing will be required if the experimental service change exceeds one (1) calendar year.

Appendix J: Metro Language Access Study

**Metro Language Access Study available upon request or on-line at:
<https://filetransfer.nashville.gov/portals/0/sitecontent/Human%20Realations%20Commission/docs/publications/MetroLanguageAccessStudy.pdf>*

Appendix K: 2022 On-Board Survey Report

WeGo's On-Board Survey Report available upon request or on-line at:
www.wegotransit.com