

Indian River County Title VI Program



Prepared by the:
Indian River County Metropolitan Planning Organization
1801 27th Street
Vero Beach, FL 32960
Phone: (772) 226-1455

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A RESOLUTION OF THE BOARD OF COUNTY COMMISSIONERS OF INDIAN RIVER COUNTY AUTHORIZING THE SUBMISSION OF A TRIENNIAL TITLE VI PROGRAM UPDATE TO THE FEDERAL TRANSIT ADMINISTRATION

WHEREAS, Title VI of the Civil Rights Act of 1964, as amended, prohibits discrimination on the basis of race, color or national origin in programs or activities receiving federal financial assistance;

WHEREAS, the Federal Transit Administration (FTA) requires that all direct and primary recipients document their compliance with Title VI requirements by submitting a Title VI Program Update every three years; and

WHEREAS, the Indian River County Board of County Commissioners must approve the Title VI Program Update prior to submission to the FTA;

NOW, THEREFORE, BE IT RESOLVED BY THE BOARD OF COUNTY COMMISSIONERS THAT:

1. The Chairman, or in his or her absence, the Vice Chairman, is hereby authorized to sign the Title VI Program Update transmittal letter.
2. The MPO Staff Director is authorized to sign any and all assurances, warranties, certifications, and other documents which may be required in connection with the 2020 Title VI Program Update.

THIS RESOLUTION was moved for adoption by _____, and the motion was seconded by _____, and, upon being put to a vote, the vote was as follows:

Chairman Susan Adams	_____
Vice-Chairman Joseph E. Flescher	_____
Commissioner Peter D. O'Bryan	_____
Commissioner Bob Solari	_____
Commissioner Tim Zorc	_____

The Chairman thereupon declared the resolution duly passed and adopted this 10th day of March, 2020.

**BOARD OF COUNTY COMMISSIONERS
INDIAN RIVER COUNTY, FLORIDA**

By: _____
Susan Adams, Chairman

RESOLUTION No. 2020-_____

Attest: Jeffrey R. Smith, Clerk of Court and Comptroller

By: _____
Deputy Clerk

I **HEREBY CERTIFY** that on this day, before me, an officer duly authorized in this State and County to take acknowledgments, personally appeared Susan Adams, as Chairman of the Board of County Commissioners, and _____, as Deputy Clerk, to me known to be the persons described in and who executed the foregoing instrument and they acknowledged before me that they executed the same.

WITNESS my hand and official seal in the County and State last aforesaid this 10th day of March, 2020.

Notary Public

APPROVED AS TO LEGAL SUFFICIENCY

SEAL:

BY: _____
Dylan Reingold,
County Attorney

APPROVED AS TO COMMUNITY DEVELOPMENT MATTERS

BY: _____
Phillip J. Matson, AICP, Director
Community Development Department

TITLE VI NONDISCRIMINATION POLICY STATEMENT

Indian River County and its transit service provider, the Senior Resource Association (SRA), are committed to ensuring that no person is excluded from participation in or denied the benefits of its services on the basis of race, color, or national origin, as provided by Title VI of the Civil Rights Act of 1964, as amended.

It is Indian River County's objective to:

1. Ensure that the level and quality of transportation service is provided without regard to race, color or national origin;
2. Identify and address, as appropriate, disproportionately high and adverse human health and environmental effects, including social and economic effects of programs and activities on minority populations and low-income populations;
3. Promote the full and fair participation of all affected populations in transportation decision making;
4. Prevent the denial, reduction or delay in benefits related to programs and activities that benefit minority populations or low-income populations; and
5. Ensure meaningful access to programs and activities by persons with limited English proficiency (LEP).

Indian River County's MPO Staff Director has been designated as the County's Title VI Specialist, responsible for civil rights compliance and monitoring to ensure the nondiscriminatory provision of transit services and programs. In addition, the SRA is responsible for implementing all aspects of the Title VI Program. All County and SRA employees share the responsibility and are committed to ensuring that Indian River County's Title VI Program is strictly adhered to.

Brian Freeman, MPO Staff Director

Date

INTRODUCTION

Title VI of the Civil Rights Act of 1964, as amended, prohibits discrimination on the basis of race, color or national origin in programs or activities receiving federal financial assistance. As a direct recipient of federal public transportation funds, Indian River County is required to submit a Title VI update to the Federal Transit Administration (FTA). This update includes the level and quality of transit service provided for minority and low-income areas and also system-wide environmental justice policies and procedures. This update is submitted to the FTA every three years and is intended to demonstrate compliance with Title VI requirements.

The purpose of this Title VI program is to assure that no person is excluded from participating in, denied the benefits of, or subjected to discrimination under any program or activity receiving federal financial assistance from the FTA, on grounds of race, color, or national origin. This report will detail policies and procedures for ensuring Title VI compliance.

This program is consistent with FTA Circular 4702.1B, dated October 1, 2012.

TITLE VI PROGRAM CHECKLIST

The following checklist addresses Title VI reporting requirements for all recipients as described in FTA Circular 4702.1B:

1. Title VI Notice to the Public, including a list of locations where the notice is posted
 - ✓ Pages 9, 23
2. Title VI Complaint Procedures
 - ✓ Page 9
3. Title VI Complaint Form
 - ✓ Page 24
4. List of transit-related Title VI investigations, complaints, and lawsuits
 - ✓ Page 10
5. Public Participation Plan, including information about outreach methods to engage minority and limited English proficient populations (LEP), as well as a summary of outreach efforts made since the last Title VI Program submission
 - ✓ Page 10
6. Language Assistance Plan for providing language assistance to persons with limited English proficiency (LEP), based on the DOT LEP Guidance

✓ Page 12

7. A table depicting the membership of non-elected committees and councils, the membership of which is selected by the recipient, broken down by race, and a description of the process the agency uses to encourage the participation of minorities on such committees

N/A

8. Primary recipients shall include a description of how the agency monitors its subrecipients for compliance with Title VI, and a schedule of subrecipient Title VI Program submissions

N/A

9. A Title VI equity analysis if the recipient has constructed a facility, such as a vehicle storage facility, maintenance facility, operation center, etc.

✓ Page 18

10. A copy of board meeting minutes, resolution, or other appropriate documentation showing the board of directors or appropriate governing entity or official(s) responsible for policy decisions reviewed and approved the Title VI Program. For State DOT's, the appropriate governing entity is the State's Secretary of Transportation or equivalent. The approval must occur prior to submission to FTA.

✓ Page iii

The following checklist addresses Title VI reporting requirements for all fixed route transit providers as described in FTA Circular 4702.1B:

Service standards:

1. Vehicle load

✓ Page 19

2. Vehicle headway

✓ Page 20

3. On time performance

✓ Page 20

4. Service availability

✓ Page 20

Service policies:

1. Transit Amenities

✓ Page 21

2. Vehicle Assignment

✓ Page 22

SECTION 1 – GENERAL REPORTING REQUIREMENTS

The following information addresses the Title VI general reporting requirements, as described in Chapter III of the FTA Circular 4702.1B.

1-1 TITLE VI NOTICE TO THE PUBLIC

Agencies shall inform the public of their rights under Title VI through such measures as posting the Title VI notice on posters, comment cards, or flyers placed at stations, bus shelters, and in transit vehicles. The type, timing, and frequency of these measures are at the recipient's discretion, as long as the type, timing, and frequency are sufficient to notify passengers and other interested persons of their rights under DOT's Title VI regulations with regard to the recipient's program. Notices detailing a recipient's Title VI obligations and complaint procedures shall be translated into languages other than English, as needed and consistent with the DOT LEP Guidance and the recipient's language assistance plan.

Indian River County has a Title VI notice to the public that directs citizens to contact the County if any person feels that the County or its transit service provider, the Senior Resource Association (SRA), has violated his or her Title VI protections. This notice is on the County website, the GoLine website, on GoLine buses, at GoLine stations, and in the GoLine rider brochure. The Title VI notice is available in both English and Spanish. A copy of the Title VI notice is provided in Appendix A.

1-2 TITLE VI COMPLAINT PROCEDURES AND FORM

In order to comply with the reporting requirements established in 49 CFR Section 21.9(b), all recipients shall develop procedures for investigating and tracking Title VI complaints filed against them and make their procedures for filing a complaint available to members of the public. Recipients must also develop a Title VI complaint form, and the form and procedure for filing a complaint shall be available on the recipient's website. FTA requires direct and primary recipients to report information regarding their complaint procedures in their Title VI Programs in order for FTA to determine compliance with DOT's Title VI regulations.

As a recipient of federal dollars, Indian River County is required to comply with Title VI of the Civil Rights Act of 1964, as amended, and ensure that services and benefits are provided on a nondiscriminatory basis. The County has in place a Title VI Complaint Procedure, which outlines a process for local disposition of Title VI complaints and is consistent with guidelines found in FTA Circular 4702.1B, dated October 1, 2012. The complaint procedure has five (5) steps, outlined below:

1. **Submission of Complaint:** Any person who feels that he or she, individually, or as a member of any class of persons, on a basis of race, color, or national origin has been excluded from or denied the benefits of, or subjected to discrimination under any program of activity receiving federal financial assistance through Indian River County may file a written complaint, using the FTA Title VI complaint form which can be downloaded by accessing the following link at the GoLine website: http://www.golineirt.com/documents/VI_Complaint_Form.pdf (a copy of the complaint form is also available in Appendix B). Any complaint must be filed within 180 calendar days after the person believes discrimination occurred. If the complainant is unable to provide a written complaint, the Title VI Specialist will conduct an interview and assist the complainant in converting verbal complaints to writing. All complaints must be signed by the complainant or his/her representative.

2. **Complaint Tracking Log:** Once Indian River County receives the complaint and the investigation is initiated, the complaint will receive a case number and will then be logged into the County's records identifying its basis and alleged harm.
3. **Complaint Review:** Upon receipt of the signed complaint, the MPO's Title VI Specialist will coordinate with the County and its transit service provider, the SRA, to ensure a thorough review of the complaint within 60 calendar days after the date received. If more time is required, the Title VI Specialist shall notify the complainant of the estimated timeframe for completing the review. Upon completion of the review, the Title VI Specialist shall make a recommendation regarding the merit of the complaint and whether remedial actions are available to provide redress. Additionally, the Title VI Specialist may recommend improvements relative to Title VI and environmental justice, as appropriate. The Title VI Specialist shall then issue a written response to the complainant explaining the determination.
4. **Request for Reconsideration:** If the complainant is dissatisfied with the determination and/or resolution set forth by the County, the same complaint may be submitted to the Federal Transit Administration (FTA) for investigation. Complainant will be advised to contact the Federal Transit Administration, Office of Civil Rights, 1200 New Jersey Avenue SE, Washington, DC 20590.
5. **County Response to FTA:** A copy of the complaint and the County's investigative report of finding and final remediation action plan, if appropriate, will be issued to FTA within 120 days of receipt of the complaint. A summary of the complaint and its resolution will be included as part of the Title VI updates to the FTA.

1-3 RECORD OF TITLE VI INVESTIGATIONS, COMPLAINTS, OR LAWSUITS

In order to comply with the reporting requirements of 49 CFR Section 21.9(b), FTA requires all recipients to prepare and maintain a list of any of the following that allege discrimination on the basis of race, color, or national origin: active investigations conducted by entities other than FTA; lawsuits; and complaints naming the recipient. This list shall include the date that the investigation, lawsuit, or complaint was filed; a summary of the allegation(s); the status of the investigation, lawsuit, or complaint; and actions taken by the recipient in response, or final findings related to, the investigation, lawsuit, or complaint.

There are no lawsuits or complaints alleging that Indian River County discriminates on the basis of race, color, or national origin with respect to service or other transit benefits.

1-4 PROMOTING INCLUSIVE PUBLIC PARTICIPATION

The content and considerations of Title VI, the Executive Order on LEP, and the DOT LEP Guidance shall be integrated into each recipient's established public participation plan or process (i.e., the document that explicitly describes the proactive strategies, procedures, and desired outcomes that underpin the recipient's public participation activities). Grant recipients are required to comply with the public participation requirements of 49 U.S.C. Sections 5307(b) (requires programs of projects to be developed with public participation) and 5307(c)(1)(I) (requires a locally developed process to consider public comment before raising a fare or carrying out a major reduction in transportation service). Recipients engaged in planning and other decision-making activities at the local level should consider the principles embodied in the planning regulations, and develop and use a documented public participation plan or process that provides adequate

notice of public participation activities, as well as early and continuous opportunities for public review and comment at key decision points.

Indian River County welcomes the opportunity to include the public in its activities. The County continually updates both the County website and the GoLine website to provide the most current information on transit activities, including, but not limited to, public notices, service changes, public workshops, fares, and policies. Comparable information is posted on GoLine buses and at GoLine stations. The County's transit service provider, the Senior Resource Association (SRA), produces a rider brochure, also available on the GoLine website, with information on GoLine policies, procedures, and routes.

The County, to the best of its ability, follows the Indian River County Metropolitan Planning Organization's Public Participation Plan. The MPO's Public Participation Plan sets forth the MPO's vision for public participation, identifies strategies for engaging the public, and establishes protocols for receiving public comment. The MPO's Public Participation Plan is available on the MPO's website at the following link: https://www.irmpo.com/Documents/Studies/DRAFT_PPP_2020.pdf. The MPO continually updates its website to provide the most current information on transportation planning activities.

In an effort to identify racial and ethnic minority, transportation disadvantaged, economically challenged, Limited English Proficient (LEP), elderly, and other populations that could potentially be the victims of discrimination in the use of federal funds, the Indian River County MPO maintains a Community Characteristics Report, which divides the county into 25 communities based on census tract boundaries. This report was first developed in 2003 and was the first such report in the state of Florida. Since that year, the report has been twice updated: first using data from the 2010 Census and American Community Survey (ACS) and then again using the 2015 ACS. The Community Characteristics Report is available on the MPO's website (<https://www.irmpo.com/Documents/Studies/Community-Profile.pdf>). For each community, major institutions and issues of concern were identified in order to meet the state's mandate of "early and proactive public involvement in future transportation improvements."

Based on the results of that input, the MPO has identified a number of neighborhoods with minority populations and has targeted numerous public transportation events and outreach activities in those areas. Most of these events have been conducted in conjunction with updates to the MPO's Transit Development Plan (TDP) and Long Range Transportation Plan (LRTP).

As part of the 2015 LRTP process, ten public workshops were conducted throughout the county to gather public input on the future of public transportation in Indian River County. Of those ten public workshops, five were conducted in predominantly minority communities, including a predominantly African-American community and a predominantly Spanish-speaking community. In addition, the 2018 Transit Development Plan (TDP) process included substantial outreach to both transit users and non-users. Over 750 passenger surveys (and an additional 249 online surveys) were conducted to provide riders an opportunity to provide the MPO with valuable feedback on how the public transportation can best serve the community and the surrounding region. Both the workshops and surveys were conducted in both English and Spanish, as needed.

1-5 PROVIDING MEANINGFUL ACCESS TO SERVICES BY PERSONS WITH LIMITED ENGLISH PROFICIENCY (LEP)

Consistent with Title VI of the Civil Rights Act of 1964, DOT's implementing regulations, and Executive Order 13166, "Improving Access to Services for Persons with Limited English Proficiency" (65 FR 50121, Aug. 11, 2000), recipients shall take reasonable steps to ensure meaningful access to benefits, services, information, and other important portions of their programs and activities for individuals who are limited-English proficient (LEP). In order to ensure meaningful access to programs and activities, recipients shall use the information obtained in the Four Factor Analysis to determine the specific language services that are appropriate to provide.

Results of the Four Factor Analysis, including a description of the LEP population(s) served

To continue reaching LEP persons in Indian River County, MPO staff conducted targeted needs assessments and gathered data to gain an understanding of the public transportation needs. The four-factor framework, as described in Chapter III of FTA Circular 4702.1B, was used to determine the following:

Factor 1 – The number or proportion of LEP persons eligible to be served or likely to be encountered by the program or recipient.

According to data from the Census Bureau's 2015 American Community Survey (ACS), Indian River County's population aged 5 years and over is 136,498, with 86.2% speaking English as the primary language at home. The ACS estimates that 13,266 people, or 9.7% of the population age 5 and over, speaks primarily Spanish at home. Table 1 provides a detailed breakdown of the languages spoken in Indian River County. Over five percent of the total population speaks English less than "very well". Of those who speak English less than "very well", the overwhelming majority speak Spanish as their primary language. Map 1 shows the geographic location of persons in Indian River County who speak English less than "very well".

As a result of this analysis, the GoLine has targeted Spanish speakers as the predominant LEP population for assistance. The agency will work to target areas with a high proportion of LEP populations to ensure that all needs for assistance are met.

Factor 2 - The frequency with which LEP persons come into contact with the program.

The Federal guidance for this factor recommends that agencies should assess the frequency with which they have contact with LEP individuals from different language groups. The more frequent the contact with a particular LEP language group, the more likely enhanced services will be needed.

Among the users of the GoLine are persons with LEP. As shown in Map 1, many GoLine routes serve portions of Indian River County where there are concentrations of persons with LEP. This includes the community of Fellsmere, where, according to the ACS, 29% of the population speaks English less than "very well". In the Fellsmere community, nearly all LEP persons speak Spanish as their primary language.

Factor 3 - The nature and importance of the program, activity, or service provided by the program to people's lives.

Due to the number of Spanish-speaking residents that rely upon the GoLine as a primary mode of transportation, the County's transit service provider, the SRA, maintains at least one Spanish-speaking dispatcher and driver on staff. Where feasible, the County, the MPO, and SRA translate plans, programs, and guidelines into Spanish, including surveys. In addition, both the County and the MPO make available translators at public transportation public meetings conducted in Fellsmere, a community which has the highest concentration of LEP persons in Indian River County.

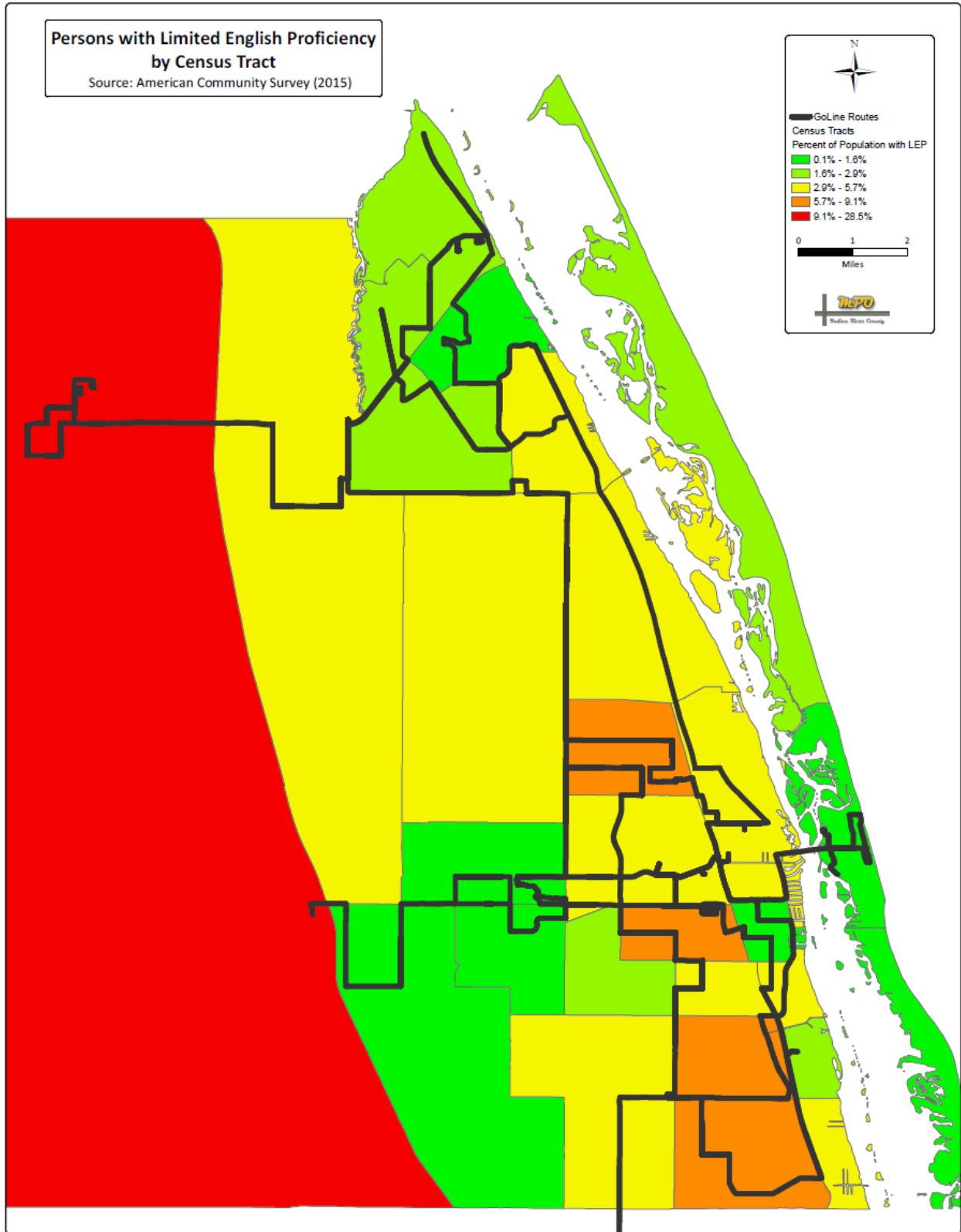
Factor 4 - The resources available to the recipient for LEP outreach, as well as the costs associated with that outreach

As discussed above, many LEP persons depend on the GoLine public transportation system as a primary mode of travel. Based on the current resources available, Indian River County, the MPO, and transit service operator (SRA) are providing the most cost-effective means of delivering competent and accurate language services within the GoLine service area. Both the County and SRA employ bilingual persons to assist with translating when needed. Both the County and the SRA will continue to monitor the need for additional language assistance, including the need for greater dissemination of information in the existing languages and/or translation to new languages. If additional services are needed, the County and the SRA will determine which additional language assistance measures are cost-effective and feasible for implementation based on current and projected financial resources.

Table 1 – Languages Spoken in Indian River County

Languages Spoken at Home (Population Age 5 and Above)			
Language	Total Population	Population Speaking English Less Than "Very Well"	% of Total Population Speaking English Less Than "Very Well"
English	117,679	0	0.00%
Spanish or Spanish Creole	13,266	5,493	4.02%
French (incl. Patois, Cajun)	594	193	0.14%
French Creole	678	289	0.21%
Italian	596	167	0.12%
Portuguese or Portuguese Creole	258	85	0.06%
German	694	48	0.04%
Yiddish	0	0	0.00%
Other West Germanic languages	111	0	0.00%
Scandinavian languages	162	18	0.01%
Greek	81	14	0.01%
Russian	55	20	0.01%
Polish	351	133	0.10%
Serbo-Croatian	32	0	0.00%
Other Slavic languages	165	52	0.04%
Armenian	93	16	0.01%
Persian	13	0	0.00%
Gujarati	60	0	0.00%
Hindi	69	0	0.00%
Urdu	53	0	0.00%
Other Indic languages	24	0	0.00%
Other Indo-European languages	13	0	0.00%
Chinese	159	71	0.05%
Japanese	72	19	0.01%
Korean	103	68	0.05%
Mon-Khmer, Cambodian	0	0	0.00%
Hmong	0	0	0.00%
Thai	37	20	0.01%
Laotian	0	0	0.00%
Vietnamese	188	145	0.11%
Other Asian languages	175	137	0.10%
Tagalog	351	176	0.13%
Other Pacific Island languages	0	0	0.00%
Navajo	0	0	0.00%
Other Native North American languages	0	0	0.00%
Hungarian	35	34	0.02%
Arabic	162	62	0.05%
Hebrew	77	15	0.01%
African languages	0	0	0.00%
Other and unspecified languages	92	25	0.02%
Total	136,498	7,300	5.35%

Map 1 – Persons with LEP in Indian River County



Developing a Language Assistance Plan

Based upon the Four Factor Analysis described above, the Language Assistance Plan addresses the results and provides further direction.

Describe how the recipient provides language assistance services by language.

Individuals who have a limited ability to read, write, speak, or understand English are considered LEP persons. Indian River County recognizes that a special effort is necessary to communicate important transit information to some transit system users. In order to meet this need, the County and its transit service provider, the SRA, take the following steps:

- Seek out opportunities to conduct outreach to the community and faith-based organizations serving minority populations.
- Provide language assistance on its transit customer service hotline.
- Participate in updates to the County's evacuation and disaster preparedness plans to ensure the plans include the needs of all community members, especially LEP, low-income, and minority populations.
- Continue to review programs, activities, and services provided to ensure that LEP persons can participate and utilize our services.

To determine how best to continue reaching LEP persons in Indian River County and improve current ongoing efforts, the County and the SRA will continue to conduct targeted needs assessments and gather data to gain an understanding of the need.

Describe how the recipient provides notice to LEP persons about the availability of language assistance.

Through the methods listed below, the County and its transit service provider, the SRA, provide notice to LEP persons about the availability of language assistance:

- **Website:** Both the MPO and GoLine websites feature a language translator for over 100 languages. For GoLine passengers, information on how to access GoLine services, bus schedules, route maps, and instructions on riding the bus are available in English and Spanish.
- **Safety and Security:** Several GoLine drivers speak Spanish and assist Spanish-speaking bus riders as needed.
- **Training:** Driver training for new employees and refresher training provided annually to drivers reminds them of the importance of conveying information to passengers as part of their customer service training.
- **Customer Service:** Telephone lines are equipped to the extent possible with persons who speak Spanish and English. Personnel who are bilingual are identified for providing assistance.
- **Translated Material:** Spanish versions of the rider brochure and survey materials are available upon request.

- **Telecommunications Device for the Deaf (TDD):** The SRA, Indian River County's transit service provider, has a TDD dedicated line.
- **Community Outreach:** Indian River County makes available persons who can serve as translators at community outreach meetings whenever possible.

Describe how the recipient monitors, evaluates and updates the language assistance plan.

Indian River County provides an ongoing needs assessment to determine how best to continue reaching LEP persons in the community and how to improve ongoing efforts. To ensure that the intent of the language assistance plan remains current, County and SRA staff will continue to monitor and update the plan and report progress every three years. These efforts will include the following actions:

- Monitor current LEP populations in the service area and in emerging populations affected or encountered.
- Assess the language assistance plan's success in meeting the needs of LEP persons.
- Communicate the goals and objectives of the language assistance plan and evaluate the opportunity for community involvement and planning.
- Post signs to communicate language services available at initial contact points. The County and SRA will continue to provide signage and written information on vehicles and at transfer stations in other languages.
- Indicate the availability of language services on outreach documents, brochures, booklets, and in recruitment materials.
- Whenever possible, make announcements in vehicles in other languages.
- Whenever possible, make available telephone voicemail and menu systems in Spanish and services about how to get them.
- Conduct outreach presentations and notices to schools, community, and faith-based organizations. The County and SRA will provide announcements and collect information on how best to serve LEP persons through community and faith-based organizations.
- Whenever possible, include Spanish and other languages on its website.
- Strive to provide excellent customer service, in-person and over the phone, in other languages. Front-line personnel will routinely provide information on LEP persons in order to best address identified needs.
- Participate to the greatest extent possible in local events.

Describe how the recipient trains employees to provide timely and reasonable language assistance to LEP populations.

Both the County and SRA will provide ample training opportunities for employees to assist LEP populations with timely and reasonable language assistance. Towards this end, the County and SRA will conduct the following activities:

- Provide information on LEP policies and procedures as part of new employee orientation and staff retraining.
- Require staff to complete customer service training and be provided guidance on working effectively with in-person and telephone interpreters.
- Inform transit staff on how to obtain LEP services.

- Train staff on how to respond to LEP persons over the telephone, through written communications, and through in-person contact.
- Strive to ensure the competency of interpreters and translation services per DOT LEP Guidance Section VII(2).

1-6 DETERMINATION OF SITE OR LOCATION OF FACILITIES

Title 49 CFR Section 21.9(b)(3) states, "In determining the site or location of facilities, a recipient or applicant may not make selections with the purpose or effect of excluding persons from, denying them the benefits of, or subjecting them to discrimination under any program to which this regulation applies, on the grounds of race, color, or national origin; or with the purpose or effect of defeating or substantially impairing the accomplishment of the objectives of the Act or this part." Title 49 CFR part 21, Appendix C, Section (3)(iv) provides, "The location of projects requiring land acquisition and the displacement of persons from their residences and businesses may not be determined on the basis of race, color, or national origin." For purposes of this requirement, "facilities" does not include bus shelters, as these are transit amenities and are covered in Chapter IV, nor does it include transit stations, power substations, etc., as those are evaluated during project development and the NEPA process. Facilities included in this provision include, but are not limited to, storage facilities, maintenance facilities, operations centers, etc.

Indian River County is committed to determining sites and location of facilities in a fair and equitable manner that is in accordance with Title VI.

Excluding bus shelters and transit stations, the County has constructed one transit facility in recent years. That facility is the Main Transit Hub located near downtown Vero Beach and was funded through a Section 5309 Bus Livability Program grant awarded by the FTA. A major route restructuring occurred with the opening of the Main Transit Hub in April, 2017. As a result of those route modifications, transit service was enhanced in the Gifford community (78% minority population) and the Oslo/Vero Beach Highlands community (45% minority population). In the case of Gifford, the number of transit routes serving the community was increased and direct service to Indian River Mall was introduced. For Oslo/Vero Beach Highlands, direct service is now offered to the Main Transit Hub (and its many connecting options).

During the planning stage for the Main Transit Hub, a Title VI equity analysis was conducted as part of the facility's Documented Categorical Exclusion prepared through the National Environmental Policy (NEPA) process. Through this analysis, it was determined that the facility was in compliance with Title VI.

SECTION 2 - SPECIFIC REQUIREMENTS FOR TRANSIT PROVIDERS

The following information addresses the Title VI reporting requirements for fixed route transit providers, as described in Chapter IV of the FTA Circular 4702.1B.

2-1 SERVICE STANDARDS

FTA requires all fixed route transit providers to develop quantitative standards for all fixed route modes of operation for the indicators listed below. Providers of public transportation may set additional standards as appropriate or applicable to the type of service they provide.

Section 2-1 summarizes the service standards for Indian River County's GoLine fixed-route transit system. GoLine operates as a fare free fixed-route system. The GoLine route network consists of 15 routes providing service throughout Indian River County, including the communities of Vero Beach, Sebastian, Fellsmere, Gifford, Wabasso, and Oslo. GoLine operates six days per week (Monday through Saturday). For most routes, weekday service hours are 6 AM to 7 PM, and Saturday service hours are 8 AM to 5 PM.

GoLine's 15 routes connect at four transfer hubs: the Main Transit Hub, Indian River Mall, Gifford Health Center, North County Transit Hub, and the South County Park Intergenerational Center. At each hub, the connecting buses arrive at the same time, which allows for easy transfers from one route to another.

According to MPO estimates, 51% of Indian River County residents live within ¼ mile of a GoLine route and 84% live within ¾ mile of a GoLine route. Because GoLine is a fare free system and because a majority of county residents live close to a GoLine route, it is expected that the utilization of the GoLine public transportation system by the transportation disadvantaged population is very high.

Vehicle Load

Vehicle load can be expressed as the ratio of passengers to the total number of seats on a vehicle. For example, on a 40-seat bus, a vehicle load of 1.3 means all seats are filled and there are approximately 12 standees. A vehicle load standard is generally expressed in terms of peak and off-peak times.

Vehicle load, or load factor, is a ratio of the number of seats on a vehicle to the number of passengers on a particular route during periods of either peak or off-peak travel. Load factors are used by transit systems to determine the extent of possible overcrowding or the need for larger or additional vehicles on a route. The County and SRA monitor vehicle loads through feedback from passengers and operations staff, as well as ride checks. In situations where ridership increases on a route, then a larger vehicle will be assigned to that route to accommodate the increase in passengers.

Because of Indian River County's aging population, it is the County's intent to operating transit vehicles with seating capacity for all passengers. Therefore, all transit routes operate at a vehicle load of 1.0 or below during all times (peak and non-peak).

Vehicle Headway

Vehicle headway is the amount of time between two vehicles traveling in the same direction on a given line or combination of lines.

Vehicle headway is a measurement of the time interval between two vehicles traveling in the same direction along the same route. A shorter headway corresponds to more frequent service. Vehicle headways are measured in minutes (e.g., every 60 minutes).

Indian River County has the same frequency of service standard for all routes, with the only exception being for routes that provide regional or intercity service. With the exception of Route 11, all GoLine routes operate on 60 minute headways. Route 11, which provides intercity service along the US 1 corridor from Vero Beach to Sebastian, operates on a 120 minute headway.

Currently, only one vehicle operates on a GoLine route at any given time. Reducing vehicle headways (i.e. increasing frequencies) would require adding a second vehicle to each affected route. Because increasing frequencies will require increasing the size of the GoLine fleet, it will involve capital costs as well as operating costs.

Due to the limited resources available to a transit system operating in a county of only 150,000 residents, it is not financially feasible to reduce headways at this time. In the future, if vehicle headways are reduced, it would be implemented on a group of connected routes with high levels of ridership.

On-Time Performance

On-time performance is a measure of runs completed as scheduled. This criterion first must define what is considered to be "on time." An acceptable level of performance must be defined (expressed as a percentage).

Indian River County strives to continually maintain on-time bus service. Because of the "hub and spoke" design of the GoLine route system, it is critical that buses consistently operate on-time. Every hour, GoLine buses connect with each other at five transfer locations: the Main Transit Hub (seven routes), Indian River Mall (five routes), the North County Hub (four routes), the Intergenerational Center (four routes), and the Gifford Health Center (three routes). Whenever one bus falls behind schedule, it can cause delays on all vehicles that operate on connecting routes. Therefore, County and SRA staff evaluate on-time performance on an ongoing basis and implement service changes to improve performance, as necessary.

On-time performance is defined as a bus arriving at a scheduled time point within five minutes of the scheduled arrival. During FY 2018/19, GoLine buses arrived on-time 93.6% of the time. On the occasions that a bus was not on time, it more than five minutes late 3.7% of the time and more than five minutes early 2.7% of the time. Through the first quarter of FY 2019/20, on-time performance has improved to 95.9%.

Service Availability

Service availability is a general measure of the distribution of routes within a transit provider's service area. For example, a transit provider might set a service standard to distribute routes such that a specified percentage of all residents in the service area are within a one-quarter mile walk of bus service or a one-half mile walk of rail service. A standard might also indicate the maximum distance between stops or stations. These measures related to coverage and stop/station distances might also vary by population density.

Service availability is a measure of the distance a person must travel to gain access to transit service. Based on an analysis of the GoLine route network using 2010 Census data, it was determined that 51% of Indian River County residents live within ¼ mile of a fixed route and 84% are within ¾ of a fixed route.

Standards developed with respect to transit access would apply to existing services as well as any proposed service modifications affecting transit service levels. The Indian River County Transit Development Plan includes policies to provide fixed route bus service to all multi-family developments exceeding 500 units and to all commercial areas exceeding 200,000 square feet.

In developing the GoLine route network, several factors are considered in determining where to provide transit service: population density, average household income/poverty status within a community, and the amount of households without access to an automobile. GoLine service availability is highest in areas of higher population density, areas of concentrated poverty, and areas where vehicle ownership rates are lowest.

2-2 SERVICE POLICIES

FTA requires fixed route transit providers to develop a policy for each of the following service indicators. Transit providers may set policies for additional indicators as appropriate.

In accordance with Chapter IV of FTA Circular 4702.1B, Indian River County has adopted the transit service policies below.

Distribution of Transit Amenities

Transit amenities refer to items of comfort, convenience, and safety that are available to the general riding public. Fixed route transit providers must set a policy to ensure equitable distribution of transit amenities across the system. Transit providers may have different policies for the different modes of service that they provide. Policies in this area address how these amenities are distributed within a transit system, and the manner of their distribution determines whether transit users have equal access to these amenities.

Policy: The location of transit amenities, such as bus shelters and benches, along bus routes shall be based on the number of passenger boardings at bus stops along those routes. In addition, the availability of public right-of-way and the presence, or lack thereof, of physical constraints are factors that can affect the installation of transit amenities.

Indian River County strives to maximize the coverage of transit service with amenities that provide comfort and convenience to its riders. In recent years, the County has implemented a program to install bus shelters at bus stop locations with high levels of passenger boardings. Through 2019, six phases of bus shelters have been constructed throughout Indian River County, including at bus stops in busy commercial areas, at transfer locations, near employment centers, and adjacent to multi-family developments. Because those bus shelters have been constructed throughout Indian River County, including in Fellsmere and Gifford (two predominantly minority communities with high levels of transit ridership), transit users have equal access to such transit amenities. All transit amenities are provided in a manner that complies with ADA regulations.

Vehicle Assignment

Vehicle assignment refers to the process by which transit vehicles are placed into service in depots and on routes throughout the transit provider's system. Policies for vehicle assignment may be based on the age of the vehicle, where age would be a proxy for condition.

Policy: Bus assignments shall take into account the operating characteristics of buses of various lengths in relation to the operating characteristics of each route. The largest vehicles shall be assigned to those routes that carry the highest number of passengers per revenue hour. Routes which require tight turns on narrow streets may be assigned smaller vehicles that are more maneuverable.

Indian River County assigns vehicles based on the number of passengers along a route, vehicle seating capacity, and vehicle maneuverability. Bus assignments and the distribution of equipment are monitored to ensure that vehicle load/assignment policies are followed. All buses are wheelchair accessible.

As of March 2020, the GoLine active fleet consists of the following vehicles:

Table 2 – Vehicle Capacity

Make/Model	Type	# of Vehicles	Length	Average Age (Yrs)	Average Seated Passenger Capacity	FY 18/19 Ridership (Avg. per Route)
Gillig Low-Floor Bus	Heavy-Duty Bus	2	35'	7.0	32	158,205
Gillig Low-Floor Bus	Heavy-Duty Bus	4	29'	5.3	28	98,362
Champion Defender	Medium-Duty Cutaway	2	31'	1.5	20	79,533
Turtle Top Odyssey	Light-Duty Cutaway	2	29'	4.0	20	72,715
Champion Defender	Medium-Duty Cutaway	2	27'	2.0	16	57,763
Turtle Top Odyssey	Light-Duty Cutaway	3	24'	4.0	16	32,251

APPENDIX A: TITLE VI NOTICES TO THE PUBLIC

Standard Notice:

Notifying the Public of Rights Under Title VI **INDIAN RIVER TRANSIT**

Indian River Transit operates its programs and services without regard to race, color, and national origin in accordance with Title VI of the Civil Rights Act. Any person who believes she or he has been aggrieved by any unlawful discriminatory practice under Title VI may file a complaint with Indian River County.

For more information on the Indian River Transit's civil rights program, and the procedures to file a complaint, contact 772-569-0903 or visit our administrative office at 4385 43rd Avenue, Vero Beach, FL 32967.

A complainant may also file a complaint directly with the Federal Transit Administration by filing a complaint with the Office of Civil Rights; Attention: Title VI Program Coordinator, East Building, 5th Floor-TCR, 1200 New Jersey Ave. SE, Washington, DC 20590.

Si necessita información en español, llame 772-569-0903.

Vehicle Notice (English):

In accordance with title VI of the Federal Civil Rights Act of 1964, any person who feels they have been discriminated against may issue a formal written complaint. The complaint procedure and Title VI Policy is available upon request from Indian River Transit's Administrative Offices or by calling 772-569-0903.

Vehicle Notice (Spanish):

En conformidad con el título VI de la Ley Federal de Derechos Civiles de 1964, cualquier persona que se sienta haber sido discriminados pueden emitir una queja formal por escrito. El procedimiento de denuncia y Política del Título VI está disponible a petición de las oficinas administrativas de Indian River Transit o llamando al 772-569-0903.

APPENDIX B: TITLE VI COMPLAINT FORM

Section I:				
Name:				
Address:				
Telephone (Home):			Telephone (Work):	
Electronic Mail Address:				
Accessible Format Requirements?	Large Print		Audio Tape	
	TDD		Other	
Section II:				
Are you filing this complaint on your own behalf?			Yes*	No
*If you answered "yes" to this question, go to Section III.				
If not, please supply the name and relationship of the person for whom you are complaining:				
Please explain why you have filed for a third party: _____				
Please confirm that you have obtained the permission of the aggrieved party if you are filing on behalf of a third party.			Yes	No
Section III:				
I believe the discrimination I experienced was based on (check all that apply):				
<input type="checkbox"/> Race <input type="checkbox"/> Color <input type="checkbox"/> National Origin				
Date of Alleged Discrimination (Month, Day, Year): _____				
Explain as clearly as possible what happened and why you believe you were discriminated against. 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 names and contact information of any witnesses. If more space is needed, please use the back of this form.				

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

Section V	
Have you filed this complaint with any other Federal, State, or local agency, or with any Federal or State court?	
<input type="checkbox"/> Yes <input type="checkbox"/> No If yes, check all that apply:	
<input type="checkbox"/> Federal Agency: _____	
<input type="checkbox"/> Federal Court _____	<input type="checkbox"/> State Agency _____
<input type="checkbox"/> State Court _____	<input type="checkbox"/> Local Agency _____
Please provide information about a contact person at the agency/court where the complaint was filed.	
Name:	
Title:	
Agency:	
Address:	
Telephone:	
Section VI	
Name of agency complaint is against:	
Contact person:	
Title:	
Telephone number:	

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

Signature and date required below

Signature

Date

Please submit this form in person at the address below, or mail this form to:

Indian River County Title VI Specialist

Indian River County MPO

1801 27th Street

Vero Beach, FL 32960