

CITY OF WAUSAU / METRO RIDE TITLE VI PLAN

Endorsed and Approved by
City of Wausau Transit Commission
July 18, 2019

Submitted to
Federal Transit Administration
July 18, 2019

Prepared by:
Greg Seubert, Transit Director
City of Wausau/Metro Ride



420 Plumer Street
Wausau, WI 54403
Phone: 715-842-9287
Fax: 715-842-1541

**Title VI Plan for
City of Wausau, Wisconsin - Grantee
Metro Ride – Recipient**

Adopted by the City of Wausau Transit Commission on July 18, 2019

This document is submitted in fulfillment of the general reporting requirements of Federal Transit Administration (FTA) circular 4702.1b, "Title VI Requirements and Guidelines for Federal Transit Administration Recipients," dated October 1, 2012. The City of Wausau is the recipient of FTA funding under sections 5307 and 5309. The City of Wausau owns and operates the Wausau Area Transit System, d.b.a. Metro Ride.

1. Title VI Policy Notice

The following Title VI policy notice is posted on the City of Wausau/Metro Ride website; on all passenger vehicles, in the Metro Ride operations and maintenance building and at the Metro Ride Transit Center:

Metro Ride assures that no person shall, on the basis of race, color or national origin be excluded from the participation in, be denied the benefits of, or be otherwise subjected to discrimination under any program, activity or service provided by Metro Ride, as provided by Title VI of the Civil Rights Act of 1964, as amended.

Persons who wish to obtain additional information regarding Title VI obligations or make a complaint regarding violations of this policy should contact Metro Ride at 715-842-9287, TDD 715-843-6827 or via email at metroride@ci.wausau.wi.us.

A Federal Transit Administration Civil Rights Assurance is attached in Appendix A.

2. Title VI Complaint Procedures

Metro Ride has developed procedures for investigating and tracking Title VI complaints filed. The procedures are intended to provide guidance to Metro Ride employees in dealing with complaints regarding Title VI. Written complaint procedures are available to members of the public upon request and are posted on the City of Wausau website. Metro Ride maintains a log of all customer complaints received. Complaints are categorized and tallied annually. Title VI Monitoring Procedures and Civil Rights Complaint Procedures are attached in Appendix B. Also attached is the Title VI Complaint Form in Appendix C.

3. Title VI Investigations, Complaints or Active Lawsuits

There are no Title VI investigations, complaints or active lawsuits pending against the City of Wausau/Metro Ride alleging discrimination on the basis of race, color, or national origin with respect to service or other transit benefits. We have received no such complaints since the submission of our previous Title VI update in 2017.

4. Public Participation

As a recipient of Federal transit funds, Metro Ride must seek to involve low-income, minority, and non-English speaking populations in the decision making process. Transit planning for the Wausau urban area is conducted by the Wausau Metropolitan Planning

Organization (MPO). Decisions regarding proposed changes to levels or quality of transit services; passenger fares; passenger amenities; and capital investment are made by the City of Wausau Transit Commission. Solicitations for public input regarding such proposals are provided to agencies and organizations representing low-income, minority, and non-English speaking populations in appropriate format. The Metro Ride Public Input Policy for Route Changes and Fare Increases is included in Appendix G.

The following community outreach efforts have occurred since the last Title VI Plan was submitted in 2017.

- Transit Commission Meetings – the City of Wausau Transit Commission meets on the third Thursday of the month. The general public is invited to attend and is given the opportunity to make comments. Meetings are noticed in advance and conducted pursuant to the Wisconsin open meetings law. Agendas, minutes and all other meeting documents are made available on the City of Wausau website and provided upon request by pursuant to Wisconsin’s open records law. Meetings are conducted at locations in close proximity to transit services and at times when transit service is available. Meeting locations are ADA accessible.
 - Program of Projects (POP) – All Metro Ride projects involving federal funds are published in the local newspaper annually with a notice of opportunity for public hearing. The notice is also mailed to organizations and agencies representing low-income, minority and non-English speaking populations. No inquiries or requests for public hearing were received since submission of the previous Title VI Plan.
 - Fare Increase and Service Elimination – No proposals have been made since the submission of the previous Title VI plan to increase passenger fares or to eliminate transit services. No public input has been solicited as a result.
 - Participation in Events Involving Minority Populations – Metro Ride will provide transportation services for the 2019 Wausau Hmong Festival in Wausau.
- 5. Language Assistance for Persons with Limited English Proficiency (LEP)**
Metro Ride has evaluated LEP populations using both census data and operational observation. A Limited English Proficiency (LEP) plan (*Appendix D*) has been developed to assist Metro Ride employees in understanding their roles and responsibilities with respect to overcoming language barriers for LEP persons.
- 6. Racial Composition of Non-Elected Committees and Councils**
The City of Wausau currently has no non-elected transit committees or councils.
- 7. Subrecipient Title VI Oversight**
The City of Wausau/Metro Ride is not currently engaged in a subrecipient relationship involving Federal Transit Administration (FTA) funds.

8. Title VI Equity Analysis for Construction Projects


Metro Ride has conducted no construction projects in the last three (3) years which would negatively impact minority communities. No such construction projects are pending or planned at this time.

9. Federal Transit Administration Title VI Monitoring Procedures

Metro Ride has established procedures to monitor levels and quality of transit service to determine compliance with Title VI. Metro Ride will compare the level and quality of transit service provided to the minority community to overall system averages and will measure the actual realization of established service policies and standards. Metro Ride Title VI monitoring procedures are attached in Exhibit E.

10. Environmental Justice Assessment And Title VI Monitoring Report

Metro Ride has completed an Environmental Justice Assessment and Title VI Monitoring Report in order to identify and address, as appropriate, disproportionately high and adverse human health or environmental effects of Metro Ride programs, policies and activities on Environmental Justice populations. The Metro Ride Environmental Justice Assessment and Title VI Monitoring Report is attached in Appendix F

By: 

Greg Seibert, Transit Director
City of Wausau/Metro Ride

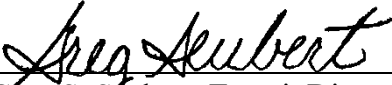
July 15, 2019
Date

APPENDIX A
FEDERAL TRANSIT ADMINISTRATION CIVIL RIGHTS ASSURANCE

The City of Wausau/Metro Ride HEREBY CERTIFIES THAT, as a condition of receiving Federal financial assistance under the Urban Mass Transportation Act of 1964, as amended, it will ensure that:

1. No person on the basis of race, color, or national origin will be subjected to discrimination in the level and quality of transportation services and transit-related benefits.
2. The City of City of Wausau/Metro Ride will compile, maintain, and submit in a timely manner Title VI information required by UMTA Circular 4702.1 and in compliance with the Department of Transportation's Title VI regulation, 49 CFR Part 21.9.
3. The City of Wausau/Metro Ride will make it known to the public that a person or persons alleging discrimination on the basis of race, color, or national origin, as it relates to the provision of transportation services and transit-related benefits, may file a complaint with the Federal Transit Administration and/or the U.S. Department of Transportation.

The person whose signature appears below is authorized to sign this assurance on behalf of the grant applicant or recipient.



Greg S. Seubert, Transit Director
City of Wausau/Metro Ride

July 15, 2019

Date

APPENDIX B
CIVIL RIGHTS COMPLAINT PROCEDURES
FOR METRO RIDE
DBE, EEO, TITLE VI, ENVIRONMENTAL JUSTICE

Adopted by the City of Wausau Transit Commission on July 18, 2019

This policy is intended to provide guidance to Metro Ride employees in dealing with complaints regarding the Disadvantaged Business Enterprise (DBE), Equal Employment Opportunity (EEO), Title VI and Environmental Justice (EJ).

All complaints regarding the aforementioned programs shall be dealt with as follows:

1. Complaints received shall be forwarded the Transit Director.
2. The Transit Director shall review the complaint and respond to the complainant in writing with ten (10) business days.
3. If the complaint cannot be resolved by the Transit Director, the complainant shall be informed in writing that the complaint has been forwarded as follows:
 - a. EEO complaints will be forwarded to the Human Resources Director
 - b. Title VI complaints will be forwarded to the Transit Commission
 - c. DBE complaints will be forwarded to the Transit Commission
 - d. Environmental Justice Complaints will be forwarded to the Transit Commission
4. A response to the complaint shall be issued by the appropriate authority within thirty (30) days after referral from the Transit Director.
5. A final written response to all Civil Rights complaints shall be issued within forty (40) days of receipt.

APPENDIX C TITLE VI COMPLAINT FORM

Metro Ride 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. The following information is necessary to assist us in processing your complaint.

Instructions: Please fill out the form below and send it to: Metro Ride, 420 Plumer Street, Wausau, WI 54403. To seek assistance completing this form or to inquire about the Metro Ride Title VI policy and procedures, please call 715-842-9287 or email metroride@ci.wausau.wi.us.

| | | | |
|--|------------------|---|--|
| Name (complainant): | | Home Address (street address, city, state, zip code): | |
| Phone: | Alternate Phone: | | |
| Location and position of person(s) if known: | | | |
| Name of Person(s) who allegedly discriminated against you if known: | | Date of incident: | |
| Which of the following best describes the reason for the alleged discrimination? <input type="checkbox"/> Race <input type="checkbox"/> Color <input type="checkbox"/> National Origin (Limited English Proficiency) | | | |
| Explain as briefly and clearly as possible what happened and how you believe you were discriminated against. Indicate who was involved. Be sure to include how you feel other persons were treated differently than you. Attach any written material pertaining to you case. Please use the back of this form if additional space is required. | | | |
| | | | |
| | | | |
| | | | |
| | | | |
| | | | |
| | | | |
| Have you filed a complaint with any other federal, state or local agencies? <input type="checkbox"/> Yes <input type="checkbox"/> No | | | |
| If yes, list agency/agencies and contact information below: | | | |
| Agency: | Address: | Phone: | |
| Agency: | Address: | Phone: | |
| Agency: | Address: | Phone: | |
| Please list below any person(s) we may contact for additional information to support or clarify your complaint (witnesses): | | | |
| Name: | Address: | Phone: | |
| Name: | Address: | Phone: | |
| Name: | Address: | Phone: | |
| I affirm that I have read the above complaint and that it is true to the best of my knowledge, information and belief. | | | |
| Complainant's Signature: _____ | | Date: _____ | |

APPENDIX D
City of Wausau / Metro Ride
Limited English Proficiency (LEP) Plan
Adopted by the City Of Wausau Transit Commission on July 18, 2019

I. Introduction

Title VI of the Civil Rights Act of 1964 prohibits recipients of federal financial assistance from discriminating against or otherwise excluding individuals on the basis of race, color, or national origin in any of their activities. It has been recognized that one form of discrimination occurs through an inability to communicate due to a limited proficiency in the English language. This limitation is often the result of an individual's national origin. Title VI of the Civil Rights Act of 1964, Executive Order 13166, and various directives from the US Department of Justice (DOJ) and US Department of Transportation (DOT) require federal aid recipients to take reasonable steps to ensure meaningful access to programs, services and activities by those who do not speak English well.

To determine the extent to which LEP services are required and in which languages, the law requires the analysis of four factors:

1. The number or proportion of LEP persons eligible to be served or likely to be encountered by the Metro Ride's programs, services or activities.
2. The frequency with which LEP individuals come in contact with these programs, services or activities.
3. The nature and importance of the program, service, or activity to people's lives.
4. The resources available and the overall cost to Metro Ride.

The goal of this Limited English Proficiency (LEP) Plan is to ensure that the Metro Ride recognizes the needs of limited English proficient (LEP) members of the community and implements a plan to communicate effectively and ensure reasonable access to its processes, information and decision-making.

Background

The City of Wausau is the recipient of funding assistance from the Federal Transit Administration under sections 5307 and 5309. The City of Wausau owns and operates Metro Ride. The Metro Ride service area is general described as the City of Wausau. The designated oversight body for Metro Ride is the City of Wausau Transit Commission.

II. Metro Ride Factor Analysis

To determine the extent to which LEP services are required and in which languages, the law requires the analysis of four factors. The following sections address each of these with respect to the Metro Ride service area.

Factor 1: Review of LEP Populations

Understanding the needs of the community begins with identifying the number of limited English proficiency (LEP) persons eligible to be served, likely to be served or likely to be encountered by Metro Ride through its programs, services or activities. In an effort to determine potential LEP needs, data was obtained from the U.S. Census Bureau, American Fact Finder report for the period of 2013 through 2017, for the City of Wausau.

The data indicates that 14.6% of the overall population speaks a language other than English. Primary languages spoken other than English include: Asian/Pacific Islander (11.1%); Spanish (2.0%); Indo-European (1.6%); and other languages (0%).

The data further indicates that 5.0% of the overall population speaks English “less than very well.” Of this limited English proficient (LEP) population, 4.3% speaks Asian/Pacific Islander languages; .6% speaks Spanish; .2% speaks Indo-European languages; and .0% speaks other languages. See Table 1.

A review of data from each of the communities indicates that LEP persons are distributed throughout the service area, with a slightly higher concentration in the City of Wausau.

| <p style="text-align: center;">Table 1 Limited English Proficiency Populations in the Metro Ride Service Area <i>(Persons who speak English less than very well)</i> Source: US Census Bureau, 2013-2017 American Community Survey</p> | | | | | | |
|---|------------------------------------|-------------------|--|-------------------------------|---|---------------------------------------|
| | Total Population 5 years and older | Total LEP Persons | LEP Persons who speak Asian/Pacific Islander Languages | LEP Persons who speak Spanish | LEP Persons who speak Indo-European Languages | LEP Persons who speak Other Languages |
| Total | 36,464 | 1,836 | 1,552 | 207 | 77 | 3 |
| Percent | | 5.0% | 4.3% | .6% | .2% | 0% |

Factor 2: Assessing Frequency of Contact with LEP Persons

Metro Ride has evaluated LEP populations using both census data and through operational observation. The data is consistent with our observations. The prevalent LEP language is Hmong. It is the only LEP language that meets the “Safe Harbor” threshold for LEP assistance (5% of population or 1000 individuals).

Metro Ride has never received any requests for translation or interpretation of its programs, services or activities into Hmong language format any other language. Metro Ride regularly receives requests for information and data via telephone and email, but no requests for LEP assistance. Encounters with passenger requiring LEP assistance are rare.

Factor 3: Assessing the Importance of Metro Ride Programs

Metro Ride’s most critical functions are the provision of fixed route bus service and ADA paratransit service. These services are open and available to the general public and they operate in locations where LEP populations reside. Metro Ride must provide public information in accessible formats to LEP populations meeting the “Safe Harbor” threshold in order to ensure access to these services. Metro Ride must also provide the opportunity for all segments of the population, including LEP persons, to be involved in the planning process for these services, consistent with its Environmental Justice Policy and goals.

Factor 4: Determining Available Resources

When planning any activity, it is imperative that Metro Ride assess resources available and conduct the activity in a way that is meaningful and balances efforts with overall cost. Given that relatively small LEP populations reside in the Metro Ride service area and financial constraints are considerable, full language translation of all public information is not considered reasonable or warranted at this time. However, some language assistance is necessary for certain activities in order to provide broad access to members of the public.

III. Language Access Implementation Plan and Procedures

This Limited English Proficiency (LEP) plan will assist Metro Ride employees in understanding their roles and responsibilities with respect to overcoming language barriers for LEP persons. It will be a roadmap that outlines and defines tasks, assigns responsibility and allocates resources necessary to achieve or maintain compliance with language access requirements. It will assist Metro Ride in meeting service delivery standards, providing notice of language assistance services, providing staff training and conducting ongoing monitoring and evaluation. The following sections outline the activities to be taken by Metro Ride to comply with LEP needs.

a. Administer LEP services:

- 1) The Transit Director will oversee the LEP program. This includes the development and implementation of this plan along with ongoing monitoring to ensure that it remains reflective of the community's needs. The LEP Plan will be updated at least every three years.
- 2) The Transit Director will ensure that Metro Ride staff is familiar with the requirements and resources for LEP persons.
- 3) Metro Ride staff will document the number and type of contacts by LEP persons and the activities and events requiring LEP assistance. Any LEP contacts resulting in unsatisfactory assistance will prompt evaluation of LEP assistance procedures.

b. Provide verbal translation as follows:

- 1) The Hmong American Center will be the provider of Hmong language verbal translation services. Contact information for the Hmong American Center will be distributed to Metro Ride staff.
- 2) The Transit Director will identify meetings, events and activities that may require a translator to ensure meaningful access by LEP persons.
- 3) Transit Commission meeting agendas and other meeting announcements will include the following notice in Hmong language format: "Interpreter services are available free of charge upon reasonable notice".
- 4) Bus operators will use color-coded language assistance cards to help LEP persons in communicating route and transfer connection requests.
- 5) Impromptu translation assistance will be provided via telephone by the Hmong American Center.

c. Provide written translation as follows:

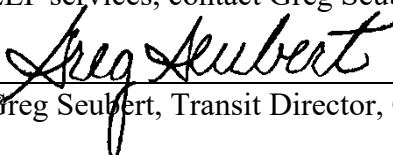
- 1) The Hmong American Center will be the provider of Hmong language written translation services. Contact information for the Hmong American Center will be distributed to Metro Ride staff.
- 2) Meeting notifications will be provided in Hmong, upon request.
- 3) Outreach documents will state that language services are available free of charge in a language that LEP persons can understand.

d. LEP document translation required:

Given the four-factor analysis, Metro Ride has identified the following documents for translation into Hmong language format:

- 1) Metro Ride Rider's Guide.
- 2) Civil rights policy and complaint procedures.
- 3) Paratransit User Guide
- 4) ADA Title II Policy and Accommodation Request Form

For questions comments or concerns regarding Metro Ride's commitment to nondiscrimination or to request LEP services, contact Greg Seubert, Transit Director, at 715-842-9287 or greg.seubert@ci.wausau.wi.us.



Greg Seubert, Transit Director, City of Wausau/Metro Ride

July 15, 2019

Date

APPENDIX E
FEDERAL TRANSIT ADMINISTRATION TITLE VI
MONITORING PROCEDURES

For the City of Wausau, Wisconsin - Grantee
And the Wausau Area Transit System, d.b.a Metro Ride – Recipient

Adopted by the City of Wausau Transit Commission on July 18, 2019

- a. The City of Wausau/Metro Ride will submit to the Federal Transit Administration and keep on file a FTA Civil Rights Assurance. The FTA Civil Rights Assurance will be updated as is necessary.
- b. If previous Title VI deficiencies have been found by the City of Wausau/Metro Ride or through an FTA review, corrective action to remedy these deficiencies will be incorporated into the Metro Ride TIP to assure compliance with Title VI.
- c. The City of Wausau/Metro Ride will monitor the level and quality of transit service to determine compliance with Title VI. Metro Ride will compare the level and quality of transit service provided to the minority community to overall system averages and will measure the actual realization of established service policies and standards. Metro Ride will utilize the level of service and quality of service methodologies outlined below:
 - (1) Level of Service Methodology - Minority communities will be identified by census tracts or traffic analysis zones. Service provided to the communities will be measured in terms of the service policies and standards adopted by the City of Wausau/Metro Ride (i.e., vehicle load, vehicle assignment, headways, amenities, access, etc.). The level of service methodology is outlined below.
 - a) Select an appropriate sample size. At a minimum, the same will include each tract or zone that has a minority population that is equal to or above the total percentage of all minorities within the service area. In addition, at least ten percent of all the census tracts or traffic analysis zones in the service area should be monitored.
 - b) Inventory the transit service provided in the selected sample areas.
 - c) Assess the performance of each route operating within the selected areas for each of Metro Ride’s service standards and policies.
 - d) Compare the transit service provided to minority areas to Metro Ride’s service policies and standards, and review and take action in all cases in which the service to minority areas do not meet the stated service policies or standards of Metro Ride.
 - e) Compare the average performance for each route to Metro Ride’s service policies and standards, and take action on the observed differences.
 - (2) Quality of Service Methodology - The methodology will determine whether the quality of service is consistent among different user groups and the degree to which transit service is responsive to minority needs. Metro Ride will utilize the following methodology to assess equality in the quality of service provided. The quality of service methodology is outlined below.

- a) Identify an appropriate number of minority census tracts or traffic analysis zones and a corresponding number of comparable non-minority census tracts or traffic analysis zones. At least three minority and three non-minority census tracts or traffic analysis zones must be selected.
- b) Conduct a survey of transit riders in the identified areas to determine travel patterns (work trip destination) and opinions on the transit service provided. Census data may also be used to model transit patterns in an urbanized area.
- c) Summarize the travel patterns of transit users in the selected census tracts or traffic analysis zones, and summarize comments or opinions about the transit service.
- d) Using transit travel time and fare matrices, and/or other appropriate indices, information must be monitored for the top three most-traveled destinations. All values below emanate from the centroid of selected census tracts or traffic analysis zones to the centroid of destination:
 1. Average peak hour travel time to destination;
 2. Number of transfers/bus stops before reaching destination;
 3. Total cost of trip to destination; and
 4. Cost per mile of trip to destination.
- e) In using this methodology, Metro Ride will compare the quality of service of minority census tracts or traffic analysis zones with non-minority census tracts or traffic analysis zones, and take action on the disparities.

APPENDIX F
ENVIRONMENTAL JUSTICE ASSESSMENT AND
TITLE VI MONITORING REPORT

The City of Wausau owns and operates the Wausau Area Transit System, d.b.a. Metro Ride. All municipalities served by Metro Ride are represented on the City of Wausau Transit Commission.

Service Availability – Metro Ride bus service is provided in the City of Wausau. Metro Ride is operates a fixed-route “hub and spoke” or “pulse-point” bus system with a central transfer station in downtown Wausau. Metro Ride also provides paratransit service, pursuant to the Americans with Disabilities Act (ADA).

Both bus service and paratransit service are provided Monday through Friday, from 6:30 a.m. to 6:30 p.m. Service is not provided on Saturdays, Sundays or Holidays.

Metro Ride has established and maintained the operation of transit service within $\frac{3}{4}$ of a mile in at least 95% of the populated areas within the Metro Ride service area, unless restricted by natural or man-made physical barriers. Wisconsin Statutes (s.66.943) prohibit Metro Ride from providing transit services to surrounding municipalities without financial support, pursuant to a contract with a public or private organization.

Frequency of service – Seven (7) regular bus routes operate in the City of Wausau, each running at thirty-minute intervals.

Vehicle Load – Passenger loads are monitored on an ongoing basis and additional capacity is added on regular routes when appropriate. School tripper routes are added during the school year to accommodate increased passengers loads at peak times. Metro Ride has not experienced capacity constraints on any route.

Travel Time – Travel times are identical for all bus routes.

Schedule Adherence – Metro Ride monitors on-time performance on an on-going basis. All bus routes are evaluated every five years during the preparation of the Transit Development Program. The only schedule adherence problems incurred have been incidental and generally caused by summer road construction or winter weather.

Transit Amenities (Bus Stops/Shelters) – Metro Ride employs a uniform bus stop policy on all routes. Bus stop signs are generally placed on every other corner and near major trip generators. Metro Ride offers few customer amenities along bus routes. Bus shelters are located at 6 major trip generators throughout the City of Wausau. Metro Ride has not acquired any new bus shelters in many years.

Vehicle assignment (Age, ADA Accessibility, Etc.) – Metro Ride operates a fleet of 25 Gillig Low-Floor transit coaches for fixed route bus service and 4 Chevrolet/Glavel standard floor buses for paratransit service. All vehicles are in good condition and all are ADA accessible with wheelchair lifts or ramps and kneelers. A fleet vehicle summary is shown in Exhibit 1.

| <i>Exhibit 1</i> Fleet Vehicle Summary | | | | |
|--|--------------|-------------|-----------------|-----------------------|
| Make | Model | Year | Quantity | ADA Accessible |
| Gillig | Low-Floor | 2011 | 6 | 6 |
| Gillig | Low-Floor | 2009 | 9 | 9 |
| Gillig | Low-Floor | 2004 | 6 | 6 |
| Gillig | Low-Floor | 2002 | 4 | 4 |
| Chevrolet/Glavel | Titan II | 2012 | 4 | 4 |

Passenger Fare – Passenger fares are the same for all routes. The half-fare for senior citizens and the disabled is in effect during all hours of operation.

Racial Analysis by Census Tract – The distribution of minority populations in the Metro Ride service area is shown in Exhibit 2. There are five census tracts with a higher percentage of minority population than the overall average minority population for the Metro Ride service area.

Minority Routes – When 1/3 or more of a bus routes’ miles are traveled through census tracts with a higher than average population of minority residents, the route is determined to be a minority route. Exhibit 3 is a map showing the distribution of minority populations along Metro Ride bus routes. All bus routes have been identified as minority routes.

Customer Complaints – Metro Ride maintains a log of all customer complaints received. Complaints are categorized and tallied annually. The basis for most complaints received is bus operator performance and not service levels, customer amenities or the distribution of transit services. Exhibit 4 is a summary of complaints for all regular bus routes for calendar year 2018.

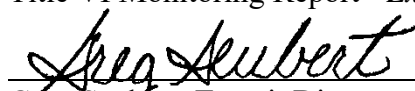
Environmental Justice Assessment and Title VI Monitoring Report

Census data indicates that the City of Wausau has a larger population of minority and low-income residents compared to the rest of the Wausau metropolitan area. The census tracts containing higher than average minority populations and lower than average income, are generally located in the City of Wausau, near the downtown.

All Metro Ride bus routes originate from downtown Wausau and travel through identified minority communities. Vehicle condition, span of service, frequency of service, headway, travel time, and fare structure are identical on all routes.

Federally supported transit services and related benefits are distributed in an equitable manner throughout the Metro Ride service area. Transit services and amenities provided to low-income and minority populations are equitable compared to the rest of the community.

A comparative summary of the levels and quality of transit service provided by Metro Ride is shown in the Title VI Monitoring Report - Exhibit 5.



 Greg Seubert, Transit Director
 City of Wausau/Metro Ride

July 15, 2019

 Date

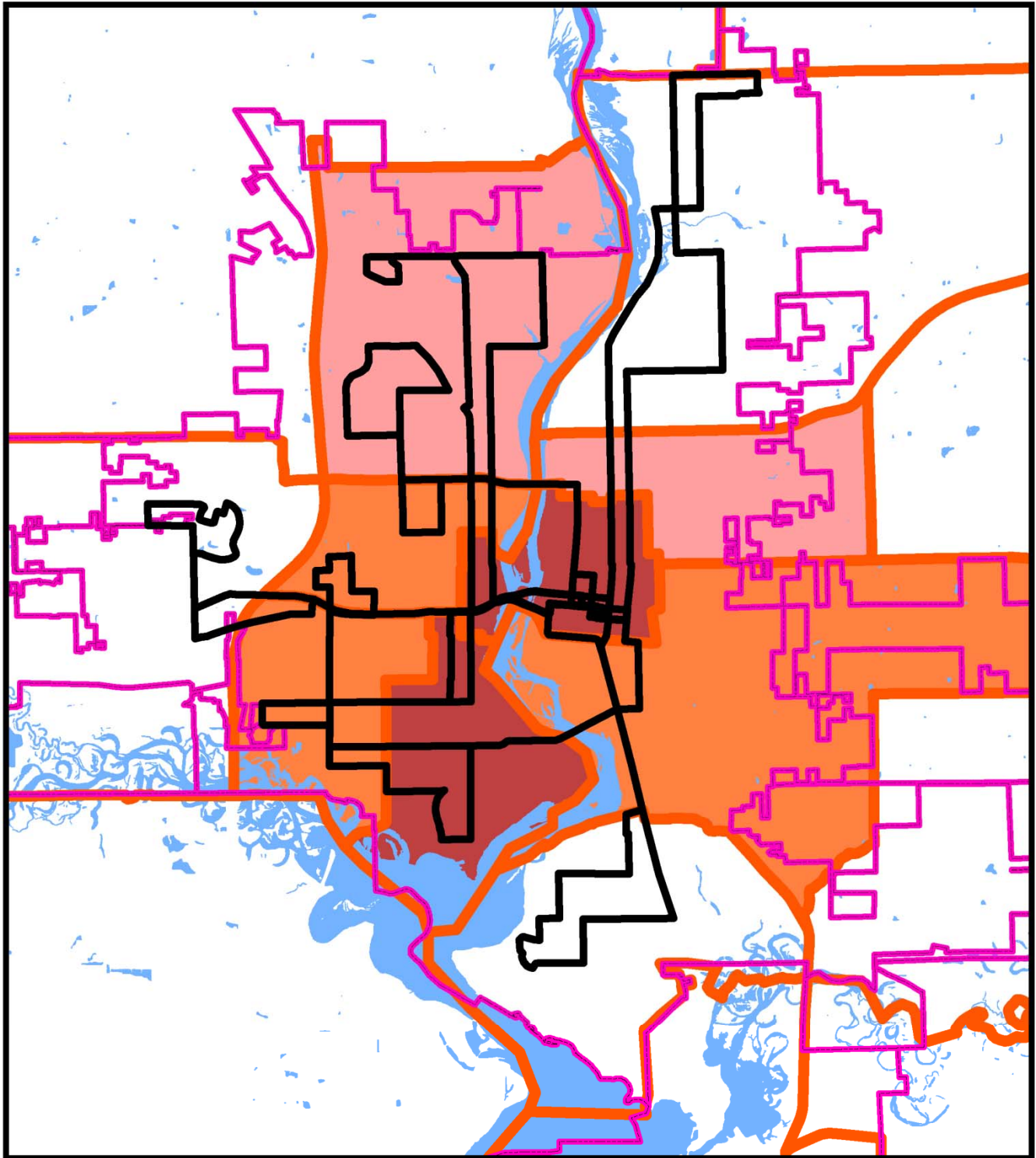
Exhibit 2
Racial/Ethnic Analysis by Census Tract for Metro Ride Service Area

| Municipality | Census Tract | Total Population | White | | African American | | Hispanic | | Asian | | Native American | | Other | | Minority Population | Minority % |
|----------------|--------------|------------------|--------|-------|------------------|------|----------|------|-------|-------|-----------------|------|-------|------|---------------------|------------|
| | | | Total | % | Total | % | Total | % | Total | % | Total | % | Total | % | | |
| City of Wausau | 1 | 3,138 | 2,252 | 71.77 | 162 | 5.16 | 192 | 6.12 | 411 | 13.10 | 91 | 2.90 | 30 | 0.96 | 886 | 28.23 |
| City of Wausau | 14 | 6,635 | 6,102 | 91.97 | 40 | 0.60 | 112 | 1.69 | 337 | 5.08 | 34 | 0.51 | 10 | 0.15 | 533 | 8.03 |
| City of Wausau | 2 | 2,932 | 2,403 | 81.96 | 61 | 2.08 | 79 | 2.69 | 342 | 11.66 | 26 | 0.89 | 21 | 0.72 | 529 | 18.04 |
| City of Wausau | 3 | 5,188 | 4,670 | 90.02 | 73 | 1.41 | 121 | 2.33 | 265 | 5.11 | 52 | 1.00 | 7 | 0.13 | 518 | 9.98 |
| City of Wausau | 4 | 6,150 | 5,062 | 82.31 | 88 | 1.43 | 146 | 2.37 | 741 | 12.05 | 54 | 0.88 | 59 | 0.96 | 1,088 | 17.69 |
| City of Wausau | 5 | 2,970 | 2,262 | 76.16 | 74 | 2.49 | 100 | 3.37 | 483 | 16.26 | 36 | 1.21 | 15 | 0.51 | 708 | 23.84 |
| City of Wausau | 6.01 | 2,066 | 1,586 | 76.77 | 25 | 1.21 | 51 | 2.47 | 395 | 19.12 | 6 | 0.29 | 3 | 0.15 | 480 | 23.23 |
| City of Wausau | 6.02 | 4,083 | 2,984 | 73.08 | 65 | 1.59 | 141 | 3.45 | 826 | 20.23 | 44 | 1.08 | 23 | 0.56 | 1,099 | 26.92 |
| City of Wausau | 7 | 5,382 | 4,282 | 79.56 | 116 | 2.16 | 161 | 2.99 | 705 | 13.10 | 82 | 1.52 | 36 | 0.67 | 1,100 | 20.44 |
| City of Wausau | 8 | 3,463 | 3,213 | 92.78 | 45 | 1.30 | 73 | 2.11 | 95 | 2.74 | 26 | 0.75 | 11 | 0.32 | 250 | 7.22 |
| | Total | 42,007 | 34,816 | | 749 | | 1,176 | | 4,600 | | 451 | | 215 | | 7,191 | |
| | Average | | | 81.64 | | 1.94 | | 2.96 | | 11.85 | | 1.10 | | 0.51 | | 18.36 |

Census tracts exceeding the average minority population are highlighted

* Census Tract 14 is not entirely within the City of Wausau




Source: U.S. Census Bureau - 2010 Census Data



Metro Ride Bus Routes by Census Tract

Prepared by: Wausau MPO
 March 18, 2016
 Data: US Census, 2010



-  Metro Ride Routes
-  2010 Census Tracts
-  Municipal Boundary


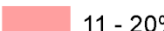


| Minority % | |
|---|----------|
|  | 0 - 10% |
|  | 11 - 20% |
|  | 21 - 25% |
|  | 26 - 30% |

Exhibit 4
Metro Ride Complaint Log
Calendar Year 2018

| Route | Name | Driver Performance | Bus Climate | Operating Policies | Route | On-Time Performance | Service Levels | Bus Stops & Shelters | Fares | Vehicle | Customer Amenities | Total |
|----------------------|---------------------------------|--------------------|-------------|--------------------|-------|---------------------|----------------|----------------------|-------|---------|--------------------|-------|
| A | Grand Ave/Health Care Center | 2 | | 2 | | | 1 | 2 | | | | 7 |
| B | North 1st Ave/NTC | 4 | | | | | | | | | | 4 |
| D | North 10th Avenue West High | 1 | | | | | | | | | | 1 |
| G | Sherman Street Shopko | 3 | | | | 1 | | | | | | 4 |
| H | North 6th Street Riverview | 3 | | | | | 1 | | | | 1 | 5 |
| I | Stewart Avenue Aspirus Hospital | 5 | | | | | | | | | | 5 |
| J | Thomas Street | 1 | | 1 | | | | | | | | 2 |
| System Totals | | 19 | 0 | 3 | 0 | 1 | 2 | 2 | 0 | 0 | 1 | 28 |
| System Average/Route | | 2.71 | 0 | .43 | 0 | .14 | .29 | .29 | 0 | 0 | .14 | 4.0 |

Exhibit 5
Title VI Monitoring Report For Metro Ride
Calendar Year 2019

| Route | Name | Minority ¹ Yes or No | Headways Peak/Off- Peak | Travel ² Time | Fare ³ | Weekday Hours ⁴ | No. of Shelters ⁵ | Complaints ⁶ | Disparities Comments |
|-----------------|-------------------------------------|------------------------------------|-------------------------------|-----------------------------|-------------------|-------------------------------|---------------------------------|-------------------------|-------------------------|
| A | Grand Ave/Health Care Center | Yes | :30/:30 | :15 | \$1.75 | 6:30 a.m.-6:30 a.m. | 2 | 5 | None |
| B | North 1 st Ave./NTC | Yes | :30/:30 | :15 | \$1.75 | 6:30 a.m.-6:30 a.m. | 1 | 0 | None |
| D | Bridge St./West High | Yes | :30/:30 | :15 | \$1.75 | 6:30 a.m.-6:30 a.m. | 1 | 0 | None |
| G | Sherman St./Shopko | Yes | :30/:30 | :15 | \$1.75 | 6:30 a.m.-6:30 a.m. | 0 | 1 | None |
| H | North 6 th St./Riverview | Yes | :30/:30 | :15 | \$1.75 | 6:30 a.m.-6:30 a.m. | 1 | 2 | None |
| I | Stewart Ave./Aspirus Hospital | Yes | :30/:30 | :15 | \$1.75 | 6:30 a.m.-6:30 a.m. | 1 | 0 | None |
| J | Thomas St. | Yes | :30/:30 | :15 | \$1.75 | 6:30 a.m.-6:30 a.m. | 0 | 1 | None |
| SYSTEM AVERAGES | | | :30/:30 | :15 | \$1.75 | | | | |

¹ Do 1/3 or more of the route miles travel through census tracts with higher than average minority residents?

² Maximum scheduled travel time to downtown from bus stops along the route.

³ Adult cash fare to downtown from all bus stops along the route.

⁴ Span of Service.

⁵ Does not include benches/shelters at Transit Center.

⁶ 2018 complaints regarding bus climate, operating policies, route, on-time performance, service levels bus stops, shelters, fares, vehicle condition, and customer amenities. Does not include driver performance complaints.

APPENDIX G

PUBLIC INPUT POLICY FOR ROUTE CHANGES AND FARE INCREASES

*Adopted by the City of Wausau Transit Commission
January 19, 2017*

Purpose

The Federal Transit Administration (FTA) requires that recipients of formula funding use an established administrative process to solicit and consider public input prior to raising fares or implementing major reductions in service. This policy is established to assist Metro Ride employees and the City of Wausau Transit Commission in determining when and how public input should be sought. Customers, stakeholders, and the general public will be invited to provide input through at least one of the following methods when appropriate: the Metro Ride website, public meetings, surveys or at public hearings.

Changes Requiring the Solicitation of Public Input

Routes

- a. Any proposed change to a regular fixed route, or to paratransit service, which involves the *permanent elimination of service in an area or neighborhood*, requires the solicitation of public comment.
- b. Any proposed change to a regular fixed route, which involves the *introduction of service to a new area or neighborhood*, requires the solicitation of public comment.

Days, Hours and Frequency of Service

- a. Any proposed change to a regular route, or to paratransit service, which involves the *elimination of days or hours of service*, requires the solicitation of public comment.
- b. Any proposed change to fixed route bus service, which involves a *reduction in the frequency of service* (interval between trips), requires the solicitation of public comment.

Fares

Any increase in fares requires the solicitation of public input.

Changes Not Requiring the Solicitation of Public Input

Routes

- a. Any proposed route change that merely involves a *change in route direction, or the use of one street instead of another in the same area or neighborhood*, does not require the solicitation of public comment.
- b. *Changes to supplemental routes* do not require the solicitation of public comment.
- c. *Temporary route changes* necessitated by construction, accidents, emergency vehicles, etc. do not require the solicitation of public comment.

Fares

The Transit Commission may *reduce fares* without the solicitation of public comment.

Public Notification

Solicitations for public input will be provided to agencies and organizations representing low-income, minority, and non-English speaking populations in appropriate format.

When required, the public comment process will begin with the publishing of a legal notice seven (7) calendar days in advance of the public hearing date in the local newspapers of general circulation. This notice will set a specific place, date, and time for one or more public hearings.

Written comments will also be accepted on the proposed changes seven (7) calendar days beyond the initial publishing of the legal notice. Legal notices will inform the public of the proposed actions that

initiated the public comment process. Press releases will also be prepared and sent to the local media.

In addition to the public hearing process, Metro Ride will employ various outreach methods including:

- Publication on website
- Information posted on buses
- Public meetings at transit accessible locations in various parts of the Metro Ride service area
- Notices to public officials, key stakeholders, and community groups
- Targeted surveys to riders of affected services
- E-communications to self-identified Metro Ride passengers (those who provide contact information)

Scheduling Public Hearings

The public hearing(s) will be scheduled and conducted by the City of Wausau Transit Commission or Metro Ride staff at a time, date, and place to be designated. The facility utilized for public hearings will be accessible to persons with disabilities. Special arrangements will be made for vision or hearing impaired persons if requested at least three days prior to the meeting. Interpreter services for LEP persons will be made available with reasonable advanced notice.

Procedure for Conducting Public Hearing

Forms will be available to attendees to register their presence and desire to speak. Public hearings will begin with a reading of the public notice, purpose, and proposed action that necessitated the public hearing. After an explanation of the proposed action is completed, the public will be invited to offer their comments. The City of Wausau Transit Commission will determine the amount of time the public has to comment during the public hearing. After all registered persons have commented, a final opportunity will be offered for any additional public comment. This offering will precede the close of the public hearing.

Documentation of Public Hearing

Official records of public hearings on service or fare adjustments will be generated by:

- Affidavits of newspaper publications of public notices
- Press releases conveying information on upcoming public hearings
- Transcripts of proceedings

Addressing Public Comments Received

All relevant comments received verbally or in writing at a public hearing, or as otherwise conveyed to Metro Ride prior to the established deadline, will be entered into the public record of the public input process. Subsequent to the public comment period, Metro Ride staff will evaluate and analyze all relevant comments received and prepare a written report for consideration by City of Wausau Transit Commission.

Transit Commission Action

Changes requiring public comment will not be formally approved or implemented until after public input is considered. The City of Wausau Transit Commission will review public comments received and consider staff recommendations before final disposition of the proposed change(s). Final action of the Transit Commission will be recorded in the minutes of the meeting.

APPENDIX H

TITLE VI SERVICE STANDARDS AND POLICIES

*Adopted by City of Wausau Transit Commission
July 18, 2019*

Overview

Pursuant to the requirements of FTA C 4702.1B, Metro Ride must establish and monitor system performance under quantitative service standards and qualitative service policies. Every three years, Metro Ride submits a Title VI Program to the FTA documenting compliance with the established Title VI requirements. In accordance with this submittal, Metro Ride will monitor and evaluate system performance relative to the service standards and policies, contained herein, no less than every three years.

Service Standards and Policies

The Federal Transit Administration requires that all fixed-route transit providers develop service standards and policies to provide a context for the monitoring and assessment of transit service. These standards and policies are used to compare the services provided in minority areas with the services provided in non-minority areas. Service standards and policies include:

Service Standards

- Vehicle Load
- Vehicle Headway
- On-time Performance
- Service Availability

Service Policies

- Transit Amenities
- Vehicle Assignments

Vehicle Load

Vehicle load is the ratio of passengers to the number of seats on a vehicle, relative to the vehicle's maximum load point. For example, on a 40 seat bus, a vehicle load of 1.5 or 150% means all seats are filled and there are 20 standees. Vehicle overcrowding is dependent upon ridership activity and the seating capacity of each vehicle assigned to the route. Metro Ride operates three vehicle sub-groups as shown below.

| Vehicle Load Standard | | | | |
|--|----------------------|----------|-------|-----------------|
| Vehicle Type | Passenger Capacities | | | |
| | Seated | Standing | Total | Max Load Factor |
| Cutaway Bus | 8 | 4 | 12 | 1.5 |
| 35' Transit Bus | 32 | 16 | 48 | 1.5 |
| 40' Transit Bus | 38 | 19 | 57 | 1.5 |
| <i>• Vehicle load standards are consistent for the peak and off-peak periods</i> | | | | |

Vehicle Headway

Vehicle headway is defined as the amount of scheduled time between two vehicles traveling in the same direction on the same route. Vehicle headways determine how long customers must wait for bus service. Higher frequencies result in reduced wait times, which make the service more attractive to potential riders. At the same time, higher frequencies can significantly increase costs by requiring additional buses and drivers.

| Vehicle Headway Standard | | |
|---------------------------------|-------------------------------|-------------------------------|
| Route Type | Monday-Friday | Saturday/Sunday |
| Regular Routes | 30 minutes throughout the day | 60 minutes throughout the day |
| Commuter Routes | 60 minutes throughout the day | 60 minutes throughout the day |
| Trippler Routes | As needed | As needed |

On-time Performance

On-time performance is a measure of service reliability that determines the percentage of buses that arrive or depart within a certain amount of time before or after the published schedule. On-time performance reflects the quality of service and influences a customer's choice to use transit.

On-time Performance Standard

A vehicle is considered on-time when it arrives zero (0) minutes early and no more than five (5) minutes late compared to the scheduled time at each time-point. Metro Ride has set a system-wide on-time performance goal of ninety percent, which allows for some level of service variability while maintaining the reasonable expectation of reliability for customers.

Service Availability

Service availability is a measure of transit accessibility based on the distribution of routes and the placement of stops within a transit provider's service area. Stops spaced further apart allow for faster bus speeds and reduce customer travel times but also require customers to walk further to access the service.

Service Availability Standard

The standard for Metro Ride service availability is to offer service within $\frac{3}{4}$ mile of all residents in at least ninety-five percent of the populated area within the City of Wausau. Second, Metro Ride should strive to incorporate other municipalities in the urbanized area, with a goal of bringing eighty-percent of the urbanized area population within $\frac{3}{4}$ of mile of the Metro Ride service (so long as population densities are sufficient to support fixed-route service).

Bus stop spacing on all routes will generally be the same. Stops are placed on every other block and near major passenger trip generators. Variance from standard spacing may be necessary to address safety and accessibility concerns. All Metro Ride bus stops shall be marked with a bus stop sign.

Transit Amenities

Transit amenities refer to items of comfort, convenience, and safety that are available to transit passengers. These items include, but are not limited to, shelters, seating, signage and trash receptacles. Transit amenities must be equitably distributed on a system-wide basis.

Transit Amenities Policy

Transit amenities shall be allocated based on ridership activity (total number of average daily boardings) and will be equitably distributed to reflect the system-wide demographics. Consideration of new amenities shall be constrained by the availability of resources to adequately maintain them.

Vehicle Assignment

Vehicle assignment refers to the process by which transit vehicles are placed into service.

Metro Ride presently maintains a fixed-route fleet with three vehicle sub-groups: 40-foot heavy-duty transit buses, 35-foot heavy-duty transit buses, and 24-foot cutaway buses. All vehicles are maintained and operated from a single facility. All vehicles are of similar age and condition.

Vehicle Assignment Policy

The goal of this vehicle assignment policy is to provide sufficient capacity to accommodate passenger demand while minimizing the labor and vehicle resources necessary to manage passenger loads. Proper vehicle assignment shall ensure that rider experience relative to vehicle age, vehicle condition and seating availability is similar on all routes.

35-foot heavy-duty transit buses are the primary vehicle for fixed route bus service and they may be assigned to any route. 40-Foot Heavy-Duty Transit Buses shall be used primarily for school tripper routes to provide additional capacity to accommodate peak passenger loads. Cutaway buses shall be used primarily for the Metro Ride paratransit program. Vehicle design is incompatible with the boarding platform at the Metro Ride transit center and they should be used only sparingly for fixed-route service.

Monitoring Transit Service

Metro Ride will monitor and evaluate transit performance relative to the service standards and policies, contained above, no less than every three years. Metro Ride will use the FTA minority transit route definition to implement this monitoring program. A minority transit route is one in which at least one-third of the revenue miles are located in a Census block or Census block group where the minority population percentage exceeds average minority population in the Metro Ride Bus service area. This method of analysis may be supplemented with on-board passenger survey data, as available, to adjust route designations accordingly.

Metro Ride will take steps to remedy any potential disparity where the monitored service fails to meet the established service standards or policies. The results of the monitoring program will be submitted to the FTA as part of the triennial Title VI Program submittal.