



TITLE VI PROGRAM

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Accessible Formats

This document is available in accessible formats upon request. Information regarding accessible formats may be obtained by contacting:

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Chapter 1: Introduction

Nashville MTA Background

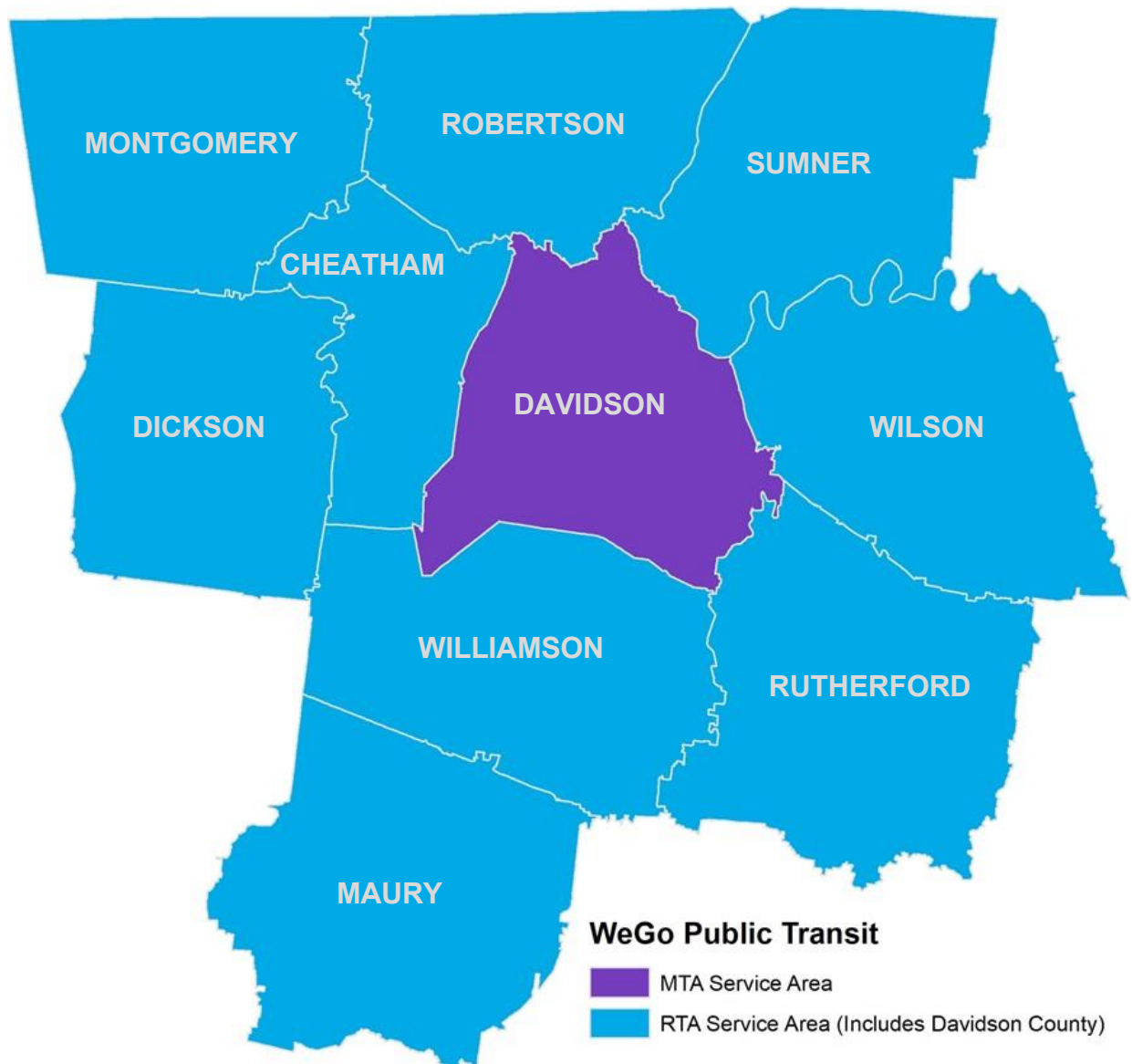
Established in 1973, Nashville Metropolitan Transit Authority (MTA) provides public transit services for Nashville-Davidson County. The agency also provides administration oversight for the Regional Transportation Authority of Middle Tennessee (RTA). Formerly known to the public as two separate agencies, in 2018 the agencies launched a three-year rebranding process to consolidate the public facing entity with the formation of “WeGo Public Transit”. Although still separate with each providing different services, the consolidation of the agencies creates a cohesive brand for transit services in Middle Tennessee. The Davidson Transit Organization manages the administrative functions of MTA and RTA. Figure 1.1 shows the organizational function of these four entities and Figure 1.2 shows the MTA and RTA service areas.¹

Figure 1.1: Organizational Function



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

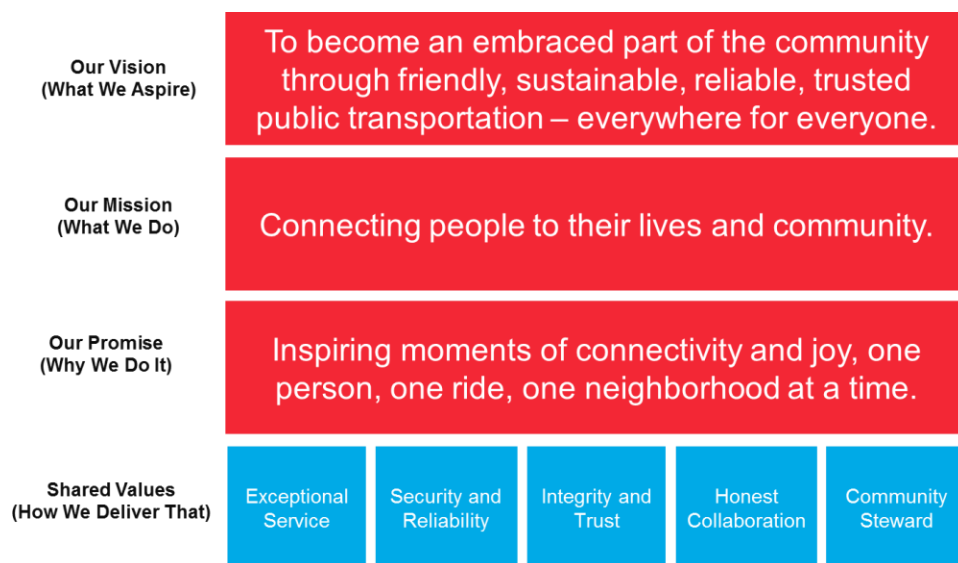
Figure 1.2: MTA and RTA Service Areas



WeGo Mission, Vision, and Promise

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

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



WeGo / Nashville MTA Organizational Background

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

The demographic breakdown of the MTA Board of Directors is as follows: White / Caucasian: 1 Male, 2 Female
African American: 1 Male, 1 Female
Total board members: 5

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

APAC Committee

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

The responsibilities of the APAC committee include:

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

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

APAC is guided by a chair, Vice-chair and secretary and is comprised of members from community organizations including; Support and Training for Exceptional Parents (STEP) Middle Tennessee Council for the Blind, Tennessee Council for the Blind, Tennessee Disability Pathfinder, Center for Independent Living of Middle Tennessee (CIL), Tennessee Disability Coalition, Greater Nashville Regional Council, Vanderbilt Medical Center, National Federation of the Blind, Centennial Adult Care, Department of Intellectual Development Disabilities IT, Disability Law & Advocacy Center of Tennessee, and consumers. APAC meets in the Elizabeth Duff Transit Center at WeGo Central Community Meeting Room. These groups individually appoint a member of their organization to participate, and MTA does not intervene or overturn members.

The demographic makeup of this committee is as follows:

White / Caucasian: 3 Male, 4 Female

Black / African American: 2 Female

Hispanic / Latino: None

Two or More Races: 1 Female

Declined to Answer: 10

MTA's management team, headed by a Chief Executive Officer, oversees the day-to-day operations. General departments breakdown is as follows:

- Finance and Administration – Accounting and Payroll, Grants management and Compliance, Human Resources, Training, and Procurement
- Safety – Safety and Security
- Growth and Development – Planning, Service Development, Engineering, Project Management and Construction, Major Projects, Legislative Liaisons, and Customer Care and Communications
- Operations – Operations, Access, Service Quality, Vehicle Maintenance, and Assets and Infrastructure

WeGo currently operates buses on 27 fixed routes and ADA complementary paratransit services (known as Access). Additional service options provided by the agency include a same-day premium service for Access customers known as Access on Demand and a first-mile last-mile connection service through a partnership with Uber and other local providers called WeGo Link.

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

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

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

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

With the rebranding to WeGo, the Nashville MTA established a new outlook on how it engages with its customers and the general public with inclusiveness as the common thread throughout all service platforms. Although law dictates that no individual or organization is excluded from participation in, denied the benefits of its programs, activities, or services, or subject to discrimination on the basis of race, color or national origin, WeGo approaches inclusivity in all forms. This includes, but is not limited to, income status, limited English proficiency, marital status, age, gender identity, religion, veteran status, or physical or mental disability. Simply put, WeGo is for everyone, everywhere.

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

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

The Nashville MTA is proud of its longstanding policy to ensure that social impacts to individuals and communities are recognized early and continually throughout the transportation decision-making process. This document sets forth the standards for every representative of the agency to guide decisions in a non-discriminatory manner.

Title VI Coordinator

Title VI Coordinator:

Felix Castrodad, Director of Planning

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

General Title VI Coordinator Duties:

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

Title VI Planning Support:

- **Title VI Compliance:** Ensures compliance of this document and related Title VI legislation in all phases of project planning including conducting Title VI analyses for any activities that could pose a disproportionate burden or disparate impact to minority and low-income populations of the service area and / or MTA riders.
- **Title VI Program Update:** Review and update the MTA's Title VI Program as needed or required. Present updated Program to the Chief Executive Officer for approval;
- **Planning and Project Development:** Ensure that available census data are included as a part of all Title VI analyses for the planning and implementation of capital projects, as well as service and fare changes;
- **Program Administration:** Administer the Title VI Program and coordinate its implementation. Ensure compliance with the assurances, policy, and program objectives. Perform Title VI Program reviews to assess administrative procedures, staffing, and resources, and provide recommendations as required to the Chief Executive Officer;
- **Data Collection:** Review the statistical data gathering process performed by agency program staff periodically to ensure sufficiency of data for meeting the requirements of Title VI Program administration;
- **Major Service and Fare Changes Analysis:** Evaluate Title VI impacts for major fixed route service changes and fare changes to the transit system.

Chapter 2: General Requirements and Guidelines

Notice to Beneficiaries of Protection under Title VI

In compliance with FTA regulations, the Nashville MTA provides information to the public regarding its Title VI obligations to inform them of their protections against discrimination by posting notices in both English and Spanish throughout WeGo Central, the main bus terminal, as well as at Riverfront Station where several bus routes currently serve. This notice is also on board buses and includes the following main points:

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

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

Title VI Complaint Policy

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

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

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

Process

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

- Complaint shall be in writing and signed by the complainant(s);
- Include the date of the alleged act of discrimination (date when the complainant(s) became aware of the alleged discrimination; or the date on which that conduct was discontinued or the latest instance of the conduct);

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

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

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

A complaint may be dismissed for the following reasons:

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

Once the complaint is accepted for investigation, the complainant and the respondent will be notified in writing within seven (7) calendar days. The complaint will receive a case number and will then be logged into MTA's records identifying its basis and alleged harm.

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

If necessary, MTA could seek assistance from the Nashville Metro Human Relations Commission office to help with investigation of a complaint and finalization of the report.

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

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

The public may obtain a complaint form by request, through the Nashville MTA website, or from Customer Care at the WeGo Central main bus terminal. The Title VI complaint process and form are both available in Spanish and English and referenced in Appendix B.

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

Title VI Investigations, Complaints, and Lawsuits

MTA maintains a log of all investigations, complaints, or lawsuits that allege discrimination on the basis of race, color, or national origin. Records will be kept for three (3) years internally then archived for a period of ten (10) years. This log can be found in Appendix B. There are no active complaints at this time.

Public Engagement

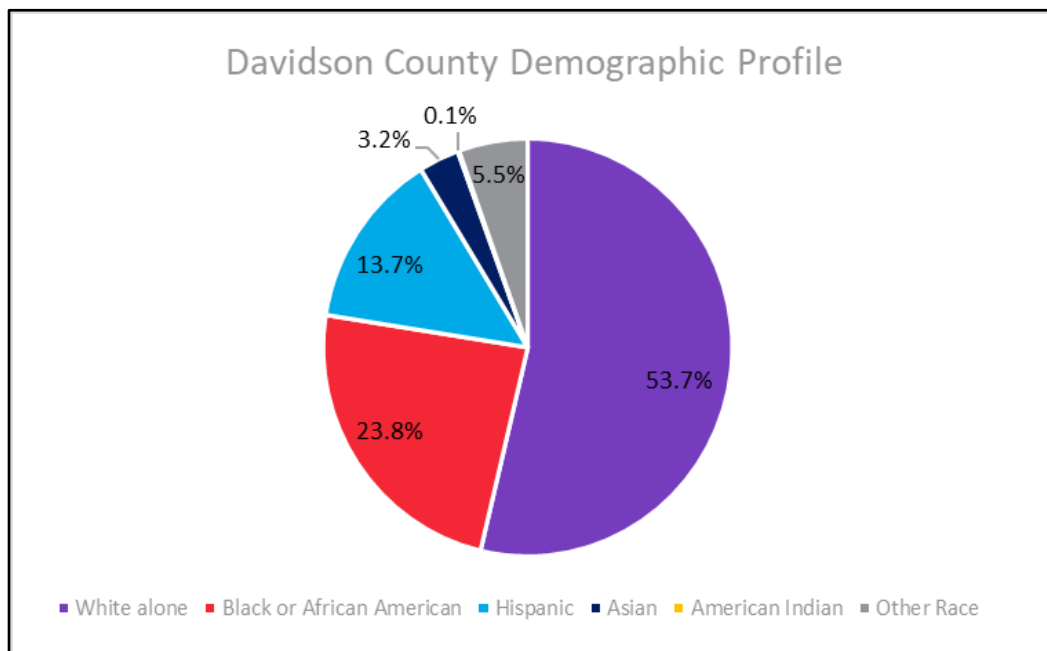
Overview

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

To better understand Nashville's low-income, minority, and LEP communities, MTA uses census data, as well as the most up to date five-year estimates from the American Community Survey in order to determine the demographic make-up of our service area. MTA also uses geographic information system (GIS) mapping to identify the minority block group communities within the MTA service area. By collecting this data, MTA has been able to develop a comprehensive plan to prevent a disparate impact on those communities and ensures inclusivity in all engagement methods to the extent possible. Furthermore, ridership data provided through on-board surveys conducted every five years allows for targeted outreach as appropriate in public engagement, particularly for considerations that impact MTA riders more so than the community at large. The 2022 On-board Survey is provided in Appendix K and summarized in chapter 3.

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

Figure 2.1: Davidson County Demographic Makeup



Source: U.S. Census and 5-year American Community Survey Data

Public Engagement and Participation Plan

Appendix C contains MTA's Public Participation Plan, revised in 2020. What follows is a synopsis of that plan, detailing effective communication strategies when engaging various stakeholder groups and communities.

Communication Strategies

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

These channels and methods include:

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

Rarely, if ever, is every tactic used. When messages don't resonate, MTA avoids leveraging other tactics to limit message fatigue or potentially over-saturating channels. WeGo has identified audiences consistent with various methods/channels, and the messaging each responds to best.

Public engagement strategies are formulated based on the content of the message, paired with available demographic statistics from the U.S. Census Bureau and American Community Survey 5-Year Estimates. In using this data, MTA completes analyses through GIS of the most up to date data available to determine the areas in which traditionally underserved populations reside and determine methods to reach those audiences.

Engagement Activities

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

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

Fare Change Example: In October of 2023 WeGo had made an adjustment to the ticketing policy. For our customers who paid with cash WeGo had eliminated the ability to receive a paper transfer card or a change card if cash paid was higher than the required fare. Payment options would then include exact cash, payment via the QuickTicket mobile application, payment via QuickTicket card, or any school or employment pass. To assist with the fare policy transition WeGo offered

discounts on fares via the QuickTicket card for several months before and after the fare policy change in order to encourage that shift.

Service Change Example: In the spring of 2024 WeGo implemented major service changes primarily in the North Nashville area in conjunction with the completion of the Dr. Ernest Rip Patton Jr. North Nashville Transit Center. Several routes were connected to the center, some routes received major extensions to connect to the center and a new route was implemented which would connect to the center. All the existing routes would also receive significant frequency improvements in order to result in better connections.

The agency is currently working on implementation of a free fare program for eligible riders under a certain income level as part of the Choose How you Move initiative passed by Davidson County voters in November 2024 (see below for more info). The Journey Pass program is expected to take effect by the end of 2025.

WeGo has introduced a “Contactless payments” system which was introduced to the QuickTicket system in August of 2025, meaning users can tap their phone to pay and board the bus without having to open an app, manage passes, or load money to a virtual card. This will lead to reduced barriers to entry to the bus system.

Strategic Planning: Every five years, Nashville MTA executes an updated comprehensive strategic plan for the next 25 years. During the planning phases, the public is encouraged to participate to provide feedback offer suggestions, and voice concerns of the city’s transit service. It is MTA’s goal to create such plans for the people, by the people. The agency’s current strategic plan is in the process of being updated. The update dubbed WeGo Forward, will build upon the accomplishments of the previous plan while aligning with the Choose How You Move (CHYM) program adopted by Nashville voters in November 2024 and that provides a dedicated funding source for transit. WeGo Forward is being developed in coordination with the Nashville Department of Transportation and Multimodal Infrastructure (NDOT) and the Metro Planning Department as part of the Multimodal Mobility Master Plan (3MP) in an effort to align different modal plans in Nashville.

Choose How You Move (CHYM) is a comprehensive transportation improvement program that targets improvements to the transit service, sidewalks, safety, and signals throughout Davidson County. The transit service improvements outlined in the program include additional frequency enhancements to many of the routes in the system and adding several routes to the frequent network. Another key aspect of the transit improvements will be to decentralize the system by building various transit centers around town which were outlined in the current strategic plan. These centers will serve as smaller transit hubs facilitating transfers that do not have to take place downtown. As of now, WeGo has two transit centers that have finished construction, with a few others in various stages of development.



Example: Other efforts including a rigorous public outreach component include the CHYM transportation improvement program educational process for future implementation of transit and related transportation improvements in Nashville. CHYM will create major improvements for transit service, infrastructure and accessibility.



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

Example: Since the last program update in 2022, the Nashville MTA has completed construction of the second of several planned transit center facilities completed in the Summer of 2024 the North Nashville Transit Center the second while the first being the Hillsboro Pike Transit Center.

The North Nashville Transit Center, the second in the series of neighborhood transit centers, involved an extensive public engagement process in efforts of creating a community-driven design in one of Nashville's historically underserved African American neighborhoods. Community driven design was an essential part of this project to ensure a context sensitive approach that caters to the vision, needs and desires of the community.

- More than two dozen meetings with business, religious and community leaders, and elected officials
- 1000 surveys mailed to residents within a 1-mile radius of the center site
- Two-month onboard survey engagement of riders within the transit center's route
- Nearly 400 total survey responses

For planning purposes it should be noted that this amount of outreach was made possible by the FY 2020 discretionary Helping Obtain Prosperity for Everyone (HOPE) grant award of \$200,000.

As of the summer of 2025 WeGo is in the early stages of a few other future transit centers in various surrounding neighborhoods in Nashville.

Antioch Transit Center

In the fall of 2023 WeGo received a 5-million-dollar grant from the Federal Transit Administration to go towards the construction of a transit center in the Antioch area of Nashville at the former site of the Hickory Hollow Mall. The transit center will be a part of the redevelopment of the old mall site. The center will serve as the terminus of the busiest route within the system and will serve as a hub to several future routes within the system within the Antioch area.

Donelson Transit Center

The Donelson Transit Center will operate as a public private partnership to include transit facilities, housing and retail options. The location currently serves as a stop for the WeGo Star train service which will then serve, soon to also serve a frequent route in the system and a future crosstown route connecting parts of town that did not have connections before including access to the Nashville International Airport.

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

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

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

- MTA has a bilingual quality assurance investigator who thoroughly investigates any complaints made by the public and ensure that Spanish speakers complaints are heard and understood.
- If for some reason a translator cannot be present at a public meeting, staff uses the Language Line to assist customers (see Appendix E). The Language Line is an "over the phone" interpretation service that enables someone to communicate clearly with customers in more than 170 languages within a matter of seconds. The service is available 24 hours a day and 7 days a week from any phone in any country. Representatives have this information at their desks to call for translation services on demand.
- MTA provides notices, announcements, survey forms, and other outreach materials in both English and Spanish.
- MTA provides a link to Spanish route schedules on its website and utilizes Google translation services which provide translation in Spanish and many other languages.

Language Assistance Plan for Limited English Proficiency Populations

Introduction

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

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

Plan Summary

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

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

Language Assistance Plan

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

MTA utilized data from the American Community Survey 2023 5-year estimates to determine the number of limited English proficient individuals along with their native languages to establish a baseline of communities within the service area. We then referred to a 2017 Metro Language Access Report conducted by the Metro Planning Department that identifies minority communities and their interaction with Metro agencies and extensions. The information contained in this report notes that Nashville has one of the fastest-growing immigrant populations in the country and that the share of the foreign born in Nashville was 13% in 2017, consistent with the national average. Over the next 25 years, Davidson County expects the Hispanic population will represent one-third of the total population whereas in 2017 they represent about 10% which has increased to 13.7% in 2023. Furthermore, the Asian population is expected to increase from 3% of the total population to just under 7% by 2040. (See Metro Access Language Report, Appendix J).

To monitor our agency’s interactions with LEP populations, MTA referred to the 2022 Origin & Destination Survey conducted by ETC Institute to establish the best use of available resources to provide meaningful accommodations for MTA customers. These surveys are conducted every five years allowing the opportunity to continue monitoring the ever-changing demographic profile of Davidson County and consequently, transit riders.

MTA adheres to the FTA required Four-Factor Framework as described below. Since the most current passenger survey data is reflective of 2022, the four-factor analysis will reference the 2022 survey data and American Community Survey (ACS) Census data from 2023.

The Four-Factor Framework

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

How LEP persons interact with the recipient’s agency:

Nashville-Davidson County is roughly 535 square miles with an estimated population of 715,884 according to the American Community Survey 2023 5-year estimates. MTA provides local and express fixed route bus services for Nashville-Davidson County. MTA also provides door-to-door WeGo Access ADA-complementary paratransit services for people with disabilities and those who are unable to ride the fixed route service. Access on Demand, a same day premium service available to Access customers in Davidson County, is also part of the services WeGo provides. MTA also partners with Uber and other local providers for the WeGo Link program providing first-mile, last-mile connections to and from designated bus stops. LEP persons are likely to come into contact with MTA through the following services provided:

- Local and regional fixed route bus services
- WeGo Access and Access on Demand Paratransit services for people with disabilities

- WeGo Link
- Customer Service at WeGo Central
- Calling and Emailing the Customer Care Department
- Ticket Sales windows
- MTA's Website
- Social Media
- Public Meetings
- Notices to the Public
- Ridership Surveys
- Community Focus Groups for Strategic Plan

Identification of LEP Communities:

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

- Speak English less than “very well”
- Exceed the 1,000-person Safe Harbor threshold³

Table 2.1 – Communities meeting LEP criteria in Davidson County

Language	Total Estimate
Spanish	45,430
Arabic	7,098
Other Asian Language	3,549
Other Unspecified Language	5,679
Other Indo- European Language	4,259

From the Origin & Destination Survey collected in 2022, MTA was able to determine which populations are predominantly served to distinguish how the LEP population of Davidson County interacts with MTA services and representatives. From this survey, the only population that met the 1,000-person threshold AND spoke English less than very well was the Spanish speaking population.

To ensure effective and meaningful use of the limited resources available, MTA considers the Spanish speaking population as the only minority group to meet the Safe Harbor threshold for written translation services

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

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

To ensure equitable inclusivity for the agency moving forward, MTA will utilize similar processes every five years as the Origin Destination Survey results are made available.

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

MTA's Customer Care Department consults directly with LEP persons when conducting monthly surveys on local and express fixed route bus services. Customer Care utilizes surveys in both English and Spanish when conducting the interviews. If surveys in other languages are requested, Customer Care can take down the participants contact information and mail or email a translated survey on a later date.

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

As part of this Title VI Program update and reviewing the current Language Assistance Plan, we recognize the growing needs of the Nashville-Davidson County area due to rapid growth, especially relative to the cited increase in foreign-born populations (See Appendix J for the Metro Language Access Report). MTA recognizes this growth to impact how we interact with LEP populations and is dedicated to ensuring equal access for current and future populations. In light of this, MTA is developing new reporting procedures for Customer Care, Operations, and Service Quality and will be updated as a revision to this document. For reporting purposes in this three-year period, verbal surveys and questionnaires with MTA departments such as Customer Care and Operations as well as referring to phone call records to the MTA and the Language Line formed the results of this section. Below is a breakdown of how often and in what way LEP individuals come into contact with the MTA's services:

- Customer Care phone services – For the fiscal year 2025 there 136 Spanish Phone calls, 14 Arabic, 2 Vietnamese, 2 French, 1 Russian, 1 Armenian and 1 Somali
- Ticket Sales – an average of 50 LEP persons per week
- Access paratransit – 40 LEP persons ride on a regular basis
- Community and Sponsored Events – 19 events in the last fiscal year
- Public Participation and Community Engagement – accommodations for notifications about service and fare changes, translation services, outreach to targeted media outlets for the Spanish speaking community

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

MTA provides local and express fixed route bus services for Nashville-Davidson County, and door-to-door WeGo Access ADA-complementary paratransit services as well as a premium same day service called Access on Demand. MTA has partnered with Uber to implement a program called WeGo Link. This program allows riders within a designated geographic boundary to call Uber for a discounted rate to take them from their location to a dedicated bus stop. The program is restricted to predefined zones which were determined using socioeconomic and demographic information to identify areas of our community that could benefit the most from this service. The

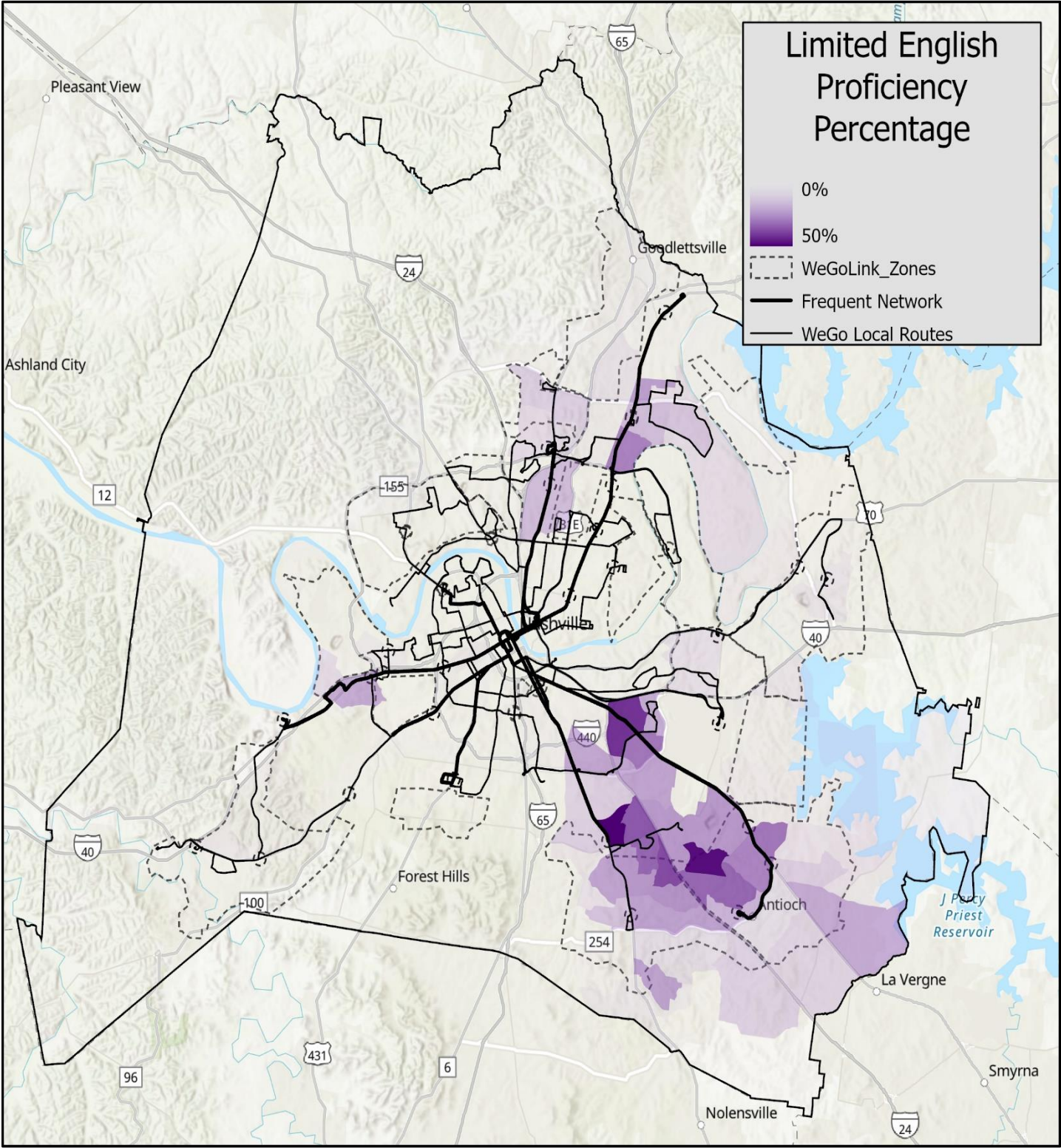
Title VI analysis of these zones are provided in the board approved items included in Appendix D. Through ridership analysis, Customer Care Representative testimonials, and Customer Care surveys MTA has found that LEP individuals come into contact with the MTA predominantly through our local fixed route bus services. Surveys show that this mode of service is used primarily for commuting to and from work. This service is also the least expensive and the most widely available. There are many transit stops in neighborhoods that have been identified as having a high concentration of LEP individuals.

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

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

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

Figure 2.2: Map of Fixed-Route transit network in relation to Limited English Proficient populations by census block.



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

MTA provides bus schedules, public notices, announcements, survey forms, and other outreach materials in both English and Spanish. Currently there are ten route schedules printed in Spanish. MTA also has one Quality Assurance Investigator as well as access to the Language Line, which is a call-in service that assists Customer Care Representatives when communicating with non-English speaking customers. MTA provides all of its written and spoken translation services to LEP persons free of charge.

The estimated costs that MTA incurred in the fiscal year as stated in order to provide written and spoken translation services are as follows:

- Language Line: \$1,247.03 (Fiscal year 2025)
- Spanish language printed materials: \$12,016 (Fiscal Year 2024)
- In the latest fiscal year WeGo has been able to perform written translation services internally

Specific Campaigns:

WeGo expanded “How to Ride” outreach materials to three additional languages in 2023 which now include Arabic, Somali, and Kurdish. Spanish translation has been part of outreach for several years. The Arabic materials were a direct request from a coalition of non-profits in Southeast Nashville which has a significantly growing Arabic speaking population. The translated materials included a “How to Ride” flyer, Quick Ticket fare card explainer, and YouTube video captioning. The Spanish, Somali, Arabic, and Kurdish materials were shared with various nonprofits in Nashville who work a variety of immigrant communities. The cards and flyers were also distributed to the Travel Training program starting in early 2024, for hands-on use with rider education in the future.

Language Assistance Plan: Goals

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

The plan includes the following five goals:

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

Identifying LEP Individuals who need language assistance

As described previously, MTA has used the Four Factor Analysis to identify LEP populations within our service area. The single prominent LEP population within Nashville- Davidson County is the Hispanic/Latino population whose predominant first language is Spanish. According to the Origin & Destination Survey conducted in 2022, 8% of the Spanish speaking population reported that they speak English less than very well. This population accounts for 1% of the total ridership on MTA

fixed-route service and therefore MTA has determined that both written and spoken translation services are appropriate for Spanish speaking individuals. All other languages spoken by LEP persons do not meet the Safe Harbor Threshold⁵, however; we offer spoken translation services through the Language Line used by our Customer Care Department as well as equip bus operators with the ability to offer these services on board. If a Customer Care Representative does not recognize the language needed by the LEP caller the Language Line may also be utilized to identify the language needed. All customer care representatives are trained upon hire to ensure acceptable procedures and practices on day-to-day operations. Since the last update to this Program, the LEP population percentage in Davidson County increased by 13.5%. The following chart reflects the 2023 estimated LEP percentage which will be used for reference as the onboard surveys are completed and collected to identify what populations currently rely on our services.

Table 2.2 – Languages Spoken by LEP Populations in Davidson County

Total Population	Speaks English Less than Very Well	%Total LEP	% Spanish	Arabic	Other Asian Language	Other Indo-European Language	Other Unspecified Language
709,846	70,012	9.9%	6.4%	1.0%	0.5%	0.6%	0.8%

Source: American Community Survey 5-Year Estimates projected to 2023

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

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

Providing language assistance measures

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

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

Training staff

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

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

Providing notice to LEP persons

MTA provides notice to LEP persons of the availability of language assistance in many ways. The Title VI Policy public notice is printed in English and in Spanish and is posted at all MTA facilities including the main hub at WeGo Central. This notice informs individuals of their rights under Title VI and also gives contact information for questions, comments, complaints, or if a person is in need of Customer Care assistance. The following is a list of other methods the MTA uses in order to notify the public of LEP assistance programs:

- Printing of Public Meeting notices and flyers in both English and Spanish
- Provide Press Release and purchase advertisements for publication in La Campana; area newspaper marketed to Hispanics

- Implement the use of an automated greeting in both English and Spanish, directing callers to select which language they prefer.
- Continued outreach to business, community, churches, and organizations whose members are predominantly LEP
- Attend events where there is a high LEP population in order to provide information about MTA services

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

Monitoring and updating the plan

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

As a continuing effort to achieve the goals of this LAP, the Nashville MTA is currently working towards a revised LEP plan to streamline data collection methodology in order to determine more accurately the changing needs of the customer service base. The following measures will be reported in order to update the plan in the coming months:

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

Sub-recipient Policy

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

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

Providing Assistance to Sub-recipients

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

Guidance materials include the following:

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

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

Monitoring Sub-recipients

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

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

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

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

Environmental Justice Equity Analysis

Since the last program update in 2022, the Nashville MTA has not taken part in the construction of any facilities requiring a site equity analysis.

A site equity analysis is completed during the planning stage of a maintenance or administrative facility to determine whether the site or location of a facility will result in discrimination on the grounds of race, color or national origin. The site equity analysis must compare the equity impacts of various siting alternatives, and the analysis must occur before the selection of the preferred site. If the recipient determines that the location of the project will result in a disparate impact, the recipient may only locate the project in that location if there is a substantial legitimate justification for locating the project there, and where there are no alternative locations that would have a less disparate impact. The recipient must show how both tests are met; it is important to understand that in order to make this showing, the recipient must consider and analyze alternatives to determine whether those alternatives would have less of a disparate impact on the basis of race, color, or national origin, and then implement the least discriminatory alternative.

Board Approval for Title VI Policy

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

Chapter 3: Collecting and Reporting Demographic Data

Demographic and Service Profile Maps

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

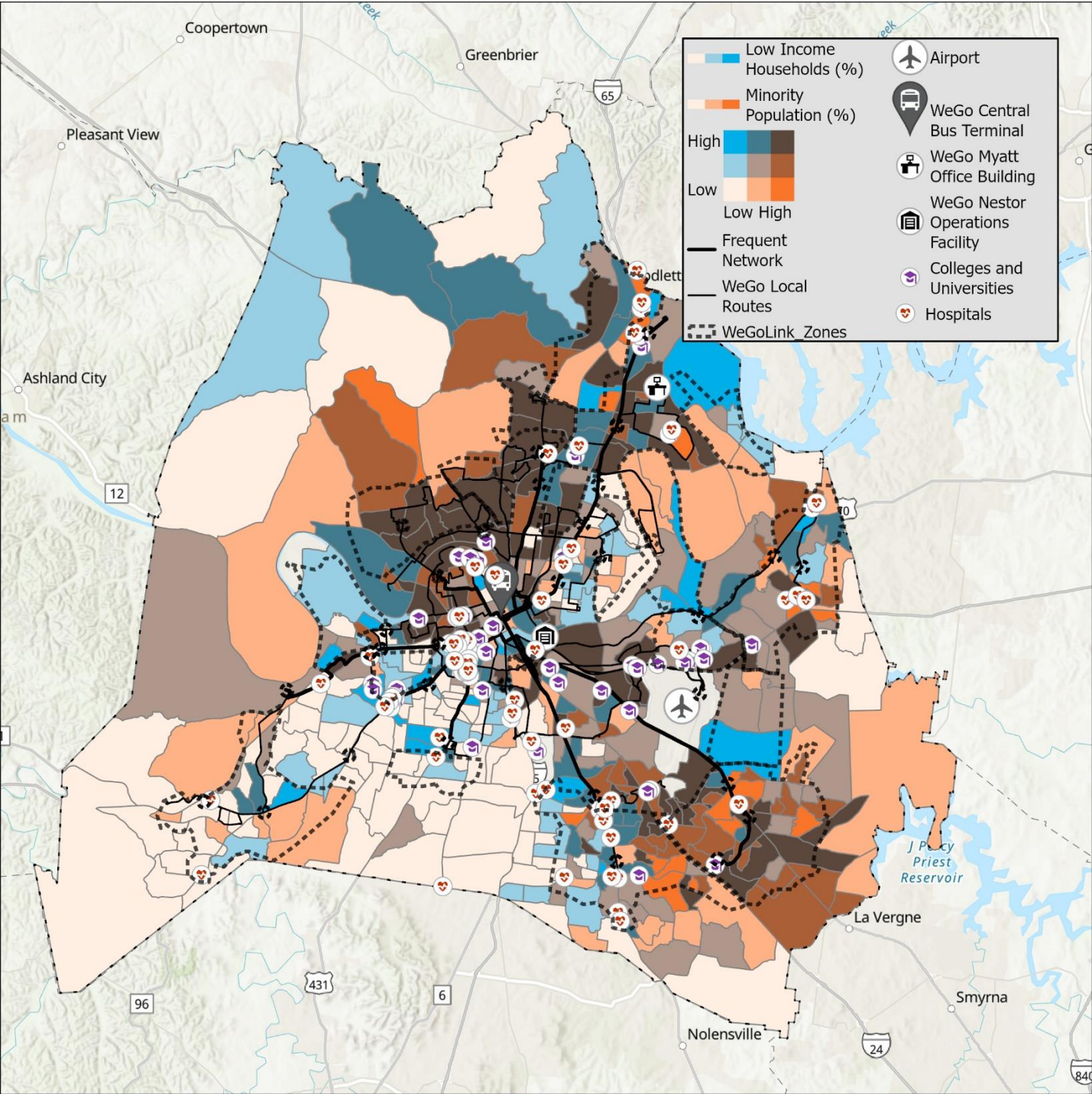
MTA utilized Transit Boardings and Estimation Simulation Tool's (TBEST) to calculate the average Census Block Group household size. For Davidson County, the data from 2023 U.S. Census and American Community Survey (ACS), puts the minority percentage at 46.3% up from 34.7% since 2017.

MTA also used the Department of Health and Human Services (DHHS) poverty-level guidelines to determine the poverty level for the average size household. The DHHS poverty income-level for the Block Group average household size is multiplied by 150% and all households where the income level is below the 150% threshold are considered to be low income. Table 3.1 lists the poverty thresholds for 2025. For Nashville-Davidson County the low-income population percentage is 18.72%, down from 21.97% from 2022. Figure 3.1 shows the Nashville MTA service coverage in relation to activity generators, and overlaying census tracks with minority and low-income population prevalence. The dark brown areas have the highest percentage of both minority and low-income while the darker blue shows high low-income and darker orange will show high minority population percentages.

Table 3.1: Poverty Thresholds

Persons in Household	Poverty Income	150% of Poverty Income
1	\$15,650	\$ 23,475
2	\$21,150	\$31,725
3	\$26,650	\$39,975
4	\$32,150	\$48,225
5	\$37,650	\$56,475
6	\$43,150	\$64,725
7	\$48,650	\$72,975
8	\$54,150	\$81,225

Figure 3.1: MTA Service Area and Minority and Low-Income Population with Major Activity Generators



Demographic Ridership and Travel Patterns

System wide Origin-Destination Onboard Survey 2022

According to FTA Title VI guidelines, transit agencies must conduct onboard surveys of their riders as part of their compliance with Title VI. Those are conducted every few years to ensure that the data is current and representative of the transit ridership. The most current data available is for MTA is from Fall 2022 and used as a baseline for all service standards within this document. Although this does not reflect the current service in place, the 2022 data is what is most readily available.

The 2022 survey covered all MTA routes as of the date of the survey in 2022. The data collection period was from October 5th 2022 to December 14th 2022. The goal was to obtain usable surveys from at least 3,300 weekday transit riders, which represented approximately 10% of the system ridership to serve as statistically valid representative sample. The actual number of completed, usable surveys was 3,588 weekday and 1,017 weekend surveys.

The survey was administered as a face-to-face interview and was made available in Spanish as well as English. Additional language options were available if the riders didn't speak either of those languages. While most respondents completed the survey during their trip, postage-paid return reply envelopes were available for riders who did not have time to complete the survey during their trip. This was done to ensure that short-trips were captured in the survey administration. Each survey contained a serial number that was used to track the route and sequence in which surveys were completed.

A sampling plan was developed to ensure that the overall results of the survey would be statistically valid. The sampling plan identifies the number of completed surveys that were needed from each route.

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

Figure 3.2: Demographics of MTA Ridership

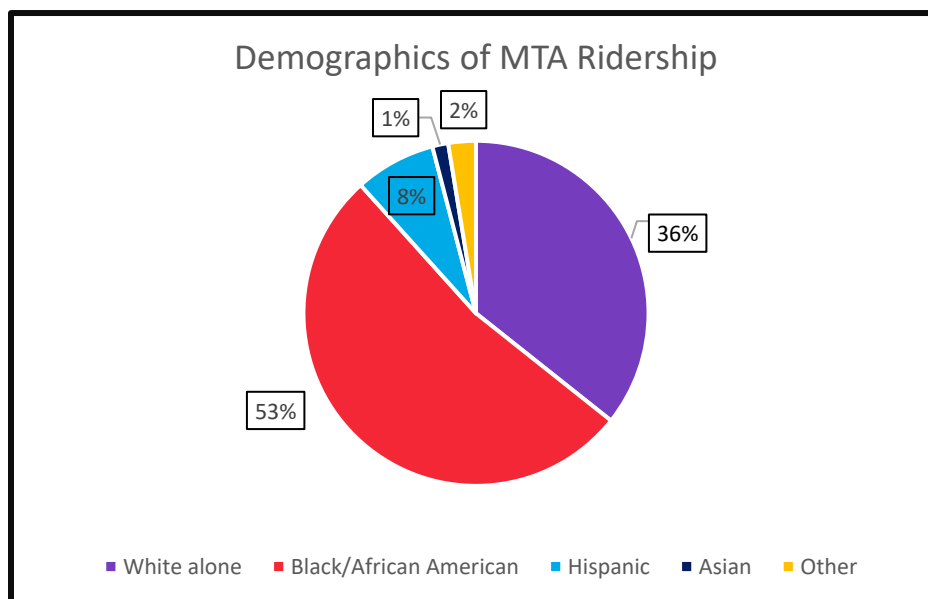


Table 3.2 Fare Media Usage by Minority Group

How the fare was paid			
	Minority	Non-Minority	Overall
Cash	42.98%	45.01%	43.8%
School Sponsored Pass (StriDe)	5.48%	2%	4.1%
Employer or College/University Sponsored Pass (WeGo ride)	8.38%	7.82%	8.2%
Quick Ticket Mobil App	10.15%	12%	10.8%
Quick Ticket Card	25.83%	25.40%	25.5%
Paper Ticket with Black Stripe	3.36%	2.91%	3.2%
N/A Free Ride	3.82%	5.59%	4.5%
	100.00%	100.36%	100.0%

Type of pass if Quick Ticket was used			
	Minority	Non-Minority	Overall
Loaded Money	30.68%	35.66%	32.16%
Day Pass	13.57%	13.49%	13.54%
7 Day Pass	13.08%	10.70%	12.15%
20 Ride Pass	3.24%	2.46%	3.01%
31 Day pass	38.84%	37.05%	38.15%
10 ride pass (WeGo Star Service Only)	0.20%	0.31%	0.24%
Refused/No Answer	0.39%	0.02%	0.30%
	100.00%	99.69%	99.55%

Table 3.4 Destination Type by Minority Group

Destination	White		Black		Hispanic		Asian		Other	
Your HOME	740	41.9%	1132	46.9%	160	48.0%	47	45.6%	23	42.6%
Your WORK PLACE	365	20.6%	544	22.6%	98	29.4%	20	19.4%	8	14.8%
Shopping	213	12.0%	183	7.6%	14	4.2%	7	6.8%	5	9.3%
Social Visit / Church / Personal / Friend's House	120	6.8%	163	6.8%	14	4.2%	8	7.8%	4	7.4%
Personal business (paying a bill, social services, etc)	87	4.9%	126	5.2%	7	2.1%	3	2.9%	2	3.7%
Restaurant / Sightseeing	70	4.0%	83	3.4%	10	3.0%	4	3.9%	4	7.4%
Medical appointment / Doctor Visit / Clinic (non-	57	3.2%	52	2.2%	8	2.4%	0	0.0%	0	0.0%

work)										
Hotel or Lodging	41	2.3%	15	0.6%	5	1.5%	3	2.9%	1	1.9%
Other work related	33	1.9%	32	1.3%	7	2.1%	3	2.9%	3	5.6%
Airport (passengers only)	22	1.2%	5	0.2%	0	0.0%	1	1.0%	1	1.9%
College / University (students only)	9	0.5%	29	1.2%	7	2.1%	6	5.8%	3	5.6%
School (K-12) (students only)	7	0.4%	44	1.8%	2	0.6%	1	1.0%	0	0.0%
Other	4	0.2%	4	0.2%	1	0.3%	0	0.0%	0	0.0%
	1768		2412		333		103		54	

Table 3.5 Number of Vehicles in the Household by Minority Group

Vehicles Per Household	White		Black/African American	Hispanic			Asian		Other	
None	1003	64.2%	1487	65.4%	164	53.2%	52	61.2%	28	68.3%
1	355	22.7%	565	24.8%	103	33.4%	23	27.1%	8	19.5%
2	166	10.6%	165	7.3%	35	11.4%	9	10.6%	5	12.2%
3	26	1.7%	37	1.6%	5	1.6%	1	1.2%	0	0.0%
4+	13	0.8%	20	0.9%	1	0.3%	0	0.0%	0	0.0%
	1563		2274		308		85		41	

Table 3.6 Top Ridership Routes for Black/African American Customers – 2,474 Total Responses

Most common routes for Black Riders		
55 MURFREESBORO PIKE	431	18.1%
56 GALLATIN PIKE	264	11.1%
23 DICKERSON PIKE	207	8.7%
52 NOLENSVILLE PIKE	198	8.3%
50 CHARLOTTE PIKE	166	7.0%

Table 3.7 Top Ridership Routes for Hispanic/Latino Customers – 351 Total Responses

Most common routes for Hispanic riders		
55 MURFREESBORO PIKE	83	27.3%
52 NOLENSVILLE PIKE	56	18.4%
56 GALLATIN PIKE	25	8.2%
3 WEST END	20	6.6%

Table 3.8 English as a Second Language by Ethnicity

Speaks a Language other than English at Home	White Alone		Black/African American		Hispanic		Asian		Other	
Yes	134	7.5%	94	3.8%	269	76.8%	44	43.1%	15	27.7%
No	1634	92.5%	2383	96.2%	81	23.2%	58	56.9%	39	72.3%
Total	1778		2477		350		102		54	

Chapter 4: Service Standards and Policies

MTA uses a classification system for its fixed-route service: *Frequent*, *Local*, *Connector*, and *Express*. Different minimum service standards are set for each of these classes. *Frequent* are routes that have daytime frequencies of 15 minutes or less. These key routes generally operate longer hours and at higher frequencies to meet higher levels of passenger demand in high-density travel corridors. The *Local* bus routes ensure basic geographic coverage of regular service in the densest areas of the city's core and Davidson County. *Local and Connector* routes have daytime frequencies between 20 and 60 minutes. The difference between a local route and a connector route has less to do with frequency and more to do with service model. Connector routes operate exclusively outside of downtown and offer connections between radial corridors. Express routes offer limited stop service between park and rides and major employment centers. MTA is responsible for the operation of two of these routes in a contractual agreement with the Regional Transportation Authority and therefore is included in the standards and policies for Nashville MTA.

Vehicle Load

An appropriate ratio of passenger load to space available on a vehicle influences passenger comfort and environment aboard a vehicle. The vehicle load standard will be defined as the number of passengers as compared to the vehicle size. For example, as shown in Table 4.1, a 40 foot bus should have a maximum of 53 passengers during peak service. If a service routinely exceeds the load standards defined below, it may be appropriate to provide additional frequency or assign vehicles with a higher capacity on that service. In the event that additional vehicle sizes are introduced to the fleet, the load standards for those vehicles shall mimic these in terms of ratio of passengers permitted to available space.

Table 4.1 Maximum Bus Load Standards

Vehicle Size	Seating capacity		
		Load Standard	Load Factor
25'	14	17	1.25
40'	38	49	1.3
60'	63	82	1.3

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

Vehicle Headway

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

The MTA standards are shown in Figure 3.2 by type of service. Currently, Express frequency is 2- 3 trips rather than a measure of frequency.

Table 4.2 Minimum Frequencies by Service Class

Service Class	Span of Service	Minimum Frequency	Frequency Goal
Frequent	Peak	15 minutes	10 minutes
	Midday	15 minutes	15 minutes
	Evening	30 minutes	20 minutes
	Weekends	30 minutes	15 minutes
Local / Connector	Peak	60 minutes	20 minutes
	Midday	60 minutes	30 minutes
	Evening	60 minutes	30 minutes
	Weekends	60 minutes	30 minutes
Express	Peak	30 minutes	15 minutes
	Midday		60 minutes

Service Performance

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

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

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

Some of these metrics, such as scheduling and recovery time and bus priority measures, are largely within agency control, but others, such as weather, are not. For each metric listed above, the performance of any individual route should be within 4 percentage points of the system average. In cases where the performance of an individual route is not within 4 percentage points of the system average, MTA should prioritize improvements to any elements that are within agency control.

Service Availability

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

routes without negatively affecting their performance. Service may include traditional fixed route transit and first / last mile services (such as WeGo Link).

Distance to transit is the area within a reasonable walking distance to the bus stop. Based on the guidelines set forth in the Agency's Transit Design Guidelines document, the standard used for access to transit will be 1/3 mile. An industry standard is that a population density of around 3 dwelling units per acre is needed to justify fixed route transit, which translates to around 5,000 people per square mile. MTA will strive to provide transit service within a ½ mile to residents of areas with a population density of over 5,000 persons per square mile. In determining whether such service can be offered, MTA will consider other factors such as the likely performance of the service that might be provided. Request for service from such areas can be another indication of whether such service is needed.

Pedestrian Access is the ability of customers on foot to access transit. The pedestrian environment is an important component of the availability of transit since in most bus systems, 95% of riders walk to transit. Lack of pedestrian access lowers the area of service coverage and potential ridership. Excellent pedestrian environment means available sidewalks, protection from traffic, safe crossings for roadways and a pleasant walking environment. Because an excellent pedestrian environment will encourage transit ridership, the 5,000 persons per square mile standard cited above could be relaxed in areas with an excellent pedestrian environment. MTA will strive to provide service within a ½ mile to residents of areas with an excellent pedestrian environment with a population density as low as 2,500 persons per square mile. Service may be flexibly routed or fixed bus service.

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

Park-and-Ride Access expands ridership for routes in areas of low density. MTA will strive to provide park and ride lots every 10 - 15 miles outside the Briley Parkway/I-440 loop where MTA has *Express* service.

WeGo Link Service aims to provide a first-mile last-mile service to areas in Davidson County where fixed route service would not be optimal at present. The zones for the WeGo Link program are located in close proximity to existing high frequency routes

Transit Amenities

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

Amenities Overview

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

following factors:

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

Guiding Principles

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

- Public Safety
- Accessibility
- Rider Comfort
- Signage

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

Shelters

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

Vehicle Assignment

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

Chapter 5: Monitoring Transit Service

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

Methodology

For each bus line, we defined the geographic area of coverage by including all Census Block Groups within one-half mile walking distance of bus stops and routes, excluding those portions of routes that travel on interstates or are otherwise not accessible to be bordered. We utilized the MTA Strategic Plan as a guide which uses a one-half mile buffer to determine route access based on the low-density nature of Nashville-Davidson County. At that point we identified the revenue miles of each route that travelled through and served minority block groups. If a route provides more than 33% of its service in minority block groups, it is classified as a minority route. Of the 28 MTA routes, only 7 are not considered minority routes, 2 of which are Frequent while the other 5 are in the Local category. We use this same methodology to identify low-income routes throughout Davidson County. Of the 28 routes only 4 routes were not considered minority routes, 1 of which is frequent while the other 3 are classified as local/connector. Table 5.1 is a comprehensive list of all MTA routes and their minority status and low-income status.

Table 5.1: Nashville MTA Routes: Minority and Low-Income Route Designation

Route	Minority Route	Low-Income Route
Frequent		
3 West End		
7 Hillsboro		Y
22 Bordeaux	Y	Y
23 Dickerson Pike	Y	Y
50 Charlotte Pike	Y	Y
52 Nolensville Pike	Y	Y
55 Murfreesboro Pike	Y	Y
56 Gallatin Pike	Y	Y
Local		
4 Shelby		Y
6 Lebanon Pike		Y
8 8th Avenue South		
9 Metrocenter	Y	Y
14 Whites Creek	Y	Y
17 12th Avenue South		

18 Airport / Elm Hill Pike	Y	Y
19 Herman	Y	Y
28 Meridian	Y	Y
29 Jefferson	Y	Y
34 Opry Mills	Y	Y
41 Golden Valley	Y	Y
42 Cumberland St. Cecilia	Y	Y
Connector		
70 Bellevue		
71 Trinity	Y	Y
75 Midtown	Y	Y
76 Madison	Y	Y
77 Thompson-Wedgewood	Y	Y
79 Skyline	Y	Y

Monitoring Service Standards

1. Vehicle Load Monitoring

Table 5.2 below shows the maximum load factors identified by MTA. For assessment, the trip with the highest average maximum load was identified for each time period. AM Service is defined as earlier than 9:15am; Midday is defined as 9:15am-3:14pm, and PM Peak is defined as 3:15pm and later for this analysis. Table 5.3 below shows the breakdown of vehicle loads for all bus routes by time of day. School trippers were excluded from this analysis because measures are in place to ensure that no students are left behind.

Table 5.2: Maximum Bus Load Standards

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

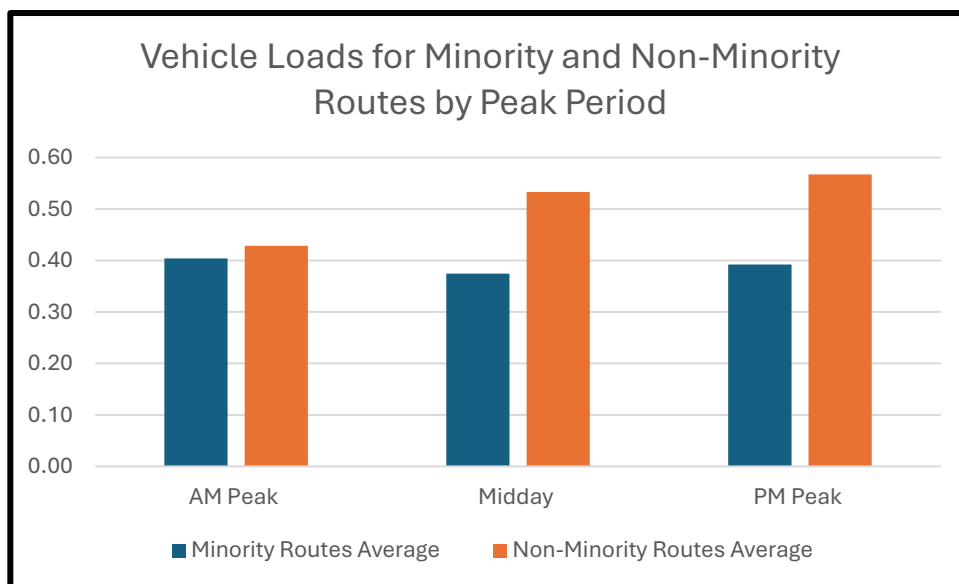
Table 5.3: Vehicle Loads for Minority and Non-Minority Routes

Route	AM Peak	Midday	PM Peak	Minority Route
Frequent				
3 West End	0.48	0.67	0.55	
7 Hillsboro	0.6	0.67	0.52	
22 Bordeaux	0.4	0.38	0.4	<u>Y</u>
23 Dickerson Pike	0.69	0.43	0.69	<u>Y</u>
50 Charlotte Pike	0.52	0.62	0.57	<u>Y</u>
52 Nolensville Pike	1	0.6	0.74	<u>Y</u>
55 Murfreesboro Pike	0.57	0.65	0.72	<u>Y</u>
56 Gallatin Pike	0.39	0.58	0.63	<u>Y</u>
Local				
4 Shelby	0.45	0.36	0.69	
6 Lebanon Pike	0.5	0.6	0.71	
8 8th Avenue South	0.43	0.55	0.62	
9 Metrocenter	0.24	0.24	0.21	<u>Y</u>
14 Whites Creek	0.45	0.21	0.36	<u>Y</u>
17 12th Avenue South	0.33	0.33	0.81	
18 Airport / Elm Hill Pike	0.48	0.4	0.52	<u>Y</u>
19 Herman	0.33	0.64	0.36	<u>Y</u>
28 Meridian	0.24	0.14	0.19	<u>Y</u>
29 Jefferson	0.17	0.21	0.19	<u>Y</u>
34 Opry Mills	0.38	0.38	0.43	<u>Y</u>
41 Golden Valley	0.26	0.24	0.31	<u>Y</u>
42 Cumberland St. Cecilia	0.36	0.21	0.26	<u>Y</u>
Connector				
70 Bellevue	0.21	0.55	0.07	
71 Trinity	0.14	0.14	0.14	<u>Y</u>

75 Midtown	0.38	0.75	0.31	<u>Y</u>
76 Madison	0.38	0.24	0.36	<u>Y</u>
77 Thompson-Wedgewood	0.56	0.31	0.31	<u>Y</u>
79 Skyline	0.14	0.12	0.14	<u>Y</u>
<u>Minority Routes Average</u>	0.40	0.37	0.39	.
<u>Non-Minority Routes Average</u>	0.43	0.53	0.57	.

The figure below depicts the average loads for all weekday service periods broken down by minority and non-minority routes. The average load is higher for non-minority routes in all time periods when comparing the two route types.

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



2) Vehicle Headway Monitoring

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

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

Route	Minority Route	Service Begins	AM Peak Headway	Midday Headway	PM Peak Headway	Service Ends	Span (Hours)	Span (Days per Week)
Frequent								
3 West End		4:50	10	15	10	26:02:00	21:12:00	7
7 Hillsboro		5:15	15	15	15	25:38:00	20:23:00	7
22 Bordeaux	Y	4:54	10	10	10	25:26:00	20:32:00	7
23 Dickerson Pike	Y	4:20	12	12	12	25:54:00	21:34:00	7
50 Charlotte Pike	Y	4:39	15	15	15	25:43:00	21:04:00	7
52 Nolensville Pike	Y	4:33	10	15	10	26:00:00	21:27:00	7
55 Murfreesboro Pike	Y	4:24	10	10	10	25:57:00	21:33:00	7
56 Gallatin Pike	Y	4:31	10	10	10	25:47:00	21:16:00	7
Local								
4 Shelby		4:38	20	20	20	25:55:00	21:17:00	7

6 Lebanon Pike		4:44	20	30	20	24:05:00	19:21:00	7
8 8th Avenue South		5:12	25	25	30	23:38	18:26:00	7
9 Metrocenter	Y	6:07	20	20	20	18:01	11:54:00	5
14 Whites Creek	Y	5:22	30	30	30	24:49:00	19:27:00	7
17 12th Avenue South		5:10	20	30	20	23:39	18:29:00	7
18 Airport / Elm Hill Pike	Y	5:15	45	45	55	24:00:00	18:45:00	7
19 Herman	Y	4:42	20	30	20	23:44	19:02:00	7
28 Meridian	Y	5:45	30	60	30	23:34	17:49:00	7
29 Jefferson	Y	5:19	20	30	20	23:32	18:13:00	7
34 Opry Mills	Y	6:30	60	60	60	22:51	16:21:00	7
41 Golden Valley	Y	5:25	60	60	60	18:23	12:58:00	5
42 Cumberland St. Cecilia	Y	5:35	30	30	30	23:35	18:00:00	7
Connector								
70 Bellevue		6:29	60	60	60	18:55	12:26:00	5
71 Trinity	Y	5:30	30	30	30	23:21	17:51:00	7

75 Midtown	Y	5:25	30	45	30	23:40	18:15:00	7
76 Madison	Y	5:02	30	30	30	22:50	17:48:00	7
77 Thompson-Wedgewood	Y	4:58	30	45	30	22:53	17:55:00	7
79 Skyline	Y	5:34	30	30	30	21:04	15:30:00	6
Minority Routes Avg.		5:11	27	31	27	23:33	18:21	6.8
Non-Minority Routes Avg.		5:11	24	28	25	23:58	18:47	6.7

Frequent

Of the Frequent routes, the total average AM and PM Peak Headway was 11.5 minutes, and the average midday headway was 12.75 minutes. The minority routes averaged lower headways throughout all three periods, and the non-minority routes were slightly higher. This indicates that minority routes have slightly more frequent service along the main corridors.

Local

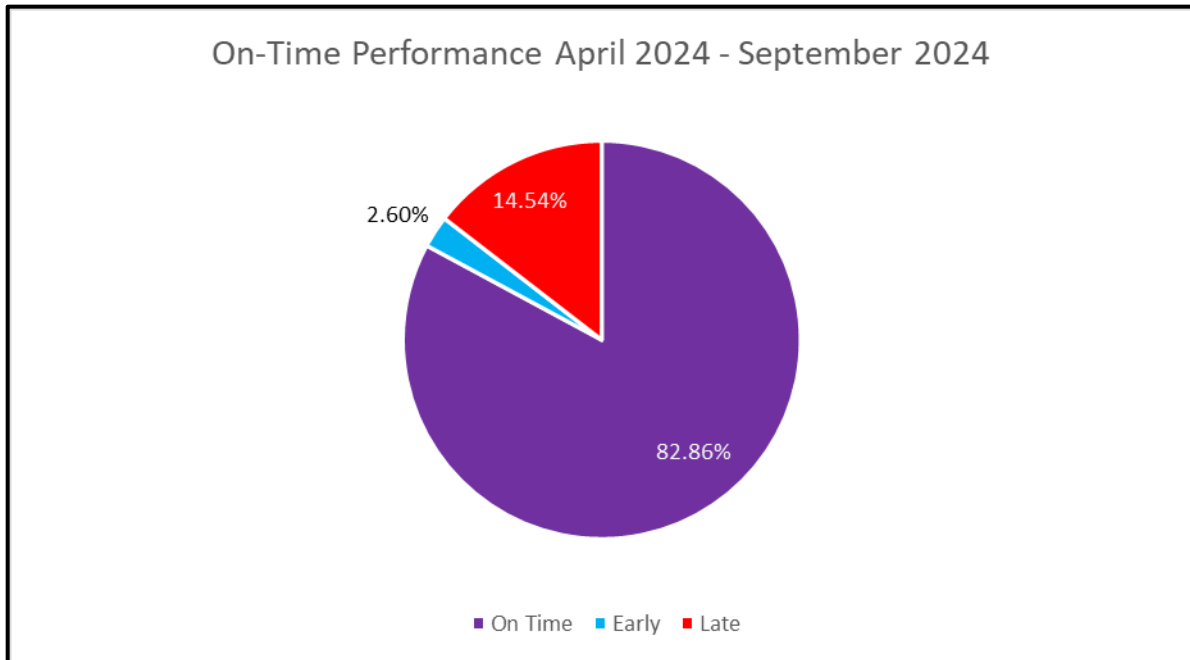
Of the Local routes, the minority routes averaged higher headways throughout the day in the morning and afternoon peaks. Therefore, service on *local* routes should be monitored to ensure that there is no disparate impact in this service class. It is important to note that because of the low number of non-minority routes, that a one-to-one comparison should not be made but rather the total service availability should be considered. When looking at the entire fixed-route bus network, 57.6% of revenue miles are in minority census tracts, indicating that the Nashville MTA service distribution is in favor of minority populations overall.

Connector

Of the Local routes, the minority routes averaged lower headways throughout the day. This indicates that minority routes have more frequent service throughout the day than non-minority routes.

3) On-Time Performance Monitoring

Figure 5.2: On-Time Performance for April 2024-September 2024



The MTA uses Automated Vehicle Locator (AVL) data to assess on-time performance. On-time performance data is collected for all buses on all routes. Over this 6 month evaluation period, data from approximately 1.91 million timepoints was collected. Of the trips observed, approximately two (2) percent were found departing a schedule time point early (i.e., more than 59 seconds before the departure time in the printed schedule). Approximately fifteen (15) percent were found departing a schedule time point late (i.e., more than 5 minutes and 59 seconds after the departure time in the printed schedule).

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

Table 5.5: On-Time Performance by Route Type		
Route	Minority Route	On Time Perf.
<u>Frequent</u>		
3 West End		81.78%
7 Hillsboro		84.36%
22 Bordeaux	Y	88.94%
23 Dickerson Pike	Y	85.57%
50 Charlotte Pike	Y	84.80%
52 Nolensville Pike	Y	77.51%
55 Murfreesboro Pike	Y	74.33%
56 Gallatin Pike	Y	79.11%
<u>Local</u>		
4 Shelby		87.48%
6 Lebanon Pike		78.18%
8 8th Avenue South		81.43%
9 Metrocenter	Y	91.30%
14 Whites Creek	Y	83.48%
17 12th Avenue South		85.01%
18 Airport / Elm Hill Pike	Y	74.87%
19 Herman	Y	88.03%
28 Meridian	Y	90.49%
29 Jefferson	Y	86.77%
34 Opry Mills	Y	85.21%
41 Golden Valley	Y	86.36%
42 Cumberland St. Cecilia	Y	90.87%
<u>Connector</u>		
70 Bellevue		88.10%
71 Trinity	Y	88.86%
75 Midtown	Y	87.03%
76 Madison	Y	83.81%

77 Thompson-Wedgewood	Y	84.33%
79 Skyline	Y	83.64%
Minority Routes Average		82.85%
Non-Minority Routes Average		82.89%

Five routes fell below the 80% on-time performance target. This indicates that these routes should be monitored for agency-controlled factors influencing on-time performance, particularly for the routes that serve primarily minority communities.

4) Service Availability Monitoring

Using available census data and GIS technologies most current as of the 2022 Origin Destination

on board survey, 54.2% of the population within MTA's service area was within ½ mile to the transit network. Furthermore, 81.2% of the service area's jobs were within ½ mile to the transit network. Using the 1/3-mile standard for minority and low-income populations, the following chart shows the percentage of each population that lives within the walk area. For example, 42.8% of the service area's Hispanic population lives within 1/3 of a mile of transit which makes up 13.7% of the total population within the 1/3-mile buffer of MTA service.

Since the last program update, several changes have occurred to the Nashville MTA fixed route network. As the agency is recovering from the effects of COVID service levels have maintained an emphasis on high frequency on major corridors, which serves the majority of our customers. The result has been less geographic coverage in non-transit supportive areas, but a better quality of service on major corridors where minority and low-income residents live and work. As the core frequent network continues to strengthen identifying areas outside of the core network to receive additional service has been a priority. This has included introducing crosstown service, additional frequency to non-frequent routes and introducing transit centers to serve neighborhoods which has provided additional connections.

Table 5.6: Population Characteristics: within 1/3-mile access to transit

Population Characteristics			
Population Share	Population	% of Walk Area	% of Service Area
Hispanic	41,955	13.7 %	43.1 %
Black	93,129	30.5 %	51.7 %
Poverty	51,422	16.8 %	52.3 %
Under 18	58,373	19.1 %	38.2 %
65 and Over	34,221	11.2 %	36.8 %
Workers	169,662	55.5 %	41.5 %
Spanish Speaking	19,200	6.3 %	41.8 %
Limited English Proficiency (LEP)	27,184	8.9 %	38.1 %

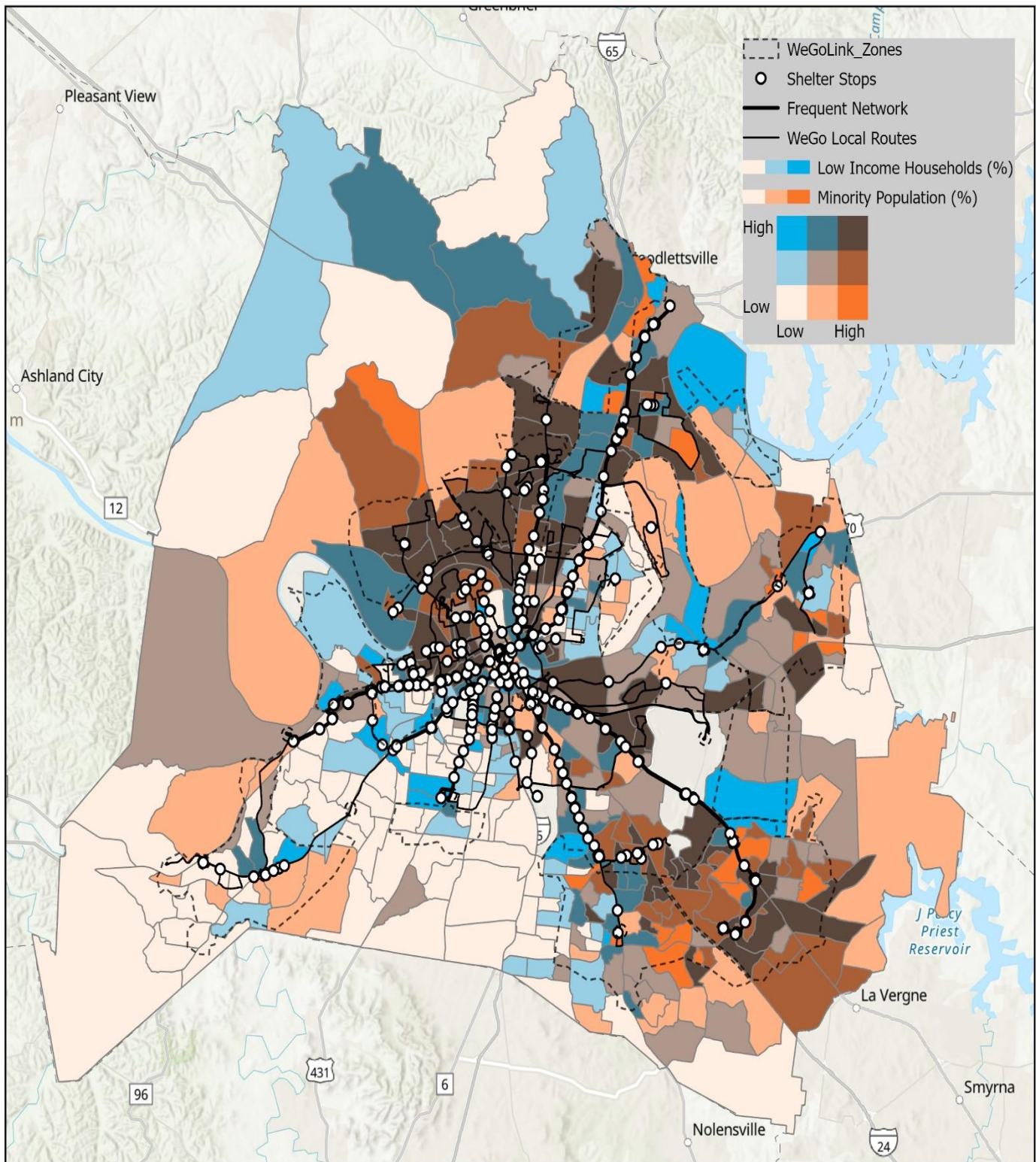
5) Vehicle Assignment Monitoring

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

6) Transit Amenities Monitoring

The overlay map below (Figure 5.4) shows the locations of shelters installed relative to the minority and low-income population distribution above system average. The map shows the locations of all sheltered stops in relation to the minority and low-income population distribution in Davidson County. An analysis shows that 72% of all shelter locations are within a ¼ mile walking distance from census tracts with a minority population higher than the system average (45.17%) and 79% are within ¼ mile from the census tracts above the low-income average (18.72%).

Figure 5.3 Bus Shelter Distribution Map



Chapter 6: Evaluation of Service and Fare Changes

Service and Fare Equity Analysis Major Service and Fare Change Policy

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

1. There is a change in any fare or fare media related to all services of fixed route and WeGo Access.
2. There is any change in service of twenty-five percent (25%) or more of the number of daily revenue miles for a specific route computed on a daily basis for the day of the week for which the change is made. ⁱ
3. A new transit route is established or eliminated.
4. Establishment or elimination of WeGo Link Zone.
5. Change of 25% or more of a WeGo Link boundary.

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

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

Example: WeGo implemented route 70 Bellevue to serve the newly constructed James Lawson High School in the fall of 2023 following a budgetary request by the Nashville Mayors Office. Service began at the start of the 2023-2024 Metro Nashville Public School year. The route 70 Bellevue was approved by the MTA board in January of 2024

WeGo Link zones if not a part of the bi-annual services changes can also be a part of experimental change due to the easy implementation of the service. In the summer of 2024 WeGo implemented three new WeGo Link zones, the Bell Road, Opry Mills and the Adventure Science Center were introduced to serve various employment, recreational and residential areas.

Adverse Effects

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

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

Disparate Impact and Disproportionate Burden Policy

The Federal Transit Administration (FTA) defines “disparate impacts” and “disproportionate burdens” as neutral policies or practices that have the effect of disproportionately excluding or adversely affecting members of a group protected under Title VI, and the recipient’s policy or practice lacks a substantial legitimate justification. The Disparate Impact Policy establishes a threshold for determining whether proposed fare or service changes have a disparate impact on minority populations versus non-minority populations. The Disproportionate Burden Policy establishes a threshold for determining whether proposed fare or service changes have an impact on low-income vs non-low-income populations.

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

The following is the Nashville MTA Disparate Impact and Disproportionate Burden Policy:

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

- Transit services are being provided to minority or low-income populations at a rate less than 80% (four-fifths) than the benefits being provided to non-minority or non-low-income populations (e.g. 8% compared to 10%)
- Adverse effects are being borne by the minority or low-income populations at a rate more than 20% (one-fifth) of the adverse effects being borne by the non-minority or non-low-income populations (e.g. 10% compared to 8%)

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

Public Participation

To ensure awareness of Nashville MTA Title VI policy proposals, MTA has discussed the Title VI changes at two public meetings to give individuals the opportunity to gather information about the proposed Title VI policy. The first meeting took place on July 31st at WeGo Central in Downtown Nashville, which is a central location for all parts of the community and provides the easiest and best access for MTA riders. The second meeting was held on August 11th virtually and was held in the evening to give individuals who were unable to attend the previous meeting an opportunity to attend. The Draft Program was released for a 28-day public review and comment period beginning on July 21st, 2025, and ending on Monday August 18th. The public was given the opportunity to provide comment via phone, email, and at public meetings. The public notice is provided on the MTA website, on social media and in two local newspapers, including one Spanish language publication. The draft document was made available online and hard copies were made available at the public meetings.

Results of Service and Fare Equity Analyses

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

Appendices

Appendices are accompanied separately from this document and can be accessed at <https://www.wegotransit.com/about-us/civil-rights/>

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