



Title VI Program Update

2019 - 2022

Regional Metropolitan Transit Authority of Omaha
d/b/a Metro
2222 Cuming Street
Omaha, NE 68102-4392
TRAMS #1839

CONTACT: Lauren Cencic
lcencic@ometro.com
402.951.6500

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Introduction

Title VI of the Civil Rights Act of 1964 prohibits discrimination on the basis of race, color, or national origin in programs and activities receiving Federal financial assistance. Specifically, Title VI provides that “no person in the United States shall, on the grounds of race, color, or national origin, be excluded from participation in, be denied the benefits of, or be subjected to discrimination under any program or activity receiving Federal financial assistance.” (42 U.S.C. §2000d).

The Regional Metropolitan Transit Authority of Omaha, d/b/a Metro, a political subdivision of the State of Nebraska, is a direct recipient of Federal financial assistance, a public transportation provider located in an urbanized area of 200,000 or more in population and operates more than fifty vehicles in peak service.

Metro operates local fixed routes and paratransit service at various levels of service seven (7) days a week, with supplementary weekday service including several commuter express routes and a downtown circulator.

This program document details how Metro incorporates nondiscrimination policies and practices in providing public transportation services to the public.

Title VI Annual Certifications and Assurances

In accordance with 49 CFR Section 21.7(a), with every application for financial assistance from the Federal Transit Administration (FTA), Metro submits an assurance that it will carry out the Title VI Program in compliance with the Department of Transportation's (DOT) Title VI regulations. Metro also submits its Title VI assurance as part of its annual Certifications and Assurances to the FTA, assuring compliance with laws and regulations so that no person will be denied the benefits of, or otherwise be subjected to discrimination in any DOT or FTA funded program or activity, particularly in the level and quality of transportation services and transportation-related benefits, on the basis of race, color, or national origin.

Executed Certifications and Assurances

The following is a copy of the most current Certifications and Assurances document signed by Metro's Chief Executive Officer Lauren Cencic.

(Signature pages alternate to providing Certifications and Assurances in TrAMS.)

The Applicant certifies to the applicable provisions of all categories: (check here) X.

The Applicant certifies to the applicable provisions of the categories it has selected:

Category	Certification
01	Certifications and Assurances Required of Every Applicant
02	Public Transportation Agency Safety Plans
03	Tax Liability and Felony Convictions
04	Lobbying
05	Private Sector Protections
06	Transit Asset Management Plan
07	Rolling Stock Buy America Reviews and Bus Testing
08	Urbanized Area Formula Grants Program
09	Formula Grants for Rural Areas
10	Fixed Guideway Capital Investment Grants and the Expedited Project Delivery for Capital Investment Grants Pilot Program
11	Grants for Buses and Bus Facilities and Low or No Emission Vehicle Deployment Grant Programs

Certifications and Assurances

Fiscal Year 2022

12 Enhanced Mobility of Seniors and Individuals with Disabilities Programs

13 State of Good Repair Grants

14 Infrastructure Finance Programs

15 Alcohol and Controlled Substances Testing

16 Rail Safety Training and Oversight

17 Demand Responsive Service

18 Interest and Financing Costs

19 Cybersecurity Certification for Rail Rolling Stock and Operations

20 Tribal Transit Programs

21 Emergency Relief Program

CERTIFICATIONS AND ASSURANCES SIGNATURE PAGE

AFFIRMATION OF APPLICANT

Name of the Applicant: Transit Authority of the City of Omaha

BY SIGNING BELOW, on behalf of the Applicant, I declare that it has duly authorized me to make these Certifications and Assurances and bind its compliance. Thus, it agrees to comply with all federal laws, regulations, and requirements, follow applicable federal guidance, and comply with the Certifications and Assurances as indicated on the foregoing page applicable to each application its Authorized Representative makes to the Federal Transit Administration (FTA) in the federal fiscal year, irrespective of whether the individual that acted on his or her Applicant's behalf continues to represent it.

The Certifications and Assurances the Applicant selects apply to each Award for which it now seeks, or may later seek federal assistance to be awarded by FTA during the federal fiscal year.

The Applicant affirms the truthfulness and accuracy of the Certifications and Assurances it has selected in the statements submitted with this document and any other submission made to FTA, and acknowledges that the Program Fraud Civil Remedies Act of 1986, 31 U.S.C. § 3801 *et seq.*, and implementing U.S. DOT regulations, "Program Fraud Civil Remedies," 49 CFR part 31, apply to any certification, assurance or submission made to FTA. The criminal provisions of 18 U.S.C. § 1001 apply to any certification, assurance, or submission made in connection with a federal public transportation program authorized by 49 U.S.C. chapter 53 or any other statute

Certifications and Assurances

Fiscal Year 2022

In signing this document, I declare under penalties of perjury that the foregoing Certifications and Assurances, and any other statements made by me on behalf of the Applicant are true and accurate.

Signature [Signature] Date: 2/16/2022

Name Lauren A. Cencic Authorized Representative of Applicant

AFFIRMATION OF APPLICANT'S ATTORNEY

For (Name of Applicant): TRANSIT Authority of the City of Omaha

As the undersigned Attorney for the above-named Applicant, I hereby affirm to the Applicant that it has authority under state, local, or tribal government law, as applicable, to make and comply with the Certifications and Assurances as indicated on the foregoing pages. I further affirm that, in my opinion, the Certifications and Assurances have been legally made and constitute legal and binding obligations on it.

I further affirm that, to the best of my knowledge, there is no legislation or litigation pending or imminent that might adversely affect the validity of these Certifications and Assurances, or of the performance of its FTA assisted Award.

Signature [Signature] Date: 2/28/2022

Name Timothy M. Perry Attorney for Applicant

Each Applicant for federal assistance to be awarded by FTA must provide an Affirmation of Applicant's Attorney pertaining to the Applicant's legal capacity. The Applicant may enter its electronic signature in lieu of the Attorney's signature within TrAMS, provided the Applicant has on file and uploaded to TrAMS this hard-copy Affirmation, signed by the attorney and dated this federal fiscal year.

Title VI Notice to Public

Public Protections Under Title VI—Statement of Policy

Title VI of the Civil Rights Act of 1964, as amended, states that “no person in the United States shall, on the grounds of race, color, or national origin be excluded from participation in, be denied the benefits of, or be subjected to discrimination under any program or activity receiving Federal financial assistance.”

Metro operates its programs and services without regard to race, color, or national origin in accordance with Title VI of the Civil Rights Act of 1964, as amended. Any person who believes they have been subjected to unequal treatment or discriminatory practices in the receipt of benefits or services may exercise their right to file a Title VI complaint with Metro.

Metro’s Notice to the Public informs the public on how to file a complaint or request additional information by calling 402-341-0800 (TDD 402-341-0807), emailing TitleVI@ometro.com, visiting the administrative office at 2222 Cuming Street, Omaha, Nebraska 68102, or online at www.ometro.com.

Notice Postings

The following Title VI Policy Statement is posted in English and Spanish on the Metro website, and in public areas of Metro's headquarters.

Notifying the Public of Rights Under Title VI

Regional Metropolitan Transit Authority of Omaha (Metro)

- The Regional Metropolitan Transit Authority of Omaha (Metro) operates its programs and services without regard to race, color, and national origin in accordance with Title VI of the Civil Rights Act of 1964 as amended. Any person who believes she or he has been aggrieved by any unlawful discriminatory practice under Title VI may file a complaint with Metro.
- For more information on Metro's civil rights program, and the procedures to file a complaint, contact 402-341-0800, (TDD 402-341-0807); email TitleVI@ometro.com; or visit our administrative office at 2222 Cuming Street, Omaha, NE 68102-4392. For more information, visit www.ometro.com
- A complainant may file a complaint directly with the Federal Transit Administration by filing a complaint with the Office of Civil Rights, Attention: Title VI Program Coordinator, East Building, 5th Floor-TCR, 1200 New Jersey Ave., SE, Washington, DC 20590
- If information is needed in another language, please contact 402-341-0800, ext. 2700.

Notificación al Público de los Derechos Bajo el Título VI

La Autoridad Regional de Tránsito Metropolitano de Omaha (Metro)

- La Autoridad Regional de Tránsito Metropolitano de Omaha (Metro) opera sus programas y servicios sin distinción de raza, color, y origen nacional, de conformidad con el Título VI del Acta de Derechos Civiles de 1964 según enmendada. Cualquier persona que cree o que ha sido perjudicada por una práctica discriminatoria ilegal bajo el Título VI puede presentar una queja con Metro.
- Para obtener más información sobre el programa de derechos civiles del Metro, así como los procedimientos para presentar una queja, comuníquese con 402-341-0800 (TDD 402-341-0807), email TitleVI@ometro.com, o visite nuestra oficina administrativa en 2222 Cuming Street, Omaha, NE 68102-4392. Para obtener más información, visite www.ometro.com
- Un demandante puede presentar una queja directamente con la Administración Federal de Tránsito mediante la presentación de una queja ante la Oficina de Derechos Civiles, Atención: Title VI Program Coordinator, East Building, 5th Floor-TCR, 1200 New Jersey Ave, SE, Washington, DC. 20590
- Si se necesita información en otro idioma, por favor póngase en contacto con 402-341-0800, ext. 2700.

The condensed statement below is printed on all transit schedules and posted in each bus.

Title VI: Metro is committed to ensuring that no person is excluded from participation in or denied the benefits of its services on the basis of race, color, or national origin, as provided by Title VI of the Civil Rights Act of 1964 as amended. To file a Title VI complaint or get more information on your rights, call 402.341.0800 TDD 402.341.0807.

Título VI: Metro se compromete a garantizar que ninguna persona sea excluida de participar o denegar los beneficios de sus servicios sobre la base de raza, color u origen nacional, conforme a lo dispuesto en el Título VI de la Ley de Derechos Civiles de 1964 según enmendada. Para presentar una queja del Título VI u obtener más información sobre sus derechos, llame 402.341.0800 TDD 402.341.0807.

Filing a Title VI Complaint

Process and Investigation Procedures

The Regional Metropolitan Transit Authority of Omaha, Nebraska, d/b/a Metro, is committed to a policy of non-discrimination in the conduct of its business and delivery of services, including its Title VI responsibilities, and to the delivery of equitable and accessible transportation services.

Any person, group of individuals or entity who believe that they have been subjected to discrimination under Title VI of the Civil Rights Act of 1964, as amended, based on race, color or national origin may file a Title VI Complaint with Metro within 180 days from the date of the alleged discrimination. Complaints may be filed with either Metro or with the U.S. Department of Transportation, Federal Transit Administration.

Metro's Title VI Complaint Form is available at www.ometro.com, or by calling:

- VOICE: (402) 341-0800
- TDD: (402) 341-0807

A Title VI Complaint Form (accessible formats available upon request) can be filed with Metro at titlevi@ometro.com or mailed to:

Metro
Title VI Coordinator
2222 Cuming Street
Omaha, NE 68102-4392

A Title VI complaint not filed on Metro's Title VI Complaint Form shall include:

1. Your name, address, and a phone number
2. Please explain what happened and how you were discriminated against. Indicate who was involved. Be sure to include how you feel other persons were treated differently than you. If you have any other information about what happened, please attach supporting documents, if needed.
3. The complaint must be signed and dated by the person filing the complaint or by someone authorized to do so on his or her behalf.

Complaint Assistance

In the case where a Complainant is unable or incapable of providing a written statement, a verbal complaint of discrimination may be made to the Title VI Coordinator. Under these circumstances, the Complainant will be interviewed, and the Title VI Coordinator will assist the Complainant in converting the verbal allegations to writing. Metro will also provide appropriate assistance to Complainants who are limited in their ability to communicate in English, e.g., language or sign language interpreter.

Complaint Tracking

The Title VI Coordinator shall maintain a log of Title VI complaints received. This log will be maintained by Metro's Title VI Coordinator. The log shall include the date the complaint was filed, a summary of the allegations, the status of the complaint, and actions taken by Metro in response to the Title VI Complaint.

Investigation Procedures

Once the complaint is received, Metro will review it to determine if Metro has jurisdiction over the incident. The complainant will receive an acknowledgement letter informing her/him whether the complaint will be investigated by Metro.

Metro has 60 days to investigate the complaint. If more information is needed to resolve the case, Metro may contact the complainant. The complainant has 30 business days from the date of the letter to send requested information to the investigator assigned to the case. If the investigator is not contacted by the complainant or does not receive the additional information within 30 business days, Metro can administratively close the case. A case can be administratively closed also if the complainant no longer wishes to pursue their case.

After the investigator reviews the complaint, the investigator will issue either a closure letter or a letter of finding. A Letter of Finding summarizes results of the investigation. A closure letter summarizes the allegations and states that there was not a Title VI violation and that the case will be closed. If the complainant wishes to appeal the decision, the complainant must contact the Chief Executive Officer within 10 days of the Letter of Finding/Closure Letter at 2222 Cuming Street, Omaha NE 68102.

A complainant may also choose to file directly with the Department of Transportation, Federal Transit Administration, Office of Civil Rights, no later than 180 days after the date of the alleged discrimination.

Mailing address:

U.S. Department of Transportation,
Attention: Office of Civil Rights, East Building, 5th Floor-TCR,
1200 New Jersey Avenue, SE, Washington, D.C. 20590

Complaint Form

A copy of the Title VI Complaint Form is contained on the next four pages. Additionally, this form is available in Spanish.



Regional Metropolitan Transit Authority of Omaha

2222 Cumming Street
Omaha, NE 68102

402.341.0800

TDD: 402.341.0807

Fax: 402.342.0849

ometro.com

**Title VI Complaint Form
Metro Office of Civil Rights**

Metro is committed to ensuring that no person is excluded from participation in or denied the benefits of its services based on race, color, or national origin, as provided by Title VI of the Civil Rights Act of 1964, as amended. Title VI complaints must be filed within 180 days from the date of the alleged discrimination.

The following information is necessary to assist us in processing your complaint. If you require any assistance in completing this form, please contact the Title VI Coordinator by calling (402) 341-0800 voice or (402) 341-0807 TDD.

The completed form must be returned to:
Metro Office of Civil Rights,
Title VI Coordinator
2222 Cumming Street, Omaha, NE 68102-4392

Please Print.

Last	First	Middle	
Street Address	City	State	Zip
()	()		
Primary Phone	Secondary Phone		
Email Address			

Preferred method of communication (Choose One): ____ Email ____ Phone ____ Mail

Person Discriminated Against if other than Complainant:

Last	First	Middle	
Street Address	City	State	Zip
()	()		
Primary Phone	Secondary Phone		
Email Address			

Preferred method of communication (Choose One): ____ Email ____ Phone ____ Mail

Please provide the basis upon which you believe your complaint is based:

- ☐ RACE
☐ COLOR
☐ NATIONAL ORIGIN (Limited English Proficiency)



Regional Metropolitan Transit Authority of Omaha

2222 Cuming Street
Omaha, NE 68102

402.341.0800
TDD: 402.341.0807
Fax: 402.342.0949

ometro.com

Description of the Alleged Title VI Discrimination *continued*

I affirm that I have read the above charge and it is true to the best of my knowledge.

Signature of Complainant Applicant (Under 18, Signature of Parent or Guardian)

____/____/____
Month / Date / Year

Print or Type Name of Complainant _____



Regional Metropolitan Transit Authority of Omaha

2222 Cumming Street
Omaha, NE 68102

402.341.0800
TDD: 402.341.0807
Fax: 402.342.0949

ometro.com

Have you filed with any other federal, state or local agency? ☐ Yes ☐ No

If you answered yes, please list agency / agencies and contact information:

Agency Name			
Last	First	Middle	
Street Address	City	State	Zip
()	()		
Primary Phone		Secondary Phone	
Email Address			

Agency Name			
Last	First	Middle	
Street Address	City	State	Zip
()	()		
Primary Phone		Secondary Phone	
Email Address			

Agency Name			
Last	First	Middle	
Street Address	City	State	Zip
()	()		
Primary Phone		Secondary Phone	
Email Address			

Date Received: _____
Received BY: _____

Title VI Complaints, Investigations and Lawsuits

From 2019 to 2021, Metro did not receive any Title VI complaints of discrimination; Nebraska Equal Opportunity Commission Changes; or lawsuits alleging discrimination based on race.

Public Participation Plan

Background

Recipients must develop a Public Participation Plan (PPP), including information about outreach methods to engage minority and Limited English Proficient populations (LEP), as well as a summary of outreach efforts made since the last Title VI Program submission.

Metro supports and promotes a proactive and open approach in reaching out to the public for comments on proposed public transportation issues such as service or fare changes, construction projects, technology upgrades, and other important decisions affecting the receipt of benefits or services. Transparency in decision making and open lines of communication ensure that all members of the community have an opportunity to contribute to the process.

This document outlines the public involvement strategies for the general public as well as those strategies targeting minority and LEP populations and efforts to engage other constituencies that are traditionally underrepresented and underserved. Underserved populations include, but are not limited to, persons with mental and physical challenges, seniors, low-income populations, and those with lower literacy skills.

Outreach Philosophy

Metro emphasizes involvement of the public in its planning process and seeks inclusive and collaborative citizen participation in decision making. It is Metro's goal to make decisions about plans, projects, and service or fare changes only after providing opportunities for public comment and analyzing any feedback received. All views should be heard. In order to accomplish this, Metro conducts proactive and ongoing outreach, as well as project or proposal specific outreach.

Early, Continuous, and Meaningful Public Engagement

Efforts are made on a regular basis to maintain clear and meaningful lines of communication between Metro and the local community. With the service area both dynamic and diverse, engagement of the public in transit planning and development is the forefront of being a responsive operation.

Open and continuous communication is vital to maintaining strong working relationships with area stakeholders and intermediaries who facilitate participation for LEP, minority, and other underserved groups. Stakeholders and intermediaries include community and advocacy groups, social service and health agencies, major employers, schools, community colleges/ universities, interested persons and local leaders. Communication with the aforementioned ensures Metro remains cognizant of the issues, needs, and priorities of LEP, minority, and the underserved populations in the community and is also vital in encouraging the participation of LEP, minority, and other underserved groups. A representative sample of those groups is listed at the end of this section.

In addition to engaging community groups, Metro solicits continuous feedback from the general public. Comments can be submitted at any time through the Metro website, by phone through a customer service agent, other staff, or by mail to Metro's headquarters. Metro's website, which features the Google language translator, is updated regularly with information and projects in order to encourage public comment. Metro has also added a text line to receive customer questions, complaints, and comments. When feasible, Metro also seeks information from current and prospective riders through on-board or online surveys.

However, just opening the participation process to the public is not enough. There are populations unlikely to become involved unless special efforts are made to interact with them.

To reach out specifically to members of the affected LEP and minority communities, Metro identified community and advocacy groups serving large numbers of LEP and minority populations. Metro's partnership with these groups assisted in developing strategies to engage their clients/members in becoming more involved with Metro's public engagement activities. Examples of this is evidenced by Metro's incorporation of strategies such as simplified messaging and visualization enhancements using color graphs and maps in handouts and presentations. Additionally, Metro utilizes these resource agencies to help disseminate information about Metro's services and the availability of special accommodations including language assistance in order to access Metro's services. When available Metro publishes information and promotes engagement opportunities through newsletters, email groups, and community bulletins of the stakeholders/intermediary groups include those that serve LEP, minority, low-income, disabled, and other special interest groups.

Organizations that work closely with LEP and minority individuals include:

- Catholic Charities/The Juan Diego Center
- Family Housing Advisory Services, Inc.
- Heartland Workforce Solutions
- Lutheran Family Services
- Refugee Empowerment Center
- South Omaha Neighborhood Alliance
- Department of Health and Human Services, *Refugee Resettlement Program*
- Vietnamese Alliance Church of Omaha
- Latino Center of the Midlands
- Omaha Refugee Task Force
- One World Health Center
- International Center of the Heartland, *a United Way Initiative*
- Heartland Family Service
- Mosaic
- Operation Hope (*Credit and Money Management services only*)
- Eat N' Talk Africa
- Learning for All
- Youth for Greater Good
- Refugee Women Rising
- Intercultural Senior Center
- Restoring Dignity
- International Council for Refugees and Immigrants
- Immigrant Legal Center
- Eastern Nebraska Community Action Partnership
- Generation Diamond
- Omaha Housing Authority
- National Able Network
- Habitat for Humanity Omaha (*Services only provided to those enrolled*)

Metro seeks to maintain open dialogue with these organizations and conducts targeted outreach to them in conjunction with public participation efforts. A more inclusive public engagement contact list can be found at the end of the public participation plan.

Metro regularly participates in numerous cross-agency committees including the Coordinated Transit Committee hosted by the Metropolitan Area Planning Agency (MAPA). This committee develops the Coordinated Public Transit and Human Services Plan and Metro's active participation in this committee also provides an ongoing venue for feedback and representative stakeholder input.

Input is also sought through the citizens Transit Advisory Committee (TAC). TAC Members are appointed by the City of Omaha Mayor and Council Members; Metro Transit Board Members; and the Mayors of Council Bluffs, Iowa; Bellevue, Nebraska; Papillion, Nebraska; and La Vista, Nebraska. TAC meets on the second Wednesday of every month. TAC is charged with addressing passenger comments, e.g., complaints, suggestions, compliments, etc. This includes being the first step on occasion in addressing Title VI complaints; final approval/disapproval of ADA eligibility certifications appeals. They also review all proposed service changes, fare structures and attend and assist at public hearings, community forums, etc.

Additionally, Metro's Board of Directors meetings are held monthly and in compliance with Nebraska's Open Meetings Act. The general populace is invited to attend and to provide input on matters under consideration by the Board. Metro's Board of Directors Meeting public notice is published in Omaha World-Herald, on Metro's Facebook, and on the Metro website.

Outreach Regarding Fare or Major Service Changes

When preparing for significant changes to Metro's public transportation services or any fare change, it is vital to gather input from a broad range of sources and through a variety of methods. No singular means of outreach can effectively gather feedback from all perspectives. As such, Metro relies on traditional outreach methods such as public meetings as well as other non-traditional outreach methods. Metro conducts outreach and seeks public input on service changes including those that are not significant enough to meet the 'major service change' threshold.

Outreach and participation efforts are stressed with environmental justice communities in order to:

1. Ensure full and fair participation by all potentially affected communities;
2. Avoid, minimize, or mitigate disproportionately high and adverse effects on minority and low-income populations; and
3. Prevent the denial of, reduction of, or significant delay in receipt of public transportation benefits by minority, LEP, low-income, and underserved populations.

Metro continually seeks to involve organizations and individuals that may have potential interest in proposed changes. Metro consults with organizations and agencies that serve environmental justice populations and seeks out populations who may be affected so that they may voice their opinion. Public input is documented, considered, and incorporated into the decision-making process.

Stakeholder Meetings

Metro seeks to capitalize on existing community resources to gather input and feedback on proposed changes. Metro often meets with stakeholders from public/private schools, universities, healthcare institutions, social service agencies, and other local groups to better understand community needs and seek to include representatives of minority, low-income, and LEP populations in stakeholder meetings and committees. These community experts often have localized knowledge that can guide Metro staff when developing proposals for the general public.

Public Meetings

As the primary method of seeking community input, there is significant planning and preparation in advance of every public meeting. The following considerations assure that minority, LEP, individuals with disabilities, and low-income populations can attend and actively participate in the decision-making process:

Location: Scheduled in settings with public transportation access near the routes or communities affected by the proposed changes, with additional considerations for members of the population with limited accessibility, such as LEP, minority, disabled and other underserved populations in North Omaha, South Omaha, and the Downtown area. All hosting facilities are fully ADA accessible and are familiar and convenient to the public, including the Metro

headquarters, local libraries, community centers, social service organizations, churches, or schools.

Time: Scheduled, at a minimum twice (preferably on two different days) during daytime and evening hours to allow for varied work and school schedules. Start and end times are planned around the nearby route schedules to facilitate participation for public transportation dependent individuals.

Publicity: Before public meetings are held, the following procedures shall be followed:

- a. Public Meeting Notices (English and Spanish) posted at major transit centers and the Metro headquarters.;
- b. Rider Alerts (English / Spanish) distributed on Metro's revenue vehicles;
- c. Online at www.ometro.com and [MyRide OMA](#);
- d. Social media posts: [Facebook](#), [Twitter](#), and [Instagram](#);
- e. Email distribution to:
 - a. Intermediaries and stakeholders including those that frequently work with traditionally underrepresented populations including LEP, minorities, low-income, senior, and individuals with disabilities, are contacted in order to disseminate information about the meetings and are asked to encourage participation;
- f. For persons most comfortable with written communications, Metro provides a reasonable timeline for the receipt of U.S. Postal Service post marked envelopes no later than midnight of a specific date;
- g. Published notice, as appropriate, in:

λ Bellevue Leader	λ Ralston Recorder
λ Omaha World-Herald	λ Council Bluffs Nonpareil
λ Douglas County Post-Gazette	λ Papillion Times
λ Omaha Star	
- h. Press releases sent to the local television, radio, radio talking book, and print media.

All meeting announcements shall inform the public of the availability of large format English/Spanish handouts and oral Spanish translation and, with 48-hours advance request, oral/sign language interpreter and/or other special needs assistance.

Format: Public meetings follow an informal structure to allow for dialogue, comments, and questions throughout the meeting. Key elements are presented visually through paper handouts, large print display boards, and/or electronic projection. Metro also seeks to accommodate lower literacy skills through clear and concise language to the greatest degree possible. Attendees are free to participate according to their comfort level, and comments can be submitted verbally or in print at the time of the meeting and may also be submitted by mail or online for at least a 10-day period following the last meeting.

Resources: Following the meetings, key documents and other presentation materials are posted on the Metro website or in print at Metro's headquarters. And continued to be

received are comments by phone, online, or by mail for at least 10 days following the last public meeting.

Non-Traditional Outreach

Metro understands that while necessary and effective, public meetings do not always provide the most convenient method of outreach to all members of the community. Metro seeks out existing community organizations such as regularly scheduled meetings of neighborhood associations, civic advisory councils, local businesses, and special interest groups. Special effort is made to reach out to minority, LEP, and other underserved populations through non-traditional outreach that may include attending existing regularly scheduled meetings, soliciting feedback through intermediaries, and publication in newsletters and other formats in English and other languages as appropriate.

Metro also uses a number of social media platforms to help reach the local community. Metro has a presence on Facebook, Twitter, Instagram, LinkedIn, and YouTube. The Communications team continues to monitor how the community is using new and emerging social media platforms and will keep options open to expand its digital presence to meet the community where they already are.

Metro has also conducted research through the use of printed and digital surveys in an effort to gain ongoing feedback from the public. These methods provide another avenue for riders and other members of the public to share their input. This is especially important for minority, LEP, and other underserved populations.

Public Participation in Recent Planning Activities

Early, Continuous, and Meaningful Public Engagement

Metro strives to maintain regular, consistent public engagement with its riders and the community at-large. Some examples of the engagement done by Metro staff include public feedback sessions, monthly Board meetings, lunch and learn sessions, and bus and bike rack demonstrations at community events. Metro staff is continually seeking new, innovative ways to engage the public including minority and LEP populations to ensure a high level of involvement with the local community.

Metro continues to communicate with passengers through bilingual messaging with permanently posted interior vehicle signs, online and onboard distribution of rider alerts and other print materials, postings in transit centers, and digital signs at key transit stations.

Metro has continued to work closely with many local organizations, community groups, and civic departments. Staff members have participated in regular cross-agency committee meetings, planning studies, and community workshops. From large format presentations at regional conferences to one-on-one meetings with local leaders, Metro has maintained open communication and connections with the community.

The following is a non-inclusive list of organizations in the Omaha community that Metro works with:

Public Engagement Contact List

- Activate Omaha
- American Red Cross
- Bellevue Human Services Department
- Black Men United
- Boys & Girls Clubs
- Catholic Charities
- City of Bellevue, NE
- City of Council Bluffs, IA
- City of La Vista, NE
- City of Omaha, NE
- City of Papillion, NE
- City of Ralston, NE
- Chicano Awareness Center
- Clarkson College
- Community Alliance
- Community Centers
- Council Bluffs Chamber of Commerce
- Council Bluffs Special Transit
- Department of Health and Human Services
- Disabled American Veterans
- Douglas County Housing Authority
- Easter Seals
- Eastern Nebraska Human Services Agency
- Eastern Nebraska Office on Aging
- Empowerment Network
- Encore
- Family Housing Services, Inc.
- Goodwill Industries
- Greater Omaha of Commerce
- Greater Omaha Community Action
- Greater Omaha Workforce Development
- Greater Omaha Young Professionals
- Green Omaha Coalition
- Habitat Omaha
- Heartland Family Service
- Heartland Hope Mission
- International Center of the Heartland
- Iowa Department of Transportation
- Iowa West Foundation
- Juan Diego Center
- Latino Center of the Midlands
- League of Human Dignity
- Lutheran Family Services of Nebraska, Inc.
- Madonna School
- Mayor's Commission for Citizens with Disabilities
- Metropolitan Area Planning Agency
- Metropolitan Community College
- Micah House
- Millard Good Samaritan Center
- Mode Shift Omaha
- Mosaic Omaha
- Nebraska Department of Roads
- Nebraska Health & Human Services
- Nebraska Medicine
- Nebraska Statewide Independent Living Council
- Nebraska Workforce Development
- Neighborhood Center for Greater Omaha
- Omaha Association of the Blind
- Omaha by Design
- Omaha Housing Authority
- Omaha Opportunities Industrialization Center
- Omaha Public Libraries
- Omaha Public Schools
- Omaha Refugee Task Force
- Omaha Together One Community
- Open Door Mission
- Paralyzed Veterans of America
- Pottawattamie Veterans Affairs
- Refugee Empowerment Center
- Restoring Dignity
- Salvation Army
- Siena Francis House

- South Omaha Development Project through the Greater Omaha Chamber of Commerce
- South Omaha Neighborhood Alliance
- Stephen Center
- Sudanese National Community of Nebraska
- United Way of the Midlands
- University of Nebraska - Omaha
- Urban League of Nebraska
- Veterans Administration
- Veterans Hospital – VA Nebraska – Western Iowa Health Care System
- Vietnamese Alliance Church of Omaha
- Visiting Nurses Association
- Vocational Rehabilitation
- Workforce Development Solutions
- YMCA

Metro has participated in and provided information in the following types of outreach events since its last Title VI submission:

- Large public community events
- Farmer's markets
- School orientations/presentations
- Employer-sponsored programs
- Lunch + Learns
- Transit Ambassadors
- Rider listening sessions
- Website communications
- Social media postings
- Sustainability events & activities
- Mailings to targeted audiences
- Local radio announcements
- Print advertisements and notices
- Radio and television outreach
- Community meetings (e.g., Chamber of Commerce)
- Community education
- Community ridership events
- K-12 Rides Free Program
- Targeted communications for
- Community events, such as parades and street parties
- Contests

Language Assistance Plan

Introduction

This Language Assistance Plan (LAP) is one component of Metro’s endeavors to provide an appropriate level of language assistance to meet the needs of individuals within Metro’s service area who are “Limited English Proficient”. LEP individuals are those who have limited ability to read, write, speak, or understand English. The plan includes a summary of language assistance measures currently provided by Metro transit and additional measures proposed for the future.

Background

Title VI regulations have been interpreted to hold that Title VI prohibits actions that have a disproportionate effect on LEP persons because such conduct constitutes a form of national origin discrimination. Executive Order 13166, “Improving Access to Services for Persons with Limited English Proficiency” directs each federal agency to examine the services it provides and implement a system by which LEP persons can meaningfully access those services, and to publish guidance for their respective recipients to assist them in meeting their obligations to LEP persons under Title VI.

The “Four-Factor Framework” outlined in the U.S. DOT’s policy guidance was followed to prepare the LAP.

Analysis Using the Four-Factor Framework

Task 1: The number or proportion of LEP persons eligible to be served or likely to be encountered by the program or recipient

Task 1, Step 1: Examine prior experiences with LEP individuals.

Serving Customers / General Public

Metro interviewed customer service staff, the administrative facility receptionist / reduced fare ID administrator, and the ADA complementary paratransit staff and found that the primary interactions with LEP individuals have been Spanish. A very small number of LEP individuals who speak languages other than Spanish have asked for information in person but have been accompanied by translators who speak English. Metro contracts for bilingual Call Center / Customer Service staffing. The contractor has on-site Spanish speaking agents and contracted third-party phone translators for other languages. The most common questions asked by LEP individuals are regarding ADA complementary paratransit service, bus schedule and route information, and fare media options and pricing.

Public Meetings

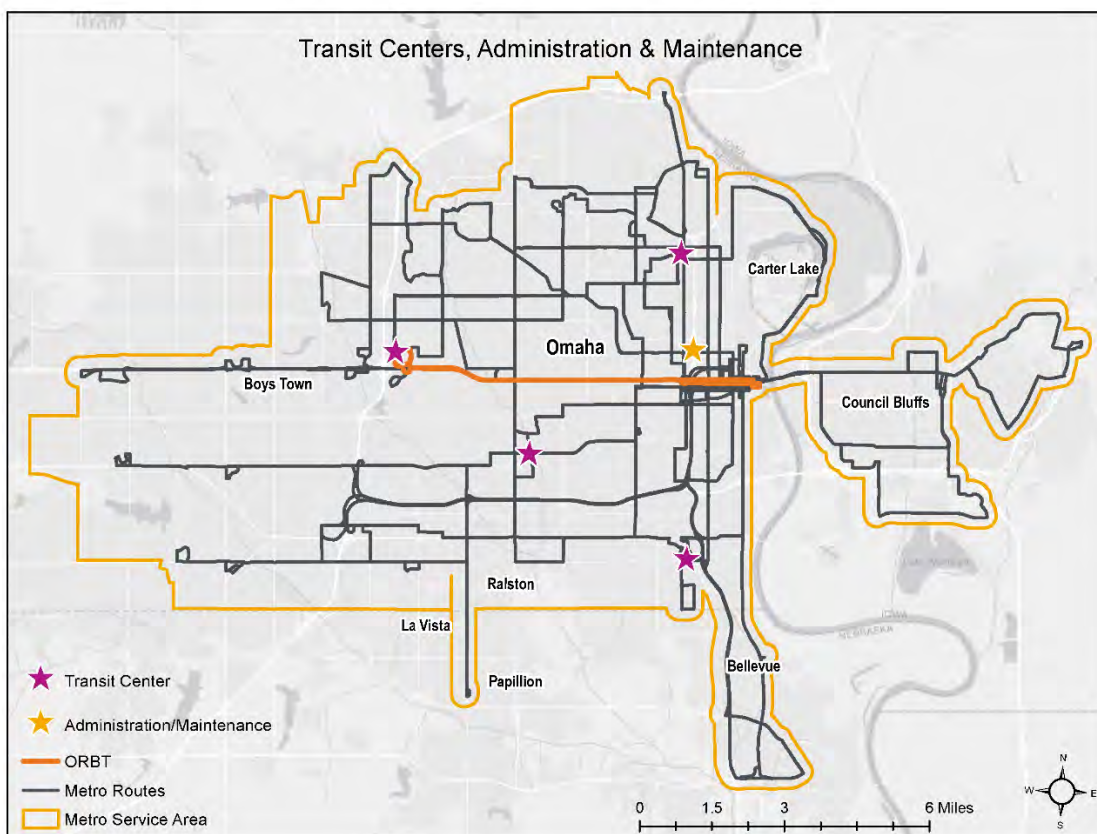
Bilingual Spanish speaking staff attend public engagement events and hearings. To date, no requests for additional translation services have been received. **NOTE:** Metro notifies local agencies/groups of upcoming events/hearings asking them to disseminate the public meeting notice. On occasion, LEP representatives and/or translators attend. This may be an explanation for the lack of request(s) for additional language assistance.

On-Board Survey

Metro conducted an onboard survey during October/November 2022 to collect passenger information on race, color, national origin, English proficiency, language spoken at home, household income, travel patterns, and other rider characteristics. Additionally, demographic information was collected on fare usage by fare type amongst minority and low-income users, in order to assist with fare equity analyses.

Task 1, Step 2A: Identify the geographic boundaries of the area your agency serves

Metro's Service Area



MAP 1: METRO TRANSIT CENTERS, ADMINISTRATION, AND MAINTENANCE

Metro’s service area is located primarily within the City of Omaha. All services operated by Metro outside Omaha’s city limits are ‘turn-key’ contracts with the individual entities defining their level of service. As such, Metro’s service area does have limited coverage beyond the city limits. For the purposes of this LAP and the Four Factor Analysis, Metro analyzed demographic data from the base service area on page 24, mapped with the gold outline.

Task 1, Step 2B: Obtain Census data on LEP population in your Service Area

477,942 people live in Metro’s service area with 421,370 individuals (88.2%) speaking only English. There are 35,745 persons who speak Spanish (or Spanish Creole) and 3.3% of those who speak Spanish, speak English less than “very well”. The cumulative total of all populations who do not speak English very well (except those who speak Spanish) is 8,856 persons or 1.9% of the population. Tables 1 and 2 show Languages Spoken at Home and All Residents 5 Years and Older Speaking English “Less Than Very Well”. Recent research is finding persons completing the American Community Survey (ACS) are self-identifying Language Spoken at Home other than English to maintain their culture and not their inability to speak some English.

TABLE 1: LANGUAGE SPOKEN AT HOME FOR METRO’S SERVICE AREA

Total population Metro Service Area	Speak Only English	Percent Speak Only English	Speak English "Less Than Very Well"	Percent Speak English "Less Than Very Well"	Speak Spanish & Speak English "Less Than Very Well"	Percent Speak Spanish & Speak English "Less Than Very Well"	Speak Language Other Than Spanish & Speak English "Less Than Very Well"	Percent Speak Language Other Than Spanish & Speak English "Less Than Very Well"
477,942	421,370	88.2%	24,825	5.2%	15,969	3.3%	8,856	1.9%

Source: 2020 American Community Survey, U.S. Census

TABLE 2: ALL RESIDENTS 5 YEARS AND OLDER SPEAKING ENGLISH “LESS THAN VERY WELL”

Language Spoken	Population Metro Service Area	Percent That Speaks English “Less Than Very Well”
Spanish	35,745	3.34%
Other languages of Asia	2,775	0.46%
French	1,900	0.15%
Nepali, Marathi, or other Indic languages	1,481	0.15%
Swahili or other languages of Central, Eastern, and Southern Africa	1,480	0.15%
Chinese (incl. Mandarin, Cantonese)	1,434	0.12%
Vietnamese	1,085	0.15%
Arabic	990	0.09%
German	892	0.02%
Tagalog (incl. Filipino)	822	0.05%
Telugu	810	0.04%
Amharic, Somali, or other Afro-Asiatic languages	809	0.12%
Hindi	679	0.02%
Yoruba, Twi, Igbo, or other languages of Western Africa	578	0.04%
Russian	556	0.04%
Korean	523	0.04%
Japanese	446	0.04%
Other Indo-European languages	368	0.01%
Malayalam, Kannada, or other Dravidian languages	344	0.01%
Persian (incl. Farsi, Darsi)	305	0.02%
Ilocano, Samoan, Hawaiian, or other Austronesian languages	279	0.01%
Tamil	270	0.01%
Italian	231	0.01%
Polish	221	0.01%
Serbo-Croatian	207	0.02%
Ukrainian or other Slavic languages	189	0.01%
Thai, Lao, or other Tai-Kadai languages	166	0.02%
Other and unspecified languages	125	0.00%
Urdu	120	0.00%
Other Native languages of North America	119	0.00%
Bengali	114	0.00%
Greek	109	0.00%
Portuguese	92	0.01%
Hmong	64	0.01%
Yiddish, Pennsylvania Dutch or other West Germanic languages	62	0.00%
Gujarati	48	0.00%
Khmer	42	0.00%
Punjabi	40	0.00%
Hebrew	30	0.00%
Haitian	18	0.00%
Navajo	12	0.00%
Armenian	4	0.00%

Source: 2020 American Community Survey, U.S. Census

Task 1, Step 2C: Analyze the data you have collected

As seen in Table 3, the top three (3) languages in the service area with persons who speak English less than very well are Spanish, other languages of Asia and French. Metro analyzed census data for each of these three languages/language categories.

TABLE 3: TOP TEN LANGUAGES SPOKEN AT HOME BY ABILITY TO SPEAK ENGLISH FOR THE POPULATION 5 YEARS AND OVER

Language	Total Speakers Metro Service Area	Percent Total Speakers	Total Speaks English "Less Than Very Well"	Percent Speaks English "Less Than Very Well"
English Only	421,370	88.16%		
Spanish	35,745	7.48%	15,969	3.34%
Other languages of Asia	2,775	0.58%	2178	0.46%
French	1,900	0.40%	713	0.15%
Nepali, Marathi, or other Indic languages	1,481	0.31%	725	0.15%
Swahili or other languages of Central, Eastern, and Southern Africa	1,480	0.31%	695	0.15%
Chinese (incl. Mandarin, Cantonese)	1,434	0.30%	564	0.12%
Vietnamese	1,085	0.23%	722	0.15%
Arabic	990	0.21%	410	0.09%
German	892	0.19%	119	0.02%

Source: 2020 American Community Survey, U.S. Census

Spanish

The 2020 American Community Survey data (ACS) identified 35,745 individuals in Metro's service area who speak Spanish, of these 15,969 speak English less than very well.

Other Languages of Asia

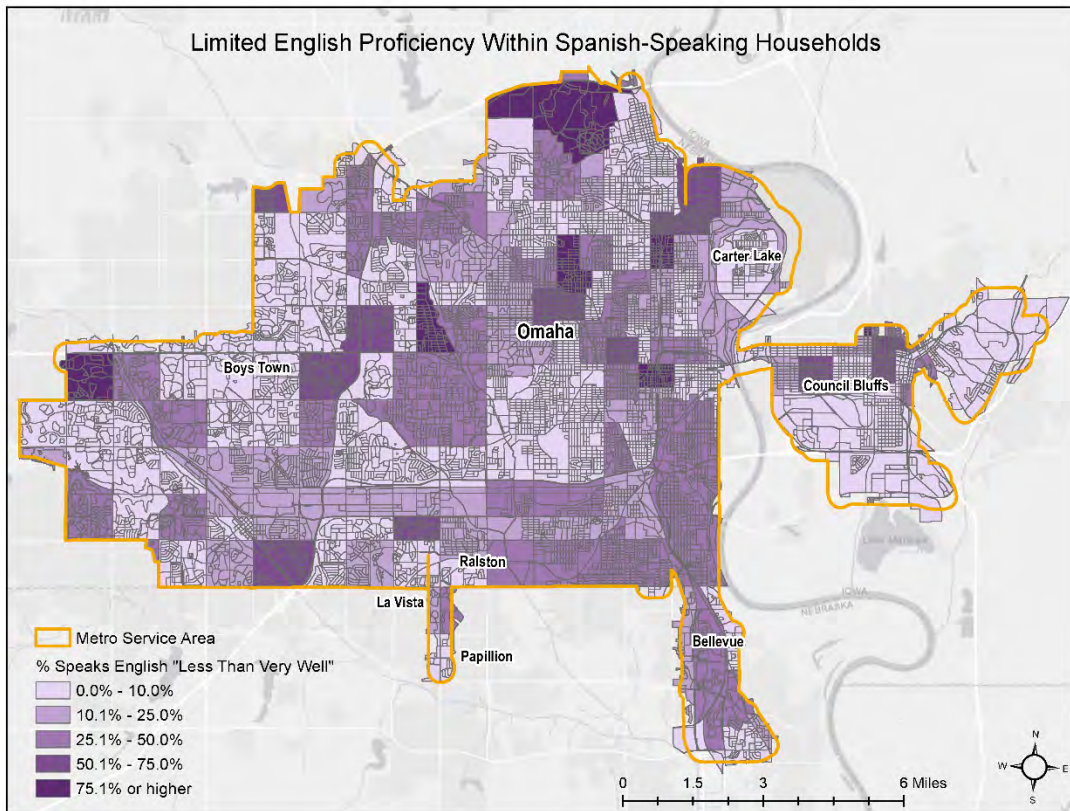
The U.S. Census aggregates thirty-one (31) languages in the category of "Other Languages of Asia". The 2020 American Community Survey data identified 2,775 individuals in Metro's service area who speak other Asian Languages, of these 2,178 speak English less than very well.

Task 1, Step 2D: Identify any concentrations of LEP persons within Service Area

Metro identified concentrations of LEP persons within the service area for each of the three most common languages/language categories: Spanish, other Asian languages, and French.

Spanish

As illustrated in Map 2 and verified through input from community organizations, Spanish speaking persons can be found throughout the City of Omaha and Omaha-Council Bluffs UZA but are concentrated primarily in South Omaha. High concentrations of Spanish speaking population are centered along South 24th Street, south of downtown within Metro's service area.



MAP 2: DISTRIBUTION OF SPANISH SPEAKING INDIVIDUALS WHO SPEAK ENGLISH LESS THAN VERY WELL

Other Languages of Asia:

Individuals who speak other languages of Asia are dispersed throughout the City of Omaha and Metro's service area. No large concentrations of individuals speaking other Asian languages within Metro's service area have been identified through census data or consultation with intermediary groups.

French:

The 2020 American Community Survey data identified 1,900 individuals in Metro's service area who speak French, of these 713 speak English less than very well.

Research with community organizations and individuals reveals that many of these LEP individuals are refugees that are placed in housing through refugee resettlement programs. In many cases, these housing units are in small clusters of several families within the same area but dispersed throughout the city and service area without large concentrations in any one area. The refugee resettlement programs provide many opportunities to learn English as a second language and provide translation

service which is evidenced by the higher percentage of individuals who speak French at home but speak English very well.

Task 1, Step 3: Consult state and local sources of data

Local sources of data on LEP persons in the Metro service area include statistics from the Omaha Public School District (OPS) English Learner program as well as information regarding refugee resettlement in the area. The OPS District English Learner and Refugee Report: 2021-2022, documents approximately an 8.3% increase in their English Learner program over 2020-21 and a 60% increase over the last 10 years. There are 20,628 K-12 students participating in the English Learner program, accounting for 20.5% of the K-12 student population. There are 2,358 refugee students in the district coming from 17 different countries making up 4.8% of the K-12 student population.

TABLE 4: LANGUAGE SPOKEN AT HOME, OMAHA PUBLIC SCHOOLS

Language Spoken at Home	Total	Percent of Non-English Speakers
Spanish	15,212	73.74%
Karen	1,780	8.63%
Somali (includes Maay-Maay)	724	3.51%
Nepali	439	2.13%
Nuer	317	1.54%
Karenni	272	1.32%
Arabic	252	1.22%
Q'anjoba'l	211	1.02%
Burmese	193	0.94%
French	173	0.84%
All Other Languages	1,055	5.11%
Speaking a Language Other Than English	20,628	100.00%
Count of Languages		108

Source: OPS District English Learner and Refugee Report: 2021-2022

Spanish

Table 4 shows Spanish speakers make up the largest percentage of OPS's LEP population.

Other Languages of Asia

OPS data in the "District English Language Learner/Refugee Report, 2021-22" identifies student enrollment speaking Karen and Burmese which are classified in the Census Data as "Other Languages of Asia". Of these, the most used language within OPS is Karen with 1,780 students who speak Karen at home. Data is not readily available on how many of these Karen speakers also speak English. To date, Metro has not received any requests for translation to Karen.

Metro will continue to monitor Asian languages, especially Karen, for increased usage in the Omaha urbanized area, but to date has not identified any written language classified as "Other Languages of Asia" that exceeds 1,000 persons.

Somali and Nuer

OPS data in the “District English Language Learner/Refugee Report, 2021 - 22” identified students speaking Somali and Nuer which are classified in the Census data as “Amharic, Somali, or other Afro-Asiatic Languages”. Neither of which had greater than 724 students enrolled in the district.

Applying the distribution of languages classified as “Amharic, Somali, or other Afro-Asiatic Languages” from the OPS data to the 809 individuals who speak Amharic, Somali, or other Afro-Asiatic Languages identified in Metro’s service area from the 2020 American Community Survey data, there are no Amharic, Somali, or other Afro-Asiatic Languages in the Omaha urbanized area that exceed 1,000 persons who speak English less than very well.

Task 1, Step 4A: Identify community organizations

Community organizations and social service agencies serving large numbers of LEP individuals were identified and include, but are not limited to:

- Boys & Girls Clubs of the Midlands
- Catholic Charities / The Juan Diego Center
- Department of Health and Human Services, Refugee Resettlement Program
- Eastern Nebraska Community Action Partnership
- Eat N’ Talk Africa
- Generation Diamond
- Habitat for Humanity Omaha
- Heartland Family Service
- Heartland Workforce Solutions
- Immigrant Legal Center
- Intercultural Senior Center
- International Center of the Heartland, a United Way Initiative
- International Council for Refugees and Immigrants
- Latino Center of the Midlands
- Learning for All
- Lutheran Family Services, Refugee Support Program
- Mosaic
- Omaha Housing Authority
- Omaha Refugee Task Force
- Omaha Together One Community
- One World Community Health Centers
- Operation Hope
- Refugee Empowerment Center
- Refugee Women Rising
- Restoring Dignity
- South Omaha Neighborhood Alliance
- Youth for Greater Good

Task 1, Step 4B: Contact relevant community organizations

Organizations and agencies to be contacted were prioritized based on their apparent level of involvement with LEP individuals. Staff members at representative community organizations were contacted via phone or an in-person interview.

Task 1, Step 4C: Obtain information

Client Population Characteristics

Organizations working with Spanish-speaking individuals indicated there is a variance in English proficiency among their clients. Additionally, there are varied literacy levels with some Spanish speaking individuals unable to read or write in Spanish. Catholic Charities indicated that they encountered a high written literacy among their SpaniSpanish-speakingntele while the Latino Center for the Midlands reported a lower literacy rate among their clients. Catholic Charities also indicated less than 50% of the population they serve can speak English.

Travel Needs

Many of the organizations indicated their clientele do not have the budget for bus fares. Challenges for refugee LEP populations are learning the destinations served and associated timetables. The Refugee Empowerment Center and Lutheran Family Services provide this training to their clients. A factor limiting travel by Metro is the production plants that employ refugee populations are primarily in rural areas outside of Omaha’s city limits. Both resettlement organizations try to place their LEP clients in the same neighborhoods to facilitate carpooling opportunities to work and emphasize traveling on public transportation for life sustaining needs, e.g., food, medical service, etc. Many of the contacted organizations offered to act as communication liaisons between Metro and their clients. They suggested assistant materials such as schedules, flyers, posters, and other sources of information.

Task 2: Determine the frequency with which LEP persons come into contact with the program

Task 2, Step 1: Review the relevant programs, activities, and services provided

Metro assessed the frequency with which LEP persons have contact with Metro’s programs, activities, and services. Frequencies of contact with LEP individuals for the avenues have been identified on an order of magnitude scale as frequently (daily), often (weekly), occasionally (monthly), and rarely (less than monthly).

TABLE #5: FREQUENCY OF CONTACT LEP PERSON HAS WITH METRO’S SERVICES, PROGRAMS

Avenue of Contact	Frequency
Drivers	Frequently
Customer Service Phone Line	Occasionally

MOBY Paratransit Reservationists	Occasionally
On-Street Signage	Frequently
Website	Occasionally
Interior fare cards	Frequently
Receptionist	Rarely
MOBY Certification	Rarely
Print media	Occasionally

Task 2, Step 2: Review information obtained from community organizations

As discussed in Task 1, Step 4, staff of community organizations and social service agencies reported that limited numbers of their clients use public transportation. However, in general, respondents did not have detailed knowledge of which routes are most heavily used, or the frequency with which public transportation services are used. Spanish speaking LEP individuals are the most likely to use Metro service as community organizations serving refugees indicated that a few of their clients use public transportation but that many carpool and are employed outside of Metro's service area.

Task 2, Step 3: Consult directly with LEP persons

Metro monitors the frequency with which LEP persons have contact with the program through calls to customer service, passengers on the bus, attendance at public meetings, and walk-in individuals to the administrative facility. Metro interacts with Spanish speaking individuals and provides verbal and written translation services in Spanish. To date, Metro has not received a request for translation to French, Vietnamese, Arabic, Chinese, Nuer, Somali, or Karen.

Task 3: The nature and importance of the program, activity or service provided by the program to people's lives

Task 3, Step 1: Identify your agency's most critical services

Public transportation provides a vital service allowing passengers to access jobs, medical facilities, shopping, and other necessary programs. Although public transportation does not traditionally provide lifesaving or emergency type access to medical services (such as an ambulance), Metro considers its services to be extremely important and believes, as such, that it is important to facilitate usage by all including those who speak English less than very well.

Critical services are defined by the DOT guidance as programs or activities that would have significant consequences for individuals if language barriers prevented a person from benefiting from the activity. Significant consequences could include the inability of an LEP individual to effectively utilize public transportation to obtain health care, education, or access to employment. Critical services provided by Metro include:

- Route and Schedule Information
- Fare media information

- System rules, particularly transfer rules
- How to Ride Video
- Information on how to ride the system
- Safety and security announcements
- Communication related to transit planning and service changes
- Information on ADA complementary paratransit services
- Non-discrimination (Title VI) policy

Task 3, Step 2: Review input from community organizations and LEP persons

Input suggests that route, schedule, ADA complementary paratransit certification, how to travel on Metro and fare information are the most vital information needed by LEP individuals.

Task 4: The resources available to the recipient for LEP outreach as well as the costs associated with that outreach

Task 4, Step 1: Inventory language assistance measures currently being provided, along with associated costs

Metro provides written translation of vital documents, including schedules, in Spanish, offers customer service on the phone in Spanish, and provides Spanish translation at public meetings and hearings. Additional accommodations and language translation services at public meetings are available with advanced request. Metro's website utilizes Google Translate for a variety of languages.

Additionally, Metro strives to present information in a format that is easily understandable by LEP individuals. These measures include simple formatting and text for schedules and other sources of passenger information and the use of graphics whenever possible. All Metro bus stops feature the international bus symbol for ease of identification.

Task 4, Step 2: Determine what, if any, additional services are needed

Although Metro has not received requests for this service, Metro contracted with a bilingual call center/customer service company. All Spanish speaking communications are completed on-site, and additional language calls are completed with a third-party translator service.

Additionally, Metro continues to strengthen partnerships with community organizations to provide additional information about its service through these community organization conduits to LEP individuals.

Task 4, Step 3: Analyze your budget

Metro completes with in-house staff all English to Spanish translations for written and verbal communications. In-house costs are minimal. When external translations are needed, Metro receives three price proposals and chooses the lowest cost option.

Task 4, Step 4: Consider cost-effective practices for providing language services

Cost-effective practices for providing language services that Metro has pursued or may pursue:

- Partnering with community organizations to assist with translation or interpretation.
- Partnering with community organizations to assist with distribution of printed information to LEP individuals, or to provide educational or outreach opportunities to LEP individuals.
- Live verbal translation service for customer service calls in languages other than English and Spanish.
- Utilizing U.S. Census, I Speak language identification cards for front line personnel.
- Providing Spanish translation at public meeting through in-house personnel.
- Translation of all vital documents to Spanish.
- Continuing to offer Google Translate on its website.

Results of Four Factor Analysis

The Four Factor Analysis showed that approximately 5.2 % of the population in Metro's service area speaks English less than very well. Spanish is the most used language other than English and is the only other language which exceeds 1,000 persons likely to be encountered or affected by Metro's service. 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. Continued translation and distribution of written vital documents in Spanish to satisfy this provision and ensure Metro's services are accessible. Other languages that do not meet or exceed 1,000 persons in the service area include French, Karan, Somali, Nuer, and Vietnamese. Given the costs and limited resources available it is not prudent for Metro to invest in written translation to these other languages. However, investing in the bi-lingual / three-way calling translator services and enhanced partnerships with community organizations to reach these individuals was warranted.

Based on the outcome of the Four Factor Analysis, Metro's LAP includes a description of language assistance services provided; notice to LEP individuals; a description of staff training; and the procedure for monitoring, evaluating, and updating the LAP to ensure meaningful access for LEP individuals to Metro's services.

Language Assistance Services Provided

As noted in the four-factor analysis, Metro provides:

- Translation of written vital documents in Spanish, including but not limited to, schedules, Title VI Forms and Notices, ADA complementary paratransit applications; and interior bus cards regarding fares, Lost and Found policy and Passenger Rules.
- How to Ride Videos.
- Verbal translation to Spanish for passenger calls.
- Verbal translation to Spanish at public meetings and hearings.
- Google Translate – website.
- Simplified schedules, bus stop signs, and other resources that utilize graphics when feasible.
- Opportunity for advanced requests for other language services (including sign language) at public meetings.
- Opportunity to accept comments, questions through several means including verbal, written, and electronic comments. The public comment period for proposed changes is extended if feasible to allow meaningful access for LEP persons. An extended comment period allows LEP individuals to seek clarification and/or assistance from Metro and other resources.
- Availability of live language translation via Call Center/ Customer Service.

Additional services to be investigated for possible inclusion by Metro are enhanced partnerships with community organizations.

Providing Notice to LEP Persons Regarding the Availability of Language Assistance

Bilingual postings inside the buses, in large format, include: the fares, Title VI Notice, Passenger Rules and Lost and Found policy. Route schedules have pertinent travel information in Spanish and ADA complementary paratransit applications and other vital are in English and Spanish.

Staff uses the U.S. Census, I Speak, Language Identification cards to identify other requested languages and, when necessary, use three-way calling with the bi-lingual call center /customer service translation services for language requests that cannot be handled by staff.

Furthermore, Metro will continue to develop relationships with community organizations to notify LEP persons about Metro's services and the availability of language assistance.

Notices for all public hearings are published and disseminated through intermediary groups. Metro provides Spanish translation at public meetings and publishes the ability for others to request additional services such as translation to other languages with advance notice to Metro. Additionally, Metro accepts public comments through a number of avenues including verbal, written, and electronic means. A public comment period is established for all public hearings so that LEP individuals are given a meaningful opportunity to comment. A notice to the public regarding the availability of language

assistance services is published in both English and Spanish and posted on the buses. Additionally, Metro's Title VI Policy Statement, which is posted inside all Metro buses, transit centers, administrative offices, electronically and on the website provides information on how to request information in additional languages.

Intermediary partner organizations are also made aware of the availability of language assistance services provided by Metro.

Training

Metro employees will receive training on Title VI policies and procedures upon hiring. The training will include the requirements of Metro's obligations under Title VI, including LEP requirements. In addition, training will be provided to all Metro employees when any Title VI related policies or procedures change, or when appropriate in resolving a Title VI complaint.

Title VI training is the responsibility of the Title VI Coordinator.

Monitoring, Updating, and Evaluating the Language Assistance Plan

At a minimum, the LAP will be evaluated and updated every three years to coincide with submittal of Metro's Title VI Program Update to the FTA. Evaluating and updating the LAP will include review of updated census and American Community Survey data, discussions with Metro employees, collaboration with resource agencies who interact with LEP individuals, outreach, and review of survey data.

In the interim, monitoring activities may identify changes that should be made to the LAP. Monitoring activities will include evaluation of the following information:

- Needs identified by front line staff during employee training activities related to LAP or during day-to-day operations of the system
- Needs identified by community partners or LEP individuals during outreach activities or other engagement with Metro staff; and
- New data related to LEP populations in the service area

If evaluation of new information received during monitoring of the plan leads to substantive changes in language assistance policies or practices, the LAP will be updated accordingly.

Minority Representation on Board of Directors and Technical Advisory Committee

Background

Recipients that have transit-related, non-elected planning boards, advisory councils or committees, or similar bodies, the membership of which is selected by the recipient, must provide a table depicting the membership of those committees broken down by race, and a description of efforts made to encourage the participation of minorities on such committees.

TABLE #6: DIVERSITY REPRESENTATION ON METRO BOARD OF DIRECTORS, TRANSIT ADVISORY COMMITTEE

Body	African American	Caucasian
Board of Directors	20%	80%
TAC	25%	75%

Metro Transit – Board of Directors

Metro is a political subdivision of the State of Nebraska having no affiliation with the City of Omaha except for the appointment of the Board of Directors. The five-member Board is appointed by the Mayor of the City of Omaha with concurrence by the Omaha City Council and Douglas County Board of Commissioners. Board members serve a five-year term with member appointments staggered with no more than one annual appointment. Interested persons must request in writing to the Mayor their interest and qualifications for appointment to the Metro Board. Subsequent to Metro’s conversion to a regional metropolitan transit authority in 2022, future Board members will be elected by the general public beginning in 2024.

While Metro has no influence on board member selection, we urge the mayor, council members, and county commissioners to appoint members representing the minority and disabled community. In addition, we urge interested persons to apply for a Board appointment.

Metro Transit – Transit Advisory Committee (TAC)

TAC members are appointed by the Mayors of Omaha, Bellevue, Papillion, Ralston and LaVista, Nebraska, Council Bluffs, Iowa, and the members of the Omaha City Council and Metro Board. Individually each has one appointment - TAC averages 7 to 10 members with a maximum of 17.

TAC meets on the second Wednesday of each the month. TAC is charged with review of all proposed service changes, fare structure adjustments, passenger comments, complaints, suggestions, compliments, and attends and assists at public hearings and community forums. Additionally, TAC is the first step in addressing Title VI complaints and has final approval / disapproval of ADA complementary paratransit certification appeals.

Again, Metro has no influence on TAC member appointments, but does encourage the appointment of representatives from the minority and disabled community. In addition, we urge interested persons, social service agencies, community and faith-based organizations and education centers, etc., to contact their representatives charged with TAC appointments to request a TAC appointment.

Providing Assistance to and Monitoring Sub-Recipients

Background

In accordance with 49 CFR 21.9(b), and to ensure that sub-recipients are complying with the DOT Title VI regulations, primary recipients must monitor their sub-recipients for compliance with the regulations. Importantly, if a sub-recipient is not in compliance with Title VI requirements, then the primary recipient is also not in compliance.

Monitoring

Metro did not have any sub-recipients in the review period. However, in the event of obtaining sub-recipients, in order to ensure Metro is in compliance with Title VI requirements, regarding the monitoring of sub-recipients, Metro would undertake the following activities:

- Document its process for ensuring that all sub-recipients are complying with the general reporting requirements of FTA Circular C 4702.1B, as well as other requirements that apply to the sub-recipient based on the type of entity and the number of fixed route vehicles it operates in peak service if a transit provider.
- Collect Title VI Programs from sub-recipients and review programs for compliance. Collection and storage of sub-recipient Title VI Programs may be electronic at the option of Metro.
- At the request of FTA, in response to a complaint of discrimination, or as otherwise deemed necessary by Metro, Metro shall request that sub-recipients who provide transportation services verify that their level and quality of FTA C 4702.1B Chap. III-11 service is provided on an equitable basis.

When a sub-recipient is also a direct recipient of FTA funds, that is, applies for funds directly from FTA in addition to receiving funds from Metro, the sub-recipient reports directly to FTA and Metro is not responsible for monitoring compliance of that sub-recipient. The supplemental agreement signed by both entities in their roles as designated recipient and direct recipient relieves Metro of this oversight responsibility.

Facility Equity Analysis

Background

The recipient shall complete a Title VI equity analysis during the planning stage with regard to where a project is located or sited to ensure the location is selected without regard to race, color, or national origin. Recipients shall engage in outreach to persons potentially impacted by the siting of facilities. The Title VI equity analysis must compare the equity impacts of various siting alternatives, and the analysis must occur before the selection of the preferred site.

Facility Construction Equity Analysis for the Period 2019 through 2022

Metro did not construct any new maintenance/storage or other facilities during the review period that required a facility equity analysis. Metro completed the following facility upgrades/renovations and BRT stations during the period of 2019 through 2021:

- **2019** – Metro constructed a Compressed Natural Gas (CNG) fueling station within the footprint of the existing Metro maintenance facility located at 2222 Cuming Street.
- **2019** – Metro replaced all the bus lane pavement at the Westroads Transit Center and converted the existing waiting area into a new electrical/communications room. New waiting areas, with protective screening and benches were installed and the lighting was upgraded on the canopy. The North Omaha Transit Center (NOTC) employee restrooms were equipped with air conditioning, air hand dryers, and new doors along with an upgraded fire alarm system in the mechanical electrical room. Concrete panels were also replaced in the drive lanes at NOTC due to wear.
- **2019-2020** – Metro constructed bus rapid transit (BRT) ADA accessible stations, equipped with extra-large shelters, ADA accessible benches, waste receptacles, real time informational signage, digital kiosks, and emergency phones. Transit Signal Priority was also installed at the signals along the western portion of the corridor. BRT stations are located along the Dodge and Douglas Street corridors between the Westroads Transit Center and 8th Street and the section of Farnam between Turner Blvd. and 8th Street.
- **2020-2021** – Metro upgraded the administration area by constructing four new offices for its Human Resources, Finance, and Legal departments.
- **2021** – Metro installed 4 new electric charging stations at the Metro Administration, Operations and Maintenance facility and an electrical panel was upgraded to support the stations.

- **2021** – Metro placed ticket vending machines at the North Omaha Transit Center, the Westroads Transit Center, the South Omaha Transit Center and at all BRT stations.
- **2022** – Metro constructed a BRT station at 8th and Farnam to provide access to the Riverfront Development.
- **2022** – Metro equipped the North Omaha Transit Center and the Westroads Transit Center with real time informational signage, digital kiosks, video surveillance equipment, and emergency phones.
- **2022** – Metro constructed three new offices and an executive conference room in the administration area and upgraded 2 electrical panels. The Training Room and Board Room will be equipped with new audio-visual equipment by December 2022.

Facility Locations:

- North Omaha Transit Center - 4308 N 30th Street, Omaha NE 68111
- Westroads Transit Center - 1099 N 102nd Street, Omaha NE 68114
- South Omaha Transit Center - Metro Community College, 2801 Babe Gomez Ave, Omaha NE 68103
- Metro Administration, Operations and Maintenance Facility - 2222 Cuming Street, Omaha NE 68102

Although no formal facility equity analyses were required during the review period, Metro analyzed the location of each of these projects to ensure the construction or renovation would not result in disparate impact on the basis of race, color, or national origin and/or disproportion burden on low-income populations. No impacts were identified in any of the projects listed above as the construction or renovation projects did not involve the acquisition of land, the displacement of persons from their residences or businesses or disruption of service in the vicinity of any of these projects.

Future Construction Projects

Future construction projects, for which Metro has been awarded 5339 funds, include the enhancement of Metro's employee parking lot which will include the removal of pavers, drainage replacement, correcting subsurface drainage, replacing concrete pad and steps in loading dock, and other security upgrades including video security and corresponding technology. This project will include skylight replacements with new roof structures, roofing, and insulation and the replacement of the deluge system, including electronic controls at the Metro administrative offices and maintenance facility. The projects will also include the replacement of electrical sub panels, the installation of up to seven rows of solar panels to produce up to 50 kW at peak, the installation of Compressed Natural Gas (CNG) sensors and the installation of a 470 Tn air cooling infrastructure and air handling at the Metro maintenance facility. This project is included within the footprint of Metro's existing administrative/maintenance facility and is not anticipated to result in negative impacts.

Service Equity Analysis

Background

Recipients shall evaluate the impacts of proposed service on minority and low-income populations for all major service changes as defined by Metro's Title VI plan. During the period from 2019 – fall 2022, a Major Service Change was defined as any change meeting or exceeding any of the following thresholds:

- The addition and/or elimination of a bus route
- A change of 12% or more of system revenue miles
- A change of 25% or more revenue miles on any individual route

These analyses were performed using the most recent Census data and five-year datasets from the American Community Survey.

Service Equity Analyses for the period 2019 through 2022

Several route changes during the review period met the definition of a Major Service Change. Each of these major changes is described below:

March 2020

In response to the global uncertainty at the onset of the COVID-19 pandemic, Metro reduced its Weekday bus schedules to a Saturday level of service, decreased the number of Express route departures, and suspended routes 34 and 96 (both commuter routes with sharp ridership declines, and auxiliary service available on nearby local routes). Frequency was increased to 15 minutes on Route 18 on Saturdays (from 30 minutes) to allow for social distancing amidst an influx of Saturday ridership. ***These changes resulted in a net decrease of 31.4% system revenue miles.***

As defined in Metro's Title VI Major Service Change policy, these changes were exempt at the time from an Adverse Effects review due to the following provisions:

8. The introduction or discontinuation of short or limited-term service (e.g., promotional, seasonal or emergency service, or service activities), as long as the service will be/has been operated for no more than 12 months.
11. Route changes/detours caused, but not limited to, road construction/maintenance closures, emergencies, major construction, inadequate fuel supplies, and safety concerns.
14. Forces of nature such as tornados, snow emergencies, or other natural, or human-caused catastrophic disasters that may force the suspension of transit service for public safety or technical reasons.

July 2020

As conditions began to stabilize through the COVID-19 pandemic, and to support the continuance of travel for essential trips, Metro increased service on some of its primary fixed routes to begin

transitioning back to previous weekday levels of service. Other change such as reduced express trips, the suspension of routes 34 and 96, and increased Saturday trips on Route 18, continued during this time. ***These changes resulted in a net increase of 30.4% system revenue miles.*** When compared to pre-COVID levels of service in February 2020, the net change was a 10.6% reduction of system revenue miles.

Again at that time, no Adverse Effects review was conducted due to the following provisions:

- 8. The introduction or discontinuation of short or limited-term service (e.g., promotional, seasonal or emergency service, or service activities), as long as the service will be/has been operated for no more than 12 months.
- 11. Route changes/detours caused, but not limited to, road construction/maintenance closures, emergencies, major construction, inadequate fuel supplies, and safety concerns.
- 14. Forces of nature such as tornados, snow emergencies, or other natural, or human-caused catastrophic disasters that may force the suspension of transit service for public safety or technical reasons.

November 2020

As the COVID-19 pandemic continued, Metro proceeded cautiously with the planned opening of its first bus rapid transit line in November 2020, called ORBT. This line introduced 10-minute frequency with upgraded transit stations along Dodge Street, the spine of Metro's transit network. This route replaced local service on Route 2, which operated on the same alignment. Several other adjacent routes were modified in conjunction with this change to improve connections to and from ORBT. Because these changes included the elimination of Route 2 and the addition of ORBT, an adverse effects review was conducted in accordance with our Title VI Major Service Change Policy. The results of the analysis revealed that no disparate impact or disproportionate burden was identified for the proposed changes.

The full November 2020 Service Equity Analysis can be found in Appendix A.

October 2021

Due to the persistence of the COVID-19 pandemic, several of the emergency changes instituted in 2020 had to be continued beyond the intended 12-month temporary period. As such, Metro conducted a service equity analysis to better understand the impacts of those service reductions on low-income and minority populations. The results of the analysis revealed that no disparate impact or disproportionate burden was identified for the changes.

The full 2021 Temporary Service Reductions Service Equity Analysis can be found in Appendix B.

April 2022

A short-range strategic plan, titled MetroNEXT, was developed for the agency and adopted by Metro's Board to guide transit investments to be implemented through 2030. The plan was developed with extensive community engagement, including 20 virtual and in-person public meetings, as well as

passenger and public surveys. A service equity analysis was conducted to determine the cumulative impacts of the proposed changes. The results of the analysis revealed that no disparate impact or disproportionate burden was identified for the potential changes. As these projects will be further developed and introduced in phases, further service equity analyses may be warranted if the subsequent changes meet the threshold of a major service change at the time of implementation.

The full 2022 MetroNEXT Service Equity Analysis can be found in Appendix C.

October 2022

A set of service increases were proposed to reinstate some trips that operated prior to the COVID-19 pandemic, as well as adding new services to respond to recent ridership growth as outlined in the MetroNEXT plan. These additional trip times and extended service hours resulted in the addition of more than 25% of weekly revenue miles on Routes 3, 24, 26, 35, and 36. The proposed improvements therefore qualified as a Major Service Change, and Metro conducted a service equity analysis to better understand the impacts of those service increases on low-income and minority populations. The results of the analysis revealed that no disparate impact or disproportionate burden was identified for the changes.

The full October 2022 Service Equity Analysis can be found in Appendix D.

Fare Equity Analysis

Background

Recipients shall evaluate the impacts of proposed fare changes on minority and low-income populations. Any fare change “triggers” a fare equity analysis.

Fare Equity Analysis for the Period 2019 through 2022

In August of 2021, after conducting a fare equity analysis and obtaining approval by the Metro Board of Directors, Metro implemented a new fare payment system and fare structure called Umo.

The fare payment system allowed transit riders to pay for rides using a smart card or mobile Android or Apple devices and installed ticket vending machines (TVMs) at ORBT stations, the administrative facility and transit centers. Umo introduced a monthly fare capping system for users of the new fare payment system, which would eventually replace the regular 30-day pass as the Umo fare card system is accepted by the entire fixed route system. The remainder of Metro’s fare structure remained unchanged. The new fare payment system and monthly capping feature was implemented to enhance customer convenience and functionality by providing greater access to fare payment options and allowing users to receive the potential cost savings of a monthly pass without the burden of the higher upfront cost.

TABLE 7: METRO CURRENT AND PROPOSED FARE PRICES

Fare Type	Current Price	Proposed Price	Proposed Fare Cap
Adult Regular	\$1.25	\$1.25	\$55.00
Adult Express	\$1.50	\$1.50	\$55.00
Student	\$1.00*	\$1.00*	-
Child (6-8 years)	\$0.50*	\$0.50*	-
Child (5 years & under)	Free	Free	-
Senior/Disabled	\$0.60	\$0.60	\$27.50
Transfer	\$0.25	\$0.25	-
Adult 30-Day Pass	\$55.00	Use of paper fare card will be phased out for UMO	-
Half Fare 30-Day Pass	\$27.50	Use of paper fare card will be phased out for UMO	-

With the new Umo system, participants pay for each trip (adult regular, express or senior/disabled half-fare) at the respective fare rate. Once the trips are paid for and activated within any month reach the applicable \$55.00 for adults or \$27.50 limit half-fare riders (eligible seniors, Medicare card holders, and individuals with a disability, future trips for the remainder of the calendar month would not incur an additional cost. The cost of the reusable smart card is \$2, but Metro is waiting to charge this fee until the cards have been available in ticket vending machines for at least three months in order to be available equitably. Passengers with a smartphone can use an app on their smartphone in lieu of the smart card if they choose.

Riders can add value to their Umo account using credit or debit cards via the internet. Metro offers free Wi-Fi on board Metro buses and at transit centers, augmenting internet access to the Umo system. To address concerns of equitable access to the Umo system for those without access to a credit or debit card, participants can add value to their account-based system using cash through ticket vending machines at all ORBT stations, Westroads Transit Center, North Omaha Transit Center, and Metro's administrative building. Ticket vending machines allow the purchase of single ride with transfer fare tokens and reloadable smartcards as well as add value to the Umo account-based system which can be accessed through both smartphones and the reloadable smartcards. The ticket vending machines accept cash and coins, and change vouchers, credit/debit cards or any combination of those payments to complete a transaction. Ticket vending machines do not dispense cash change but provide a change voucher that can be redeemed at any ticket vending machine for future fare purchases.

To identify any potential disparate impacts or disproportionate burdens of Umo on protected populations such as low income and minority passengers, farebox and onboard survey data was utilized for the equity analysis. Metro completed an equity analysis by distribution to identify potential disparate impacts and disproportionate burdens based on ease of access to the new account-based system and smart cards. Metro reviewed access based on bus routes that are considered minority routes for the purpose of program monitoring in Metro's Title VI Plan.

Based on the fare equity analysis, Metro concluded that given that the potential benefits of the Umo fare capping system were geared towards riders who paid with cash or tickets as opposed to 30-day passes, no disparate impact existed with the introduction of the monthly fare capping proposal. To ensure a smooth transition and mitigate potential burdens, Metro has allowed customers to use both the 30-day pass and monthly fare capping option.

The full August 2021 Fare Equity Analysis can be found in Appendix E.

Title VI Policies

Title VI

Title VI of the Civil Rights Act of 1964, as amended, prohibits discrimination on the basis of race, color, or national origin in programs and activities receiving Federal financial assistance. Specifically, Title VI provides that "no person in the United States shall, on the ground of race, color, or national origin, be excluded from participation in, be denied the benefits of, or be subjected to discrimination under any program or activity receiving Federal financial assistance" (42 U.S.C. Section 2000d).

Metro's Major Service Change, Disproportionate Burden, and Disparate Impact Policies were updated and approved by the Board in October 2022. Three public meetings were held in October 2022, and two comments from the public were received. In addition to the meetings, Metro staff sent out media alerts, social media posts, and public notices as methods of outreach. Public comments were also accepted through Metro's website and by mail during the public comment period. There was no change to the Fare Equity Policy submitted in Metro's 2013 Title VI Program. These policies comply with applicable federal requirements under Title VI of the Civil Rights Act of 1964, including 49 CFR Section 21 and FTA Circular 4702.1B, "Title VI Requirements and Guidelines for Federal Transit Administration Recipients," October 1, 2012.

Environmental Justice (EJ)

Although no formal report is required for the Executive Order on Federal Actions to Address Environmental Justice in Minority Populations and Low-Income Populations, Federal Transit Administration requires transit providers to incorporate EJ and non-discrimination principles into transportation planning and decision-making processes as well as environmental review for specific projects. The two primary classes considered are minorities and low-income populations.

Title VI Policy Descriptions

Major Service Change Policy

The purpose of the Major Service Change Policy is to define thresholds for determining major service changes and whether potential changes to existing transit services will have adverse effects: a) disparate impact based on race, color, or national origin, or whether potential service changes will have a b) disproportionate burden on low-income populations.

The following is considered a major service change (unless otherwise noted under Exemptions), and will be evaluated in accordance with the regulatory requirements set forth in FTA Circular 4702.1B.

The following thresholds for analysis are not set so high so as to never require an analysis; rather, are established to yield a meaningful result in light of Metro's service characteristics and shall be defined as any significant change in transit service in effect for twelve or more months that meets at least one of the following:

1. The addition and / or elimination of a bus route
2. A ten percent or more addition or reduction in the system revenue miles
3. A fifteen percent or more addition or reduction of revenue miles on any individual route
 - a. This includes a change in frequency, span of service, or route alignment beyond a three-quarter mile buffer of the terminus and either side of an existing alignment

All major service changes will be subject to an equity analysis which includes an analysis of adverse effects on protected service populations. Metro recognizes that additions to service may also result in disparate impacts and disproportionate burdens, especially if the additions come at the expense of reductions in service on other routes. Metro shall consider the degree of adverse effects and analyze those effects when planning major service changes and / or any fare change.

Any service change analyses are performed using the most recent Census and five-year dataset from the American Community Survey.

Exempt Service Changes with No Adverse Effect Review

1. Any service change that does not meet the conditions of a major service change as defined above.
2. Headway adjustments up to 7 minutes during the peak hour periods, and 15 minutes during non-peak hour periods.
3. Changes to a service on a route with fewer than 10 total trips in a typical service day unless service on that route is eliminated completely on any such day.

4. Reduction in revenue miles on one transit route that is offset by an increase in revenue miles on the overlapping section of an alternative transit route (an overlapping section is where two or more bus routes share the same alignment, stops, etc. for a short distance).
5. Changing a route number, name or other designation.
6. The introduction, modification, or discontinuation of any temporary or limited-term service (e.g., promotional, demonstrational, seasonal or emergency service, or service activities), as long as the service will be/has been operated for no more than 12 months.
7. Changes on special service routes such as sporting events, special events or service contracted with other cities, agencies, employers, etc.
8. Route changes/detours caused by outside factors including, but not limited to, road construction/maintenance closures, emergencies, major construction, inadequate fuel supplies, and safety concerns.
9. Actions of other service providers or public agencies providing/administering transit services that are not the responsibility of Metro.
10. Service addition, change or discontinuance of transit service contracts operated by Metro, but not within Metro's taxing service area.
11. Forces of nature such as tornados, snow emergencies, or other natural, or human-caused catastrophic disasters that may force the suspension of transit service for public safety or technical reasons.
12. Failures of auxiliary transportation infrastructure such as vehicular bridges, highway bridge overpasses, tunnels, or elevated highways that force the suspension of transit service.

Equity Analysis Data Sources

TABLE #8: EQUITY ANALYSIS DATA SOURCES

Category	Action	Sub Action	Evaluation Method
Fare	Adjustment	N/A	Survey, farebox reports, and / or Census Data of affected fare category
Service Span	Reduction	N/A	Surveys, farebox reports, and / or Census data of affected route(s)
	Expansion	N/A	
Service Headway	Reduction	N/A	Surveys, farebox reports, and / or Census data of affected route(s)
	Expansion	N/A	
Route Length	Reduction	N/A	Surveys, farebox reports, and / or Census data
	Expansion	N/A	Surveys, farebox reports, and / or Census data
Route Alignment	Reduced Alignment	N/A	Surveys, farebox reports, and / or Census data
	Expanded Alignment	N/A	Surveys, farebox reports, and / or Census data
	Modified Alignment	Eliminated Segment(s)	Surveys, farebox reports, and / or Census data
		Segment(s) to New Areas	Surveys, farebox reports, and / or Census data
New Route	New Route	N/A	Surveys, farebox reports, and / or Census data

Definitions:

1. Major Service Change – Defined as:
 - a. The addition and / or elimination of a bus route.
 - b. A ten percent or more addition or reduction in the system revenue miles.
 - c. A fifteen percent or more addition or reduction of revenue miles on any individual route
 - i. This includes a change in frequency, span of service, or route alignment beyond a three-quarter mile buffer of the terminus and either side of an existing alignment
2. Adverse Effect – defined as a geographical or temporal reduction in service which includes but is not limited to: span of service changes, frequency changes, route segment elimination, and re-routing and route elimination.
3. Disparate Impact – Should the impact of any fare or major service change require a minority population to bear adverse effects fifteen percent or greater of a cumulative impact compared to those adverse effects borne by the nonminority population, that impact will be deemed a disparate impact.
4. Disproportionate Burden – Should the burden of any fare or major service changes require a low-income population to bear adverse effects fifteen percent or greater of the cumulative burden compared to the effects borne by the non-low-income population, that impact will be considered a disproportionate burden.
5. Express Transit Service – Metro designated express routes.
6. Local Transit Service – Metro fixed-route bus routes not designated as express routes.
7. For purposes of this policy, “low-income population” is defined as any readily identifiable group of households who live in geographic proximity and whose median household income is at or below of the Department of Health and Human Services Poverty Guidelines.
8. Minority Populations & Areas – Minority populations include those persons who self-identity as being one or more of the following ethnic groups: American Indian and Alaska Native, Asian, Black or African American, Hispanic or Latino, Native Hawaiian and Other Pacific Islander, as defined in the FTA Title VI Circular. "Minority Areas" are residential land use areas within Census tracts where the percentage of minority persons is higher than the Metro service area average.
9. Revenue Mile – For technical purposes, one revenue mile represents a bus being on the road for one mile. Three revenue miles represents one bus being on the road for three miles or three buses being on the road for one mile each. By using revenue miles instead of revenue dollars, Metro can control for currency inflation and can better prepare for and evaluate major service changes.

10. Route-Level – Refers to the geographic level of analysis by which the performance of a transit route is measured for equity.
11. Route-Service Area – A three-quarter mile buffer on both sides and terminus of a transit route's alignment.
12. Service Level – Refers to the span of service (hours of operation), days of operation, trips, and headways (service frequencies) for a transit route or the regional transit system.
13. Service Area – According to 49 CFR 604.3, geographic service area means "the entire area in which a recipient is authorized to provide public transportation service under appropriate local, state, and federal law."
14. Service Span – The span of hours over which service is operated (e.g., 6 a.m. to 10 p.m.). The service span may vary by weekday, Saturday, or Sunday.
15. System-wide – Refers to the geographic level of analysis by which the performance of the entire transit system is measured for equity.
16. Transit Center – A transit facility that serves as the connection point for three or more bus routes.

Fare Equity Analysis Policy

Metro's Fare Equity Analysis Policy in compliance with applicable federal requirements under Title VI of the Civil Rights Act of 1964, including 49 CFR Section 21, the Environmental Justice requirements under Executive Order 12898, and FTA Circular 4702.1B.

Except for those limited and unique conditions noted below, the FTA requires that recipients of FTA funding prepare and submit fare equity analyses for all proposed fare changes, regardless of whether the proposed change is an increase or decrease. As with the service equity analyses required under Title VI and Federal Environmental Justice requirements, FTA requires Metro to evaluate the effects of fare changes on minority populations and low-income populations. Metro's Fare Equity Analysis Policy is a stand-alone provision, separate from Metro's Major Service Change Policy. Metro's Fare Equity Analysis Policy operates in tandem with all other Metro policies for changing the fare structure, fare media, or fare price.

For purposes of this policy, "minority population" is defined as: Any readily identifiable group of minority persons (persons identified by race, color, or national origin) who live in geographic proximity.

For purposes of this policy, "low-income population" is defined as: Any readily identifiable group of households who live in geographic proximity and whose median household income is at or below of the Department of Health and Human Services Poverty Guidelines.

This policy incorporates by reference the definitions of "Disparate Impact" and "Disproportionate Burden" from Metro's Title VI Disparate Impact Policy and Disproportionate Burden Policy, respectively.

This policy incorporates by reference the percentage thresholds for "Disparate Impact" and "Disproportionate Burden" from Metro's Title VI Disparate Impact Policy and Metro's Disproportionate Burden Policy, respectively.

For proposed changes that would increase or decrease the fares on the entire system, on certain transit modes, or by fare payment type or fare media, Metro shall analyze ridership surveys, census demographic data, fare box reports, and other sources of information as available to determine whether minority and/or low-income riders are disproportionately more likely to use the mode of service, payment type, or payment media that would be subject to the fare change.

Metro shall then—

- a. Determine the number and percent of users of each fare media being changed.
- b. Review fares before and after the change.
- c. Compare the percentage differences for each particular fare media between minority users and overall users.
- d. Compare the percentage differences for each particular fare media between low-income users and overall users.

Metro will analyze proposed fare changes to see if the proposed change would result in a disparate impact to minority populations or a disproportionate burden on low-income populations. If a disparate impact or disproportionate burden is identified, Metro must attempt to modify the proposed changes to avoid, minimize, or mitigate potential disparate impacts and/or disproportionate burdens. Metro shall then reanalyze the proposed changes to determine whether the modifications actually removed, minimized or mitigated the disparate impacts of the changes.

Where disparate impacts and/or disproportionate burdens are identified, Metro shall provide a meaningful opportunity for public comment on any proposed mitigation measures, including any less discriminatory alternatives that may be available.

If Metro chooses not to alter the proposed fare changes despite a disparate impact on minority ridership or disproportionate burden on low-income riders, or if Metro finds, even after the revisions, those minority or low-income riders will continue to bear a disproportionate share of the proposed fare change, Metro may implement the fare change only if:

- a. Metro has a substantial justification for the proposed change, and
- b. Metro can show that there are no alternatives that would have a less disparate impact on minority riders but would still accomplish Metro's legitimate program goals.

Exceptions: Metro will not require a fare equity analysis for the following conditions:

- a. Emergencies, or other instances in which Metro may declare that all passengers ride free.
- b. Temporary fare reductions that are mitigating measures for other actions.
- c. Promotional fare reductions lasting less than six months in duration.

Disproportionate Burden Policy

Metro's Disproportionate Burden Policy, in compliance with applicable federal Environmental Justice requirements under Executive Order 12898 and FTA Circulars 4703.1 and 4702.1B requiring that recipients of FTA funding prepare and submit service and / or fare equity analyses.

The Disproportionate Burden Policy establishes a threshold for determining whether proposed service or fare changes have a disproportionate effect on low-income populations relative to non-low-income populations.

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

If the threshold is exceeded, Metro must avoid, minimize, or mitigate impacts where practicable.

For purposes of this policy, "low-income population" is defined as any readily identifiable group of households who live in geographic proximity and whose median household income is at or below of the Department of Health and Human Services Poverty Guidelines.

Metro establishes the threshold for a "disproportionate burden" as follows: Should the burden of any fare or major service changes require a low-income population to bear adverse effects fifteen percent or greater of the cumulative burden compared to the effects borne by the non-low-income population, that impact will be considered a disproportionate burden.

Disproportionate Burden will be reviewed on the affected changes on a cumulative basis.

Should a proposed fare or major service change result in a disproportionate burden, Metro will consider modifying the proposed change to avoid, minimize, or mitigate the disproportionate burden of the change. If Metro finds a potential disproportionate burden and then modifies the proposed changes to avoid, minimize, or mitigate potential disproportionate burdens, Metro will reanalyze the proposed changes to determine whether the modifications actually removed the potential disproportionate burden of the changes.

If Metro chooses not to alter the proposed changes, Metro may implement the service change if:

- a. There is substantial legitimate justification for the change; and
- b. The agency can show that there are no alternatives that would have less impact on the low-income population and would still accomplish the agencies legitimate program goals.

In accordance with FTA guidance, Metro will not alter this Disproportionate Burden Policy until its next Title VI Program Submission, though Metro maintains the freedom to select the most appropriate and

informative dataset for use in low-income population service equity analyses. Metro shall, however, use the same comparison population data in low-income population service equity analyses as it uses for minority population service equity analyses. For example, if Metro uses ridership surveys to determine the comparison population in minority population service equity analyses, Metro will also use ridership surveys to determine the comparison population for low-income service equity analyses.

Metro engaged the public in the decision-making process prior to adopting this Policy, and will do so when altering, or amending this Disproportionate Burden Policy, if needed at the next submission.

Disparate Impact Policy

Metro has established a Disparate Impact Policy in compliance with applicable federal requirements under Title VI of the Civil Rights Act of 1964, including 49 CFR Section 21 and FTA Circular 4702.1B requiring that recipients of FTA funding prepare and submit service equity analyses for proposed major service or fare changes.

The Disparate Impact Policy establishes a threshold for determining whether proposed service or fare changes disproportionately affect minority populations relative to non-minority populations on the basis of race, ethnicity or national origin.

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

A “disparate impact” refers to a facially neutral policy or practice that disproportionately affects members of a group identified by race, color, or national origin, where Metro’s policy or practice lacks a substantial legitimate justification and where there exist one or more alternatives that would serve the same legitimate objectives but with less disproportionate effect on the basis of race, color, or national origin.

Metro defines the threshold for a “disparate impact” as follows: Should the impact of any fare or major service change require a minority population to bear adverse effects fifteen percent or greater of a cumulative impact compared to those adverse effects borne by the nonminority population, that impact will be deemed a disparate impact.

Disparate impacts will be reviewed on the affected changes on a cumulative basis.

Should a proposed major service change or any fare change result in a disparate impact, Metro will consider modifying the proposed change to avoid, minimize, or mitigate the disparate impact of the change. If Metro finds potential disparate impacts and then modifies the proposed changes to avoid, minimize, or mitigate potential disparate impacts, Metro will reanalyze the proposed changes to determine whether the modifications actually removed the potential disparate impacts of the changes.

In accordance with FTA guidance, Metro will not alter this Disparate Impact Policy until its next Title VI Program Submission, though Metro maintains the freedom to select the most appropriate and informative dataset for use in minority population service and fare equity analyses. Metro shall, however, use the same comparison population data in low-income population equity analyses as it uses for minority population equity analyses. For example, if Metro uses ridership surveys to determine the comparison population in minority population equity analyses, Metro will also use ridership surveys to determine the comparison population for low-income equity analyses.

Metro engaged the public in the decision-making process prior to adopting this Policy, and will do so when altering, or amending this Disparate Impact Policy, needed at the next submission.

Service Standards and Policies

Overview

In order to ensure continued progress towards Metro's objectives and guiding principles implementation of service will require close and systematic monitoring of service performance and delivery. Service standards define a policy level set of evaluation metrics which serve as a management tool to assess the efficiency, effectiveness, and quality of service delivered. Monitoring productivity and financial effectiveness supports Metro's objective of building long-term financial sustainability and a market-based network. Service standards define benchmarks to inform decision-making on existing and future services.

It is the policy of Metro to provide quality service to all customers regardless of race, color, national origin or income.

Title VI of the Civil Rights Act of 1964, as amended, prohibits discrimination on the basis of race, color, or national origin in programs and activities receiving Federal financial assistance. Specifically, Title VI provides that "no person in the United States shall, on the ground of race, color, or national origin, be excluded from participation in, be denied the benefits of, or be subjected to discrimination under any program or activity receiving Federal financial assistance" (42 U.S.C. Section 2000d).

There are no changes to Metro's Service Standards and Policies as submitted in Metro's 2013 Title VI Program. These policies comply with applicable federal requirements under Title VI of the Civil Rights Act of 1964, including 49 CFR Section 21 and FTA Circular 4702.1B, "Title VI Requirements and Guidelines for Federal Transit Administration Recipients" October 1, 2012.

This document establishes service standards and related policies for Metro's fixed route transit service. In addition to serving as a guide for staff and stakeholders, this document satisfies several requirements with Title VI of the Civil Rights Act of 1964, Executive Order 12898, and related civil rights laws which help assure that Metro's services are provided in a non-discriminatory manner.

The updated Service Standards document defines proposed service tiers for Metro, establishes service performance standards, recommends a methodology for applying service standards, and identifies strategies for future service investments.

This document is broken into four main sections:

FIGURE 1: SERVICE STANDARDS OVERVIEW



Service Products and Tiers

The establishment of the recommended service tiers allow for the classification of Metro service products by network role and market function. Organization of transit service into tiers creates a consistent and balanced approach to service performance monitoring. Figures 1 and 2 and Table 9 illustrate recommended service products and tiers.

FIGURE 2: SERVICE PRODUCTS AND TIERS OVERVIEW

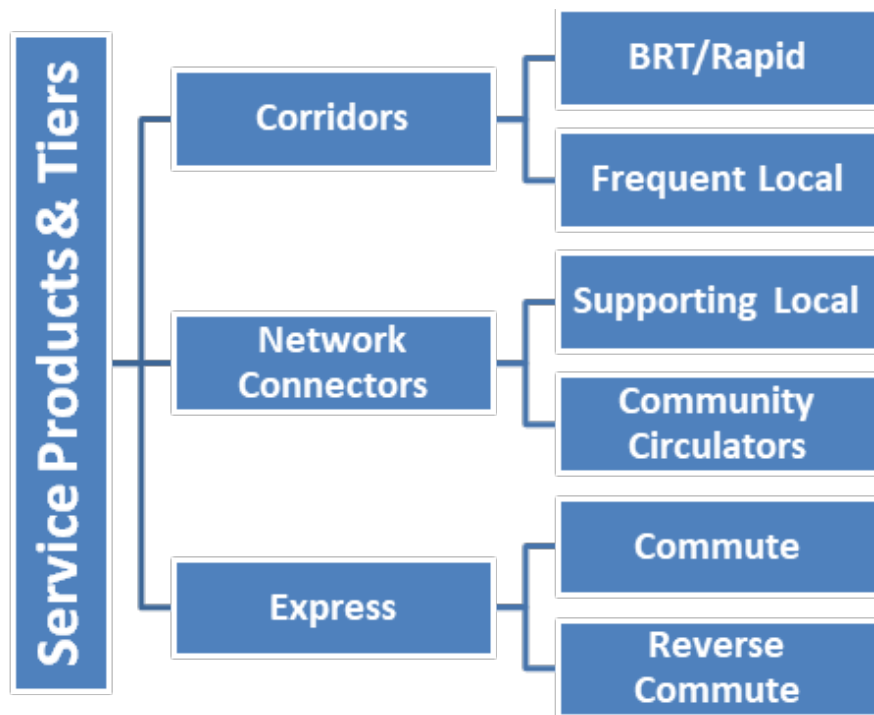
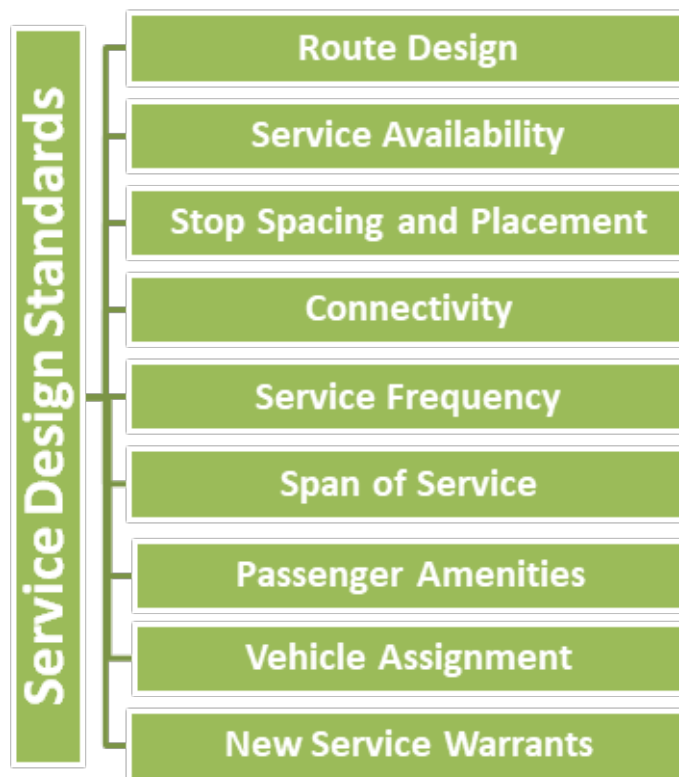


TABLE #9: DETAILED SERVICE TYPES AND TIERS

	Service Type	Description	Network Role	Key Markets	Frequency Target
Corridors	Arterial BRT Rapid Bus	High frequency, high capacity, and high-quality service that uses transit priority measures to speed travel times. Stop spacing is typically greater than local bus with enhanced service characteristics intended to emulate the passenger experience of arterial rail transit.	Spontaneous use, transit-oriented corridor, fast travel, and short waits	All-day, all-week community and sub-regional travel	10 minutes
	Key Corridor Local Bus	Conventional bus service, operating on a timetable following a pre-set route with identified stops that typically operate as part of a wider network of integrated routes. May include enhanced service characteristics such as signal priority, bus lanes or other amenities where appropriate.	Structural network corridor, fast sub-regional service	All-day, all-week community and sub-regional travel	15 minutes
Network Connections	Supporting Local Bus	Fixed route transit using various size vehicles serving a specific community area with connections to the regional and/or sub regional transit network.	Network completion and service coverage	All-day weekday community and sub-regional travel	30 minutes
	Community Circulators	Fixed route or flexible route transit using various size vehicles serving a specific community area with connections to the regional and/or sub regional transit network.	Targeted network connection, local circulation	Community travel in less transit-conducive areas	60 minutes or Demand Based
Express	Commute Express	Peak hour express bus service with limited stops connecting surrounding communities with downtown and other major regional destinations. Typically accessed via park-and-ride at the residential end.	Freeway or key corridor based commute	Peak period regional travel	Tailored to Demand
	Reverse Commute Express	Peak hour express bus service with limited stops connecting major core area hubs (often downtown) with employment in surrounding communities, serving reverse direction commuters.	Freeway or key corridor based commute	Reverse commute travel	Tailored to Demand

Service Design Standards

FIGURE 3: SERVICE DESIGN STANDARDS OVERVIEW



The dynamic nature of development in Omaha results in changing travel markets and patterns in Metro's service area. In order for Metro to continuously improve the attractiveness of transit service that it provides to Omaha area residents and visitors, it is imperative that service standards be adopted in order to constantly monitor the quality of service provided as well as determine where new services may be appropriate or what services need to be refined or discontinued. Given budget and equipment constraints it is imperative that Metro has specific standards and guidelines in place to ensure the highest possible quality of service is provided and delivered efficiently and effectively. Figure 3 provides an overview of the service design standards.

Route Design

The alignment of each route is a key factor in its ability to successfully serve customers' mobility needs. Route design refers to route directness, connections to key origins and destinations, and how the route interfaces with other transit tiers and services that comprise the overall network.

- Metro routes should be designed to serve origins and destinations via direct pathways, minimizing out-of-direction movements. This provides a faster trip to attract more customers and fare revenue, while minimizing the cost to provide service.
- With the exception of community routes, bus routes should serve major mixed-use corridors throughout the service area, avoiding smaller neighborhood streets.

- Metro routes should be designed in a hybrid grid and radial crosstown structure, with higher-frequency routes serving major corridors and connecting on-street rather than deviating to serve transfer hubs in the urban core.

Service Availability

The Service Availability standard generally defines how transit service should be provided in the different mobility markets of the service area. This includes defining the maximum allowable walking distance to transit services and how far apart stops should be placed given the type of service that is being proposed or provided currently.

- Transit routes in the urban core should be ideally no closer than one-half mile to balance good access with service cost-effectiveness. This provides customers with $\frac{1}{4}$ mile walk access (roughly five minutes) to more frequent service than is possible with closer spaced routes. Placing routes closer should only occur where regular $\frac{1}{2}$ mile spacing is not feasible and/or where market densities support productive service more closely spaced.
- Outside of the urban core network route spacing should follow the demand corridors where densities meet minimum requirements for productive service. Areas with fewer than 2,000 residents or jobs per square mile (3.1 per acre) within the Metro service area do not have the necessary density to support productive transit service and should only receive service if a major trip generator activity or unique corridor development is present.

Stop Spacing and Placement

Stop spacing and placement is an important part of the customer experience and balances convenient access with short waits and fast service. Stops spaced further apart allow for higher bus speeds (minimizing travel time for passengers on the bus and potentially reducing operating costs) but require customers to walk further to access service. Stop spacing standards differ by service type, with Rapid stops spaced further apart than Local or community service stops.

The urban core of Omaha is conducive to walking, which should be taken into account in stop spacing decisions. Where grid-based, walkable streets with sidewalks are present, bus stops can be spaced further apart without negatively impacting customer access.

- Rapid bus routes on corridors also served by Local routes should have stops spaced a minimum of $\frac{1}{2}$ mile apart extending up to one mile, and should be placed at major destinations, intersections, and transfer points.
- For Local and Community services, stop spacing between 800 and 1,320 feet is desirable. Community services can sustain the most closely spaced stops (since trip distances are usually short) while Local stops on major arterial streets risk introducing unnecessary delay if stops are placed closer than 1,000 feet. Existing stops with continuously low utilization shall be subject to review for consolidation or removal to increase service speed and reliability.
- Express services will use park-and-ride access with additional Rapid-type stopping patterns at the origin end with a Rapid or Local spacing pattern at the destination end.

Far-side stop placement for new and relocated bus stops is recommended wherever possible. Far-side stop placement improves bus speed with and without transit signal priority and improves pedestrian and bicycle safety (crossing the street behind instead of in front of the bus). Stops should be made in the travel lane to maximize speed and safety (pulling in and out of traffic increases safety issues) including use of bus bulbs where parallel parking is present. At posted travel lane speeds over 45 miles per hour curb cuts with a reentry lane are recommended.

Connectivity

To fully realize success Metro needs customers to “use the network,” rather than just individual routes. This is especially critical for growing transit ridership for non-commute travel, which has much more dispersed patterns and is used less regularly. For customers to “use the network” transfers need to be easy, convenient, and reliable. This means connecting with short waits at major hubs, such as North Omaha Transit Center, or on-street at major intersections. While transfers can usually be timed at major hubs, street transfer waits cannot and must rely on service frequency to minimize wait times. As a result, routes in the urban core network should focus on street transfers for fast network travel, which means that frequent service is necessary to support convenient transfer waits (see frequency standards in the following section). Outside of the urban core network, transfers should focus on hubs where well-timed connections between routes can be made in most cases.

Designing the service and network to enable convenient transfers allows Metro to minimize service duplication, since every route does not need to provide a one-seat ride to the customer’s final destination. Within a limited-resource environment, minimizing duplication allows for a more effective use of resources. As a result, new services should not only be evaluated as isolated routes, but also for their role in the overall transit network. Where the demand does not support regular all-day transit, special “first mile/last mile” connections should be considered.

Lastly, the connection experience for the customer is also affected by the waiting facility on the street corner or at the transit hub. Upgraded passenger facilities should be a priority at major on-street transfer locations and hubs, supporting Metro’s brand. Facility attributes should include enhanced shelters, seating, real-time trip departure/other customer information, facility and site lighting, and complete pedestrian walking paths in a positive, safe, public environment space.

Service Frequency/Vehicle Headway

Service frequency defines how long customers must wait for bus service with waits occurring multiple times for customers who transfer to complete journeys. High frequencies result in short customer wait times but increase costs by requiring more buses and operators. Thus, establishing frequent service requires balancing route and network productivity against cost.

Consumer research shows that the “sweet spot” where frequency provides the maximum value is in the 10-15-minute headway range, resulting in average waits of 5-7½ minutes. Research shows that at 15-minute service levels a significant number of patrons begin to arrive at the stop randomly, rather

than timing their arrival around the transit trip. At 10-minute service levels the majority of customers attracted to arrive randomly is higher. The opportunity to just randomly show is the key attribute that attracts the largest market segment of potential riders.

As a result, Metro frequency warrants are:

- BRT/Rapid routes should be both fast and frequent, operating a desired frequency of **15 minutes or better throughout a majority of the day** (evenings and possible weekends may require less frequent service), with **10 minutes or better being highly desirable** for this style of service. Rapid services should operate *more frequently* than Local service on the same corridor, to allow maximum customer convenience and greater service effectiveness on the faster service option (carrying passengers at a lower cost per mile).
- Local routes should operate at **30 minutes or better throughout the day and week**. Local routes on major corridors (especially those without Rapid options) warrant much more frequent service, with **15 minutes or better being desirable**.
- Community routes should **operate every 60 minutes or better** to ensure that service remains accessible to passengers who rely on it.
- Express and Commuter route frequency should be tailored to demand volumes but should **operate 15 minutes or better** during peak demand periods to foster spontaneous use.

All frequency warrants are subject to cost effectiveness and should be adjusted based on productivity and passenger loading capacity needs as defined in the section on Service Performance.

TABLE 10: FREQUENCY WARRANTS BY TRANSIT SERVICE TIER

	BRT/Rapid	Frequent Local	Local	Community	Express
Peak	15 mins	15 mins	30 mins	60 mins	Tailored to Demand
Off-Peak	15 mins	30 mins	30 mins	60 mins	Tailored to Demand
Evening	30 mins	30 mins	60 mins	60 mins	Tailored to Demand
Saturday	15 mins	30 mins	30 mins	60 mins	Tailored to Demand
Sunday	15 mins	30 mins	30 mins	60 mins	Tailored to Demand

Span of Service

The span of service defines the start and finish of service each day for both specific routes and the network. A longer span of service allows a route to capture more riders throughout the day for a wider variety of trip purposes, but also increases overall costs.

Span of service standards are more important to differentiate by the type of market/corridor served than the category of service, as local routes serving major regional corridors may have very different span needs than secondary arterials. As well, it is important that the route spans be coordinated to provide appropriate networks to meet time-of-day market needs.

- Metro urban core network service should operate from approximately **4:15 am until midnight on weekdays, 6:00 am to 11:00 pm on Saturdays, and 7:00 am to 8:00 pm on Sundays**. Earlier or later service may be required on certain corridors based on markets and patronage.
- Community services should be tailored to local demand patterns, but typically should operate from **6:00 am to 7:00 pm on weekdays**.
- Express service spans (i.e., trip times) should be tailored to demand patterns.

Passenger Amenities

Metro should provide riders with safe, accessible, and comfortable wait areas. However like many other transit agencies and jurisdictions, resources for providing and improving passenger facilities are limited requiring them to prioritize what and where improvements will be made. The following passenger amenities should be provided as funding permits:

- **Transit Centers:** Should include a passenger waiting area, a shelter area, passenger seating, trash receptacles, and route maps/schedules for routes traveling through the Transit Center, and digital information such as real-time transit information signage will be placed at transit centers.
- **Bus Shelters:** Should be placed where there is an expected boarding of 200 or more passengers per day. Bus shelters may include lighted advertising panels and bench type seating.
- **Bus Benches:** Should be placed where deemed appropriate by the public and the city. Currently, bus benches are contracted by local jurisdictions with an outside vendor.
- **Bus Stops:** Information at each bus stop should include a Metro's logo, the international bus stop graphic, Metro's website, phone number to Metro Customer Service, and the TDD number for Metro Customer Service.

Vehicle Assignment

Prior to each operator signup, revenue vehicles are assigned to routes/blocks based on several factors including required vehicle passenger capacity, community or street operating restrictions, operating performance requirements, and special equipment needs. Each service timetable is designed to meet ridership demand through the balancing of frequency or trips using different vehicles with specific capacities assigned to special blocks. For example, electric buses should be assigned to runs less than 10 consecutive hours due to battery range. Special operating restrictions including tight turns or community vehicle size limitations will also be respected. Higher performing vehicle types may be assigned to blocks with more schedule adherence problems. As well, ORBT has a subfleet that's only assigned to that route because of special equipment, e.g. branded vehicles and signal prioritization equipment. After the special vehicle block needs have been addressed, the remaining vehicles are rotated through random assignment to any route/block on which the vehicle can travel.

New Service Warrants

As development patterns and population/employment/school centers continue to evolve, Metro should analyze the need for new services using a set of consistent criteria to ensure that new market

opportunities are comprehensively and equitably assessed. New services or improvements to existing services should be evaluated with respect to design standards and consistency with adopted policy principles. Service investment decisions can provide incentives for community support of transit in policy, funding, zoning, and site design.

Planning and implementing new transit service requires an examination of certain characteristics of the proposed service area. The densities and demographic characteristics of a given service area are important determinants of transit success. To determine whether an area warrants new transit service, Metro should analyze the following characteristics of a proposed service:

- Population and Employment Density: A minimum level of density (2,000 residents or jobs per square mile) needs to be present in a given area to support regular bus service. Generally higher density areas are more conducive to effective bus service than low density areas due to greater demand and potential ridership. Above this threshold, the density of the proposed new service area should be compared to the densities of existing Metro areas to identify the most appropriate service type and network structure. Metro can deviate from the minimum density thresholds where there is specific evidence of short-term plan implementation of corridor intensification that will result in exceeding the minimum threshold by 50% or more.
- Transit Dependent Populations: Certain demographic groups are more inclined to use transit than others such as seniors, the disabled, students, low-income individuals, and households without automobiles. In assessing an area's demand for transit service, it is important to examine the presence and intensity of these demographics groups and whether any unmet needs are present.
- Key Destinations: Connecting residents with key destinations such as employment centers, hospitals, schools, shopping, and entertainment is a key factor in designing transit service.
- Network Integration: Any new service should avoid duplicating existing service (see Service Spacing guidelines) and should link into the existing transit network in a logical manner to ensure that connections to other routes and services provide attractive linked journeys.
- Pedestrian Access: Adequate sidewalks should be in place in order to ensure safe access to service.
- Safety Considerations: Safety factors include the avoidance of potentially hazardous turns and the availability of traffic signals and stop-sign protection.
- Travel Patterns: Consider customer and non-user travel patterns. Customer travel patterns can be collected through interviews and on-board surveys. Data for non-users can be obtained from the region travel demand model.
- Routing and Scheduling: Factors such as headways, running times, number of vehicles, and unnecessary deviations and turns should be considered.
- Special Funding: Services outside of Metro's service area should be fully funded through public-private partnerships and/or inter-local agreements.
- Projected Performance: In order to ensure ongoing Metro financial sustainability through continued maintenance or improvement of Metro service productivity, new routes should be projected to perform at levels at or exceeding system average based on the metrics outlined in the Service Performance section.

New services depend on long term budget availability and can only be initiated when funding allows, either through resource reallocation, additional fare revenue, or new sustained outside funding. Testing of new service with special limited term funding (e.g., JARC) should be undertaken as long as post-trial period funding is identified to sustain the service following a successful trial period.

Introduction of all new services should be subject to a trial period of **12 months** to meet minimum performance standards within the appropriate service category. If the new service does not meet minimum performance standards within six months, the route should be evaluated for adjustments with a second evaluation at 12 months. If the route continues to fall below minimum performance standards after 12 months, the 'trial' service should automatically "sunset" (be discontinued) unless approved for an extension of the trial period.

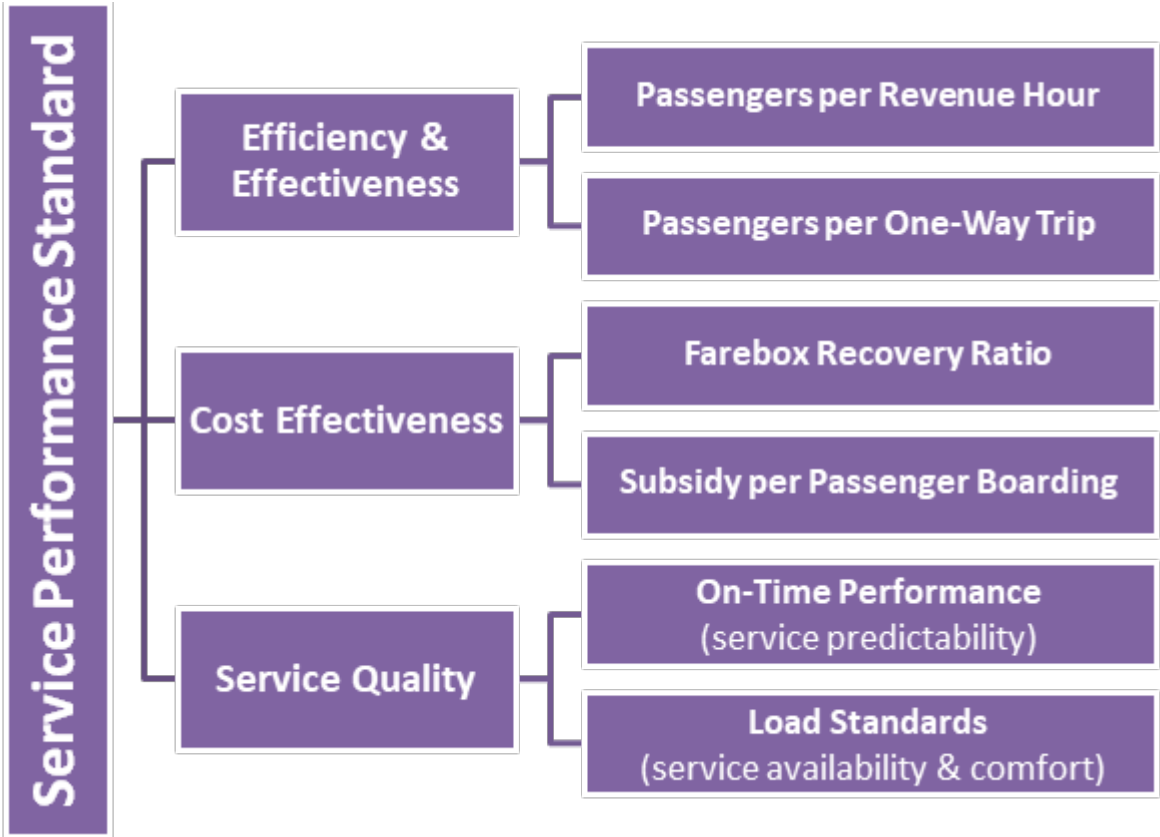
Service Performance Standards

Service performance standards are necessary to ensure that all services are fulfilling their roles in the transit network and contributing to the overall financial sustainability of Metro. Performance should be measured regularly in order to identify changes in performance over time, and to allow prompt changes to be enacted if necessary. Performance standards help ensure that Metro services are useful to customers as well as cost-effective for the agency.

Key Performance Metrics

Service performance standards may be measured using a number of industry best practice key performance indicators (KPIs). These fall into three distinct groups, the first two groups focused on efficiency and effectiveness, the third on service quality, see Figure 4:

FIGURE 4: SERVICE PERFORMANCE STANDARDS OVERVIEW



Minimum Service Effectiveness Measures

Passengers per Revenue Hour (PPH)

This KPI measures service effectiveness or productivity based on ridership (unlinked passenger trips) generated for each hour of service operated.

Current Metro route-level performance for these metric ranges from approximately 10 passengers per revenue hour to 30 passengers per revenue hour on weekdays, and from approximately 6 to over 25 passengers per revenue hour on weekends.

Table 11 shows the following recommended *minimum* thresholds required to justify service. There are different minimum expectations for each service category and day of the week. Express service should not be evaluated on passengers per hour basis, as there is less passenger turnover leading to lower boardings overall but longer trip distances. Express service is evaluated on passengers per one-way trip basis.

TABLE 11: PASSENGER BOARDINGS PER REVENUE HOUR THRESHOLD

Minimum Passenger Boardings per Revenue Hour		
Category	Weekday	Weekend
Rapid	30	25
Key Corridor Local	20	15
Supporting Local	15	10
Community	15	10

Passengers per One-Way Trip

This indicator measures the average boardings per one-way trip. It is useful in evaluating express service where passengers board at the start of the trip and alight at the end of the trip, with little to no activity in between. Passengers per one-way trip provides a way to gauge how full the bus is during its journey. A typical Metro vehicle has 40 seats, and effective service should generate enough passengers to fill a majority of those seats.

TABLE 12: EXPRESS PASSENGER BOARDINGS PER ONE-WAY TRIP THRESHOLD

Minimum Passenger Boardings Per One-Way Trip	
Category	Weekday
Peak Express	30

Relative Service Effectiveness Measures and Corrective Action Guidelines

Along with minimum performance standards, routes should be evaluated in comparison with each other for service efficiency and effectiveness. Metro should derive the system wide average for each metric and determine how each route performs compared with the system average. For example, if the system wide average is 20 passengers per revenue hour, and one route generates 15 passengers per revenue hour, that route performs at 75% of system average.

Based on percentage of system average, the routes should be evaluated within the following categories:

- **Low-performing service:** 50% of system average and below
- **Average-performance service:** Between 51% and 149% of system average
- **High-performing service:** 150% of system average or better

The sections below include action plans for routes falling into these categories. Routes in the low and high categories may warrant more intensive actions, while routes towards the middle are adequately fulfilling their roles in the network and are unlikely to need major attention between major system-wide studies.

Low-Performing Service (50 percent or lower of system average)

Routes which rank within this category should be reviewed to determine their potential for improvement. Remedial actions include any and all of the following:

- **Segment Level Analysis:** A segment level analysis of a low-performing service may highlight a specific portion of the route that significantly reduces the overall performance, causing it to perform below the standard for its service class. If a low-performing segment is identified, it can be modified to attempt to raise productivity for the route as a whole. If the results of a segment level analysis turn out to be inconclusive, however, modifications to the entire route should be considered.
- **Operational Analysis:** Often the difference between meeting and failing minimum performance standards is an inefficient or ineffective schedule that requires unnecessary vehicle resources. Realigning service to cover only critical segments or eliminating unnecessary delay (e.g., deviations) are ways to reduce travel time and save resources.
- **Targeted Marketing:** Marketing tactics can help to raise the public awareness of a route in need of remedial action. Poor ridership may be occasionally a result of a lack of public knowledge of a route and investing in marketing can reverse this trend. This can be the case for concentrated market groups like employment centers, shopping districts, schools, hospitals, agencies, and other major destinations.
- **Rider Outreach:** Onboard surveys and rider interviews are methods for gaining valuable information on how a route can be improved. These methods can reveal information about popular destinations that a route may bypass, or other attributes of a service that may be holding back ridership growth.

- Change in Service Levels: Adjusting the available service along a low-performing route – by any combination of frequency, span, or service day changes that reduces operating resources and costs – to better match the transit product to its market, and subsequently increase productivity.
- Discontinuation: Discontinuation is the final option for a low-performing route that does not meet minimum performance standards and can be applied to a route segment or the route as a whole. If none of the aforementioned remedial actions are successful in raising productivity above the minimum standard for its service class, discontinuation may be necessary to ensure effective use of resources and maintain overall system financial sustainability. Remedial actions to discontinue service should assess the effects on disadvantaged or vulnerable riders (Title VI/EJ populations) and allow time for these riders to make other mobility arrangements.
- Delayed action: Remedial actions involving service level changes and discontinuation can be delayed only in circumstances where demonstrable changes are expected from external factors in the short term that are likely to result in significant improvement in service performance. Such changes may include such factors as new market densification (short term planning and construction), delayed availability of replacement service, or short-term corridor circumstances (e.g., road construction) that have artificially decreased demand.

Average-Performing Service (51 to 149 percent of system average)

Routes in this category are adequately fulfilling their roles in the transit network, and no remedial action is required. These routes should be monitored on an ongoing basis to determine whether their performance improves, decreases, or remains steady. While no particular action is necessary, ranking in this category does not preclude service adjustments at the discretion of Metro.

- Actions: Routes in this category perform well as a whole; however, their average performance may point to routes which perform equally throughout their length or those which may contain segments of very high and also low performance. Routes in this category should undergo a trip-by-trip or segment-level analysis periodically to determine whether they are average overall, or include trips or segments which fall into the more extreme categories. *Segments which would be considered low or very high performers should be subject to the actions detailed in those sections.*

High-Performing Service (150 percent or higher of system average)

Routes ranking in this category suggest the need for greater investment, as high performance may signal the presence of significant latent demand. Actions for high-performing routes include:

- Increase service levels: Increasing frequency can help make service more attractive to a wider pool of potential customers, including those that currently drive. High frequencies provide dependable service with minimal waits, encouraging passengers to arrive randomly without consulting a schedule. Increasing service levels by adjusting the service's frequency, span, or

days of week served should be monitored to ensure that high performance is maintained above the 100 percent level as service is added.

- Upgrade transit operating environment: Providing additional customer and operational amenities can provide an improved customer experience. Adding operating improvements such as signal priority, bus bulbs, or bus lanes can improve performance by making service faster and more reliable. Providing additional amenities at route stops such as bus shelters, benches, and real-time bus information can also heighten the perception of higher-quality service.
- Introduce additional service types (Rapid): High-performing corridors may warrant the upgraded service quality of Rapid bus service with or without Local underlays. Very high-performing corridors should be analyzed for the need to introduce new Rapid service.

This category of routes constitutes the top-performing tier of the entire Metro system and essentially the system's critical service spines that support the overall network. It is very important to maintain a high-quality level of service as well as to continue further investment. It is important to monitor these routes and make investments in key areas that are aimed at further improving overall service.

Service Quality Measures

Passenger Loads

Passenger loads refers to how many people are on the bus at any given moment compared to its capacity both seated and standing. High passenger loads results in overcrowded conditions, which may require additional service to address the issue¹.

Service quality issues with crowding are dependent on the amount of time that customers must stand on the bus. If crowding is a relatively brief phenomenon, it does not justify the expense of adding additional service. Table 13 illustrates the proposed maximum load standards by service category. Short term fluctuations in ridership associated with fuel cost increases and special- events do not apply to these load standard criteria.

TABLE 13: MAXIMUM LOAD STANDARD BY SERVICE VEHICLE TYPE

Category	Maximum Load Standard
Rapid	125% of seated capacity for two or more miles
Local (Key Corridor, Supporting)	125% of seated capacity for two or more miles
Community	125% of seated capacity (short duration routes)
Express	125% of seated capacity for two or more miles

On-Time Performance

An on-time performance standard defines a minimum threshold of Metro daily trips by route and for the system that operate on-time. On-time performance reflects both the quality and reliability of service, which can affect whether or not people choose to use transit or continue to use transit.

Metro defines “on time” as 1 minute early and up to 5 minutes late at each time point. This follows a common industry standard and represents a balance between quality and efficiency for the customer.

In addition, Metro should adopt a minimum goal of **85% on-time performance system wide**, an industry standard that balances performance and cost. This standard results in a customer experience that is most often very good while recognizing that there are operating issues beyond Metro’s control on some days.

Data Needed for Service Performance Monitoring

The performance measures discussed above require the regular collection and updating of the following data sources:

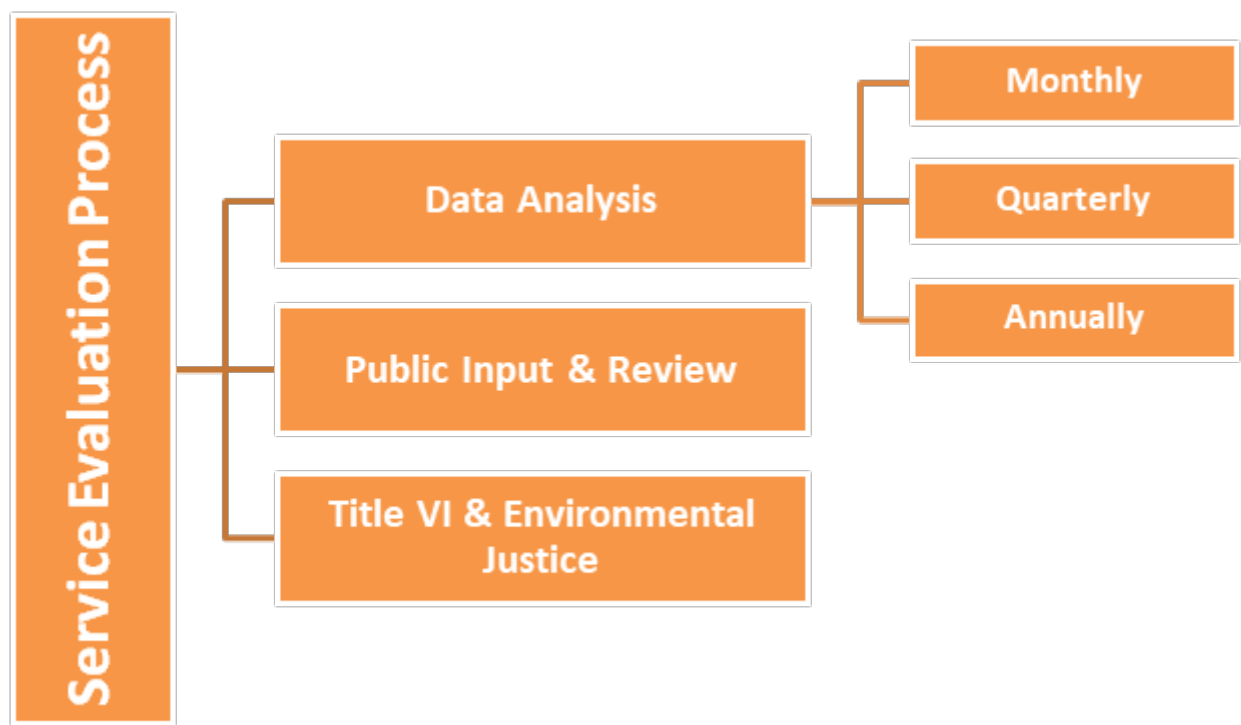
- **Ridership:** Total number of boardings and on-board load by route and day of the week should be collected regularly. Manual collection of ridership and operating data is expensive and time consuming; which means it is not undertaken frequently. Metro should consider investing in Automatic Passenger Counter (APC) systems which cost-effectively collect ridership and operating data daily and allow for trends over time to be examined.

- **Resources:** The number of vehicles and revenue hours per route by day of the week should be collected from Metro scheduling information.
- **On-Time Performance:** Departure times at each time point (and arrival at final time point) should be collected regularly. This data is provided by both Automatic Vehicle Location (AVL) and Automatic Passenger Counter (APC) systems.

Service Evaluation Process

The service evaluation process is conducted in order to ensure the continued performance of individual services, as well as the overall network. This evaluation is intended to improve service design and productivity within categories, which is important to ensure that Metro offers a consistent system that is easy for customers to use and easy for Metro to promote, manage, and administer. Figure 5 illustrates the service evaluation process.

FIGURE 5: SERVICE EVALUATION PROCESS OVERVIEW



Service Evaluation Timeline

Monthly & Quarterly Route Performance Analysis

In preparation for each service change, at least three times per year, service performance measures should be reviewed according to the metrics and standards outlined above. The service performance report should provide information to allow for immediate actions that can be made with the next operator sign-up to modify service (frequency or alignment changes). Monthly metrics of efficiency and effectiveness KPIs including Passengers per Revenue Hour and Passengers per One-Way trip, will be provided as a part of the regular reporting, but commentary and potential actions will be provided prior to each service change.

Title VI Analysis

At least once every three years, in conjunction with the Title VI submission, Metro will monitor service standards and policies to compare the services provided in minority areas to non-minority areas. As provided for in the regulation and next section, a minority route is a transit route in which at least one-third of the revenue miles are located in a Census block where the percentage of the minority population exceeds the percentage of the minority population in Metro's service area as whole which will be used in this analysis. The service standards and policies, as defined in this section, to be monitored are:

Service Standards:

- Vehicle Load
- Vehicle Headway
- On-Time Performance
- Service Accessibility

Service Policies:

- Vehicle Assignment
- Distribution of Transit Amenities

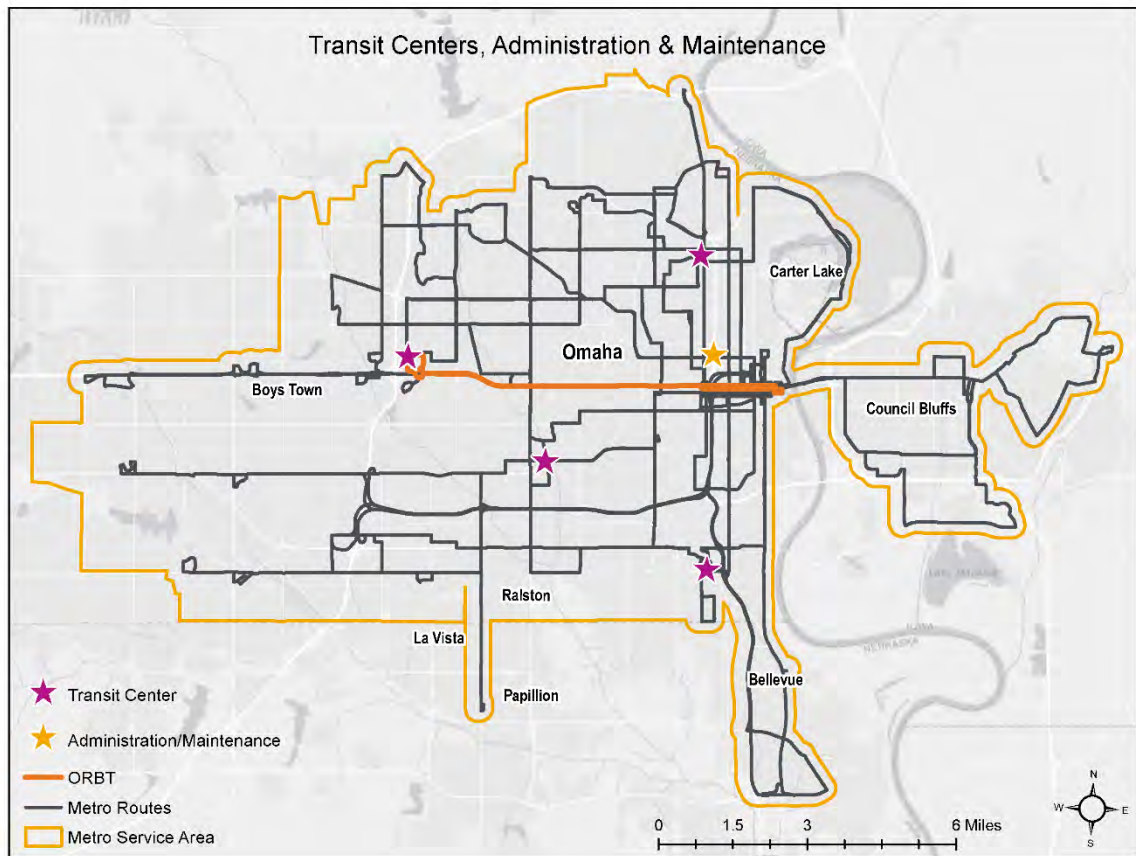
Demographic and Service Profile Maps and Charts

Background

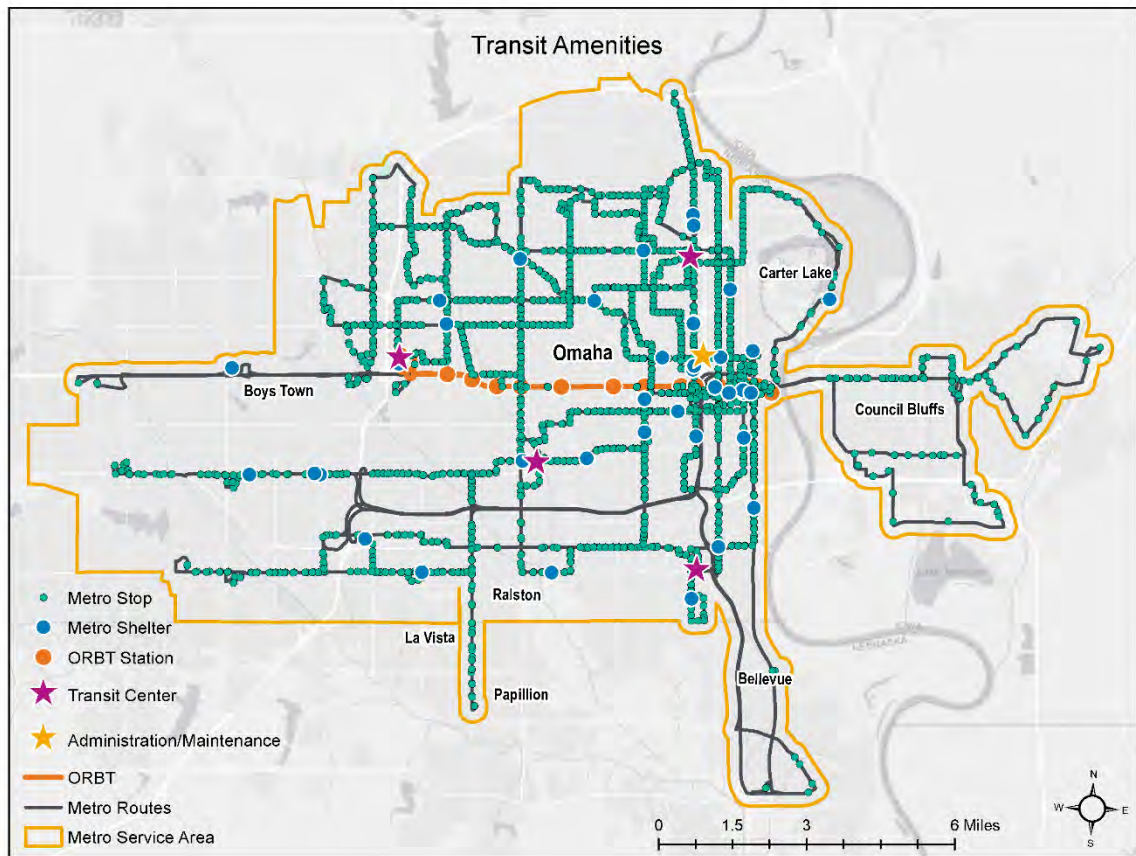
Metro operates more than 50 fixed route vehicles in peak service and is located in an urbanized area (UZA) of more than 200,000 people, and therefore meets the threshold defined in Chapter IV to prepare demographic and service profile maps and charts to determine whether and to what extent transit service is available to minority populations within the service area.

Metro conducted an onboard survey during October/November 2022 to collect passenger information on race, color, national origin, English proficiency, language spoken at home, household income, travel patterns, and other rider characteristics. Additionally, demographic information was collected on fare usage by fare type amongst minority and low-income users, in order to assist with fare equity analyses. Metro last conducted an onboard survey as outlined above in October 2017.

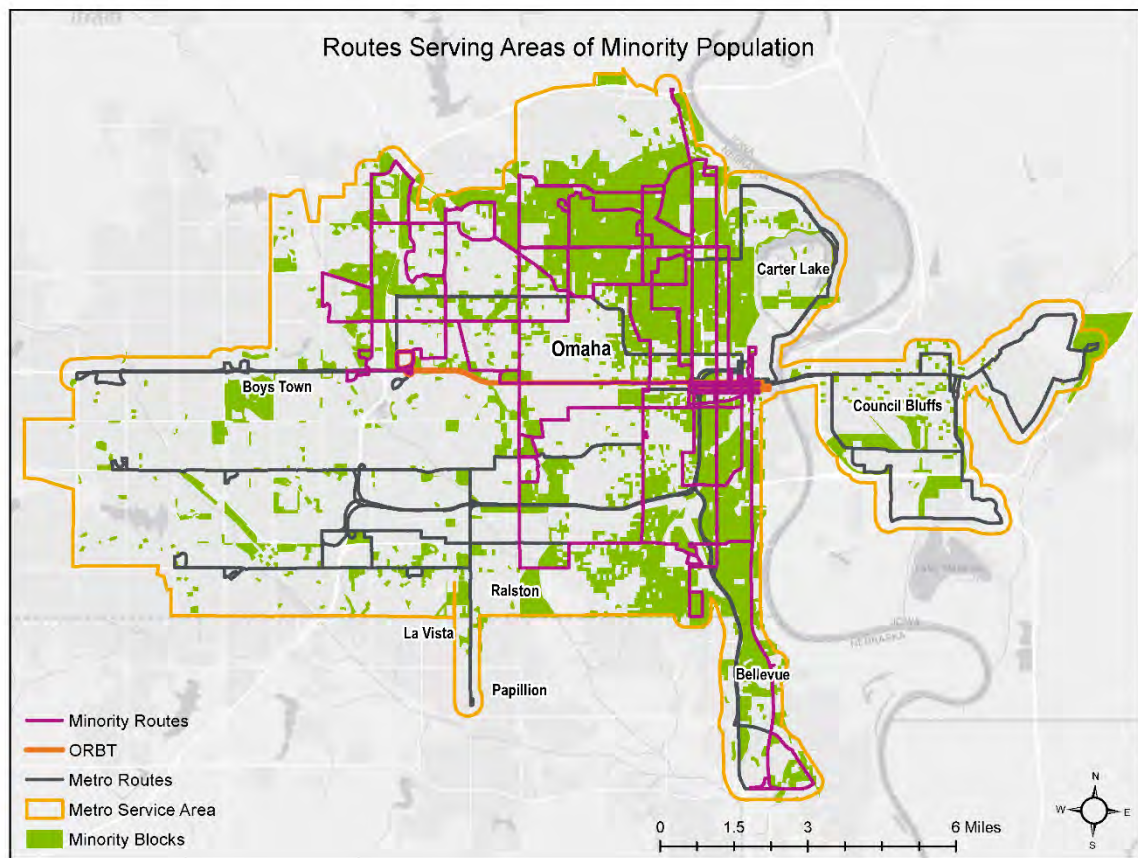
The following demographic profile maps and charts utilize 2020 Decennial U.S. Census and American Community Survey data to illustrate the distribution of Metro's routes and amenities throughout the service area.



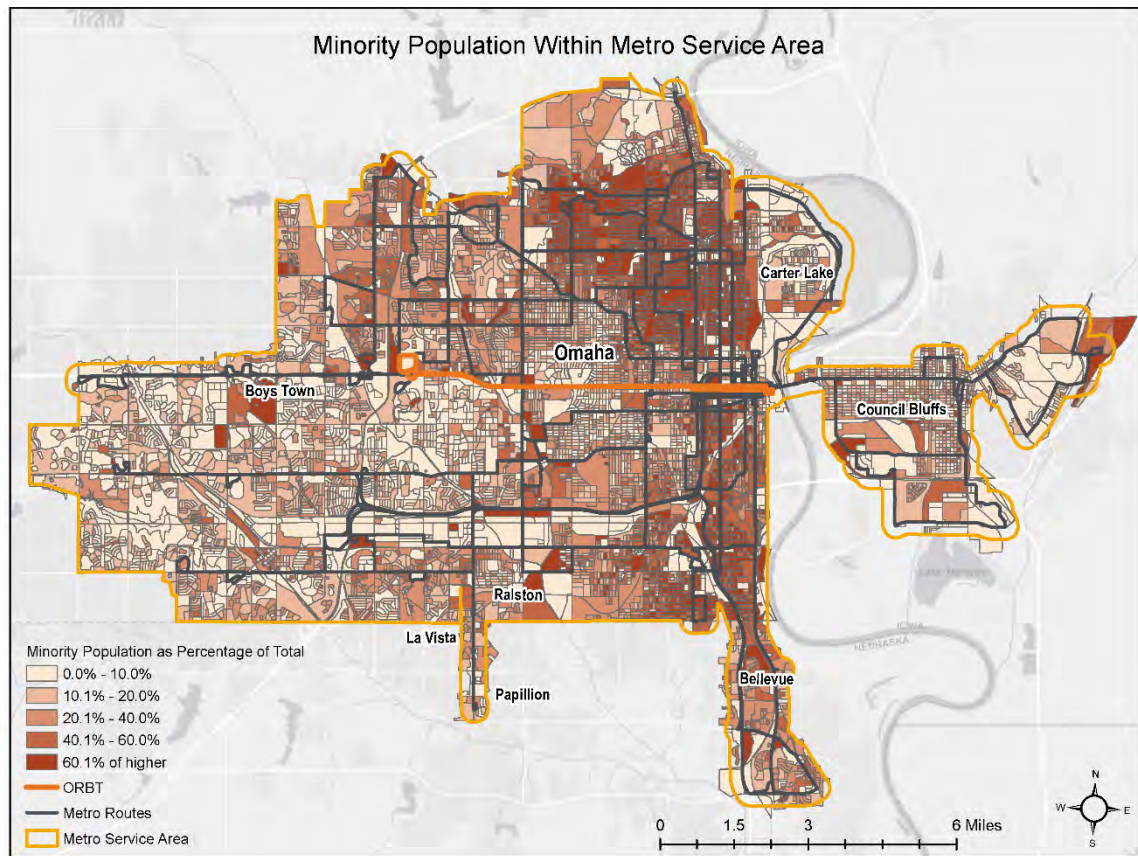
MAP #3: TRANSIT CENTERS, ADMINISTRATION & MAINTENANCE



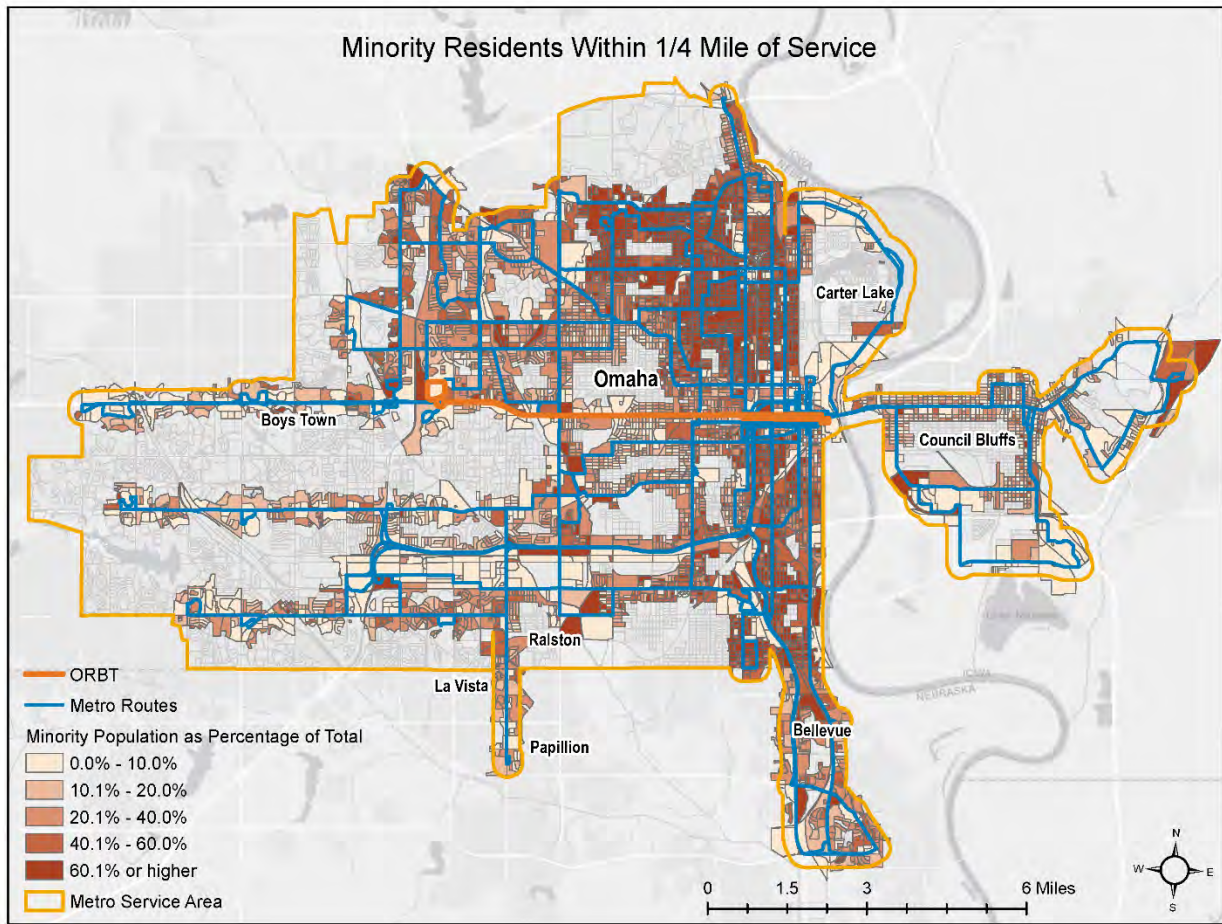
Map #4: TRANSIT AMENITIES



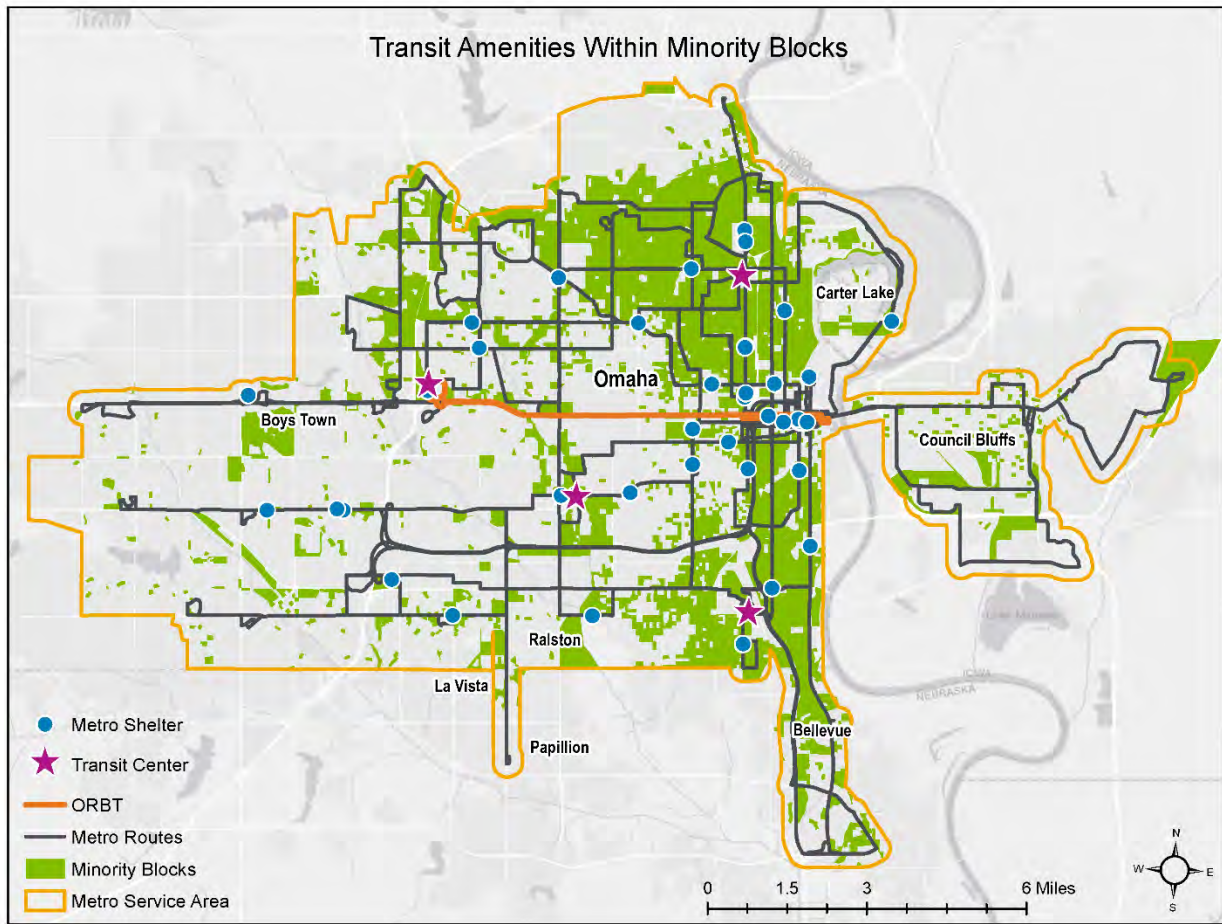
MAP #5: ROUTES SERVING AREAS OF MINORITY POPULATION



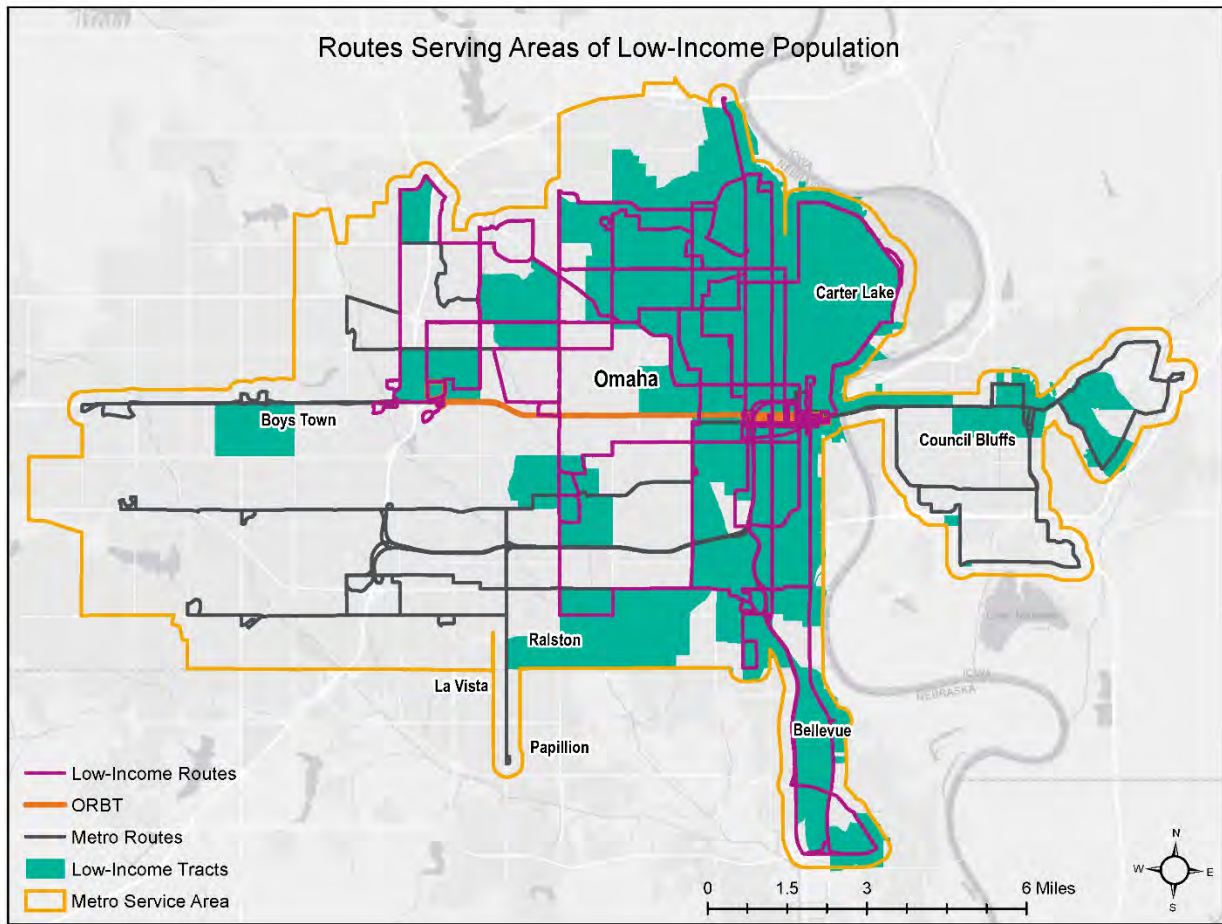
MAP #6: MINORITY POPULATION WITHIN METRO SERVICE AREA



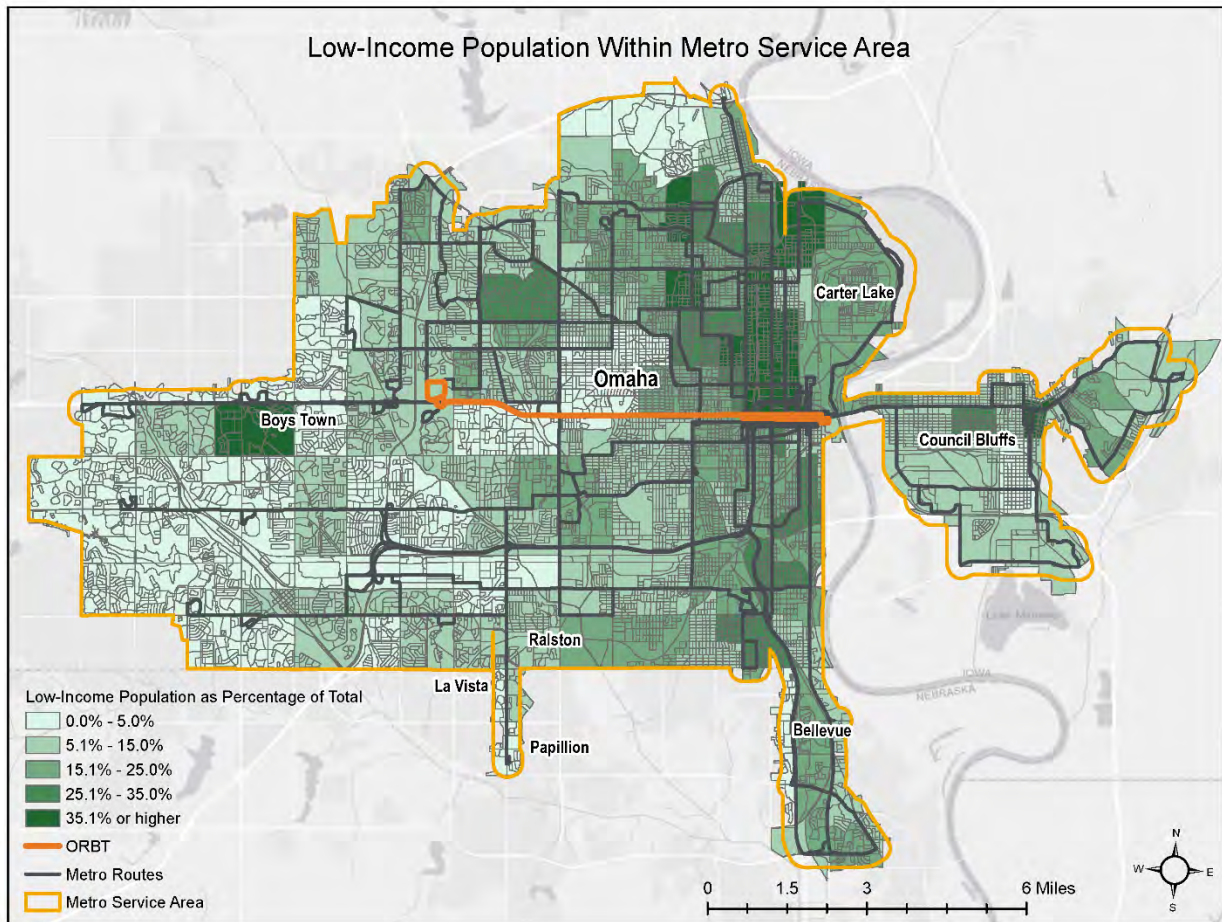
MAP #7: MINORITY RESIDENTS WITHIN ¼ MILE OF METRO SERVICE



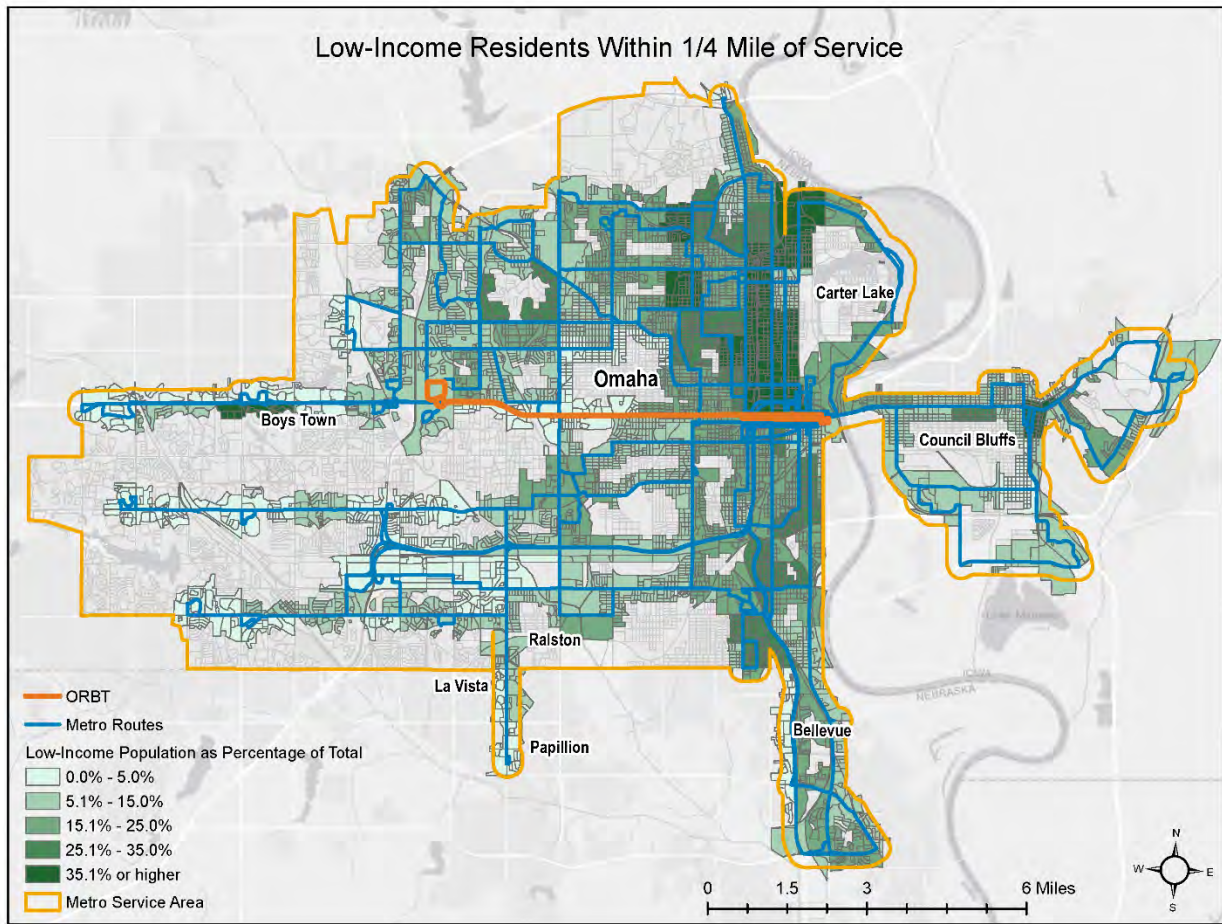
MAP #8: TRANSIT AMENITIES WITHIN MINORITY BLOCKS



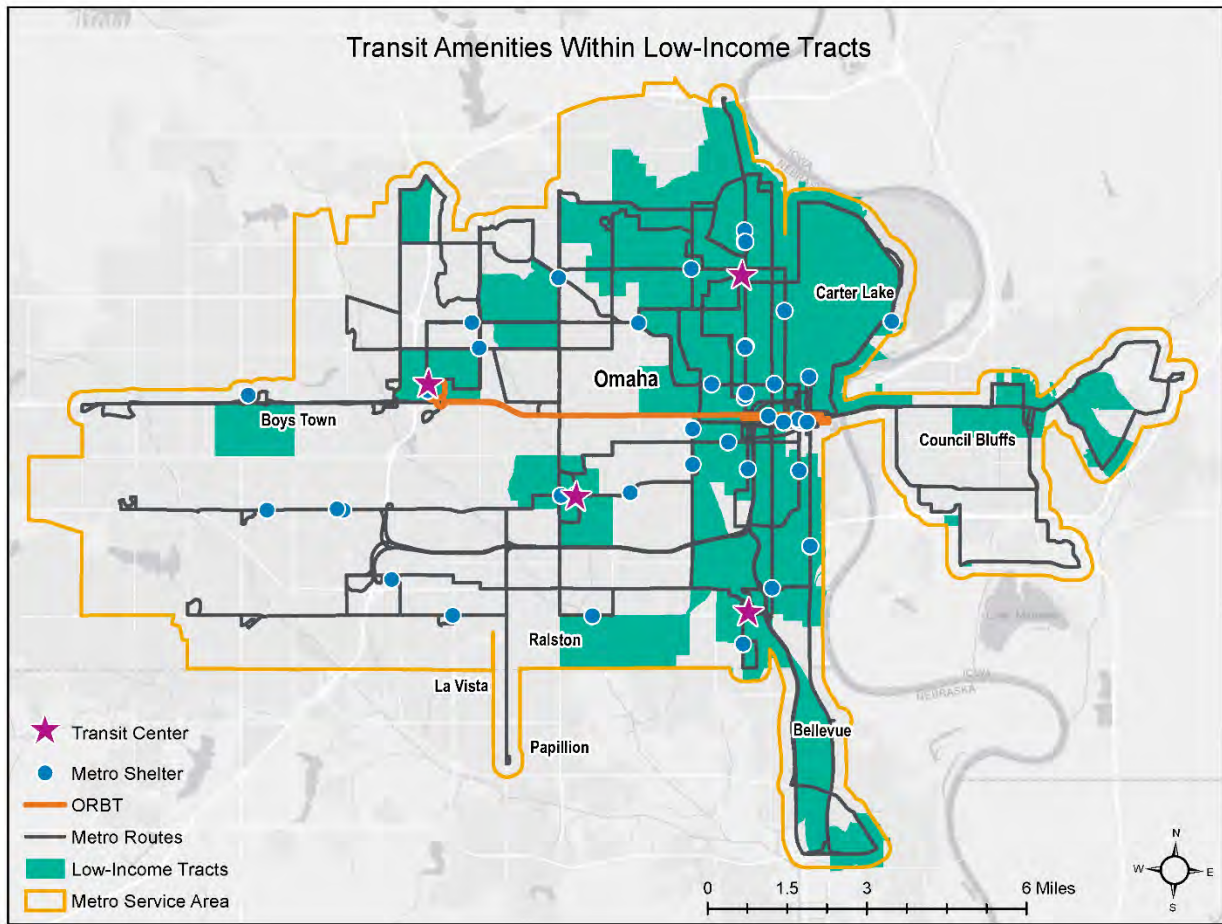
MAP #9: ROUTES SERVING AREA OF LOW-INCOME POPULATION



MAP #10: LOW-INCOME POPULATION WITHIN METRO SERVICE AREA



MAP #11: LOW-INCOME RESIDENTS WITHIN ¼ MILE OF SERVICE



MAP #12: TRANSIT AMENITIES WITHIN LOW-INCOME TRACTS

Metro Service Area Statistics

Total Population	477,942
Total Non-Hispanic White	308,956
Total Percent Minority	35.36%
Total Census Blocks (<i>with population</i>)	7,275
Total Block Average % Minority	29.80%
Total Minority Blocks (<i>exceeds Block Average</i>)	3,691

TABLE #14: METRO SERVICE AREA STATISTICS BY DISTANCE

Residents	Within ¼ Mile	More than ¼ Mile
Minority	76.5%	23.5%
Non-Minority	58.2%	41.8%
System	64.7%	35.3%

TABLE #15: NON-HISPANIC & HISPANIC SERVICE AREA STATISTICS WITHIN ¼ MILE OF BUS ROUTE

Statistics From Within 1/4 Mile of Any Bus Route				
Non-Hispanic Total			252,981	82.42%
Non-Hispanic White	180,517	71.36%		
Non-Hispanic Black	46,186	18.26%		
Non-Hispanic Native	1,314	0.52%		
Non-Hispanic Asian	12,962	5.12%		
Non-Hispanic Pacific Islander	78	0.03%		
Non-Hispanic Other	642	0.25%		
Non-Hispanic Two or More Races	11,283	4.46%		
Hispanic Total			53,956	17.58%
Hispanic White	30,661	56.83%		
Hispanic Black	588	1.09%		
Hispanic American Native	1,006	1.86%		
Hispanic Asian	149	0.28%		
Native Pacific Islander	12	0.02%		
Hispanic Other	11,148	20.66%		
Hispanic Two or More Races	10,392	19.26%		
Total Pop			306,937	100%

TABLE #16: IDENTIFICATION OF ROUTES WITH LARGER MINORITY POPULATIONS

Route	Length Mile	Minority Length Miles	Percent Length Mile	Demographics within 1/4 Mile				
				Total Blocks with Population	Total Minority Blocks	Route Percent Minority Population	Sum Total Population	Average Block Percent Minority
ORBT	16.535969	4.189574	25.34%	250	83	27.87%	18859	30.52%
Route 3	19.482512	11.802565	60.58%	448	320	53.72%	24464	53.75%
Route 4	24.107293	5.504584	22.83%	407	190	38.79%	29063	37.36%
Route 5	26.825027	13.655698	50.91%	326	233	52.18%	21135	56.69%
Route 8	22.616816	15.313177	67.71%	455	286	54.48%	25561	52.87%
Route 11	12.905125	4.468610	34.63%	294	107	33.72%	21243	32.81%
Route 13	26.503959	9.938391	37.50%	384	264	46.79%	24933	48.77%
Route 14	33.668586	13.877524	41.22%	447	262	44.81%	30005	46.61%
Route 15	25.379132	5.168942	20.37%	400	117	29.19%	27775	28.45%
Route 16	20.687858	6.177130	29.86%	162	112	52.03%	6883	58.08%
Route 18	25.329768	15.814867	62.44%	478	365	59.32%	28717	63.12%
Route 24	20.180533	12.629550	62.58%	431	411	67.62%	27571	72.69%
Route 26	13.668916	10.408887	76.15%	268	249	68.48%	14006	68.93%
Route 30	15.907834	9.581127	60.23%	382	281	50.49%	21441	57.91%
Route 35	13.355530	8.649858	64.77%	391	308	57.72%	22382	63.96%
Route 36	6.638466	3.764837	56.71%	161	107	48.01%	12424	47.34%
Blue	20.384937	2.436827	11.95%	355	69	19.82%	19746	23.31%
Yellow	22.463240	2.666363	11.87%	421	83	21.10%	18704	23.83%
Route 55	14.646611	4.040186	27.58%	139	49	31.78%	13207	30.22%
Route 92	17.763790	1.769432	9.96%	75	19	23.14%	6444	25.04%
Route 93	11.367916	1.214910	10.69%	300	151	37.48%	25520	39.65%
Route 94	15.658539	2.311357	14.76%	370	145	31.71%	30598	33.95%
Route 95	16.009394	5.705516	35.64%	588	405	46.34%	45561	49.69%
Route 97	10.099934	0.646114	6.40%	377	151	31.62%	30406	34.51%
Route 98	25.132483	9.351590	37.21%	471	156	31.82%	38051	31.17%
Green	1.272260	0.000000	0.00%	27	12	26.56%	2598	40.87%

Highlighted routes are considered minority routes for the purpose of program monitoring in that one-third or more of revenue miles travel through Census Blocks where the percentage of minority population exceeds the percentage minority population in the service area.

Monitoring Program

Background

FTA requires transit providers that operate 50 or more fixed route vehicles in peak service and are located in urbanized areas (UZAs) of 200,000 or more people, to monitor their service standards and policies to compare the service provided in minority areas compared to non-minority areas. A minority route is defined as operating at least one-third of the revenue miles in a Census block, Census block group, or traffic analysis zone where the percentage of minority population exceeds the percentage of minority population in the overall service area. For the purposes of monitoring past performance, Metro relied on the classification of routes as either minority or non-minority as defined in the most recent approved Title VI plan.

The monitoring of service standards and policies compares the level of service provided to predominantly minority areas with the level of service provided to predominantly non-minority areas to ensure the end result of policies and decision-making is equitable. These service standards and policies are evaluated for each mode. Metro does not operate rail or other modes of service. The following analyses are for all fixed route bus service operated by Metro. The evaluated service standards and policies are:

- Service Standards:
 - Vehicle Load
 - Vehicle Headway
 - On-Time Performance
 - Service Availability
- Service Policies:
 - Vehicle Assignment
 - Distribution of Transit Amenities

Service Standards:

Vehicle Load Analysis

Metro conducted a Vehicle Load Analysis of randomly sampled routes during calendar year 2021. According to Metro's current Service Standards and Policies, the Vehicle Load Factor should not exceed 125% of seated capacity for the vehicle.

Methodology

A random sample of 208 one-way trips was selected (the same used for National Transit Database (NTD) sampling) and peak loads were recorded for each trip. A Load Factor was then calculated based on the peak load as a percentage of the vehicle's seated capacity.

Assessment

Of the 208 trips sampled, none experienced a load factor beyond Metro's Service Standards. No disparate impact is identified. Table 17 shows average load factors for both minority (10.3%) and non-minority (10.8%) routes, neither of which represent issues of vehicle load. Individual route samples that experienced a vehicle load above the system average (10.5%) are highlighted in blue.

TABLE 17: VEHICLE LOAD ANALYSIS 2021

Route	Sample Size	Average Peak Load
3	6	11.8%
5	9	15.3%
8	4	6.5%
11	8	8.4%
13	11	14.5%
14	4	17.5%
18	24	18.7%
24	17	14.5%
26	3	4.2%
30	9	8.0%
35	7	7.0%
36	7	5.9%
95	1	6.3%
98	1	6.3%
Minority Total	111	10.3%

4	22	14.0%
15	11	15.0%
16	3	7.1%
55	4	13.8%
92	4	1.7%
200	6	0.5%
Blue	6	15.8%
ORBT	39	13.9%
Yellow	2	15.7%
Non-Minority Total	97	10.8%

System Total	208	10.5%
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Vehicle Headway Analysis

Metro conducted an analysis of its system to evaluate the frequency of service for minority and non-minority routes. Table 18 below shows the number of routes operating, median headways, and average headway in minutes for minority and non-minority routes by time of day for weekday, Saturday, and Sunday service.

Methodology

A review of all schedules and frequencies as of December 2021 was conducted by day type and service period. It is important to note that during this time, Metro was still operating emergency service reductions on some routes due to the COVID-19 pandemic.

Assessment

Overall, Metro operated more service on minority routes throughout the week, especially when considering weekend and evening service. Minority routes had longer average headways compared to non-minority routes at all times of the week, with a difference of 12 minutes (49 minutes versus 37 minutes) during weekday peak periods, a difference of 18 minutes during the day on Sundays (63 minutes versus 45 minutes), and a difference of 5 minutes or less for all other times of the week. This variance is largely due to ORBT, a high-frequency bus rapid transit line (non-minority route) that began operation in November 2020. Although headways were longer for minority routes, this was balanced by the higher number of routes operating during these periods. These findings suggest that on-going monitoring of vehicle headways to assess potential disparate impacts is warranted. Metro will consider implications to minority and non-minority headways when studying potential schedule changes to routes in the future, including the restoration of pre-COVID schedules, the study of future ORBT lines, and evaluation of other fixed route services.

TABLE 18: VEHICLE HEADWAY ANALYSIS 2021

Minority Routes	Weekday			Saturday		Sunday	
	Peak	Mid Day	Night	Day	Night	Day	Night
Routes Operating	15	13	9	13	9	9	3
Median Headway (min)	60	60	60	60	60	60	60
Average Headway (min)	49	49	63	52	63	63	50

Non-Minority Routes	Weekday			Saturday		Sunday	
	Peak	Mid Day	Night	Day	Night	Day	Night
Routes Operating	15	7	4	6	4	3	3
Median Headway (min)	30	60	60	45	60	60	60
Average Headway (min)	37	44	58	48	58	45	47

On-Time Performance Analysis

Metro conducted an On-Time Performance Analysis for departure times from all timepoints (excluding end of line) on all routes during calendar year 2021. According to Metro's current Service Standards and Policies, a bus was considered on time if it departed from a published time point no more than one minute early and no more than five minutes late.

Methodology

Monthly on-time performance reports were compiled to form an annual summary of departures from all recorded timepoints using Metro's Automatic Vehicle Locating (AVL) software. Timepoint departures were categorized as early, on time, or late for each route.

Assessment

Table 19 shows that 80.7% of all departures system-wide were considered on time. Non-minority routes reflected an on-time percentage of 79.4%, while 81.6% of minority routes were found to be on time. Individual routes that had lower on-time performance compared to the system average are highlighted in orange.

TABLE #19: ON-TIME PERFORMANCE ANALYSIS 2021

Route	Percent Early	Percent On Time	Percent Late	Total Timepoints
3	10.0%	81.7%	8.3%	157,910
5	12.0%	70.3%	17.7%	48,067
8	9.5%	83.9%	6.6%	64,479
11	9.0%	79.7%	11.3%	95,570
13	9.5%	79.5%	10.9%	124,574
14	8.8%	75.4%	15.8%	77,541
18	10.8%	82.2%	7.0%	300,192
24	10.0%	84.1%	5.9%	198,505
26	13.9%	79.6%	6.4%	29,927
30	10.5%	86.7%	2.8%	111,068
35	7.9%	84.8%	7.3%	69,389
36	10.5%	82.3%	7.1%	38,549
95	10.4%	69.2%	20.5%	6,172
98	19.9%	68.8%	11.3%	6,522
Minority Routes	10.1%	81.6%	8.3%	1,328,465

ORBT	8.5%	83.7%	7.8%	473,241
4	12.1%	80.0%	7.9%	213,227
15	13.5%	79.4%	7.1%	112,498
16	13.7%	77.5%	8.8%	34,996
Blue	18.3%	62.9%	18.8%	40,812
Yellow	11.9%	75.0%	13.1%	37,196
55	18.8%	73.7%	7.6%	50,335
92	12.4%	73.6%	14.0%	9,312
93	32.6%	55.6%	11.8%	3,888
94	35.9%	48.6%	15.5%	5,211
97	36.2%	56.4%	7.4%	7,873
200	34.4%	54.5%	11.0%	17,750
Non-Minority Routes	12.0%	79.4%	8.6%	1,006,339

System Total	10.9%	80.7%	8.4%	2,334,804
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Service Availability Analysis

Metro conducted an analysis of the availability of service for residents within the service area.

Methodology

Metro used 2020 Census block data to calculate the percentage of individuals residing within ¼ mile of a transit route as of January 2022 for the system as well as the percentage of minorities within ¼ mile by route. Total Population and Minority Population were determined by the location of the centroid of each census block in relation to a ¼ mile buffer around each individual route.

Assessment

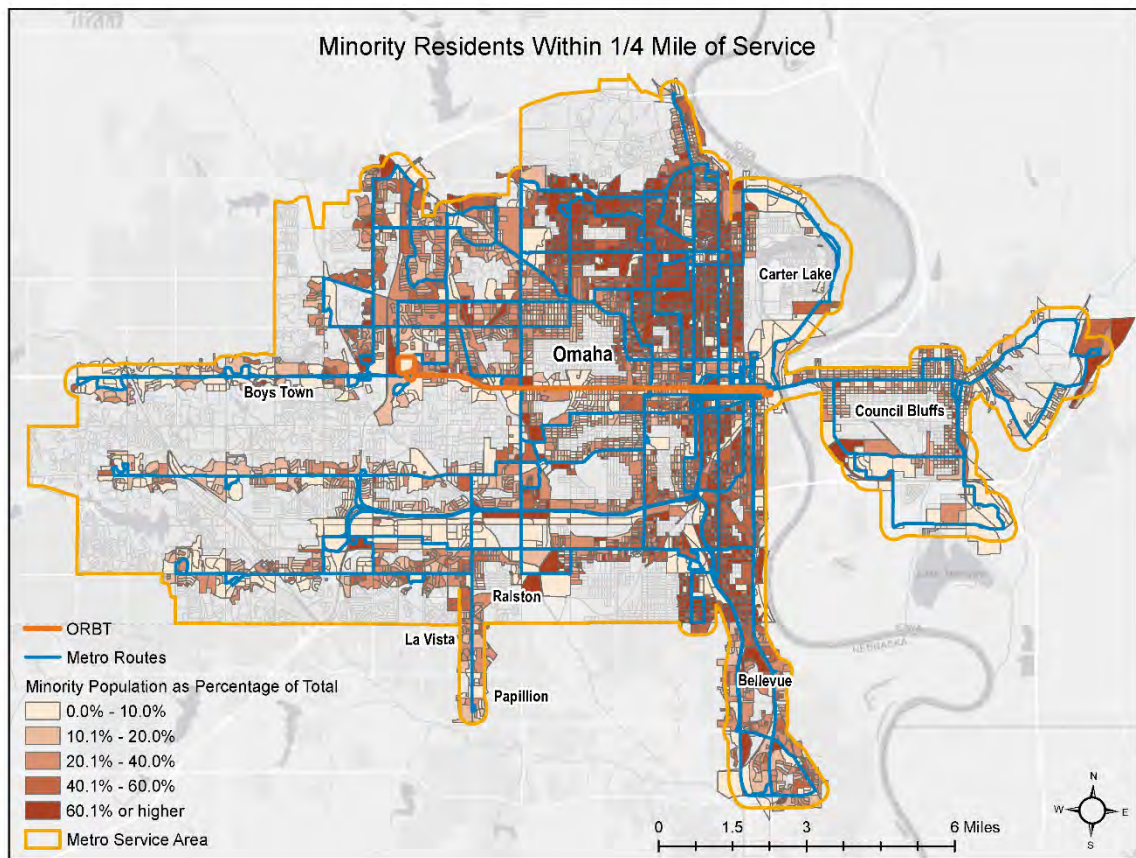
Table 20 below shows the percentages of minority and non-minority residents in Metro's service area. The percentage of minority residents within ¼ mile of a route was 76.5%. The percentage of all residents in the service area within a ¼ mile of a route was 64.7%. Table 21 shows the percentage of minorities within ¼ mile of each route within the system. Overall, the percentage of minorities in the service area within ¼ mile of a route is higher than the percentage of the entire population within the service area that is within ¼ mile from a route.

TABLE #20: SERVICE AVAILABILITY ANALYSIS OF SYSTEM

Residents	Within ¼ Mile	More than ¼ Mile
Minority	76.5%	23.5%
Non-Minority	58.2%	41.8%
System	64.7%	35.3%

TABLE #21: SERVICE AVAILABILITY ANALYSIS BY ROUTE

Route	Total Population within ¼ Mile of Fixed Route Service	Total Minority Population within ¼ Mile of Fixed Route Service	% of Minority Population within ¼ Mile of Fixed Route Service
ORBT	18,859	5,256	27.9%
3	24,464	13,141	53.7%
4	29,063	11,274	38.8%
5	21,135	11,029	52.2%
8	25,561	13,925	54.5%
11	21,243	7,164	33.7%
13	24,933	11,666	46.8%
14	30,005	13,445	44.8%
15	27,775	8,108	29.2%
16	6,883	3,581	52.0%
18	28,717	17,035	59.3%
24	27,571	18,643	67.6%
26	14,006	9,592	68.5%
30	21,441	10,825	50.5%
35	22,382	12,920	57.7%
36	12,424	5,965	48.0%
Blue	19,746	3,913	19.8%
Yellow	18,704	3,946	21.1%
55	13,207	4,197	31.8%
92	6,444	1,491	23.1%
93	25,520	9,565	37.5%
94	30,598	9,704	31.7%
95	45,561	21,115	46.3%
97	30,406	9,615	31.6%
98	38,051	12,109	31.8%
200	2,598	690	26.6%



MAP #13: MINORITY RESIDENTS WITHIN ¼ MILE OF METRO SERVICE

Service Policies

Vehicle Assignment Analysis

Metro conducted a Vehicle Assignment Analysis of its system in calendar year 2021. Metro's fleet is 100% ADA accessible, and all high floor vehicles are lift equipped. Metro's active fixed route fleet is 100% low-floor. High-floor vehicles from a contingency and/or emergency fleet are rarely assigned to fixed routes.

Methodology

A random sample of 208 one-way trips (the same used for NTD sampling) was selected and vehicle age was recorded for each trip. Additionally, each vehicle was classified as either "low floor" or "high floor".

Assessment

Table 22 shows that 100% of total sampled trips were operated by low floor vehicles, with an average age of 7.8 years. Buses assigned to non-minority routes had an average age of 7.1 years. However, buses assigned to minority routes had an average age of 8.2 years. This is largely attributed to the dedicated subfleet on ORBT, a high-frequency bus rapid transit line (non-minority route) that began operation in November 2020 (with the lowest average fleet age by route of 2.7). Individual route samples with an older average fleet age compared to the system average are highlighted in orange. These findings suggest that on-going monitoring of vehicle assignments to assess potential disparate impacts is warranted. Metro will evaluate bus assignment procedures to ensure vehicles are distributed equitably across all bus routes.

TABLE #22: VEHICLE ASSIGNMENT ANALYSIS 2021

Route	Sample Size	Average Bus Age	Percent Low Floor
3	6	7.2	100%
5	9	4.6	100%
8	4	8.3	100%
11	8	7.8	100%
13	11	7.5	100%
14	4	8.8	100%
18	24	11.0	100%
24	17	9.1	100%
26	3	6.0	100%
30	9	8.9	100%
35	7	9.9	100%
36	7	8.6	100%
95	1	11.0	100%
98	1	7.0	100%
Minority Total	111	8.2	100.0%

4	22	7.1	100%
15	11	8.7	100%
16	3	5.3	100%
55	4	12.5	100%
92	4	7.0	100%
200	6	8.3	100%
Blue	6	7.5	100%
ORBT	39	2.7	100%
Yellow	2	5.0	100%
Non-Minority Total	97	7.1	100.0%

System Total	208	7.8	100.0%
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Distribution of Transit Amenities Analysis

Metro conducted an analysis of the distribution of transit amenities throughout the system in 2022 to ensure equitable distribution. According to Metro's current Service Standards and Policies, bus shelters shall be installed where there is an expected boarding of 200 or more passengers per day, funding permitting. Bus benches are placed where deemed appropriate by the public and are contracted by local jurisdictions with an outside vendor and beyond the control of Metro. Signs at all bus stops include a Metro logo, bus icon, and Metro's website and phone numbers (voice and TDD). At stops with transfer opportunities, route numbers are posted. Metro does not have elevated transit centers or bus shelters and does not have escalators/elevators.

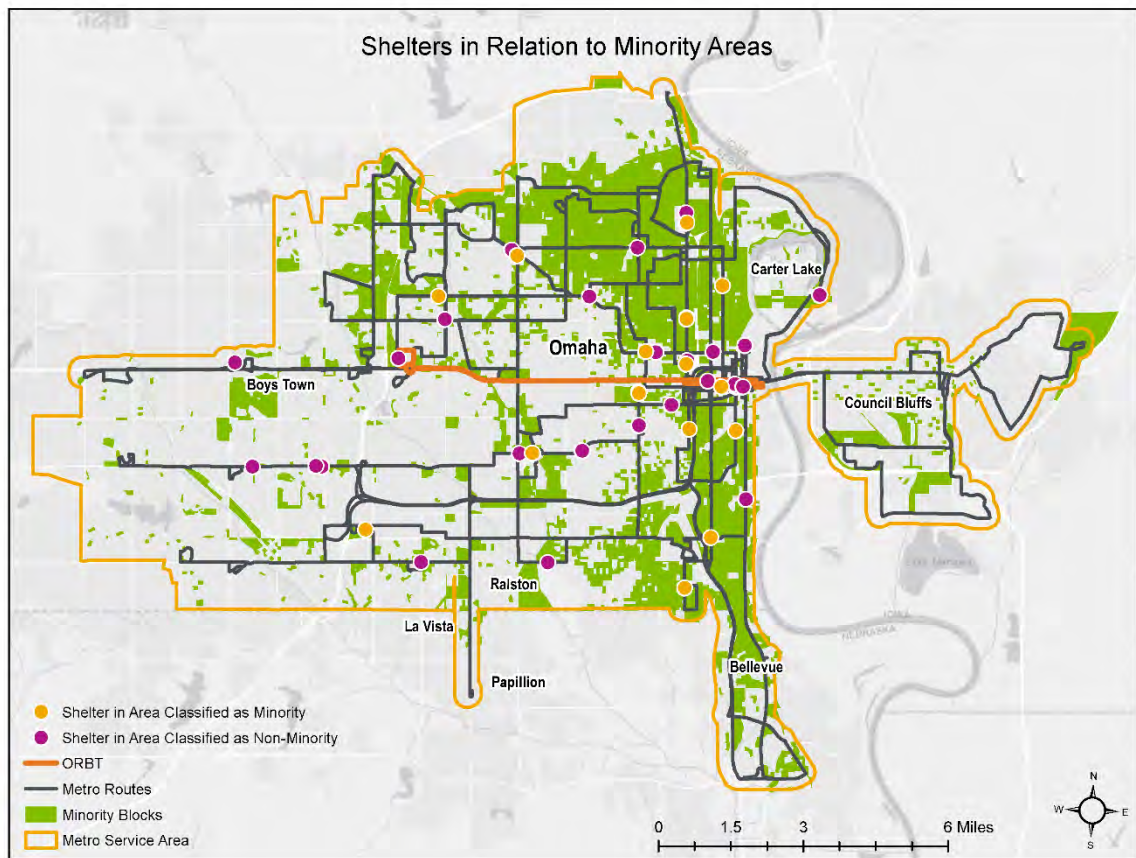
Methodology

Metro classified all existing bus stop shelters and transit centers as located in either a minority or non-minority area. Metro also considered the number of minority routes served by each bus shelter and transit center as a percentage of all routes serving the facility.

Assessment

Table 23 shows that Metro had 47 bus shelters (as of December 31, 2021) installed along its bus routes with 17 or 36.2% located within minority blocks. Thirty-six shelters are located along minority routes, or 76.6% of all bus shelters within the service area.

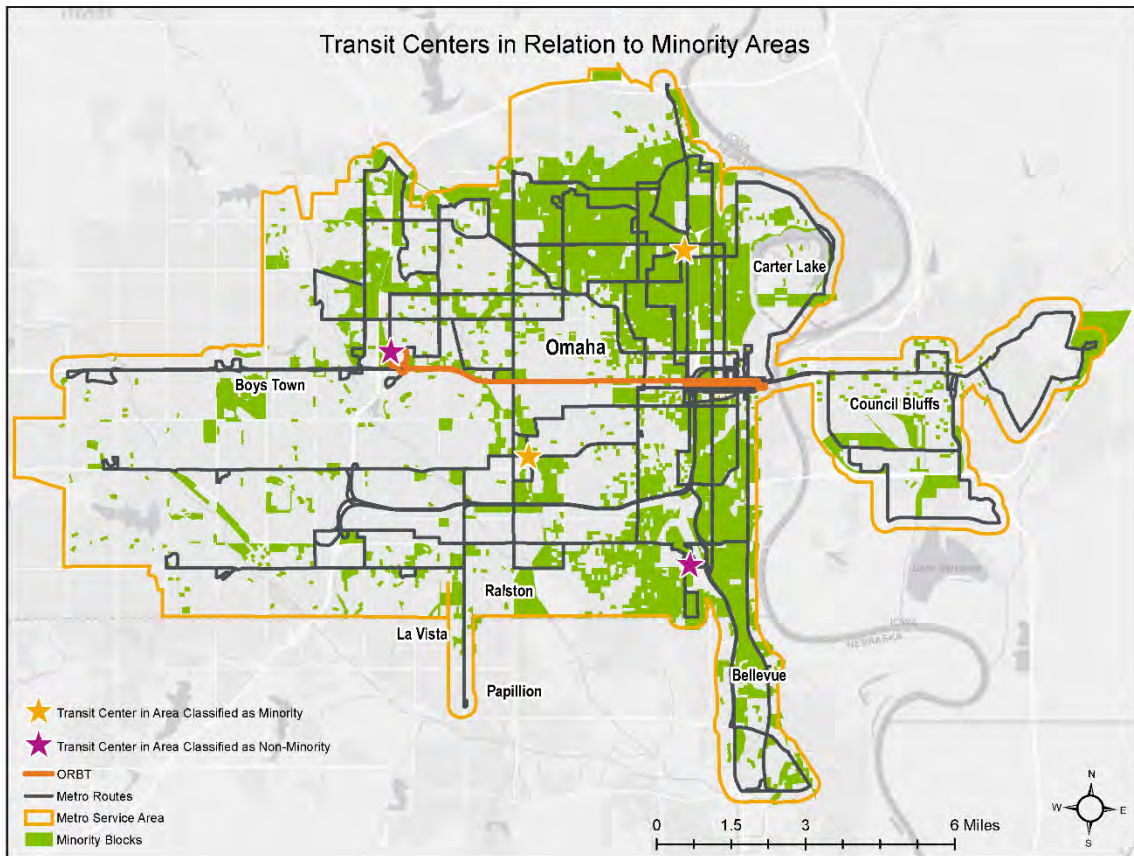
Metro has four transit centers where numerous routes converge providing multi-directional transfer opportunities. As shown in Table 24, two of the four transit centers (50%) are located in a minority block. All transit centers are served by at least one minority route, with the MCC South Transit Center serving the highest percentage of minority routes of the four transit centers.



MAP #14: METRO SHELTERS IN RELATION TO MINORITY AREAS

TABLE #23: BUS SHELTER DISTRIBUTION ANALYSIS 2021

Bus Shelters				
Intersection / Address	Zip Code	Route(s)	Located in Minority Block	% Served by Minority Routes
13 th & Bert Murphy NE	68107	13	N	100%
13 th & Nicholas NW	68102	13	N	100%
14 th & Farnam NE	68102	4, 15, 16, 18, 30	N	40%
16 th & Douglas SW	68102	36, Y, B, 93, 94, 95, 97, 98	N	25%
16 th & Farnam NE	68102	15, 18, 30	N	66%
16 th & Farnam NW	68102	11, 36, Y, B	N	50%
16 th & Pine NE	68108	36	Y	100%
20 th & Farnam NW	68102	15, 30	Y	50%
Florence & Spencer NW	68110	18	Y	100%
23 rd & Cuming NE	68102	4	N	0%
24 th & L St NW	68107	24	Y	100%
25 th & Dodge SW	68102	24	N	100%
Park Ave & Woolworth SE	68105	35	Y	100%
30 th & California SW	68131	30, 35	Y	100%
30 th & Ellison NW	68111	30	N	100%
30 th & Fort NE	68111	30	Y	100%
30 th & Fort NW	68111	30	N	100%
30 th & Patrick NE	68131	30	Y	100%
30 th & Patrick SW	68131	30	Y	100%
30 th & Upland Pkwy NE	68107	24	Y	100%
30 th & Webster SE	68131	30	N	100%
Turner Blvd & Leavenworth SW	68105	11	N	100%
38 th & Cuming NE	68131	4	N	0%
40 th & Cuming NW	68131	3	Y	100%
4181 Woolworth - VA Hospital	68105	3	N	100%
42 nd & Ames SW	68104	18	N	100%
42 nd & Dewey NW	68105	3, 15	Y	50%
42 nd & Dewey SE	68105	3, 15	Y	50%
42 nd & William NE	68105	3, 15	N	50%
52 nd & NW Radial NW	68104	4	N	0%
55 th & Center SW	68124	15	N	0%
63 rd & Q St SW	68117	13	N	100%
68 th & Mercy NW	68106	11, 13, 15, 55	Y	50%
68 th & Mercy SW	68106	15, 18, 55	N	33%
Military & Skyline Manor	68114	14	N	100%
72 nd & Lawndale SW	68134	18	Y	100%
72 nd & Mercy SE	68124	15, 18, 55	N	33%
90 th & Blondo NW	68114	5	N	100%
93 rd & Maple SE	68134	4	Y	0%
96 th & Q St SW	68127	55	N	0%
102 nd & Center SW	68144	15, 94	N	0%
110 th & J St NW	68137	55	Y	0%
122 nd & Center NE	68144	15, 94	N	0%
139 th & Center SW	68144	15, 94	N	0%
E 21 st & Locust NW	68110	16	N	0%
FNB Park & Ride	68114	92	N	0%



MAP #15: TRANSIT CENTERS IN RELATION TO MINORITY AREAS

TABLE #24: TRANSIT CENTER DISTRIBUTION ANALYSIS 2021

Transit Centers				
Transit Center	Address	Route(s)	Located in Minority Block	% Served by Minority Routes
Aksarben Transit Center	6801 Mercy Road	11, 13, 15, 18, 55	Y	20%
MCC South Transit Center	2808 Q Street	3, 13, 24, 95	N	100%
North Omaha Transit Center	4308 N. 30 th Street	5, 8, 14, 16, 18, 24, 26, 30, 35	Y	88%
Westroads Transit Center	1099 N 102 nd Street	4, 5, 14, 92, ORBT	N	40%

Title VI Program: Board Awareness, Review and Adoption

AMENDED AGENDA
REGULAR BOARD MEETING
TRANSIT AUTHORITY OF THE CITY OF OMAHA
2222 Cuming Street
Omaha, Nebraska, 68102
JANUARY 30, 2020
8:30 a.m.

1. Call to Order: Notice of the Regular Meeting was published in the Omaha World Herald on January 26, 2020.
2. Approval of Minutes of Previous Meetings:
 - a. Regular Meeting: December 18, 2019
3. Administrative Reports:
 - a. Administration/Human Resources (E. Simpson)
 - b. Programs/Operation (D. Jameson)
 - c. Marketing/Communications (J. Rose)
 - d. Fare Medium Update (K. Pendland)
4. Resolution – Request Approval of Standing Purchase Orders – CY 2020 (D. Finken)
5. Resolution – Request Approval to Amend the 2020 Transportation Improvement Program (J. Rumery)
6. Resolution – Request Approval of Fuel Contract (C. Simon)
7. Resolution – Request Approval of 3 Year Labor Agreement with TWU 223 (D. Jameson)
8. Administrative Report (C. Simon)
9. Executive Session
This Board reserves the right to enter into Executive Session in order to protect the public interest with respect to discussion regarding litigation, personnel, and other matters listed in Nebraska Revised Statute § 84-1410.
10. Date, Time and Place of Next Regular Board Meeting
Thursday, February 27, 2020 at 8:30 a.m.
Authority's Administrative Building
11. Adjournment

Tentative Resolutions for Next Board Meeting
None

Meeting Minutes – January 30, 2020

MINUTES

**REGULAR MEETING
TRANSIT AUTHORITY OF THE CITY OF OMAHA**

**2222 Cuming Street
Omaha, Nebraska, 68102**

January 30, 2020

MINUTES

The Transit Authority of the City of Omaha Board met in Regular Session on Thursday, January 30, 2020 at 8:30 a.m., in the Authority's Administration Building, 2222 Cuming Street, Omaha, Nebraska 68102. Notice was given in advance of the meeting by publication in the Omaha World Herald. For the benefit of the public in attendance, a copy of the Open Meetings Law is posted in the meeting room and the Agenda is published on the display in the facility lobby. The following persons were in attendance at the meeting:

Authority Board:

Mr. Michael Young, Chair

Mr. Jay Lund, Vice Chair

Ms. Amy Haase, Secretary/Treasurer

Mr. Daniel Lawse (Absent)

Ms. Julia Plucker (Absent)

Authority Staff:

C. Simon, Executive Director

E. Simpson, Legal/Human Resource Director

D. Finken, Finance Director

D. Jameson, Safety Director

K. Shadden, Operations Director

L. Barritt, Marketing Director

G. Bradley, Maintenance Director

J. Willoughby, Senior Project Manager Engineering/Transportation/Planning

J. Rumery, Grant Administrator

Others Present:

Other Metro staff

Other MAPA staff

Kimara Snipe

Marisa Martinez

Bill Troc

Meeting Minutes – January 30, 2020

Agenda Item #7: Request Approval of New 3 Year Labor Agreement Between Metro and Transport Workers, Local 223 for January 1, 2020 Through December 31, 2020

(D. Jameson)

Staff is requesting full Board approval of a new three-year labor agreement between Metro and the Transport Workers Union, Local 223 (AFL-CIO). The Company final offer was ratified by the rank and file on December 17, 2019. Every employee will receive a 3.0% salary increase each year of the contract. Additional changes include increased contributions to the pension fund by both employees and Metro every year over the life of this contract.

This was sent to the Personnel Committee on January 6th for their review and comment, prior to this Board meeting.

Discussion was had.

Motion by Ms. Haase; Second by Mr. Young.

**ROLL CALL:
UNANIMOUS; MOTION CARRIES.**

Agenda Item #8: Administrative Report

(C. Simon)

Mr. Simon informed the Board that staff is finalizing the Equity Analysis of any impacts on Low-Income, Minority and Limited English speaking population with Route 2 transitioning into ORB.

While there is no change in routing, there is a reduction in the number of bus stops.

A review of the 2017 Ridership Study identified three areas with holes (spaced further away from an ORBT Station).

Mr. Simon notified the Board that staff attended Employee Townhall meetings on January 29, 2020. The meetings were well-attended, and a host of information was shared including the announcement of Mr. Simon's retirement in Fall 2020. A task force has been assembled to look for a replacement.

Lastly, Mr. Simon informed the Board that B Cycle offers a corporate membership rate, and Metro is currently gauging employee interest in that program.

Agenda Item #9: Executive Session

Mr. Young entertained a motion to enter into Executive Session at 9:30 a.m.

Motion by Ms. Haase; Second by Mr. Lund.

**ROLL CALL:
UNANIMOUS; MOTION CARRIES.**

AGENDA
REGULAR BOARD MEETING
TRANSIT AUTHORITY OF THE CITY OF OMAHA
2222 Cuming Street
Omaha, Nebraska, 68102
NOVEMBER 16, 2020
9:00 a.m.

1. Call to Order: Notice of the Regular Meeting was published in the Omaha World Herald on November 11, 2020.
2. Approval of Minutes of Previous Meetings:
 - a. Regular Meeting: October 22, 2020
3. Administrative Reports:
 - a. Administration/Human Resources (E. Simpson)
 - b. Programs/Operation (D. Jameson)
 - c. Marketing/Communications (J. Rose)
4. Resolution – Request Approval of Revised February 27, 2020 Board Meeting Minutes (L. Cencie)
5. Resolution – Request Approval of Title VI Service Equity Analysis (L. Barritt)
6. Resolution – Request Approval to Award Service Agreement to IntelliRide (D. Jameson)
7. Resolution – Request Approval to Award Contract to New Flyer for Operator Barriers (D. Jameson)
8. Resolution – Request Approval to Award Contract to New Flyer for Three (3) Electric Transit Buses, Charging Stations and Associated Equipment (D. Jameson)
9. Resolution – Request Approval of Changes in the Actuarial Assumptions for Both the Hourly and Salaried Pension Plan Actuary Studies (D. Finken)
10. Resolution – Request Approval of the Hourly and Salaried Employees’ Pension Plan Actuary Reports as of January 1, 2020 (D. Finken)
11. Resolution – Request Authority to Make a Lump Sum Payment to Hourly Pension Plan (L. Cencie)
12. Resolution – Request Approval to Award Contract to Trapeze Software Group, Inc. for AVL Equipment (L. Cencie)
13. Administrative Report (L.Cencie)
14. Date, Time and Place of Next Regular Board Meeting
Thursday, December 17, 2020 at 8:30 a.m.
Authority’s Administrative Building
15. Adjournment

Meeting Minutes – November 16, 2020

- Launch: our team is prepared for continuous social media coverage throughout the day, and is ready to respond to any media inquiries that come up. We expect quite a few stories that day.
- Ongoing: we will keep all current messaging going through the Thanksgiving holiday, after which we'll shift to more of a balanced messaging ratio and include ConnectGO pushes.

Agenda Item #4: Request Approval of Revised February 27, 2020 Board Meeting Minutes

(L. Cencic)

The Metro Board approved the meeting minutes from the February 27, 2020 Board Meeting at the regularly scheduled March 26, 2020 Board Meeting. However, the previously approved minutes inadvertently omitted a summary of one of the administrative reports (Agenda Item 3d). The revised meeting minutes correct this oversight. The remainder of the meeting minutes remain unchanged since their approval at the March Board Meeting with the exception of the addition of Item 3d.

Discussion was had.

Motion by Mr. Lawse; Second by Ms. Plucker

ROLL CALL:

UNANIMOUS; MOTION CARRIES.

Agenda Item #5: Request Approval of Title VI Service Equity Analysis

(L. Barritt)

In compliance with our Title VI Program's Major Service Change Policy, an Equity Analysis is to be conducted when a proposal includes an addition and/or elimination of a route. The analysis determines whether the proposed change(s) have a disparate impact on minority populations or causes a disproportionate burden on Title VI-protected persons with low incomes. Where disparate impacts and/or disproportionate burdens are identified, Metro shall provide a meaningful opportunity for public comment on any proposed mitigation measures, including any less discriminatory alternatives that may be available.

DISPARATE IMPACT ANALYSIS

Findings reveal on a cumulative basis the minority population will benefit more than the non-minority population. In addition to the increase in revenue miles, the percentage of minorities served by the service buffer of the proposed service changes will increase slightly from 32.75% to 34.83%. The number of weekly revenue miles was multiplied by the percent of minority population residing in the service buffer to identify the cumulative effect on minority populations. The cumulative benefit of the changes to minorities is 36%. The cumulative impact of the changes to non-minorities is 26%.

No disparate impact is identified for the proposed changes.

DISPROPORTIONATE BURDEN ANALYSIS

Findings reveal on a cumulative basis the low-income population will benefit slightly less than the non-low-income population. In addition to the increase in total revenue miles, the percent of low-income individuals served by the service buffer of the proposed service changes will increase slightly from 17.82% to 19.5%. The

Meeting Minutes – November 16, 2020

number of weekly revenue miles was multiplied by the percent of low-income population residing in the service buffer to identify the cumulative effect on low-income populations. The cumulative benefit of the changes to low-income populations is 27%. The cumulative impact of the changes to non-low-income individuals is 30%, a difference of 3%. The difference is mostly attributed to the route's mid-corridor which has extremes in income levels. This is illustrated by the University of Nebraska Medical Center and University of Omaha student populations versus, with in close proximity, long established, upscale neighborhoods.

No disproportionate burden is identified for the proposed changes.

Discussion was had.

Motion by Mr. Lawse; Second by Ms. Haase

ROLL CALL:

UNANIMOUS; MOTION CARRIES.

Agenda Item #6: Request Approval to Award Service Agreement to IntelliRide
(D. Jameson)

Staff is requesting Board approval of a new service agreement between Metro and IntelliRide. The service agreement is for two-years with three (3) one-year options. IntelliRide has been providing Metro's Customer Service call center operations since May of 2015. The previous service agreement expired on May 31, 2020. IntelliRide has continued to provide Metro's Customer Service call center operations on a month-to-month basis. The original Metro/IntelliRide contract had a flat fee for the first three years in the amount of \$36,048.00 per month or \$432,576.00 per year. Metro exercised the two (2) one-year options with IntelliRide using the same monthly service fee.

This new service agreement continues all existing staffing levels of service operations, coverage and carries a static flat monthly fee for the entire term of this contract, including option years. This new service agreement is in the amount of \$47,571.16 per month or \$570,853.86 per year.

This was sent to the Procurement Committee for their review and comment, prior to this Board meeting.

Discussion was had.

Motion by Ms. Plucker; Second by Ms. Haase

ROLL CALL:

UNANIMOUS; MOTION CARRIES.

Agenda Item #7: Request Approval to Award Contract to New Flyer for Operator Barriers
(D. Jameson)

As part of our on-going response to the COVID-19 pandemic, staff recommends the purchase and installation of permanent plexi-glass shielding in the buses as protection for our operators. These permanent barriers will replace the temporary barriers currently installed on our Alexander Dennis buses.

AGENDA
REGULAR BOARD MEETING
TRANSIT AUTHORITY OF THE CITY OF OMAHA
2222 Cuming Street
Omaha, Nebraska, 68102
AUGUST 26, 2021
8:30 a.m.

1. Call to Order: Notice of the Regular Meeting was published in the Omaha World Herald on August 22, 2021.
2. Approval of Minutes of Previous Meetings:
 - a. Regular Meeting: July 22, 2021
3. Administrative Report (L. Cencic)
4. Administrative Reports:
 - a. Administration/Human Resources (E. Simpson)
 - b. Programs/Operation (I. Maldonado)
 - c. Marketing/Communications (J. Rose)
5. Resolution – Request Approval to Enter into Contract with Omaha Electric Service, Inc for the Electric Charging Stations Project (J. Willoughby)
6. Resolution – Request Approval of Title VI Fare Equity Analysis (L. Barritt)
7. Resolution – Request Approval of the Hourly and Salaried Employees’ Pension Plan Actuarial Reports as of January 1, 2021 (C. Distefano)
8. Resolution – Request Approval to Rescind Resolution No. 419 – Preliminary Tax Levy – CY 2022 (C. Distefano)
9. Resolution 420 – Request Approval of Resolution No. 420 – Final Tax Levy Allocation – CY 2022 (C. Distefano)
10. Resolution – Request Approval of Revised Operating Policy #27 (L. Cencic)
11. Board Chair Report (A. Haase)
12. Date, Time and Place of Next Regular Board Meeting
Thursday, September 23, 2021, at 8:30 a.m.
Authority’s Administrative Building
13. Adjournment

Meeting Minutes – August 26, 2021

**MINUTES
REGULAR MEETING
TRANSIT AUTHORITY OF THE CITY OF OMAHA
2222 Cuming Street
Omaha, Nebraska, 68102
August 26, 2021
MINUTES**

The Transit Authority of the City of Omaha Board met in Regular Session on Thursday, August 26, 2021 at 8:30 a.m., in person at the Authority's Administration Building, 2222 Cuming Street, Omaha, Nebraska 68102, and virtually due to COVID-19. Notice was given in advance of the meeting by publication in the Omaha World Herald. For the benefit of the public in attendance, a copy of the Open Meetings Law is posted in the meeting room and the Agenda is published on the display in the facility lobby. The following persons were in attendance at the meeting:

Authority Board:

Ms. Amy Haase, Chair
Mr. Othello Meadows, Vice Chair
Mr. Jay Lund (Absent)
Mr. Daniel Lawse
Ms. Julia Plucker

Authority Staff:

L. Cencic, CEO/Executive Director
I. Maldonado, Deputy Executive Officer
E. Simpson, Legal/Human Resource Director (Absent)
C. Distefano, Finance Director
L. Barritt, Marketing Director
K. Pendland, IT Director
J. Willoughby, Senior Project Manager (Absent)
J. Rumery, Grant Administrator

Others Present:

Other Metro staff
Members of the public

Meeting Minutes – August 26, 2021

Agenda Item #6: Request Approval of Title VI Fare Equity Analysis
(L. Barritt)

In compliance with Metro's Title VI Program, a Fare Equity Analysis was conducted on the proposed implementation of a new fare payment system and fare capping. This new fare system, called Umo, will be deployed across Metro's fleet and provide access to an account-based system that riders can use to pay fares with a smart card or smartphone. Additionally, staff proposes to implement monthly fare capping at \$55 for regular fares and \$27.50 for approved half fare card holders. This monthly fare capping will allow users to receive the potential discounts of a monthly pass even if they cannot afford the upfront cost of Metro's current 30-Day unlimited pass. This fare capping program will replace Metro's existing 30-Day unlimited pass but the current pass will be phased out slowly to ensure a seamless transition.

Metro's Title VI Policy requires a Fare Equity Analysis be completed for any proposed increases, decreases or elimination of a fare type. Additionally, a Fare Equity Analysis must be completed if there is a proposed change in fare medium or structure change to determine if the proposal has a discriminatory impact on minority and/or low-income populations.

The Title VI Fare Equity Analysis found:

- No disparate impact on minority riders.
- No disproportionate burden on low-income riders.
- Minority and low-income riders will not be limited to or denied the benefits of the proposed fare change.

Board approval will ensure Metro's continued compliance with the Federal Transit Administration's Title VI requirements.

This item will be reviewed sent to the Planning/Policy Committee prior to the Board Meeting. Assuming committee concurrence, staff recommends the full Board approve the resolution as presented.

Discussion was had.

Motion by Mr. Lawse; Second by Ms. Plucker

ROLL CALL:
UNANIMOUS; MOTION CARRIES.

Agenda Item #7: Request Approval of the Hourly and Salaried Employees' Pension Plan Actuarial Reports as of January 1, 2021
(C. Distefano)

Staff is requesting approval of the updated Hourly and Salaried Employees Pension Plan Actuarial Valuation reports, which were produced and presented by Becky Spielman of Milliman Retirement Services for both the Hourly and Salaried Pension Plans. Both the Hourly and Salaried Committees met June 17, 2021, discussed and recommended changes which the Board approved at the June 24, 2021, meeting. The finalized reports are included in the Board Packet information.

AGENDA
REGULAR BOARD MEETING
TRANSIT AUTHORITY OF THE CITY OF OMAHA
2222 Cuming Street
Omaha, Nebraska, 68102
February 24, 2022
8:30 a.m.

1. Call to Order: Notice of the Regular Meeting was published in the Omaha World Herald on February 20, 2022.
2. Approval of Minutes of Previous Meetings:
 - a. Regular Meeting: January 27, 2022
3. Request to be Heard – R. Johnson
4. Administrative Report (L. Cencic)
5. Administrative Reports:
 - a. Administration/Human Resources (D. Grant)
 - b. Programs/Operation (I. Maldonado)
6. Resolution – Request Approval of Resolution #422 – Approval of Federal Certifications and Assurances (L. Cencic)
7. Board Chair Report (A. Haase)
8. Date, Time and Place of Next Regular Board Meeting
Thursday, March 24, 2022, at 8:30 a.m.
Authority's Administrative Building
9. Adjournment

Meeting Minutes – February 24, 2022

MINUTES

REGULAR MEETING

TRANSIT AUTHORITY OF THE CITY OF OMAHA

2222 Cuming Street

Omaha, Nebraska, 68102

February 24, 2022

MINUTES

The Transit Authority of the City of Omaha Board met in Regular Session on Thursday, February 24, 2022, at 8:30 a.m., in person at the Authority's Administration Building, 2222 Cuming Street, Omaha, Nebraska 68102, and virtually due to COVID-19. Notice was given in advance of the meeting by publication in the Omaha World Herald. For the benefit of the public in attendance, a copy of the Open Meetings Law is posted in the meeting room and the Agenda is published on the display in the facility lobby. The following persons were in attendance at the meeting:

Authority Board:

Ms. Amy Haase, Chair

Mr. Othello Meadows, Vice Chair

Mr. Jay Lund (Absent)

Mr. Daniel Lawse

Ms. Julia Plucker

Authority Staff:

L. Cencic, CEO/Executive Director

I. Maldonado, Deputy Executive Officer

D. Grant, HR Director

E. Simpson, Legal Director (Absent)

L. Barritt, Experience & Engagement Director

K. Pendland, IT Director

J. Willoughby, Senior Project Manager

J. Rumery, Grant Administrator

Others Present:

Other Metro staff

Members of the public

Meeting Minutes – February 24, 2022

Agenda Item #1: **Call to order**

Ms. Haase called the meeting to order at 8:32 a.m. For the benefit of the public in attendance, a copy of the Open Meetings Law has been posted in the meeting room and is available online at ometro.com, and the Agenda is published on the display in the facility lobby.

Agenda Item #2: **Approval of Minutes of Previous Meetings**

Ms. Haase entertained a motion to approve the minutes of the Board Meeting on January 27, 2022.

Motion by Ms. Plucker; Second by Mr. Haase

ROLL CALL:

UNANIMOUS; MOTION CARRIES.

Agenda Item #3: **Request to be Heard – R. Johnson**

Ms. Haase informed the Board that Mr. Johnson rescinded his request to be heard.

Agenda Item #4: **Administrative Report**
(L. Cencic)

Ms. Cencic welcomed Mr. Grant as Metro's new Human Capital and Talent Development Director. Metro is excited to have him and he will be providing the Human Resources Administrative report later on in this meeting.

Ms. Cencic informed the Board that Metro has two billboards along Dodge Street celebrating Metro's achievement of a half-million rides on ORBT since inception. Additionally, the Art+ORBT project, which was led by Omaha by Design in partnership with Metro to install murals at the ORBT stations, was awarded the Outstanding Public Art Award by the Omaha Entertainment and Arts Board.

Ms. Cencic updated the Board that Metro is scheduled to install the canopy at the new 8th & Farnam ORBT station in May. Metro expects the work at this station to be completed in May, but the station will not open until July when the park opens.

Ms. Cencic informed the Board that Metro is out for bid on the IT Office additions and audio-visual building upgrades. Metro expects to bring a resolution to the Board during the March Board meeting to award the contract. This project includes upgrades to audio-visual systems in the Board room and the downstairs Training room. At this time, we do not expect disruptions to the ability to hold future Board meetings in the Board room but if that should change, Metro will work with the Board to arrange for alternative accommodations. This project is intended to better facilitate in-person and virtual meetings so future Board meetings will have much better equipment and be able to welcome more virtual participation.

Meeting Minutes – February 24, 2022

Ms. Cencic updated the Board that all of the digital display signs, emergency phones, and cameras are installed at both Westroads Transit Center and North Omaha Transit Center (NOTC). As of today, Westroads is up and running. Metro expects to have all of the equipment at NOTC online by next week.

Ms. Cencic informed the Board that electric charging stations are 98% complete. Metro is waiting on a few remaining pieces including surge protectors that have been delayed until the end of March. The charging stations are functional without those surge protectors. Metro is also waiting on the Cable Management System but that does not impact charging.

Ms. Cencic updated the Board that the Facility Sustainability Project is in the design and engineering phase. Metro has been trying to identify the location of the future chiller room to allow for Metro to add conditioned air to the maintenance shop. Metro is making good progress on this project and working on the overall engineering so we can release that soon. Metro has had a few COVID-related delays on this project, so the schedule has not yet been updated to account for those changes.

Ms. Cencic informed the Board that Metro's annual audit will kick off soon with the auditors visiting in March. Metro is running a little behind schedule this year due to staff turnover, but we will work with the Finance Committee to make sure the audit is completed in time for the audit in April. Depending on the timing of the completion of the audit, Metro may need to request a special Board meeting in April but that will be determined once we have more information, and the audit is underway.

Ms. Cencic updated the Board that Metro's Title VI program update is due to the Federal Transit Administration in September. As a reminder, Title VI prohibits discrimination based on race, color, or national origin under any program or activity receiving federal financial assistance to ensure that public funds are not spent in a way that encourages, subsidizes, or results in discrimination. Metro's updated program will include adopted standards and policies including major service change definitions and disparate impact to proportion burden policies. Metro will look at all elements of service including vehicle loads, headways, on-time performance, service availability, vehicle assignments, and bus stop amenities. Metro will monitor past performance using randomly sampled bus trips, update and review our Language Assistance Plan, looking at minority representation of the Board and Advisory Committee, complaint procedures and investigations, and Metro's public participation plan. Staff will work with the Planning and Policy Committee on that update as we prepare for this in September.

Lastly, Ms. Cencic shared with the Board an update on MetroNEXT. Metro will be holding public meetings in March and would like to share with the Board the couple of PowerPoint slides showing information that will be presented. Ms. Cencic proceeded to go through the PowerPoint slides with the Board, explain the information that will be presented to the public at the upcoming MetroNEXT meetings, and inform the Board of when the upcoming meetings will take place.

Discussion was had.

Agenda Item #5a: **Administrative Reports**
(D. Grant)

AGENDA
REGULAR BOARD MEETING
TRANSIT AUTHORITY OF THE CITY OF OMAHA
2222 Cuming Street
Omaha, Nebraska, 68102
April 28, 2022
8:30 a.m.

1. Call to Order: Notice of the Regular Meeting was published in the Omaha World Herald on April 24, 2022.
2. Approval of Minutes of Previous Meetings:
 - a. Regular Meeting: March 24, 2022
3. Administrative Report (L. Cencic)
4. Administrative Reports:
 - a. Administration/Human Resources (D. Grant)
 - b. Programs/Operation (I. Maldonado)
5. Resolution – Election of Board Officers and Committee Assignments (O. Meadows)
6. Resolution – Request Appointment of New Members to Salaried Pension Retirement Committee (W. Clingman)
7. Resolution – Request Approval of MetroNEXT Title VI Service Equity Analysis (E. Schweitz)
8. Resolution – Request Approval of MetroNEXT Plan (E. Schweitz)
9. Board Chair Report (A. Haase)
10. Date, Time and Place of Next Regular Board Meeting
Thursday, May 26, 2022, at 8:30 a.m.
Authority's Administrative Building
11. Adjournment

Meeting Minutes – April 28, 2022

MINUTES

REGULAR MEETING

TRANSIT AUTHORITY OF THE CITY OF OMAHA

2222 Cuming Street

Omaha, Nebraska, 68102

April 28, 2022

MINUTES

The Transit Authority of the City of Omaha Board met in Regular Session on Thursday, April 28, 2022, at 8:30 a.m., in person at the Authority's Administration Building, 2222 Cuming Street, Omaha, Nebraska 68102, and virtually due to COVID-19. Notice was given in advance of the meeting by publication in the Omaha World Herald. For the benefit of the public in attendance, a copy of the Open Meetings Law is posted in the meeting room and the Agenda is published on the display in the facility lobby. The following persons were in attendance at the meeting:

Authority Board:

Ms. Amy Haase, Chair (Absent)
Mr. Othello Meadows, Vice Chair (Absent)
Mr. Jay Lund
Mr. Daniel Lawse
Ms. Julia Plucker

Authority Staff:

L. Cencic, CEO/Executive Director
I. Maldonado, Deputy Executive Officer
D. Grant, HR Director
E. Simpson, Legal Director
L. Barritt, Experience & Engagement Director
K. Pendland, IT Director
W. Clingman, Finance Director
D. Kelsey, Operations Director
J. Willoughby, Senior Project Manager
J. Rumery, Grant Administrator

Others Present:

Other Metro staff
Members of the public

Meeting Minutes – April 28, 2022

Linda Barritt from the committee, and John Philo, CFA would fill the vacancy created by the resignation of the prior, long-serving, Omaha citizen qualified in financial affairs, J.J. Schenkelberg, CFA.

Discussion was had.

Motion by Mr. Lawse; Second by Ms. Plucker

ROLL CALL:

UNANIMOUS; MOTION CARRIES.

Agenda Item #7: Request Approval of MetroNEXT Title VI Service Equity Analysis
(E. Schweitz)

In compliance with our Title VI Program's Major Service Change Policy, an Equity Analysis was conducted for the proposed MetroNEXT projects to be implemented by 2030. The analysis determines whether the proposed changes have a disparate impact on minority populations or cause a disproportionate burden on low-income populations.

Disparate Impact Analysis

Findings reveal on a cumulative basis the minority population will benefit more than the non-minority population. The number of weekly revenue hours was multiplied by the percent of minority population residing in the ¼ mile area surrounding each route to identify the cumulative effect on minority populations. The cumulative benefit of the changes to minorities is 48%. The cumulative impact of the changes to non-minorities is 36%.

No disparate impact is identified for the proposed changes.

Disproportionate Burden Analysis

Findings reveal on a cumulative basis the low-income population will benefit more than the non-low-income population. The number of weekly revenue hours was multiplied by the percent of low-income population residing in the ¼ mile area surrounding each route to identify the cumulative effect on low-income populations. The cumulative benefit of the changes to low-income populations is 48%. The cumulative impact of the changes to non-low-income individuals is 41%.

No disproportionate burden is identified for the proposed changes.

The service equity analysis considers the cumulative changes as outlined in the MetroNEXT plan. Individual projects or service changes may require additional Title VI analyses if the changes meet the threshold of a major service change at the time of implementation.

Discussion was had.

Motion by Mr. Lawse; Second by Ms. Plucker

ROLL CALL:

UNANIMOUS; MOTION CARRIES.

AGENDA
REGULAR BOARD MEETING
REGIONAL METROPOLITAN TRANSIT AUTHORITY OF OMAHA
2222 Cuming Street
Omaha, Nebraska, 68102
September 22, 2022
8:45 a.m.

1. Call to Order: Notice of the Regular Meeting was published in the Omaha World Herald on September 18, 2022.
2. Approval of Minutes of Previous Meetings:
 - a. Regular Meeting: August 25, 2022
3. General Public Comment Period
This is an opportunity for members of the audience to be heard regarding topics related to the Regional Metropolitan Transit Authority of Omaha, not on the agenda for a maximum of 2 minutes.
4. Administrative Report (L. Cencic)
5. Administrative Reports:
 - a. Administration/Human Resources (D. Grant)
 - b. Programs/Operation (I. Maldonado)
 - c. Communications (N. Ebat)
6. Resolution – Resolution #427 – Request Approval of the 2023 Tax Levy (W. Clingman)
7. Resolution – Resolution #428 – Request Approval of the Amended 2022 Annual Budget (W. Clingman)
8. Resolution – Resolution #429 – Request Approval of Proposed 2023 Annual Budget (W. Clingman)
9. Resolution – Request Approval of Agreement with Eide Bailly for Annual Audit Services for Fiscal Years 2022 through 2026 (W. Clingman)
10. Resolution – Request Approval of Metro Advertising Policy (W. Clingman)
11. Resolution – Staff Briefing on Title VI Program Update (L. Cencic)
12. Resolution – Request Approval of Title VI Service Equity Analysis for Ongoing Temporary COVID-Related Service Reductions (E. Schweitz)
13. Resolution – Request Approval of Title VI Service Equity Analysis for Upcoming Service Changes (E. Schweitz)
14. Resolution – Request Approval of the 2023 Transportation Improvement Program (J. Rumery)
15. Resolution – Request Approval of Agreement with Cleaver-Brooks Sales & Service for Boiler Repairs (W. Clingman)

16. Board Chair Report

(A. Haase)

17. Date, Time and Place of Next Regular Board Meeting
Thursday, October 27, 2022, at 8:30 a.m.
Authority's Administrative Building

18. Adjournment

Meeting Minutes – September 22, 2022

MINUTES

REGULAR MEETING

REGIONAL METROPOLITAN TRANSIT AUTHORITY OF OMAHA

2222 Cuming Street

Omaha, Nebraska, 68102

SEPTEMBER 22, 2022

MINUTES

The Regional Metropolitan Transit Authority of Omaha Board met in Regular Session on Thursday, September 22, 2022, at 8:45 a.m., in person at the Authority's Administration Building, 2222 Cuming Street, Omaha, Nebraska 68102, and virtually due to COVID-19. Notice was given in advance of the meeting by publication in the Omaha World Herald. For the benefit of the public in attendance, a copy of the Open Meetings Law is posted in the meeting room and the Agenda is published on the display in the facility lobby. The following persons were in attendance at the meeting:

Authority Board:

Ms. Amy Haase, Chair
Mr. Othello Meadows, Vice Chair (Absent – Virtual Only)
Mr. Jay Lund
Mr. Daniel Lawse
Ms. Julia Plucker

Authority Staff:

L. Cencic, CEO/Executive Director
I. Maldonado, Deputy Executive Officer
D. Grant, HR Director
E. Simpson, Legal Director (Virtual)
K. Pendland, IT Director (Absent)
W. Clingman, Finance Director
D. Kelsey, Operations Director (Virtual)
J. Willoughby, Senior Project Manager (Absent)
J. Rumery, Grant Administrator

Others Present:

Other Metro staff

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Agenda Item #9: Request Approval of Agreement with Eide Bailly for Annual Audit Services for Fiscal Years 2022 through 2026

(W. Clingman)

Staff is seeking approval to enter into an agreement with Eide Bailly for external annual audit services, including the review of our annual NTD filing, for the next 5 years beginning with the fiscal year 2022. This approval is for an amount not to exceed \$320,270 over the next 5 years.

This cost is not eligible for Federal funding and will be paid 100% by local match funds.

Discussion was had.

Motion by Ms. Plucker; Second by Mr. Lund

ROLL CALL:

UNANIMOUS; MOTION CARRIES.

Agenda Item #10: Request Approval of Metro Advertising Policy

(W. Clingman)

Staff is requesting approval of a formal advertising policy as it relates to paid advertising on Metro owned and/or operated assets.

This policy will ensure consistent guidelines are applied in all advertising. The policy includes a list of prohibited items to ensure only viewpoint neutral advertising is allowed and advertising that may be disruptive to traffic is also prohibited. A copy of the proposed advertising policy will be provided under separate cover.

Discussion was had.

Motion by Mr. Lund; Second by Mr. Lawse

ROLL CALL:

UNANIMOUS; MOTION CARRIES.

Agenda Item #11: Staff Briefing on Title VI Program Update

(L. Cencic)

Every three years, Metro is required to submit a Title VI Program Update to the Federal Transit Administration (FTA). Title VI of the Civil Rights Act of 1964, as amended, is a federal statute that provides that no person shall, on the grounds of race, color or national origin, be excluded from participation in, denied the benefits of, or be subjected to discrimination, under any program or activity receiving federal financial assistance.

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Staff is working diligently on this program update and will bring it to the Board for approval at a future Board meeting. In particular, this program update will look at Metro's services over the last several years as well as set new definitions and thresholds for the future.

Among other things, the Title VI Program Update will look at service monitoring (including vehicle loads, headway, on-time performance, service accessibility, vehicle assignments and distribution of transit amenities), updating our Public Participation Policy, updating our Limited English Proficiency Plan, and will incorporate updated Census data for our use in equity analyses.

An important aspect of the Title VI Program is Metro's definitions of "Major Service Change", "Disparate Impact Policy", and "Disproportionate Burden Policy". These three definitions will need to be approved by the Board along with the overall program update.

The purpose of the Major Service change Policy is to define the thresholds for a major change warranting an equity analysis. The thresholds should not be set so high as to never require an analysis, but to yield a meaningful result in light of Metro's service characteristics.

The Disproportionate Burden Policy establishes a threshold for determining whether proposed service or fare changes have a disproportionate effect on low-income populations relative to non-low-income populations.

The Disparate Impact Policy establishes a threshold for determining whether proposed service or fare changes disproportionately affect minority populations relative to non-minority populations.

The Disproportionate Burden Policy and Disparate Impact Policy consider both the burdens borne by and the benefits experienced by the relevant affected populations.

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	Current Policy	Draft Proposed Policy
Major Service Change	<ul style="list-style-type: none">• The addition and/or elimination of a bus route• 12% or more for system revenue miles• 25% or more revenue miles on any individual route	<ul style="list-style-type: none">• The addition and/or elimination of a bus route• 10% or more for the system revenue miles• 15% or more revenue miles on any individual route
Disproportionate Burden Policy	+/-25%	15%
Disparate Impact Policy	+/- 25%	15%

Metro will hold public meetings in October to seek input from the public on proposed changes to these three policies before returning to the Board to request approval.

Discussion was had. No motion was necessary.

Agenda Item #12: Request Approval of Title VI Service Equity Analysis for Ongoing Temporary COVID-Related Service Reductions

(E. Schweitz)

In 2020, in response to the COVID-19 pandemic, Metro temporarily reduced service on numerous routes. At the time, no Title VI Service Equity Analysis was required because of the temporary nature of these service reductions. However, as the impact of the COVID-19 pandemic has lasted longer than expected extending the length of these service reductions, staff completed a Service Equity Analysis in compliance with Metro's Title VI Program. However, it is worthy to note that these reductions are still intended to be temporary in nature and Metro has already begun the process to increase services on these routes, with plans to return many of them to the pre-pandemic levels.

Metro's Title VI Policy requires a Service Equity Analysis be completed for any proposed changes that meet the definition of a Major Service Change. A Major Service Change includes any significant change in transit service that meets at least one of the following:

- The addition and/or elimination of a bus route
- A 12 percent or more addition or reduction in the system revenue miles
- A twenty-five percent or more addition or reduction in revenue miles on any individual route, whether by frequency, span of service or route realignment beyond a three-quarter mile buffer

The temporary COVID-19 related service reductions meet this definition of a Major Service Change by reducing system revenue miles by more than 12 percent. The Service Equity Analysis was completed to identify if the

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proposed changes would have a discriminatory impact on minority and/or low-income populations. The Title VI Service Equity Analysis found:

- No disparate impact on minority riders.
- No disproportionate burden on low-income riders.

Board approval will ensure Metro's continued compliance with the Federal Transit Administration's Title VI requirements. The Title VI Service Equity Analysis will be provided under separate cover. Staff recommends the full Board approve the resolution as presented.

Discussion was had.

Motion by Mr. Lawse; Second by Ms. Plucker

ROLL CALL:

UNANIMOUS; MOTION CARRIES.

Agenda Item #13: Request Approval of Title VI Service Equity Analysis for Upcoming Service Changes

(E. Schweitz)

In compliance with Metro's Title VI Program, a Service Equity Analysis was conducted on the proposed service changes planned for October 2022. Metro's Title VI Policy requires a Service Equity Analysis be completed for any proposed changes that meet the definition of a Major Service Change. A Major Service Change includes any significant change in transit service that meets at least one of the following:

- The addition and/or elimination of a bus route
- A 12 percent or more addition or reduction in the system revenue miles
- A twenty-five percent or more addition or reduction in revenue miles on any individual route, whether by frequency, span of service or route realignment beyond a three-quarter mile buffer

The proposed changes for October 2022 meet this definition of a Major Service Change by increasing services on several routes (Routes 3, 24, 26, 35 and 36) by more than 25% of their revenue miles.

The Service Equity Analysis was completed to identify if the proposed changes would have a discriminatory impact on minority and/or low-income populations. The Title VI Service Equity Analysis found:

- No disparate impact on minority riders.
- No disproportionate burden on low-income riders.
- Minority and low-income riders will not be limited to or denied the benefits of the proposed service increases.

Board approval will ensure Metro's continued compliance with the Federal Transit Administration's Title VI requirements. The Title VI Service Equity Analysis will be provided under separate cover. Staff recommends the full Board approve the resolution as presented.

Discussion was had.

Motion by Mr. Lawse; Second by Ms. Plucker

ROLL CALL:

UNANIMOUS; MOTION CARRIES.

AGENDA
REGULAR BOARD MEETING
REGIONAL METROPOLITAN TRANSIT AUTHORITY OF OMAHA
2222 Cuming Street
Omaha, Nebraska, 68102
October 27, 2022
8:30 a.m.

1. Call to Order: Notice of the Regular Meeting was published in the Omaha World Herald on October 23, 2022.
2. Approval of Minutes of Previous Meetings:
 - a. Special Meeting: September 22, 2022
 - b. Regular Meeting: September 22, 2022
3. General Public Comment Period
This is an opportunity for members of the audience to be heard regarding topics related to the Regional Metropolitan Transit Authority of Omaha, not on the agenda for a maximum of 2 minutes.
4. Administrative Report (L. Cencic)
5. Administrative Reports:
 - a. Administration/Human Resources (D. Grant)
 - b. Programs/Operation (I. Maldonado)
 - c. Communications (N. Ebat)
6. Resolution – Request Approval to Award Task Order 17 – Onboard Survey for IDIQ Contract with SRF (L. Cencic)
7. Resolution – Request Approval of Updates to Title VI Policy Definitions (A. Pigaga)
8. Resolution – Request Approval of the 2023 Transportation Improvement Program (J. Rumery)
9. Board Chair Report (A. Haase)
10. Date, Time and Place of Next Regular Board Meeting
Thursday, November 17, 2022, at 8:30 a.m.
Authority's Administrative Building
11. Adjournment

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**MINUTES
REGULAR MEETING
REGIONAL METROPOLITAN TRANSIT AUTHORITY OF OMAHA
2222 Cuming Street
Omaha, Nebraska, 68102
OCTOBER 27, 2022
MINUTES**

The Regional Metropolitan Transit Authority of Omaha Board met in Special Session on Thursday, October 27, 2022, at 8:30 a.m., in person at the Authority's Administration Building, 2222 Cuming Street, Omaha, Nebraska 68102, and virtually due to COVID-19. Notice was given in advance of the meeting by publication in the Omaha World Herald. For the benefit of the public in attendance, a copy of the Open Meetings Law is posted in the meeting room and the Agenda is published on the display in the facility lobby. The following persons were in attendance at the meeting:

Authority Board:

Ms. Amy Haase, Chair
Mr. Othello Meadows, Vice Chair (Absent)
Mr. Jay Lund (Absent – Virtual Only)
Mr. Daniel Lawse
Ms. Julia Plucker

Authority Staff:

L. Cencic, CEO/Executive Director
I. Maldonado, Deputy Executive Officer
D. Grant, HR Director
E. Simpson, Legal Director (Absent)
K. Pendland, IT Director (Absent)
W. Clingman, Finance Director
D. Kelsey, Operations Director (Virtual)
J. Willoughby, Senior Project Manager (Absent)
J. Rumery, Grant Administrator (Absent)

Others Present:

Other Metro staff
Members of the public

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ROLL CALL:

UNANIMOUS; MOTION CARRIES.

Agenda Item #7: Request Approval of Updates to Title VI Policy Definitions
(A. Pigaga)

Every three years Metro is required to submit a Title VI Program Update to the Federal Transit Administration (FTA). Title VI of the Civil Rights Act of 1964, as amended, is a federal statute that provides that no person shall, on the grounds of race, color or national origin, be excluded from participation in, denied the benefits of, or be subjected to discrimination, under any program or activity receiving federal financial assistance.

Metro staff has refined the agency's definitions of "Major Service Change", "Disparate Impact Policy", and "Disproportionate Burden Policy" Public meetings were held, and a two-week public comment period was opened to give members of the community the opportunity to share their feedback on these changes.

The purpose of the Major Service Change Policy is to define the thresholds for a major change warranting an equity analysis. The thresholds should not be set so high as to never require an analysis, but to yield a meaningful result considering Metro's service characteristics.

The Disproportionate Burden Policy establishes a threshold for determining whether proposed service or fare changes have a disproportionate effect on low-income populations relative to non-low-income populations.

The Disparate Impact Policy establishes a threshold for determining whether proposed service or fare changes disproportionately affect minority populations relative to non-minority populations.

The Disproportionate Burden Policy and Disparate Impact Policy consider both the burdens borne by and the benefits experienced by the relevant affected populations.

The current and proposed policies are on the following page. Public comments will be submitted under separate cover.

Recommend approval.

Major Service Change

CURRENT POLICY:

- The addition and/or elimination of a bus route
- 12% or more for system revenue miles
- 25% or more revenue miles on any individual route

PROPOSED POLICY:

- The addition and/or elimination of a bus route
- 10% or more addition or reduction in system revenue miles
- 15% or more addition or reduction in revenue miles on any individual route

Disparate Impact

CURRENT POLICY:

Should the impact of any major service change require a minority population to bear adverse effects twenty-five percent or greater of a cumulative impact will be deemed a disparate impact.

PROPOSED POLICY:

Should the impact of any fare or major service change require a minority population to bear fifteen percent or greater of a cumulative adverse impact, it will be considered a disparate impact.

Disproportionate Burden

CURRENT POLICY:

Should the burden of any fare or major service changes require a low-income population to bear adverse effects twenty-five percent or greater of a cumulative burden it will be considered a disproportionate burden.

PROPOSED POLICY:

Should the burden of any fare or major service change require a low-income population to bear adverse effects fifteen percent or greater of a cumulative burden, it will be considered a disproportionate burden.

Discussion was had.

Motion by Mr. Lawse; Second by Ms. Plucker

ROLL CALL:

UNANIMOUS; MOTION CARRIES.

Agenda Item #8: Request Approval of the 2023 Transportation Improvement Program (W. Clingman for J. Rumery)

Staff requests approval of the 2023 element of the 2023- 2028 Transportation Improvement Program (TIP). This amendment is to program funds and create the 2023 Program of Projects (POP).

Staff recommends programming existing Areas of Persistent Poverty Funds in the FY 2023 element of the TIP.

Staff is recommending approval of the 2023 Program of Projects in the following manner:

10.

RESOLUTION:

Request Approval of Title VI Monitoring of Service Standards & Policies

EXPLANATION:

In compliance with our Title VI Plan, an analysis was conducted to monitor Metro's service standards and policies. This assessment observes the service provided on minority and non-minority routes compared to Metro's service standards and policies to ensure the result of decision-making is equitable.

Vehicle Load

The vehicle load factor should not exceed 125% of the vehicle's seated capacity. In the observed sample, no instances of excessive vehicle load were identified.

Vehicle Headway

Staff compared vehicle headways for minority and non-minority routes for all service periods as of December 2021. Average headways on minority routes ranged between 18 and 3 minutes longer than average headways on non-minority routes across service periods. Staff will continue to monitor minority and non-minority route headways when evaluating future service changes.

On-Time Performance

Buses are considered on-time if they depart from a published timepoint no more than one minute early and up to five minutes late. For 2021, minority routes averaged an on-time performance of 81.6% while non-minority routes averaged an on-time performance of 79.4%.

Service Availability

Staff utilized 2020 census data to determine the availability of service for residents within Metro's service area. The percentage of minority residents within ¼ mile of a route was 76.5%, while the percentage of non-minority residents within ¼ mile of a route was 58.2%.

Vehicle Assignment

Metro's vehicle assignment policy states that older, high-floor vehicles shall be distributed equally across all bus routes. In the observed sample, buses assigned to minority routes had an average age of 8.2 years, while buses assigned to non-minority routes had an average age of 7.1 years. This is largely attributed to the dedicated subfleet on ORBT, with an average age of 2.7 years.

Distribution of Transit Amenities

Staff compared the placement of transit centers and bus shelters throughout the service area. As of December 2021, Metro had 47 bus shelters with 36 (76.6%) located along minority routes, and 4 transit centers, all of which serve one or more minority routes.

Recommend Approval.

A handwritten signature in black ink, appearing to read "Amy Haase". The signature is written in a cursive style with a large initial "A".

Ms. Amy Haase – Chair

11.

RESOLUTION:

Request Approval of Title VI Program Update (2019-2022)

EXPLANATION:

Staff is requesting approval of Metro's Title VI Program Update and approval to submit it to the Federal Transit Administration (FTA). FTA requires updates from all direct recipients of FTA financial assistance that are i) a transit provider located in an Urbanized Area of 200,000 or more in population, and ii) operates more than fifty vehicles in peak service. An update must be submitted every three years and is reviewed for compliance with the FTA Circular 4702.1B.

The 2022 program update covers CY 2019 – 2022. The Title VI Program was adopted by the Board in September 2013 and the last program update was adopted in September of 2019.

This program update address Metro's Title VI complaint procedure, public participation plan, language assistance plan, equity analyses done during this time, Title VI policy descriptions, service design and performance standards, updated demographic and service profiles, monitoring program, and Board awareness. This Title VI Program Update includes the definition of a major service change, disparate impact and disproportionate burden that were adopted by the Board in October 2022.

This program update was reviewed by the Policy and Planning Committee.

Recommend approval.



Ms. Amy Haase – Chair