Title VI Program

April 1, 2019

Prepared by:
Greater Portland Transit District
114 Valley Street
Portland, ME 04102
207.774.0351
gpmetro.org
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Attachment A – Civil Rights (Title VI) Complaint Form
Attachment B – Policies and Procedures for General, ADA, and Title VI Complaints
Attachment C – Title VI Log 2016-2019 (Complaints and Investigations)
Attachment D – Public Participation Policies
Attachment E – Title VI Brochure
Attachment F – Meeting Minutes from 3.28.19 board meeting
Sec. 1.0 INTRODUCTION

This Greater Portland Transit District’s (METRO) Title VI Program has been updated to ensure that the level and quality of METRO’s fixed route and demand response services are provided in a nondiscriminatory manner and that the opportunity for full and fair participation is offered to METRO’s riders and other community members. Additionally, through this program, METRO has examined the need for services and materials for persons for whom English is not their primary language and who have a limited ability to read, write, speak, or understand English.

METRO is committed to ensuring that no person is excluded from participation in, or denied the benefits of, or subjected to discrimination in the receipt of any of METRO’s services on the basis of race, color, or national origin. The contents of this program have been prepared in accordance with Section 601 of Title VI of the Civil Rights Act of 1964 and Executive Order 13116 (Improving Access to Services for Persons with Limited English Proficiency).

Under the Civil Rights Act of 1964, and as a recipient of federal funding under the programs of the Federal Transit Administration (FTA) and of the U.S. Department of Transportation (US DOT), METRO has an obligation to ensure that:

- The benefits of its bus services are shared equitably throughout the service area;
- The level and quality of bus services are sufficient to provide equal access to all riders in its service area;
- No one is precluded from participating in METRO’s service planning and development process;
- Decisions regarding service changes or facility locations are made without regard to race, color, or national origin and that development and urban renewal benefitting a community as a whole not be unjustifiably purchased through the disproportionate allocation of its adverse environmental and health burdens on the community’s minority population; and
- A program is in place for correcting any discrimination, whether intentional or unintentional.

METRO has sought to engage the public in the development and update of this program. METRO engaged community organizations, riders, and staff to provide input. METRO’s Board of Directors was involved in the update of this program. In February and March 2019, the Board’s Ridership Committee reviewed the draft Title VI Program. The scope of the public notice was increased to notify the public and transit users that the Title VI Program was under review and public participation was encouraged. Following this review, the final proposed program was reviewed and approved by the METRO Board of Directors on March 28, 2019.
This program contains all of the elements required of a transit provider operating in an urbanized area of 200,000 or more in population and operating less than fifty (50) vehicles in peak service. It supersedes METRO’s Title VI Program of 2016 and is effective as of April 1, 2019. It has been prepared using data from the 2013-2017 American Community Survey 5-yr Estimate.

Sec. 2.0 GENERAL REQUIREMENTS

21 Notice to the Public:

To make METRO’s riders aware of its commitment to Title VI compliance, and of their right to file a civil rights complaint, METRO has presented the following language on its website (gpmetro.org), on posters at the Congress/Elm Transit Center and in buses, in the published schedule-map Transit Guide, and in a stand-alone Title VI brochure:

Title VI of the Civil Rights Act of 1964
"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."

22 Procedures for Filing a Complaint:

These procedures cover all complaints under Title VI of the Civil Rights Act of 1964. Members of the public who believe they have been the subject of discrimination can file a written and signed complaint up to 180 days from the date of the alleged discrimination. To find out more about METRO’s nondiscrimination procedures or to file a complaint, look for information online at gpmetro.org or call (207) 774-0351.

Any individual, group of individuals, or entity that believes it has been subjected to discrimination prohibited under Title VI may file a complaint by completing the METRO complaint form and forwarding it to:

Greater Portland Transit District
Attn: General Manager
114 Valley Street
Portland, ME 04102
METRO has developed a Title VI Complaint Form (Attachment A) that asks for the following information:

- Individual contact information.
- Date and location of incident.
- Detailed description of incident, the basis for alleging that discrimination has occurred, and identification of all involved parties.
- Identification of any witnesses to the incident.

Title VI complaints must be signed and dated. Members of the public can access complaint forms and instructions at METRO’s Congress/Elm Transit Center, main office located at 114 Valley Street, Portland ME 04102, and on the website. Hard copy forms and instructions can be mailed upon request.

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 Transportation Manager. Under these circumstances, the complainant will be interviewed, and the Transportation Manager will assist the complainant in converting the verbal allegations to writing.

2.3 Procedures for Processing a Complaint

These procedures cover all complaints under Title VI of the Civil Rights Act of 1964, Executive Order 12898 “Federal Actions to Address Environmental Justice in Minority Populations and Low-Income Populations” (1994), and Executive Order 13166 “Improving Access to Services to Persons with Limited English Proficiency” (2000), for alleged discrimination in a program or activity administered by METRO.

The following measures will be taken to resolve Title VI complaints.

COMPLAINT HANDLING PROCEDURES

Within two (2) business days, the Transit Operations Manager will notify the customer that he/she received the complaint and will conduct an investigation. Within the same timeframe, the EEO Officer will be immediately notified of any complaints identified as, or initially believed to be, Title VI.

a. If a complaint is deemed incomplete, additional information will be requested, and the Complainant will be provided thirty (30) business days to submit the required information. Failure to do so may be considered cause for a determination of no investigative merit.

2. FOR GENERAL COMPLAINTS - within ten (10) business days from receipt of a complete complaint, the Transit Operations Manager will complete a written report outlining the investigation’s conclusions and what, if any, resolutions will be implemented.
3. **TITLE VI COMPLAINTS** – within two (2) business days from receipt of a complete complaint, the Transit Operations Manager (or designee in the case of absence) will report the complaint to the EEO Officer who will determine whether the complaint has sufficient merit to warrant additional investigation as an ADA or Title VI complaint. Within three (3) business days from this decision point, the EEO Officer (or designee) will notify the Complainant whether or not a formal Title VI investigation will be pursued.

*If the complaint is deemed to have investigative merit:* A complete investigation will be conducted, and an investigative report will be completed within sixty (60) days from receipt of the complaint. The report will include a narrative description of the incident, summaries of all persons interviewed, a finding with recommendations for remedial steps as appropriate and necessary. The remedial steps, if any, will be implemented as soon as practicable. The Complainant will receive a copy of the final report together with any remedial steps.

*If the decision is not to investigate as a Title VI complaint:* the notification shall specifically state the reason for the decision.

   a. The complainant may appeal the EEO Officer’s decision by making a written request to the General Manager within thirty (30) days of receiving the EEO Officer’s decision.

   b. Upon receiving an appeal, the General Manager will evaluate the appeals request, the original complaint, the facts of the case including the investigation process, conclusions and outcomes. The General Manager’s primary evaluation criteria will include: proper application of Title VI law and regulations, consistent and equitable investigation process, sound judgment and considerations of operational practicality.

   c. The General Manager will respond to the appeal within ten (10) business days.

   d. Complaints may also be filed with the Federal Transit Administration (FTA) no later than 180 days after the date of the alleged discrimination. Complaints to FTA may be submitted to the following office:

   Federal Transit Administration  
   Office of Civil Rights  
   55 Broadway, 9th Floor  
   Cambridge, MA 02142

The EEO Officer will retain all pertinent records of ADA and Title VI complaints for five (5) years. Using MS Excel, MS Access, or other appropriate database tool, the EEO Officer will maintain a summary log of all complaints received for one (1) year. The log shall include the date the complaint was filed, the type of complaint (i.e., General, ADA, Title VI), a summary of the allegations, the status of the complaint, and actions taken by Metro in response to the complaint.

**Attachment B: Policies and Procedures for General, ADA, and Title VI Complaints**

**Attachment C: METRO’s TITLE VI – Log of Complaints and Investigations (2016-2019)**
Sec. 3.0  METRO’S PUBLIC PARTICIPATION PLAN

METRO’s Public Participation Plan has been prepared to ensure that no one is precluded from participating in METRO’s service planning and development process.

3.1  METRO Public Involvement Efforts

METRO uses a variety of proactive methods to gather broad-based public input on its services, standards, and projects.

• **Board of Directors and Board Committee Meetings** – these meetings are open to the public and the meeting location is accessible by transit as well as ADA accessible. Every agenda includes a separate item for public comment. Agendas are posted on the website, at METRO’s main office and at METRO’s transit center. All supporting materials are posted on METRO’s website, along with the agenda. METRO’s new website, launched in July 2018, includes options for riders to subscribe to receive text alerts for meeting agendas, schedule changes, and other updates. The Board and its three committees each meet monthly. The regular meeting dates for the Board and its three committee meetings are established at the beginning of the year and listed on METRO’s website (gpmetro.org) and posted at METRO’s downtown transportation center, allowing the public ample notice for meeting dates.

  The Board’s three committees include Executive, Ridership, and Finance. The Ridership Committee meets monthly, typically the third Thursday, and includes agenda items most impacting riders. Service plans, fares, and budgeting are discussed and decided at Board and Committee meetings. The General Manager and staff, as directed by the General Manager, are available at all meetings. A sign-up sheet is available to record the names of members of the public attending. Members of the general public are invited to speak at the meetings. METRO provides translation services, including American Sign Language, upon request.

• **Targeted Community Workshops** – for service improvements and expansions, METRO holds more focused community workshops. The most recent examples of this were service expansions for the introduction of METRO BREEZ, the express route between Portland, Yarmouth, and Freeport in 2016, and the addition of Brunswick in 2017, as well as the Transit West Expansion Project, which added two new routes to METRO’s transit system.

• **Task Forces and Advisory Committees** – METRO facilitates the assembly of task forces for specific initiatives. Most recently (2015-2017), task forces were formed to guide the development, implementation, and expansion service to Freeport, Yarmouth, and Brunswick. In 2017-2018, an advisory task force was formed to plan METRO’s Transit West Expansion, which included the addition of two new routes and implementation of a U-Pass for students, staff, and faculty attending the University of Southern Maine. Additionally, METRO continues to meet with students and staff and Portland Public
Schools to discuss their partnership program with METRO, which allows high school students to ride METRO’s transit system for their school and other transportation needs. METRO staff and METRO board members facilitate these meetings, which are held two – three times annually. Staff and students from the three participating high schools are encouraged to attend and provide feedback.

- **Online Comment Form** – METRO manages an online comment form on its website to allow members of the public to submit questions, comments, and complaints.

- **E-Mail** - METRO address - info@gpmetro.org - for requests and suggestions.

- **Metropolitan Planning Organization (MPO) Process** – The MPO formally notices and conducts public hearings on behalf of METRO and other regional transportation providers for the purpose of the gathering public comments on the regional program of projects and updates to the Transportation Improvement Program (TIP).

- **Local City/Town Council Meetings** – Each year, the communities of Portland, Westbrook, and Falmouth consider their local contributions as part of their annual budget processes. METRO staff often provides presentations on budget, services, and current/proposed projects at these budget meetings, which are open to the public. METRO added new communities to its service network and, although they are not official members of the transit district, their community leaders are included in this process. The communities of Yarmouth, Freeport, and Brunswick will have the opportunity to join GPTD in 2019.

### 3.2 Public Comment for Fare Increases and Major Service Reductions

Beyond the approaches stated above, METRO will hold additional issue-specific public meetings whenever the agency is considering one or more of the following changes:

- A fare increase or significant change in the method of fare payment.
- A new route is being established.
- An existing route is proposed for elimination.
- Considering the total discontinuance of service on any route or group of routes on any given day when service is currently offered.
- Any system-wide change in service hours that exceeds (plus or minus) 10% of current total service hours.
- Proposed modifications to routes or groups of routes that would affect more than 25% of the riders using the affected routes.
- Proposed schedule changes on any given route or group of routes that reduces the total number of one-way bus trips by more than 25% of the current number of bus trips.
- For minor schedule and service changes not rising to the level of those above, METRO will post notices on appropriate buses and stops thirty (30) days in advance of the change date.
The approval process for any of these changes will take the following form:

Step 1 - Internal staff review based on documented need, professional judgment, public request.

Step 2 - Preliminary review of proposed changes by one or more committees of the Board of Directors.

Step 3 - Preliminary review by full Board of Directors.

Step 4 – Public input process commences using public meetings and other approaches to gather broad-based feedback including surveys, presentations to stakeholder groups and organizations, and public presentations to city/town councils or other public bodies (e.g., planning boards, and council committees).

Step 5 - Public input along with final recommendations communicated to the METRO Board of Directors.

Attachment D – Policy and Procedures for Soliciting and Considering Public Comment on Fare Increases and Major Service Reductions.

Per this policy, meetings are held in communities along METRO service routes, with at least one held on a weekday evening and one on a Saturday. Meetings are always held at a location that is transit and ADA accessible.

Alerting the public to these meetings includes the following outreach tactics:

- Formal notice in one or more local newspaper(s)
- Brochures on board all buses
- Brochures/posters posted at METRO’s transit center
- Facebook posts and other social media outlets.
- Notices on METRO’s website and websites of member communities
- Newsletter distribution and e-mail blasts to numerous community organizations, stakeholders, and residents who have asked to be on METRO’s e-mail distribution list, including subscribers to METRO’s website new alerts.
3.3 Public Transit-Human Services Transportation

METRO participates in the local public transit-human services transportation coordinated planning effort. To be eligible for Section 5310, 5316, or 5317 funds administered by the State, projects must be in the local plan. Through our participation in the planning efforts, we regularly meet with representatives of human service agencies to discuss the transportation needs of elderly persons, persons with disabilities, low income, and LEP persons to ensure our current or planned services meet the needs of these individuals. In addition, METRO participates in Greater Portland Council of Governments (GPCOG) outreach activities that support outreach efforts to low income, LEP, and senior populations.

3.4 Transportation Improvement Program (TIP) Public Involvement Process

The public involvement process for the Transportation Improvement Program (TIP) provides the public another opportunity to participate in METRO’s transportation planning efforts. This effort is led by the Portland Area Comprehensive Transportation System (PACTS) and Metropolitan Planning Organization (MPO). PACTS has a written public involvement plan and an approved Title VI Plan. Strategies used by PACTS to inform and involve the public in transportation planning efforts include:

- Website, news releases to local media, and public notices distributed to interested parties by email;
- Workshops and forums;
- Public opinion surveys;
- Presentations to civic and professional groups;
- Outreach to stakeholder organizations; and
- Convening the Transportation & Community Well-Being Network

In 2017, GPCOG and PACTS launched the Transportation & Community Well-Being Network, which meets monthly. This “mobility management” network brings together key stakeholders to share information and work together on improving transportation access and options for people who experience barriers. The network includes representatives from human services, health care, transportation, aging, disability, and representatives from populations that frequently experience transportation barriers. The Network provides a venue for coordination and information sharing and includes over ninety (90) interested parties including METRO.

SEC. 4.0 LANGUAGE ASSISTANCE PLAN

4.1 Four-Factor Analysis

In order to ensure meaningful access to programs and activities, METRO conducted the four-factor analysis and based on the results of the analysis, developed a language assistance plan to aid efforts in reaching persons with Limited English Proficiency (LEP).
METRO analyzed the following four factors:

- The number and proportion of LEP persons served or encountered in the eligible service population;
- The frequency with which LEP individuals come into contact with METRO services and programs;
- The nature and importance of the program, activity, or service provided by our program;
- The resources available to the recipient and costs.

Factor 1: Number and Proportion of LEP Persons Served or Encountered

The first step in determining components of an LEP Plan is understanding the proportion of LEP persons who may encounter and use METRO's services, their literacy skills in English and their native language, and the location of their communities and neighborhoods.

Across the seven service areas covered by METRO, the data indicates a total population of 168,159. Within the population, 16,166 are estimated to speak another language at home (9.6%) other than English. Within this population, 6,446 (3.8%) are estimated to speak English “less than very well. Table 1 illustrates this distribution by municipality.

Table 1: Proportion of Languages other than English by Community:

| Municipality   | Percent Speaking Language other than English | Percent Speaking English less than "very well"
<table>
<thead>
<tr>
<th></th>
<th></th>
<th></th>
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<tbody>
<tr>
<td>Falmouth</td>
<td>5.5%</td>
<td>1.2%</td>
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<tr>
<td>Freeport</td>
<td>5.7%</td>
<td>0.6%</td>
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<td>Gorham</td>
<td>2.7%</td>
<td>0.3%</td>
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<td>Portland</td>
<td>15.1%</td>
<td>7.2%</td>
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<tr>
<td>South Portland</td>
<td>8.0%</td>
<td>3.0%</td>
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<tr>
<td>Westbrook</td>
<td>9.1%</td>
<td>3.4%</td>
</tr>
<tr>
<td>Yarmouth</td>
<td>3.6%</td>
<td>0.4%</td>
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</table>

Source: 2013-2017 American Community Survey 5-yr Estimate
DP02 Selected Social Characteristics in the United States
Table 2: Top Population Groups with Highest Proportions of Individuals over 5 years of Age.

<table>
<thead>
<tr>
<th>Location</th>
<th>Total Population (over age 5)</th>
<th>Pop. Speaking Language other than English</th>
<th>Other Indo-European languages</th>
<th>Asian and Pacific Islander languages</th>
<th>Other languages</th>
</tr>
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<tbody>
<tr>
<td>Brunswick</td>
<td>19,745</td>
<td>1,296</td>
<td>680</td>
<td>292</td>
<td>18</td>
</tr>
<tr>
<td>Falmouth</td>
<td>11,358</td>
<td>630</td>
<td>324</td>
<td>271</td>
<td>8</td>
</tr>
<tr>
<td>Freeport</td>
<td>7,789</td>
<td>444</td>
<td>353</td>
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<td>Gorham</td>
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<td>429</td>
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<td>Portland South</td>
<td>63,160</td>
<td>9,557</td>
<td>3160</td>
<td>1941</td>
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<tr>
<td>Portland North</td>
<td>24,527</td>
<td>1,958</td>
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<td>467</td>
<td>193</td>
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<tr>
<td>Westbrook</td>
<td>17,151</td>
<td>1,554</td>
<td>762</td>
<td>57</td>
<td>473</td>
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<tr>
<td>Yarmouth</td>
<td>8,272</td>
<td>298</td>
<td>245</td>
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<tr>
<td>Service Area</td>
<td>168,159</td>
<td>16,166</td>
<td>6,680</td>
<td>3,117</td>
<td>3,701</td>
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Source: 2013-2017 American Community Survey 5-yr Estimate
DP02 Selected Social Characteristic in the United States

Table 2: Languages Spoken at Home Other Than English

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<th>Total Population (over age 5)</th>
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Source: 2013-2017 American Community Survey 5-yr Estimate
DP02 Selected Social Characteristic in the United States

Table 2: Languages Spoken at Home Other Than English and Speak English "Less than Very Well"

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<td>353</td>
<td>36</td>
<td>1</td>
</tr>
<tr>
<td>Gorham</td>
<td>16,157</td>
<td>429</td>
<td>198</td>
<td>30</td>
<td>53</td>
</tr>
<tr>
<td>Portland South</td>
<td>63,160</td>
<td>9,557</td>
<td>3160</td>
<td>1941</td>
<td>2925</td>
</tr>
<tr>
<td>Portland North</td>
<td>24,527</td>
<td>1,958</td>
<td>958</td>
<td>467</td>
<td>193</td>
</tr>
<tr>
<td>Westbrook</td>
<td>17,151</td>
<td>1,554</td>
<td>762</td>
<td>57</td>
<td>473</td>
</tr>
<tr>
<td>Yarmouth</td>
<td>8,272</td>
<td>298</td>
<td>245</td>
<td>23</td>
<td>30</td>
</tr>
<tr>
<td>Service Area</td>
<td>168,159</td>
<td>16,166</td>
<td>6,680</td>
<td>3,117</td>
<td>3,701</td>
</tr>
</tbody>
</table>

Source: 2013-2017 American Community Survey 5-yr Estimate
DP02 Selected Social Characteristic in the United States
Table 2 shows census data and identifies four (4) main language classifications. The top table shows the breakdown of the four main language classifications by municipality. The bottom one shows the same breakdown, but the difference is it shows people who speak that language at home AND speak English “less than very well.”

This most recent census data does not break down individual languages. The Census Bureau collapses the languages into more manageable categories for tabulations. The original language categories were developed following the 1970 Census and were based generally on Classification and Index of the World’s Languages (Voegelin, C.F. and F.M., 1977). In the American Community Survey, the language categories have been updated, with the latest revision occurring in 2016. In 2016, linguistic classifications were based generally on the hierarchies in Ethnologue: Languages of the World, 19th Edition (Simons, G.F. and C.D. Fennig (eds.), 2016). The determination of whether to show an individual language or collapse it into an aggregated category depends chiefly on the size of the population in the United States speaking that language at home. In tabulations, smaller languages are aggregated with other languages in a way that meets a certain population threshold, but has some utility for translators or researchers.

The simplest collapse recodes languages other than English into four major language groups: Spanish, Other Indo-European languages, Asian and Pacific Island languages, and Other languages.

As Table 2 indicates, the largest language category of LEP persons is Indo-European; followed by “Other Languages,” and Asian and Pacific Islander languages. Because the US Census Bureau data does not break down this category into actual languages, METRO staff examined data provided by Portland Public Schools to gain additional information on the extent and proportionality of different languages.

Table 3, below, lists languages spoken at the Portland Public Schools, indicating that the top languages, other than English, within the Portland Public School System are Somali, followed by Arabic, French, Portuguese, and Spanish. The chart above also lists ‘other languages’ spoken at Portland Public Schools. The full list, which further breaks down the list of languages, includes 67 world languages spoken by 2,317 students, which is 33.9% of the student population.
Community Partner Survey:
To assist in breaking down the language categories, METRO staff asked community partners to assess the extent to which they come into contact with LEP populations. Additional information was received from Portland Public Schools along with the Greater Portland Immigrant Welcome Center and Catholic Charities (RIS Service).

Table 4: Community Organizations in Service Area:

<table>
<thead>
<tr>
<th>Portland Public Schools</th>
<th>Greater Portland Immigrant Welcome Center</th>
<th>Catholic Charities (RIS Program)</th>
</tr>
</thead>
<tbody>
<tr>
<td>Portland Public Schools provides translations for these languages (in order): Somali, French, Arabic, Portuguese, Spanish, Vietnamese, Khmer, Acholi</td>
<td>The Greater Portland Immigrant Welcome Center opened in July 2017 to serve as a hub of collaboration that strengthens the immigrant community through language acquisition, economic integration, and civic engagement. The Center doesn’t have official records of usage; however, based on visitors signing in to use their resources, individuals who speak Portuguese is the top language using their services, followed by French. Additionally, the Center’s Director also suggested Spanish should be considered as a top language since the Spanish speaking population is possibly more likely to be undocumented and not included in the census.</td>
<td>Maine’s only refugee resettlement program, Catholic Charities Maine Refugee and Immigration Services (RIS) is dedicated to helping those seeking a new life in America become independent, productive members of our community. Since they work specifically with new arrivals, they don’t have an accurate count of overall language populations; however, based on their intake information, the top languages they encounter are French, Arabic, Swahili, Kinyarwanda, and Somali</td>
</tr>
</tbody>
</table>

Factor 2 – Frequency of LEP Use/Contact with METRO Service
There are a number of places where METRO riders and members of the LEP population can come into contact with METRO services including riding the bus, calls to and direct contact with customer service representatives, and outreach materials and orientation events.

Major points of contact include:
- Using bus service (on board signage, announcements, and driver language skills);
- Communication with customer service staff (phone, email, website, in person);
- Printed and online materials;
- Website and Social Media;
- Local news media including print and radio;
- Public meetings and orientation events.
Bus Rider Survey (Conducted in February 2019)
In addition to census data, employee surveys, and outreach to community partners, METRO also surveyed bus riders in person. More than 550 riders were surveyed at METRO’s downtown Portland Transportation Center and on-board buses. The on-board surveys were conducted at different times throughout the day, ranging from 8 a.m. – 6:30 p.m.

As part of a larger survey about fare payment options, one question asked what was the primary language spoken in their household. When bus passengers were asked what language they spoke, fewer than five respondents answered that English was not the primary language spoken at home. Several others did not provide an answer to this question.

Employee Survey (Conducted in February 2019)
To better understand the frequency with which LEP riders come into contact with METRO services, METRO surveyed its staff, including bus operators and customer service staff. The survey asked what language skills already exist among employees and the number and nature of encounters with riders or other community members where language is a barrier.

The first question asked employees if they can communicate in a language other than English, and, if so, what language or languages. Of the 63 out of 100 employees who responded to the survey, a very small percentage of the employees participating could speak one or more languages other than English.

Table 5: Staff Language Abilities

<table>
<thead>
<tr>
<th>Language</th>
<th>Ability: Fluent</th>
<th>Ability: Limited</th>
</tr>
</thead>
<tbody>
<tr>
<td>French</td>
<td></td>
<td>1</td>
</tr>
<tr>
<td>Spanish</td>
<td></td>
<td>3</td>
</tr>
<tr>
<td>ASL</td>
<td>1</td>
<td>1</td>
</tr>
<tr>
<td>Arabic</td>
<td>1</td>
<td></td>
</tr>
<tr>
<td>Danish</td>
<td>1</td>
<td></td>
</tr>
<tr>
<td>German</td>
<td>1</td>
<td></td>
</tr>
<tr>
<td>Swedish</td>
<td>1</td>
<td></td>
</tr>
</tbody>
</table>

The second question asked employees what languages they encountered within the last year and the frequency.
Table 6: Languages Encountered by METRO Staff

<table>
<thead>
<tr>
<th>Language</th>
<th>Daily</th>
<th>Weekly</th>
<th>Monthly</th>
<th>Less than Monthly</th>
<th>Not Specified</th>
</tr>
</thead>
<tbody>
<tr>
<td>African (unspecified)</td>
<td>2</td>
<td>3</td>
<td>1</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Arabic</td>
<td></td>
<td>1</td>
<td>2</td>
<td></td>
<td></td>
</tr>
<tr>
<td>ASL</td>
<td></td>
<td>1</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Chinese</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td>1</td>
</tr>
<tr>
<td>Creole</td>
<td>1</td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Farsi</td>
<td>1</td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>French</td>
<td>13</td>
<td>1</td>
<td>3</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Portuguese</td>
<td>3</td>
<td>1</td>
<td>1</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Russian / Eastern European</td>
<td>1</td>
<td></td>
<td>1</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Somali</td>
<td>1</td>
<td>1</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Spanish</td>
<td>3</td>
<td></td>
<td>2</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Swahili</td>
<td>1</td>
<td></td>
<td></td>
<td></td>
<td>1</td>
</tr>
<tr>
<td>Unknown</td>
<td>13</td>
<td>10</td>
<td>3</td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

The third question asked employees what type of needs or requests for assistance have been received from LEP customers. Those responses included:

- Understanding time schedules.
- Where are stops located?
- Directions and routes
- Fare Collection – various questions around types of tickets, reduced fare, etc.
- Clarification around number of kids under 5 who can ride with an adult
- Am I on the right bus? How do I get to my destination? (majority)
- Information about baby strollers blocking the aisle
- Lost and found
- Employment applications

Factor 3 – The Importance of LEP Services to People’s Lives

The transit service provided by METRO is a critical public service that many members of the community use and rely on. Many depend on METRO services – and associated complementary ADA paratransit service – for access to jobs, education, shopping, and healthcare.

Recent surveys conducted in 2011 and 2014 indicated that if public transit were not available, respondents would have to walk, pay for a taxi or other service, or stay home. Past surveys indicated that METRO provides access to seniors, low-income riders, commuters, and students. METRO has developed several programs with schools and colleges to provide easy and accessible transportation.
Those programs include partnerships with:

- The University of Southern Maine (USM). METRO expanded transit service between USM campuses and introduced a new U-Pass program for students, staff, and faculty to use the transit system.

- Southern Maine Community College (SMCC). METRO and SMCC have partnered for several years, providing free transportation to students.

- METRO partnered with Portland Public Schools in 2015 and continues to work with the school system to provide transportation for all high school students. METRO estimates that approximately 600 students use METRO services per weekday. Using LEP percentages, that would approximate to 162 LEP students. Future plans may include the expansion of this program for younger students.

When limited English proficiency is a barrier to using METRO, this can be a barrier to employment, education, healthcare, and other life necessities. Critical information from METRO which can affect access includes:

- Route and schedule information
- Fare and payment information
- Information on using the transit system
- Service Alerts and announcements
- Complaints and Comment forms
- Announcements related to public meetings
- Information about ADA complementary service
- Emergency communications

METRO continues to update these materials as appropriate.

**Factor 4 – Resources Available and Costs for LEP Outreach**

METRO has committed resources to improving access to its services and programs for LEP persons. METRO employs a Director of Marketing and Community Outreach who manages the agency’s LEP outreach efforts and has implemented the following measures to reach LEP populations:
• METRO has contracted a third-party translation service to provide translation services over the phone on an on-call basis. The costs of the service are covered through our marketing budget.

• Pictorials in the Greater Portland Transit Guide (at right) – the guide includes a pictorial “How to Ride” Guide with step-by-step instructions using photos on riding the bus. This pictorial is used for bus ride orientations for LEP persons.

• METRO also has a new website that sends text alerts regarding meetings, schedule updates, and other service information to riders, and employs Google Translate so that LEP persons can access service, fare, and other information on the website.

• Coordination with Community Organizations, include:

  Catholic Charities (RIS): METRO’s staff presents a half hour program and distributes the Greater Portland Transit Guide and free bus passes through this translator-assisted orientation program.

  Immigrant Welcome Center: This new resource for the Greater Portland Region serves as a hub of collaboration providing resources and information to the immigrant community. METRO staff is developing contacts within the Welcome Center to offer support, provide insight, and help communicate information to LEP persons on METRO opportunities.

• Website Translation – METRO maintains an extensive website that presents schedules; fares; route, service and weather updates; services and programs; board meetings; board members; contact information; and Title VI notification. METRO uses Google Translate for its website to translate website information into more than fifty (50) languages and is looking into additional options that might be available.

• On Request Oral Translation – Upon request, METRO provides translation services, including American Sign Language, at its administrative office and at public meetings, including Board and Committee meetings. METRO has also contracted with an interpreter service to provide service via phone or in person upon request.
New Approaches

Based on the results of the four-factor analysis, METRO will advance activities to reach LEP persons and plan to add two languages for translation of vital documents within the next year.

Translation of Vital Documents – In 2016, vital documents were translated into Arabic, French, and Somali. These languages were identified for translation based on the four-factor analysis and these considerations:

According to the Safe Harbor Provisions, written translation of vital documents is called for when a language group makes up at least 5% or 1,000 persons (whichever is less) of the total population. Based on the four-factor analysis, no single language met the thresholds established in the Safe Harbor Provision. However, as the US Census Bureau data from 2014 indicated, “African Languages” are spoken by over 1,400 residents across METRO’s service area who also reported that they speak English “less than very well.”

The census data did not further break down African Language; however, data from the region’s public schools, community organizations, and METRO’s survey efforts indicated that Somali is the most prevalent of the African languages. With 731 students speaking Somali in the Portland Public School system, it is likely that the general Somali population exceeds 1,000 persons living in the service area.

Arabic and French are among the most prevalent languages in METRO’s service area in their own right, but each by themselves would not meet the Safe Harbor Provision thresholds. However, Arabic and French are also prevalent languages on the African continent. METRO consulted with a local community leader representing the immigrant community and it was suggested that translating transit material into Arabic and French, in addition to Somali, would effectively reach most of the community.

Based on updated 2018/2019 statistics received from Portland Public Schools, Somali, Arabic, and French are still the top three languages, other than English spoken in our region. Additional input from Portland Public Schools, The Immigrant Welcome Center, City of Portland, and Greater Portland Council of Government staffs recommend adding Portuguese and Spanish translations to vital documents. While these languages may not meet “Safe Harbor” provisions, they are included in the five top languages in the Greater Portland region.

Vital Documents:
- ADA overview and application
- Reduced fare information and application
- How to Ride Guide including fare information
- Title VI brochure
- Title VI complaint form
- General complaint Form
Of the four major language groups created by the most recent Census breakdown, the further breakdown of languages included for translations as part of METRO’s vital documents are part of these categories:

- Spanish
- Other Indo-European languages – French and Portuguese
- Asian and Pacific Island languages
- Other languages – Somali, Arabic

(additional information: https://www.census.gov/topics/population/language-use/about.html)

Posters with Information in Multiple Languages – METRO created multi-lingual posters that provide information on how to access language assistance when engaging with METRO. The poster contains statements and directions in the following languages, which were identified based on the four-factor analysis in 2016: Arabic, English, French, and Somali. The posters are displayed at METRO’s Elm Street Transit Center and have been made available to the region’s public schools, housing authorities, Maine’s Department of Health and Human Services facility, City/town halls, and community centers and that serve immigrant populations. This information is also included in METRO’s Greater Portland Transit Guide, which is accessible on METRO’s website, distributed at orientations, and widely available for METRO riders. Additional languages of Portuguese and Spanish will be added to these posters.

Expanded Partnership and new public awareness campaign with Portland Public Schools

Through a partnership that began in 2015, Portland’s high school students use METRO transit services extensively and also represent diverse nationalities, races, and languages. Portland Public Schools has a Multilingual and Multicultural Center that accommodates the unique needs of immigrant and refugee families in Portland by providing a centralized system of student registration to ensure data information accuracy. They also provide outreach and services for limited English-speaking parents in the Portland Public Schools. METRO staff works with Portland Public Schools on conducting surveys and providing LEP materials for students using the transit system. In addition, METRO staff and Board work with PPS staff and students to improve communications and respond to the needs of students when possible.

As a result of student feedback, METRO implemented a multi-tiered safety and anti-harassment program targeting not only students but all passengers, that included:
• Strengthening METRO’s Passenger Code of Conduct to include stronger language around prohibiting and preventing harassment;

• Additional bus operator training around safety, detection of harassers, and intervention procedures.

• “Expect Respect” campaign provides communication options, including the introduction of a texting option, for riders to report harassment. These materials, which also remind riders that all buses have video and audio surveillance, are posted on buses, and distributed at orientation, school, and METRO events. METRO staff encourages student involvement opportunities.

Sec. 5.0 DECISION-MAKING BODIES

Decisions regarding policy, service changes, fares, operations, and capital programs are made by a municipally appointment board of directors. METRO has a governing board of ten (10) members, as provided by statute. The mayors of Portland and Westbrook and Town Manager of Falmouth appoint five, three, and two members, respectively.

Currently, nine (9) members are Caucasian and one is African American. METRO also has three committees – Executive, Finance, and Ridership - comprised of board members. The public is invited to attend these monthly meetings, and public comment is welcome. METRO also forms task force groups around partnerships and programs to help guide decisions around routes, schedules, and other operations. The below chart lists board and other committees and their racial breakdown.

Table 7: Breakdown of Board-Committee Members by Race.

<table>
<thead>
<tr>
<th>Board, Committee, or Task Force</th>
<th>Caucasian</th>
<th>Latin</th>
<th>African American</th>
<th>Asian American</th>
<th>Native American</th>
</tr>
</thead>
<tbody>
<tr>
<td>METRO Board of Directors</td>
<td>9</td>
<td>0</td>
<td>1</td>
<td>0</td>
<td>0</td>
</tr>
<tr>
<td>Finance Committee</td>
<td>4</td>
<td>0</td>
<td>0</td>
<td>0</td>
<td>0</td>
</tr>
<tr>
<td>Executive Committee</td>
<td>4</td>
<td>0</td>
<td>0</td>
<td>0</td>
<td>0</td>
</tr>
<tr>
<td>Ridership Committee</td>
<td>4</td>
<td>0</td>
<td>1</td>
<td>0</td>
<td>0</td>
</tr>
<tr>
<td>Transit West Advisory Committee*</td>
<td>20</td>
<td>0</td>
<td>0</td>
<td>0</td>
<td>0</td>
</tr>
<tr>
<td>Portland Schools Advisory Comm. *</td>
<td>6</td>
<td>0</td>
<td>1</td>
<td>0</td>
<td>0</td>
</tr>
</tbody>
</table>

*These committee are no longer active. Transit West Committee – 2017/2018 | Portland Schools Advisory Committee – 2017/2018
Sec. 6.0 SERVICE STANDARDS AND POLICIES

METRO has developed quantifiable service standards and policies. These standards have been updated and will be presented at a public information session in February and March 2019. Staff will review and discuss these standards. The Board’s Ridership Committee will be asked to review and provide input on these standards and policies which will then be voted on by METRO’s Board of Directors in March 2019:

These service standards include:
- Vehicle Load
- Headways (Frequencies)
- On-time performance
- Service Availability Standards
- Vehicle Assignments
- Transit Amenities

6.1 Vehicle Load Standards

As shown in Table 8, METRO has adopted these load factors. The Preferred Load category equals 1.5 times the seated capacity. In general, METRO staff assigns larger equipment to higher ridership routes.

Table 8: Vehicle Load Standards by Bus Type

<table>
<thead>
<tr>
<th>Vehicle Type</th>
<th>Seated Capacity (SC)</th>
<th>Standing Capacity (1.5 x SC)</th>
<th>Total Capacity</th>
<th>Maximum Load (2 x SC)</th>
</tr>
</thead>
<tbody>
<tr>
<td>2004 HD Transit Bus</td>
<td>35</td>
<td>17</td>
<td>52</td>
<td>70</td>
</tr>
<tr>
<td>2005 HD Transit Bus</td>
<td>33</td>
<td>17</td>
<td>50</td>
<td>66</td>
</tr>
<tr>
<td>2011 HD Transit Bus</td>
<td>31</td>
<td>16</td>
<td>47</td>
<td>62</td>
</tr>
<tr>
<td>2014 HD Transit Bus</td>
<td>31</td>
<td>16</td>
<td>47</td>
<td>62</td>
</tr>
<tr>
<td>2016 Cutaway Bus</td>
<td>18</td>
<td>7</td>
<td>25</td>
<td>36</td>
</tr>
<tr>
<td>2017 Cutaway Bus</td>
<td>18</td>
<td>7</td>
<td>25</td>
<td>36</td>
</tr>
<tr>
<td>2018 HD Transit Bus</td>
<td>39</td>
<td>20</td>
<td>59</td>
<td>78</td>
</tr>
</tbody>
</table>

METRO relies on Automatic Passenger Counts and information received from fare boxes in addition to METRO street supervisors’ reports and driver and passenger feedback. If circumstances warrant, METRO will conduct an on/off survey of a specific route outside the normal survey cycle.
6.2 Vehicle Headway Standards
METRO’s general vehicle headway standard is to provide headways on all local routes that are 60 minutes or better. Among METRO’s network of nine (9) bus routes, there is headway variation as a result of ridership demand and the constraints of municipal budgets.

METRO’s proposed long-term headway goals include:

- Weekday Peak Period (6-9am and 3-7pm) – 15-minute headways
- Weekday Off-Peak Periods (midday, evening) – 30-minute headways
- Saturdays – 30-minute headways
- Sunday/Holidays – 30-60-minute headways

Table 9: Current Headways

<table>
<thead>
<tr>
<th>Route Name/Number</th>
<th>Service Type</th>
<th>Weekday Peak</th>
<th>Weekday Off Peak</th>
<th>Saturday</th>
<th>Sunday</th>
</tr>
</thead>
<tbody>
<tr>
<td>Route 1 Congress Street</td>
<td>Linear Regional Fixed Route</td>
<td>30 min</td>
<td>30 min</td>
<td>30 min</td>
<td>60 min</td>
</tr>
<tr>
<td>Route 2 Forest Ave</td>
<td>Linear Regional Fixed Route</td>
<td>20-25 min</td>
<td>20-25 min</td>
<td>60 min</td>
<td>60 min</td>
</tr>
<tr>
<td>Route 3 Crosstown</td>
<td>Linear Regional Fixed Route</td>
<td>30 min</td>
<td>30 min</td>
<td>60 min</td>
<td>60 min</td>
</tr>
<tr>
<td>Route 4 Westbrook</td>
<td>Linear Regional Fixed Route</td>
<td>30 min</td>
<td>30 min</td>
<td>30 min</td>
<td>45 min</td>
</tr>
<tr>
<td>Route 5 Maine Mall</td>
<td>Linear Regional Fixed Route</td>
<td>25-35 min</td>
<td>25-35 min</td>
<td>30 min</td>
<td>45 min</td>
</tr>
<tr>
<td>Route 7 Falmouth</td>
<td>Linear Regional Fixed Route</td>
<td>60 min</td>
<td>60 min</td>
<td>60 min</td>
<td>60 min</td>
</tr>
<tr>
<td>Route 8 Peninsula Loop</td>
<td>Urban Circulator</td>
<td>30-35 min</td>
<td>30-35 min</td>
<td>60 min</td>
<td>60 min</td>
</tr>
<tr>
<td>Route 9A/B North Deering</td>
<td>Linear Regional Fixed Route</td>
<td>30 min</td>
<td>60 min</td>
<td>60 min</td>
<td>60 min</td>
</tr>
<tr>
<td>Husky Line P-W-G / USM</td>
<td>Limited Stop</td>
<td>30 min</td>
<td>30 min</td>
<td>45 min</td>
<td>45 min</td>
</tr>
<tr>
<td>BREEZ</td>
<td>Express</td>
<td>30-60 min</td>
<td>120</td>
<td>150</td>
<td>N/A</td>
</tr>
</tbody>
</table>

6.3 On-time Performance Standards
Among the most important service standards for riders is on-time performance or adherence to published schedules.

- A vehicle is considered on time if it departs a scheduled time point no more than zero (0) minutes early and no more than five (5) minutes late.
- METRO’s on-time performance standard is 90% or greater at both route and system levels.
6.4 Service Availability Policies
At the present time, geographical and budgetary challenges prevent METRO from setting a standard whereby x percent of all residents in the service area are within y distance of public transit service. However, the agency will conduct planning and goal-setting activities with the public and Board of Directors to develop and adopt a policy goal.

6.5 Vehicle Assignment Policy
With the exception of METRO’s Husky Line and BREEZ express routes*, vehicles are not assigned to specific routes and are circulated throughout the system based on ridership demand and operational or geographic limitations. Within these constraints, METRO’s dispatchers and operations managers are trained to deploy vehicles as evenly as possible throughout the system.

*The Husky Line service is open to the general public, but operates with funding from the University of Southern Maine (USM) to transport students between campuses in Portland and Gorham. The five (5) buses on this route are branded with a Husky, the USM mascot, and only service this route. The four (4) METRO BREEZ buses are specifically branded for the express service between Portland, Yarmouth, Freeport, and Brunswick.

6.6 Transit Amenities Policy
- **Bus Stops** – METRO provides approximately 450 bus stops across its service area, which includes Brunswick, Falmouth, Freeport, Gorham, Portland, South Portland, Westbrook, and Yarmouth. Bus stops are ¼ mile apart along most corridors and route segments and 1/8 mile apart in higher density urban environments. Requests for bus stop sites which deviate from this policy – particularly route deviations - are evaluated on a case-by-case basis based on matters of potential ridership demand, timing and impact to the schedule, mileage, impacts to travel-time of the base route, and costs and resources.

- **Bus Shelters** – As of March 2019, METRO has 40 bus shelters, at least half of which have been installed within the last two years. Current and future shelters are placed at locations that demonstrate higher ridership volume, serve as major transfer points and/or destinations, and where space and property easements are available.

- **Transit Center** – METRO’s Downtown Transportation Center is centrally located on the Portland Peninsula on Elm Street at Congress Street. The center provides exterior weather protection and an indoor heated/air-conditioned waiting area. The waiting area is accessible to persons with disabilities, has benches and trash cans, and displays system maps and bus schedules. All of METRO’s routes, except Route #3, serve the Downtown Transportation Center, which is open weekdays from 7 a.m. to 7 p.m. and Saturdays from 9 a.m. to 4:30 p.m.

- **Route and Schedule Information** – METRO distributes individual printed route and schedule information – along with a comprehensive Transit Guide brochure that includes systemwide route maps, schedules, and a “learn to ride” guide using visual cues --- at the
Downtown Transportation Center, (METRO Pulse), on buses, our administrative office, and locations throughout the region such as municipal buildings, supermarkets, hotels, bus stations, the airport, and train station. Route maps and schedules can be downloaded and printed from our website at gpmetro.org.

- **Real-time Bus Arrival Information** — In 2016, METRO deployed a “next bus” real time ITS technology. Each bus stop is assigned an identification number. Using mobile phones, passengers can text the bus stop number METRO to find out when the next bus is due. Also, passengers will be able to obtain the information via the internet and will be able to view the location of all buses.

- **Wi-FI** — All METRO buses have free wi-fi available for riders to access.

- **New Buses, New Branding** — METRO updated its branding and logo in 2018, adding eleven (11) new HD buses to its fleet. The new buses add capacity for bikes and wheelchairs.

- **Metro Bus Garage** — The bus storage garage is located next to the District headquarters on Valley Street in a light industrial area away from residential neighborhoods.

### 6.7 Monitoring Service Standards

For ongoing monitoring and measurement of service standards and policies, METRO proposes to use the following schedules and methods:

<table>
<thead>
<tr>
<th>Service Standard/Policy</th>
<th>Evaluation Frequency</th>
<th>Methodology</th>
</tr>
</thead>
<tbody>
<tr>
<td>Vehicle Load</td>
<td>Semi-annually</td>
<td>Automatic Passenger Counts/Fare Collection</td>
</tr>
<tr>
<td>Vehicle Headways</td>
<td>Annually</td>
<td>Schedule review compared to adopted</td>
</tr>
<tr>
<td>On-Time Performance</td>
<td>Monthly</td>
<td>Automatic Vehicle Locator (AVL)</td>
</tr>
<tr>
<td>Service Availability</td>
<td>Annually</td>
<td>Geographic Information System</td>
</tr>
<tr>
<td>Vehicle Assignments</td>
<td>Quarterly</td>
<td>Automatic Vehicle Locator (AVL)</td>
</tr>
<tr>
<td>Transit Amenities</td>
<td>Annually and with deployment of new amenities</td>
<td>System wide Review</td>
</tr>
</tbody>
</table>
6.8 Construction Equity Analysis
Over the past three years, METRO did not plan for the construction of any new facilities. When METRO plans to construct or expand a facility, such as a vehicle storage facility, maintenance facility, transit hub, or operation center, the agency will include a copy of the Title VI Equity Analysis conducted during the planning stage with regard to the location of the facility. The following principles will be applied in the analysis:

1. To avoid, minimize, or mitigate disproportionately high and adverse human health and environmental effects, including social and economic effects, on minority populations and low-income populations;
2. To ensure the full and fair participation by all potentially affected communities in the transportation decision-making process; and
3. To prevent the denial of, reduction in, or significant delay in the receipt of benefits by minority and low-income populations.

METRO will follow federal guidance provided in FTA Circular 4703.1 (August 2012).

Sec. 7.0 PROGRAM SPECIFIC REQUIREMENTS

7.1 Title VI Monitoring
The results of monitoring of service standards as defined in this program may be obtained by contacting METRO staff.

7.2 Subrecipient Compliance
As of this plan’s adoption, METRO does not have any subrecipients.

7.3 Equity Analysis for Facility
During the past three (3) years, METRO has not constructed a vehicle storage, operations, or maintenance facility.

7.4 Demographic Service Profile
Because METRO operates fewer than 50 buses in peak service, a demographic service profile was not prepared for this plan update.

Sec. 8.0 GRANTS, REVIEWS, AND CERTIFICATIONS

8.1 Pending Applications for Financial Assistance
METRO has no pending applications for financial assistance from any federal agency other than the FTA.
82 Pending FTA Grants
METRO has no pending grants at this time.

83 Open FTA Grants
ME900213 Operating Assistance and Capital Maintenance
ME2016003 Expansion Bus Service to Freeport-Yarmouth
ME2016016 Operating Assistance and Capital Maintenance
ME2017007 Northern Service Expansion Phase 2
ME2016017 Regional Bus Shelter/Sign Project
ME2017008 Operating Assistance and Capital Maintenance
ME2018011 Misc. Projects: ADA/Prev Maint/Bus Stop Improvements
ME2018016 Operating Assistance and Capital Maintenance

84 Civil Rights Compliance Reviews in the Past 3 Years
METRO has not been the subject of any such reviews since its 2016 submission.

85 Recent Annual Certifications and Assurances
METRO executed its most recent Certification and Assurances to the FTA and is in the process of executing 2019 certifications and assurances.

86 Previous Triennial Review Findings
METRO’s 2016 Triennial Review resulted in no findings with respect to its Title VI Plan/activities.

Sec. 9.0 CONTACT
For additional information on the Greater Portland Transit District’s Title VI Plan, or its efforts to comply with the Civil Rights Act of 1964 or Executive Order 13166 Improving Access to Services for Persons with Limited English Proficiency, please contact:

Greg Jordan, General Manager/Chief Executive Officer
Greater Portland Transit District
114 Valley Street
Portland, ME 04102
Tel: 207.517.3025
email: gjordan@gpmetro.org
gpmetro.org

Sec. 10.0 BOARD ADOPTION OF POLICY
METRO’s Board of Directors approved the Title VI Program at its March 28, 2019 meeting. A record of the DRAFT minutes is provided as Attachment F.
Complaint Form (combined)  Date __________

<table>
<thead>
<tr>
<th>Section I: Contact Information</th>
</tr>
</thead>
<tbody>
<tr>
<td>Name:</td>
</tr>
<tr>
<td>Address:</td>
</tr>
<tr>
<td>Telephone # where you wish to contacted:</td>
</tr>
<tr>
<td>E-mail address:</td>
</tr>
<tr>
<td>Accessible Format Requirements:</td>
</tr>
<tr>
<td></td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>Section II: Type of Complaint</th>
</tr>
</thead>
<tbody>
<tr>
<td>Type of Complaint (check mark or x):</td>
</tr>
<tr>
<td>1. <strong>General Complaint or Concern:</strong> Bus service, schedule or specific incident. (   )</td>
</tr>
<tr>
<td>2. <strong>Civil Rights / Title VI Complaint:</strong> Discrimination based on race, color or national origin: (   )</td>
</tr>
<tr>
<td>3. <strong>ADA Discrimination:</strong> Discrimination based on a disability. (   )</td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>Are you filing this complaint on your own behalf?</th>
<th>Yes</th>
<th>No</th>
</tr>
</thead>
<tbody>
<tr>
<td>If not, please supply the name and relationship of the person for whom you are complaining:</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Please explain why you have filed for a third party?</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Please confirm that you have obtained the permission of the aggrieved party if you are filing on behalf of a third party:</td>
<td>Yes</td>
<td>No</td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>Section III: Details of Complaint or Incident</th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>1. General Complaint, Concern or Incident:</strong></td>
</tr>
<tr>
<td>Date of incident: (Month, Day, Year):__________ Time __________ AM  PM</td>
</tr>
<tr>
<td>Bus #_________ Route # _________ Inbound / Outbound Driver # or information ___________</td>
</tr>
<tr>
<td>Additional information (location, details, witnesses, illustrations, etc.):</td>
</tr>
</tbody>
</table>
2. **Civil Rights / Title VI Complaint:**
   Discrimination based on (check all that apply):  
   ( ) Race   ( ) Color   ( ) National Origin

   Explain below as clearly as possible what happened and why you believe you were discriminated against. Describe all persons involved. Include name and contact information of person(s) who discriminated against you (if known) as well as names and contact information of witnesses.

3. **ADA Discrimination:** Discrimination based on a disability.
   - Describe all persons who were involved. Include the name and contact information of the person(s) who discriminated against you (if known) as well as the names and contact information of any witnesses.
   - If this complaint is related to equipment or structures (for example: buses or bus stops), please try to be as specific as possible in identifying which vehicle or locations may be creating the situation.
   - Explain below as clearly as possible what happened and why you believe you were or are being discriminated against based on your disability.

   **If more space is needed, please attach an additional sheet to this form.**

---

**Section IV:**
Have you previously filed complaint with this agency?

What type of complaint did you file:

<table>
<thead>
<tr>
<th>ADA</th>
<th>TITLE VI</th>
<th>Other</th>
</tr>
</thead>
<tbody>
<tr>
<td>Yes</td>
<td></td>
<td>No</td>
</tr>
</tbody>
</table>
**Section V:**

Have you filed this complaint with any other Federal, State or local agency, or any Federal or State court?

(    ) Yes  (    ) No

If yes, check all that apply and provide agency or court name:

(    ) Federal Agency: _________________________  (    ) Federal Court: _________________________

(    ) State Agency: _________________________  (    ) State Court: _________________________

(    ) Local Agency: _________________________

Please provide information about a contact person at the agency/court where the complaint was filed:

<table>
<thead>
<tr>
<th>Name:</th>
<th>Title:</th>
<th>Agency:</th>
</tr>
</thead>
<tbody>
<tr>
<td>Address:</td>
<td>Telephone:</td>
<td>E-mail:</td>
</tr>
</tbody>
</table>

**Section VI:**

Name of agency complaint is against:

________________________________________________________________________________________

Contact Person:________________________________________________________________________________________

Title:________________________________________________________________________________________

Telephone Number:________________________________________________________________________________________

E-Mail address:________________________________________________________________________________________

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

Signature and date required below:

________________________________________________________________________________________

Signature                      Date

**Submission Options:** You may submit this form in person at the address below, by mail to the address below or you may scan this completed form along with all supporting materials and e-mail to the individual stated below. This form is also available online at: gpmetrobus.com / Inside METRO/ Policies.

**Transit Operations Manager**
Greater Portland Transit District
114 Valley Street
Portland, ME 04102
tridge@gpmetro.org.
Policies and Procedures for General, ADA and Title VI Complaints

Rev. March 2019

PURPOSE
Ensure that METRO’s customers and the general public are aware of and have ready access to methods to communicate complaints about METRO’s services, infrastructure, projects and policies.

POLICY
METRO will provide a complaint process that meets the following goals:

• Accessible and well-advertised to the general public, to persons with disabilities and to populations covered by the Title VI of the Civil Rights Act of 1964;
• Provides for prompt and equitable resolutions;
• Contains appropriate due process standards;
• Documented internally in accordance with federal requirements.

STAFF RESOURCES
• Lead Staff – Chief Transportation Officer has overall responsibility for implementation.
• Support Staff – Transit Operations Manager, Director of Human Resources, Director of Marketing, Bus Operators, Customer Service Staff.

CUSTOMER INFORMATION
Members of the public who have a general complaint are encouraged to complete the Customer Contact/Complaint Form, but may also contact Metro and submit a complaint by phone, e-mail or in person. This form is attached to this policy as Attachment A.

Individuals who believe they have been the subject of discrimination due to disability (ADA) or race, color or national origin (Title VI) must file a written and signed Customer Contact/Complaint Form up to 180 days from the date of the alleged discrimination. Metro staff will be available to assist with completing the form if needed and can provide forms in accessible formats or provide language assistance.

Individuals can submit their complaint in the following ways:

• Complete the Customer Contact/Complaint Form at gpmetro.org and SUBMIT ONLINE.
• Download the Customer Contact/Complaint Form from METRO’s website, complete form and e-mail to info@gpmetro.org or mail to METRO at 114 Valley Street, Portland, ME 04102.
• Acquire the Customer Contact/Complaint Form from METRO’s offices and submit to Customer Service staff.
• Contact a Metro staff member by phone (207-774-0351) or e-mail (info@gpmetrobus.com) to communicate your complaint and Customer Service Staff will complete the form.
PUBLIC INFORMATION
METRO will ensure access to the complaint process by posting this policy and the related complaint form on its website and having hard copies available at METRO’s transit center and main office. In addition, METRO will update printed materials to reference this process and postings will be placed at METRO’s transit center and main office. METRO staff will conduct (and document) outreach to appropriate groups and organizations. Materials will note that this policy can be made available in accessible formats. METRO’s Director of Marketing shall have direct responsibility for this part of the procedure.

INTERNAL TRAINING
METRO will train bus operators, administrative staff and customer service staff on the availability and implementation of these policies and procedures. METRO’s EEO Director shall have direct responsibility for this part of the procedure.

COMPLAINT HANDLING PROCEDURES
1. Within two (2) business days, the Transit Operations Manager will notify the customer that he/she received the complaint and will conduct an investigation. Within the same timeframe, the General Manager will be immediately notified of any complaints identified as or initially believed to be ADA or Title VI.
   
   a. If a complaint is deemed incomplete, additional information will be requested, and the Complainant will be provided thirty (30) business days to submit the required information. Failure to do so may be considered cause for a determination of no investigative merit.

2. FOR GENERAL COMPLAINTS - within ten (10) business days from receipt of a complete complaint, the Transit Operations Manager will complete a written report outlining the investigation’s conclusions and what, if any, resolutions will be implemented.

3. FOR ADA and TITLE VI COMPLAINTS – within two (2) business days from receipt of a complete complaint, the Transit Operations Manager (or designee in the case of absence) will report the complaint to the EEO Officer who will determine whether the complaint has sufficient merit to warrant additional investigation as an ADA or Title VI complaint. Within three (3) business days from this decision point, the EEO Officer (or designee) will notify the Complainant whether or not a formal ADA or Title VI investigation will be pursued.
   
   If the complaint is deemed to have investigative merit: A complete investigation will be conducted, and an investigative report will be completed within sixty (60) days from receipt of the complaint. The report will include a narrative description of the incident, summaries of all persons interviewed, a finding with recommendations for remedial steps as appropriate and necessary. The remedial steps, if any, will be implemented as soon as practicable. The Complainant will receive a copy of the final report together with any remedial steps.

   If the decision is not to investigate as an ADA or Title VI complaint: the notification shall specifically state the reason for the decision.

   a. The complainant may appeal the EEO Officer’s decision by making a written request to the General Manager within 30 days of receiving the EEO Officer’s decision.
b. Upon receiving an appeal, the General Manager will evaluate the appeals request, the original complaint, the facts of the case including the investigation process, conclusions and outcomes. The General Manager’s primary evaluation criteria will include: proper application of Title VI/ADA law and regulations, consistent and equitable investigation process, sound judgment and considerations of operational practicality.

c. The General Manager will respond to the appeal within ten (10) business days.

d. Complaints may also be filed with the Federal Transit Administration (FTA) no later than 180 days after the date of the alleged discrimination. Complaints to FTA may be submitted to the following office:

Federal Transit Administration  
Office of Civil Rights  
55 Broadway, 9th Floor  
Cambridge, MA 02142.

4. The EEO Officer will retain all pertinent records of ADA and Title VI complaints for five (5) years. Using MS Excel, MS Access or other appropriate database tool, the EEO Officer will maintain a summary log of all complaints received for one (1) year. The log shall include the date the complaint was filed, the type of complaint (i.e., General, ADA, Title VI), a summary of the allegations, the status of the complaint, and actions taken by Metro in response to the complaint.

APPLICABLE RESOURCES

- Customer Contact/Complaint Form
### Title VI Log of Investigations, Lawsuits and Complaints

**April 2016 - March 2019**

<table>
<thead>
<tr>
<th>TYPE</th>
<th>DATE</th>
<th>SUMMARY</th>
<th>STATUS</th>
<th>ACTION(S) TAKEN</th>
</tr>
</thead>
<tbody>
<tr>
<td>Investigations</td>
<td>None.</td>
<td>None.</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Lawsuits</td>
<td>None.</td>
<td>None.</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Complaint</td>
<td>6/2/16</td>
<td>Allegation that metro customer service staff refused to make change for customer based on race.</td>
<td>Closed</td>
<td>Finding of no discrimination. No action taken. Metro's policy had previously changed to not making change at its Elm Street passenger facility and is applied equally.</td>
</tr>
<tr>
<td>Complaint</td>
<td>10/14/16</td>
<td>Allegation of unprofessional conduct by bus operator toward elderly and people of color.</td>
<td>Closed</td>
<td>Unable to investigate. Customer did not provide contact information for necessary follow-up contact.</td>
</tr>
<tr>
<td>Complaint</td>
<td>1/13/17</td>
<td>Allegation of unprofessional conduct based on race by bus operator.</td>
<td>Closed</td>
<td>Unable to investigate. Customer did not provide contact information for necessary follow-up contact. Initial investigation could not adequately identify employee.</td>
</tr>
<tr>
<td>Complaint</td>
<td>7/20/17</td>
<td>Allegation of refusal of service based on race by bus operator.</td>
<td>Closed</td>
<td>Finding of no discrimination. No action taken. Driver acted properly. Complainant was at a bus stop not served by the Breez.</td>
</tr>
<tr>
<td>Complaint</td>
<td>8/5/17</td>
<td>Allegation of unprofessional conduct based on national origin by bus operator.</td>
<td>Closed</td>
<td>Finding of no discrimination. However, employee counseled on cultural sensitivity and professional conduct.</td>
</tr>
<tr>
<td>Complaint</td>
<td>8/28/2017</td>
<td>Allegation that intoxicated passenger made racial slurs on bus.</td>
<td>Closed</td>
<td>Finding of no discrimination. No action taken. Driver reported he didn’t hear passenger.</td>
</tr>
<tr>
<td>Complaint</td>
<td>3/3/18</td>
<td>Allegation of refusal of service based on race by bus operator.</td>
<td>Closed</td>
<td>Unable to investigate. Customer did not return calls to provide additional information.</td>
</tr>
</tbody>
</table>
# Title VI Log of Investigations, Lawsuits and Complaints

**April 2016 - March 2019**

<table>
<thead>
<tr>
<th>TYPE</th>
<th>DATE</th>
<th>SUMMARY</th>
<th>STATUS</th>
<th>ACTION(S) TAKEN</th>
</tr>
</thead>
<tbody>
<tr>
<td>Complaint</td>
<td>7/12/18</td>
<td>Allegation of refusal of service based on race by bus operator.</td>
<td>Closed</td>
<td>Finding of no discrimination. However, driver received disciplinary action for inattentiveness to core duties.</td>
</tr>
<tr>
<td>Complaint</td>
<td>1/16/19</td>
<td>Allegation of refusal of service based on race by bus operator.</td>
<td>Closed</td>
<td>Finding of no discrimination. No action taken. Concluded driver acted properly.</td>
</tr>
<tr>
<td>Complaint</td>
<td>2/26/19</td>
<td>Allegation of refusal of service based on race by bus operator.</td>
<td>Closed</td>
<td>Finding of no discrimination. No action taken. Driver acted properly to have passenger removed due to onboard disruptive behavior.</td>
</tr>
</tbody>
</table>
Policy and Procedures for
Soliciting and Considering Public Comment
on Fare Increases and Major Service Reductions
Rev. August 2016

PURPOSE
Define thresholds for major service reductions/fare changes and outline a process for soliciting, receiving and considering public comments to ensure GPTD implements a broad, inclusive, equitable and accessible decision making process.

STAFF RESOURCES
• Lead Staff – Marketing Director

POLICY
GPTD will implement the public participation plan outlined below when changes to services or fares meets/exceeds one or more of the following thresholds:

• A fare increase or significant change in the method of fare payment.
• A new route is being established.
• An existing route is proposed for elimination.
• Considering the total discontinuance of service on any route or group of routes on any given day when service is currently offered.
• Any system wide change in service hours that exceeds (plus or minus) 10% of current total service hours.
• Proposed modifications to routes or groups of routes that would affect more than 25% of the riders using the affected routes.
• Proposed schedule changes on any given route or group of routes that reduces the total number of one-way bus trips by more than 25% of the current number of bus trips.

PUBLIC PARTICIPATION PROCEDURES:

Public Notice – A public hearing(s) for fare increases and major changes/reductions shall be advertised in a daily publication of general circulation at least twenty (20) calendar days prior to conducting such hearing and shall be held at a location that is accessible to all interested persons including persons with disabilities and easily accessed by public transportation. An explanation of the content; along with the date, time, and location of the hearing will be published along with the instructions for submitting written comments; contact information for questions or additional information; the due date for the written comments.

Additional notifications will be issued using the following measures:
• “Rider alerts” and notices will be posted on-board fixed-route vehicles indicating when and where the
meeting will take place at least twenty (20) calendar days in advance of the scheduled public meeting
date.
• Notification will be included on GPTD’s website at least twenty (20) calendar days prior to the meeting
along with notifications using social media.
• Notification will be included in GPTD’s agency newsletter and/or e-mail blast.
• A press release will be issued at least ten (10) calendar days prior to the meeting.
• The public hearing notice will be published in at least one publication serving minority communities at
least twenty (20) days prior to conducting the meeting.
• Public meeting notices will be displayed at the transit center leading up to the public meeting.

Public Meetings – GPTD makes efforts to ensure that scheduling and locations are accessible to the public
(this includes a location near public transportation, a time when public transportation is available; as well as
an accessible building/room for individuals with disabilities).

• Public hearings will be held at central locations to inform the public of the planning process, solicit
ideas, input, and feedback. GPTD will provide a presentation to attendees that explain the proposed
service or fare changes before taking questions and comments.
• At least one (1) meeting will take place in the evening and/or on a weekend to accommodate those
with traditional work schedules. Additionally, one meeting will be held during a traditional work day to
accommodate those who work in the evenings or weekends.
• GPTD will ensure at least one (1) public hearing is implemented in each member community served.
• Upon request, GPTD will provide interpreters for those who do not speak English, materials for
individuals with visual impairments, and sign language interpreters. The availability of these services
will be mentioned in public notices.
• GPTD will conduct outreach to persons with a Limited English Proficiency (LEP) by submitting public
meeting notices to local social agencies and public schools.

Receiving Public Comments – GPTD will document comments received during the course of the public
input process in the following ways:

• Verbal Statements at Public Hearing – GPTD staff will formally record verbal comments made at each
public hearing.
• Written Comment Form/Survey – GPTD will provide each attendee a comment form/survey on which
to record their comments on the proposed service or fare changes.
• Online Comment Form/Survey – GPTD will include on its website an online comment form for members
of the public to complete if they were unable to attend any of the meetings. The online comment form
will be supported by information explaining the proposed service or fare changes.

GPTD will establish a fourteen (14) day window following the last public hearing implemented for members
of the public to complete the online comment/survey or submit the written comment/survey. GPTD will
also ensure that comments e-mailed to GPTD or taken by phone are included in the record of public
comments.
Consideration of Public Comments – GPTD will consider public comments in the following ways:

- Analyzing standardized survey results to develop information on 1) support or opposition to the proposed service or fare changes, and 2) the impact of the changes on respondents’ travel and daily life.
- Conducting “content analysis” of all written comments and transcribed comments (either from public hearing notes or comments submitted by phone). The content analysis will extract the key concerns or opinions expressed by participants and then code these concerns in a manner that can be subject to analysis.

Results of these analyses may lead GPTD staff to recommend modifications to the proposed service or fare changes to the Board’s Ridership Committee.

The results of GPTD’s analyses, the full record of written or transcribed comments received, summary survey results, and updated service or fare change proposals will be presented to GPTD’s Board Ridership Committee for review, consideration and further recommendations. This committee meeting is open to the public.

Following the Ridership Committee meeting, the same information along with updated recommendations for actual service or fare changes will be presented to the Board of Directors for further recommendations and action. The Board of Directors meeting is open to the public.
Discrimination is Prohibited by TITLE VI
There are many forms of illegal discrimination based on race, color or national origin that limit the opportunity of minorities to gain equal access to services and programs.

Among other things, in operating a federally assisted program, a recipient cannot, directly or indirectly:

- Deny program services, aids or benefits,
- Provide a different service, aid or benefit, or provide them in a manner different than they are provide others; or
- Segregate or separately treat individuals in any matter related to the receipt of any service, aid or benefit.

TITLE VI PROGRAM
How to file a complaint:
Members of the public who feel they have been the subject of discrimination, may file a signed, written complaint up to 180 days from the date of the alleged discrimination.

Complaint forms and instructions can be accessed online at gpmetrobus.com or by visiting METRO’s Transit Center at 21 Elm Street or Main office at 114 Valley Street in Portland. Forms can also be mailed upon request. METRO’s TITLE VI Complaint Form asks for the following information:

- Name, address, telephone number
- Date and location of incident
- Detailed description of incident
- Identification of witnesses

Complaints must be signed and dated, and mailed or delivered to:

Greater Portland Transit District
METRO
114 Valley Street
Portland, ME 04102
Your Rights under Title VI of the Civil Rights Act of 1964:

“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.”

If you feel that you have been discriminated against based on race, color or national origin, you may file a complaint with Greater Portland transit District METRO.

Look for information about this process on the back page of this brochure.

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**Public Involvement**

Public involvement is an important part of transportation planning and project development. METRO uses a variety of methods to gather public input on services, standards and projects, including:

- Board and Committee Meetings
- Annual Public Meetings
- Community Workshops
- Task Forces for special initiatives
- Online Comment Form(s)

**For information:**

- gpmetro.org/ 207-774-0351
- Email: info@gpmetro.org
- Visit - 114 Valley St., Portland

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**Limited English Proficiency (LEP)**

The federal government and those entities receiving assistance from the federal government must take reasonable steps to ensure that LEP persons have access to programs, services and information.

**Who is a Limited English Proficient Person?** Persons who do not speak English as their primary language and who have a limited ability to read, speak, write or understand English can be Limited English Proficient or “LEP.” These individuals may be entitled to language assistance with response to a particular type of service, benefit or encounter. METRO works with a third-party phone interpreter service on an on-call basis and will also provide interpreters for public meetings, on request, with advance notice.

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“Simple Justice requires that all public funds, to which all taxpayers of all races contribute, not be spent in any fashion which encourages, entrenches, subsidizes or results in racial discrimination.”

President John F. Kennedy
Meeting of the Board of Directors
March 28, 2019
Draft Meeting Minutes

Minutes of the Board of Directors Meeting of Thursday, Thursday, March 28, 2019 held at 4:00 p.m. in the Greater Portland Transit District’s conference room, 114 Valley Street, Portland, Maine.

Board Members Present:
Hope Cahan – Board Vice President
John Thompson – Board Secretary
Merrill Barter
Mike Foley
Jim Violette
Ed Suslovic
Jeff Levine
Pious Ali

Staff and Others Present:
Greg Jordan
Ellen Sanborn
Glenn Fenton
Jennifer Ogden
Tom Ridge
Denise Beck
Lauren Shaw

Board Members Absent:
Belinda Ray – Board President
Paul Bradbury – Board Treasurer

Public: George Rheault

1. The meeting was called to order at 4:06 p.m. by Hope Cahan, Vice President of the Board.

2. Public comment:
   George Rheault of West Bayside was present. He noted an omission in the December minutes of the very quiet and well-behaved presence of his dog, Pistachio, at the entire December meeting, and reiterated that some dogs should be allowed on buses. He also clarified that the “many” USM students he spoke of in December was actually a handful and he had a chance to speak with Greg Jordan after the meeting who clarified that there are times a bus running a route may not show on the tracker because it’s operating as a supplement to an existing trip.

   George also commented that Falmouth is going through a big bump about growth, improvements, and pro-density, but with an attitude of nimbyism. Similar to Munjoy Hill last year. Greg Jordan’s long-term vision for Metro won’t work if the agency doesn’t support the pro-density push, resulting in empty buses and lack of revenue.

3. Meeting Minutes:
   Motion made by Ed Suslovic, seconded by John Thompson to approve the minutes, as written, from the February 28, 2019 Board of Directors meeting. Jeff Levine pointed out a needed correction that each Portland member would have the equivalent of 1.6 votes rather than a 1.6% vote as written in the minutes.

   Motion made by Ed Suslovic, seconded by John Thompson to approve the minutes, as amended, from the February 28, 2019 Board of Directors meeting. Motion passed unanimously by all present.
4. General Manager’s Report – due to time constraints, this item was moved on the agenda to be presented after Item 6.

5. Final 2019 Title VI program
Greg Jordan gave a brief background of the development and review of the draft 2019-2022 Title VI Program. As required by the Federal Transit Administration (FTA), this program is updated every 3 years.

Denise Beck, Marketing and Community Outreach Manager provided an overview of the program and major changes. She reviewed the key items on the checklist of requirements, including:

1. Notice to Public including a list of locations where notices are posted  
2. Complaints procedure, complaint forms and log  
3. Public Participation Plan  
4. Public Language Assistance Plan  
5. Board member breakdown  
6. Service standards and policies – including vehicle load, headways, on-time performance, service availability, vehicle assignment, transit amenities, and service monitoring.

Metro’s Title VI notices are on buses, the web site, at the Elm St. Pulse, and in the Transit Guide.

Greg Jordan reviewed the updated procedures for documenting and investigation Title VI complaints. When complaints are received, they are now immediately provided to HR Director, Jennifer Ogden as the EEO Officer for investigation and disposition. Hope Cahan asked why a 2016 complaint is still open. Greg Jordan explained it was investigated at the time at a lower staff level, but had not been formally identified as a Title VI complaint and elevated, so at this stage, HR Director Jennifer Ogden is investigating. Greg further commented that Ms. Ogden will be augmenting the annual Anti-Discrimination and Anti-Harassment Training provided to bus operators. Greg also noted that our bus operator ranks are much more racially and culturally diverse than in the past and now more closely reflect the community we serve.

Regarding Metro’s public participation plan, Denise reported that all Board and committee meetings are open to the public and held at a location accessible by transit and ADA accessible. Supporting materials are posted on the web site and people can sign up for text alerts regarding meeting information. Metro also holds targeted community workshops, task forces, and advisory committees for specific initiatives, including meeting with students and staff of Portland Public Schools (PPS) for input, ideas, and feedback. Metro also has an on-line comment form and an easily accessible email for questions, comments, or complaints. Additionally, public meetings/hearings are held to address any fare increases or major service reductions per Metro’s Public Participation Policy.

Regarding language assistance, Denise reported that Metro will begin translating our “Vital Documents” into Spanish and Portuguese in addition to Arabic, French, and Somali. Metro began translating for these latter languages in 2016.
On the recommendation of Pious Ali, additional items were added to the list of vital documents Metro will have translated: route changes, postings in buses, announcements, and notices advertising Transit Guide availability.

Regarding service standards, Denise reported on the various service standard that Metro is required to monitor for equitable implementation. Denise noted that Metro distributes its buses evenly across its service area based on ridership demand and operational or geographic limitations. Only Husky Line and Breez buses are limited to those routes due to the modal distinction.

Ed Suslovic reiterated that the updated program was reviewed by the Ridership Committee in February and March and at the March 13, 2019 meeting voted unanimously to recommend its passage by the Board of Directors.

Motion made by Mike Foley to approve the 2019 Title VI Program as presented, seconded by John Thompson. **Motion passed unanimously by all present.**

6. Automated Fare Policy and Technology
Greg Jordan, General Manager, reviewed previous discussions and the general terms of Metro’s proposal. Eight public meetings were held in March: two in Portland and one in each of the other six communities served. Based on these engagements so far, Metro staff believe there is positive overall reaction to the proposed fare changes and payment options. The chief concerns heard include the fare increase itself and the elimination of paper transfers for cash-paying customers.

Mike Foley gave a kudos to Denise Beck for how helpful and informative the materials and poster boards used at the meetings were.

Metro has met with several stakeholders, many of which attended in-person workshops with the program consultants March 6-8, and is in negotiations with Maine Medical Center (MMC) about launching a new passenger program there.

Regarding regional cooperation, Greg reported that Metro initiated the discussion around increasing fares, adopting new technology and considering fare capping at a July 2018 meeting of the PACTS Transit Committee Workshop. At a February 14, 2019 meeting coordinated by GPCOG, Metro presented a set of fare pricing and payment proposals to representatives from South Portland, Shuttlebus-Zoom, Casco Bay Lines, Maine DOT and GPCOG and requested input, potential concerns and in invitation to join the project. At this meeting, Metro presented an offer to utilize funding from an existing grant and the local contributions from Metro member communities to cover 100% of the design-engineering costs and 80% of equipment costs attributable to the partners. The only cost to the partners would be the 20% local share on their equipment costs. This meeting was followed by a series of workshops with interested partners and stakeholders on March 7-8. Based on these engagements, Shuttlebus Zoom decided to join the project. Additional communications and materials were submitted to the City of South Portland on March 4 and a meeting was held with the Assistant City Manager on March 26. At this stage, its unclear whether South Portland will participate in any part of this initiative.
Ed Suslovic expressed the need for a single fare system and partners joining Metro’s proposed program should adopt unified pricing to make it as easy as possible for all riders.

The Automated Fare Vendor RFP will be issued Friday, March 29, 2019 and will close on May 8, 2019, with the expectation that a vendor will be chosen by the end of May.

The current timeline includes the program going before the Board on April 25, 2019 for final approval. Discussion followed about whether to extend the final approval of fare pricing to the May meeting to give South Portland additional time. The board agreed to hold to the planned timeline for now, but will evaluate the issue at its April 25 meeting. At that meeting, the Board may elect to defer the final approval until May based on concrete information that a mutually agreeable unified fare pricing and collection system can be established.

4. General Manager’s Report

Greg Jordan provided updates on the following issues and projects:

- Battery electric bus production
- Route 8 urban circulator development
- Process around transitioning BREEZ from pilot phase to permanence and associated board membership issues.
- PACTS long range regional transit plan: Transit Tomorrow
- Metro Facility and status of RTP’s plans and funding requests to construct a separate facility.

7. Future Agenda Items

The Ridership Committee meeting is being held on April 10, 2019 at 5:45 p.m. at the East End School and will double as a public hearing opportunity for the proposed fare increase and new payment options.

The 2018 Financial Audit will be presented by Runyon Kersteen, Ouellette at the April 3, 2019 Finance Committee meeting.

8. Upcoming Meetings

- Finance Committee – April 3, 2019 at 4:00 p.m.
- Executive Committee – April 10, 2019 at 4:30 p.m.
- Ridership Committee – April 10, 2019 at 5:45 p.m. – East End School
- Board of Directors – April 25, 2019 at 4:00 p.m.

9. Adjournment

John Thompson moved to adjourn, seconded by seconded by Ed Suslovic and Pious Ali. With unanimous approval by all present the meeting adjourned at 5:29 p.m.