

Coast Transit Authority

Title VI & LEP Plan

2016

***DRAFT***

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# INTRODUCTION

The major goal of the Title VI, LEP and Service Standards Plan is to provide a framework for evaluation of transit services as CTA's markets, customer expectations, and resources change over time. CTA must be responsive to these changes in order to retain current customers and sustain ridership growth. Balancing customer expectations, quality service and budget constraints is a difficult challenge. The CTA's mission is to deliver efficient, accessible and quality transit services that link people, jobs, and communities. The service standards discussed in this Plan lay out a framework for achieving this mission.

Based on FTA Circular C 4702.1B TITLE VI REQUIREMENTS AND GUIDELINES FOR FEDERAL TRANSIT ADMINISTRATION RECIPIENTS including the Appendix C to 49 CFR part 21 referenced therein, which states "No person or group of persons shall be discriminated against with regard to the routing, scheduling, or quality of service of transportation service furnished as a part of the project on the basis of race, color, or national origin. Frequency of service, age and quality of vehicles assigned to routes, quality of stations serving different routes, and location of routes may not be determined on the basis of race, color, or national origin", CTA will sets and adopts system-wide service standards and service policies to ensure service design and operations practices do not result in discrimination on the basis of race, color, or national origin.

## Transit Service Profile

CTA's legislatively authorized operating area along the Mississippi Gulf Coast consists of the counties of Hancock, Harrison and Jackson Counties.

### Fixed Route Public Transportation

CTA offers routes which provide service in portions of Ocean Springs, St. Martin, D'Iberville, Biloxi and Gulfport. Service is also offered during community events as well as to Keesler Air Force Base in Biloxi. Reasonable walking distance can vary for different areas depending on topography, sense of safety, and other factors along a street and neighborhood. It is generally understood that most people will walk from 5 to 15 minutes (1/4 mile to 1/2 mile) to get to or from a transit station stop. This industry standard is referenced in FHWA's "Pedestrian Safety Guide for Transit Agencies". For purposes of planning and service evaluation, CTA uses a defined service area to identify the area from which most transit users will access the system by foot. The definition of a transit service area is needed to evaluate service by identifying gaps and redundancies in service. Redundancy occurs when the same parcel is served by multiple routes leading to the same destination. Gaps occur in areas where a transit route is not reasonably reachable by foot.

*CTA Fixed Route Service Area: 1/4 mile (1320 ft.)*

### Bike 'N Bus

Every bus and trolley on the fixed route system is equipped to accommodate up to two bicycles on an easy to use front rack free of charge. The integration of bicycles and transit in CTA's "Bike and Bus" program enables transit users to access transit reasonably at farther distances. Of course

in order to provide safe access to transit by bike, the community must have a system of roadway suitable for bicycle travel that include adequate signage, paved shoulders, bike lanes and separated paths. Although the transit service area used by CTA is based on reasonable distances to transit by foot, for planning and evaluation purposes it is worth considering the impacts of a desirable biking distance to access transit. As referenced in Mineta Transportation Institute's "Bicycling Access and Egress to Transit" guide in 2011, most people prefer to ride their bike to transit between 1.2 and 1.9 miles.

*CTA Biking Service Area: 1.5 miles*

### **ADA Paratransit Service**

As referenced in 49CFR37.121, since CTA is operating a fixed route system, CTA shall provide paratransit or other special service to individuals with disabilities that is comparable to the level of service provided to individuals without disabilities who use the fixed route system. This complementary paratransit service shall provide the service to the ADA paratransit eligible individuals to origins and destinations within corridors with a width of 3/4 of a mile on each side of each fixed route. The corridor shall include an area with a 3/4 of a mile radius at the ends of each fixed route.

*CTA ADA Paratransit Service Area: 3/4 of a mile*

### **ADA Paratransit Plus**

The goal of ADA Para transit PLUS is to provide transportation to people with disabilities that live outside of the ADA mandated 3/4 mile service corridors. You must make an appointment to ride ADA Para transit PLUS. Service requests are taken Monday - Friday from 8am to 5pm at the CTA offices for Harrison, Hancock and Jackson Counties. Requests can be made up to two weeks in advance. The same eligibility requirements exist for ADA and ADA Plus services.

### **Senior Demand-Response Transportation**

The Senior Citizen Service is a non-emergency curb-to-curb service the CTA provides for senior citizens that reside in Harrison County. The service is provided by CTA in cooperation with the Harrison County Board of Supervisors. Transportation is provided free of charge to eligible participants for medical appointments, grocery shopping and to senior citizen centers. Applications for this service are collected by the Harrison County Human Resource Agency. Applicants may apply online, in person and over the phone.

### **Coast Commuter**

The Coast Commuter is a work transportation program consisting of vanpools, carpools and fixed route services. The Commuter program provides cost and stress reducing work commute options in the three counties making up the Gulf Coast region. A total of 37 vanpools were in operation as of February 2016. Service is offered to the Northrop Grumman Shipyard in Pascagoula (Jackson County), Stennis Space Center in Hancock County and other major employers on the Gulf Coast.

## Hurricane Evacuation and Cold Weather Services

CTA provides evacuation transportation in the event of a hurricane or other emergency situation occurring in the Gulf Coast region. This service is provided to residents of Harrison County in partnership with the Harrison County Emergency Management Agency. The service is available to all citizens including seniors, disabled and people with pets. CTA also provides transportation to cold weather shelters. This service is activated when the shelters are opened due to extreme cold weather. Citizens can register for emergency transportation by calling CTA or by visiting the CTA website.

## Fare Zones and Bus Passes

CTA operates with a system of Fare Zones. CTA does not offer free or reduced transfers. Customers pay a fare when they board a vehicle and must pay an additional fare each time they cross a fare zone. The zones are located at the Ocean Springs Walmart, Biloxi Transit Center, Edgewater mall, Gulfport Transit Center and Grocery Depot on Deadeux Road. Fare Zone locations are easily identifiable on route schedules because they are printed in red ink while other route stops are printed in black ink.

Purchasing a daily, 3-day or monthly pass can result in considerable savings. Passes may be used anytime and are good for unlimited rides for the period indicated on the pass. Passes are non-refundable and have no cash value. Riders must have a CTA ID in order to purchase a bus pass. ID cards can be purchased for \$2.00 at the CTA administrative offices. All future pass purchases can be done at the administrative offices or by any fixed route bus operator. CTA offers the following fare structure to the general public:

Fare Classification	Amount
Regular Adult Fare (Single Ride) and Transfers	\$1.50
With Medicare Card	\$.75
Senior Citizens (60 and Older)	\$0.75
With CTA ID Card	\$0.75
Monthly Pass (w/CTA ID)	\$32.00
Public School Student (w/CTA ID)	\$1.25
Monthly Pass (w/CTA ID)	\$40.00
Children Ages 5 and Under	\$FREE
Ages 6 to 14	\$1.00
Disabled (w/CTA ID)	\$0.75
Monthly Pass (w/CTA ID)	\$32.00
Coast Tour Pass	
Daily, Unlimited Rides	\$6.00
3-Day, Unlimited Rides	\$14.00
Monthly, Unlimited Rides	\$50.00
ADA/Para transit	\$2.00/Zone

## CTA Facilities

Coast Transit Authority (CTA) operate and maintain several types of facilities that support the transit service which are presented below:

Facility	Type	Description
Biloxi Coliseum Station	Comfort Station	Parking areas, public restroom & beach access
Courthouse Road Station	Comfort Station	Parking areas, public restroom & beach access
Jones Park Station	Comfort Station	Parking areas, public restroom & beach access
Long Beach Harbor Station	Comfort Station	Parking areas, public restroom & beach access
Rodenberg Avenue Station	Comfort Station	Parking areas, public restroom & beach access
Gulfport Transit Center	Transfer Hub	Parking, inside waiting area, public restroom
Biloxi Transit Center	Transfer Hub	Parking, inside waiting area, public restroom
D'Iberville Transit Center	Hub	Parking, outside waiting area, public restroom
CTA Main Offices	Administration	Offices and bus maintenance shop

CTA will complete a Title VI equity analysis during the planning stage with regard to where a facility is located or sited to ensure the location is selected without regard to race, color, or national origin. CTA will engage in outreach to persons potentially impacted by the siting of facilities. The Title VI equity analysis must compare the equity impacts of various siting alternatives, and the analysis must occur before the selection of the preferred site. When evaluating locations of facilities, CTA should give attention to other facilities with similar impacts in the area to determine if any cumulative adverse impacts might result. Analysis should be done at the Census tract or block group where appropriate to ensure that proper perspective is given to localized impacts. If CTA determines that the location of the project will result in a disparate impact on the basis of race, color, or national origin, they may only locate the project in that location if there is a substantial legitimate justification for locating the project there, and where there are no alternative locations that would have a less disparate impact on the basis of race, color, or national origin. CTA will show how both tests are met; it is important to understand that in order to make this showing, the recipient must consider and analyze alternatives to determine whether those alternatives would have less of a disparate impact on the basis of race, color, or national origin, and then implement the least discriminatory alternative

## Planning Documents

### Title VI Plan

Coast Transit Authority (CTA) will undertake a full update to the Title VI Plan every 3 years. This process will include a review and update to general information and services offered, updates with available data for demographic analysis of user populations and groups and review and updates to the agency's system-wide service standards. The process of completing this review and update will follow all procedures and guidelines provided by the Federal Transit Administration, US

Department of Transportation. Notice of the full update to the Title VI Plan will be made to the public and will be accompanied by a defined period for review and comment.

### **Transit Development Plan**

The Transit Development Plan (TDP) is the source for identifying the types of transit projects planned for implementation which will be included within the MPO's Transportation Improvement Program (TIP). The TDP is updated every five years in connection with updates to the region's Long Range Transportation Plan (MTP).

### **5310 Coordinated Services Plan**

The Coordinated Public Transit-Human Services Transportation Plan is a plan developed and approved through a process that included participation by seniors, individuals with disabilities, representatives of public, private, and nonprofit transportation and human services providers and other members of the public.

### **Transportation Improvement Program**

The Metropolitan Planning Organization (MPO) is required, to develop a Transportation Improvement Program (TIP) which is a list of upcoming transportation projects covering a period of at least four years. The TIP must be developed in cooperation with the Mississippi Department of Transportation (MDOT) and CTA as the Gulf Coast's urban public transit provider. The TIP should include all regionally significant capital and non-capital projects receiving FHWA or FTA funds, or for which FHWA or FTA approval is required, in addition to non-federally funded projects that are consistent with the Metropolitan Transportation Plan (MTP).

CTA Planning Document Change Descriptions	
<b><i>FULL UPDATE</i></b>	<ul style="list-style-type: none"><li>• Required document update</li></ul>
<b><i>AMENDMENT</i></b>	<ul style="list-style-type: none"><li>• Addition or deletion of a project</li><li>• Major changes scope</li><li>• Change in system service standard measure or threshold</li><li>• Financial changes in a project's programmed amount of federal funds greater than 20% of the original cost</li></ul>
<b><i>MODIFICATION</i></b>	<ul style="list-style-type: none"><li>• Correcting obvious minor data entry errors</li><li>• Splitting or combining projects without modifying the original project design, concept and scope or creating project segmentation</li><li>• Changing or clarifying elements of a project description. This change would not alter the original project design, concept and</li></ul>

	<p>scope. It also must be consistent with the approved environmental document.</p> <ul style="list-style-type: none"> <li>• Moving a project from one federal funding category to another federal funding category</li> <li>• Moving a project from federal funding to state funding</li> <li>• Shifting the schedule of a project or phase within the years covered by the TIP</li> <li>• Updating project cost estimates (within the original project scope and intent) not to exceed greater than 20% of the original cost estimate</li> <li>• Moving any identified project phase programmed for previous year into a new TIP (rollover provision)</li> <li>• Adding an additional agency to a group</li> <li>• Adding projects with grouped projects within the TIP, provided fiscal constrain is maintained</li> <li>• Removing a project reported as obligated or completed</li> <li>• Redemonstration of fiscal constrain is not required</li> </ul>
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## CTA Board Breakdown

The Coast Transit Authority (CTA) Board of Commissioners consists of eight members who are residents of seven specific cities or counties served by CTA. Each member of the Board has been appointed by city and county officials. The Board acts on all policy matters necessary to the safe, reliable and efficient delivery of public transportation service to the Gulf Coast area. CTA's current Board of Commissioners include:

Ricky Cox – white male  
 Charlie Furman – white male  
 Jerry Dodge – white male  
 Mike Strojny – white male  
 Mary Bankston – white female  
 Gini Fellows – white female  
 Cindi Ladner - white female  
 Dick Wilson – white male



## SYSTEM-WIDE SERVICE STANDARDS & POLICIES

In order to comply with 49 CFR Section 21.5(b)(2) and (7), Appendix C to 49 CFR part 21, CTA has sets system-wide service standards used to guard against discriminatory service design or operations decisions.

### Vehicle Load

Based upon load factors currently experienced by CTA, a maximum load factor of 1.1 of the seated capacity has been established. During peak periods, if a route exceeds the maximum load factor for a period of one week, additional service or larger equipment will be implemented as soon as possible. The seated capacities for buses currently in service are as follows:

Route Used	Bus Make	Seated Capacity
Route 34 - Pass Road Route 24 - Keesler	GILLIG	26 or 23 plus 1 wheelchair or 20 plus 2 wheelchairs
Route 4 – D’ Iberville Route 7 – Ocean Springs Route 37 – Orange Grove Route 38 – West Gulfport Route 8 – D’ Iberville Festival Hopper	GLAVAL	20 or 16 plus 2 wheelchairs
Casino Hopper	OPTIMA	28 or 20 plus 2 wheelchairs
Beachcomber	SUPREME	25 plus 2 wheelchairs

### Vehicle Headway

Frequency of service for CTA’s fixed routes ranges from 15 minutes to 90 minutes depending on route class, location and ability to navigate local traffic conditions and return to the designated CTA transit centers in Biloxi and Gulfport. Headways are capped at 90 minutes for all fixed routes, as it has been CTA’s experience that this is the longest time possible to run transit routes in the region, address obstacles created by local vehicular traffic and still accommodate potential passengers with a baseline of service. All routes are designed with the objective of meeting a 15 minute interval test. Each system route must be able to start and finish at one of the existing CTA transit centers (Biloxi or Gulfport) within this time or within a multiple of 15 minutes (30, 45, 60, 75, 90 minutes) in order to maximize the ability of passengers on these buses to transfer through the transit center to other routes in the network. CTA currently has three different classes of routes that include System Mobility Routes, System Accessibility Routes and Special Routes.

## Mobility System Routes

Transportation mobility is the quick and efficient movement of people from point to point across the region. The MS Gulf Coast region has a linear geography with most of the population density and employment density between two major east-west corridors I-10 and US 90 with north-south corridors in between. The fixed route service provided on these mobility corridors are the bus routes that serve as the primary arteries to navigate CTA's fixed route system. The priority for these routes is mobility as opposed to accessibility. For instance, as transit is made more accessible with more route coverage and stop areas, mobility is reduced. As mobility increases, accessibility is compromised because of fewer posted stops and fewer neighborhood or individual area routes as more of the system is turned over to intercity or regional route strategies. Long-term, better transit mobility on these important corridors will attract new customers to CTA increasing the numbers who use transit as a viable option for not just their work commute but other daily trips as well. Headways on these corridors should be among the shortest in the system. To the extent possible and practicable, transit provided on mobility corridors should have priority for improvement to enable shorter travel time and shorter headways.

Transit provided on mobility corridors should have priority for improvement to enable shorter travel times and shorter headways.



Beachcomber .....	45 minute headway
Route 4 - D' Iberville.....	90 minute headway
Route 7 - Ocean Springs.....	90 minute headway
Route 37 - Gulfport .....	90 minute headway

## Accessibility System Routes

The purpose of these routes is more access than mobility therefore more route coverage and stop areas resulting in higher headways are acceptable. These routes serve as collectors that feed the mobility routes by making transfers at the CTA transit centers.

Casino Hopper .....	45 minute headway
Route 34 - Pass Road .....	45 minute headway
Route 38 - Gulfport .....	90 minute headway

## Special Routes

These are routes that serve a particular function and are not necessarily required to pulse with the rest of the system.

Route 8 – D’ Iberville.....	15 minute headway
CTA Route - Festival Hopper.....	15 minute headway
CTA Route 24 - Keesler AFB .....	60 minute headway

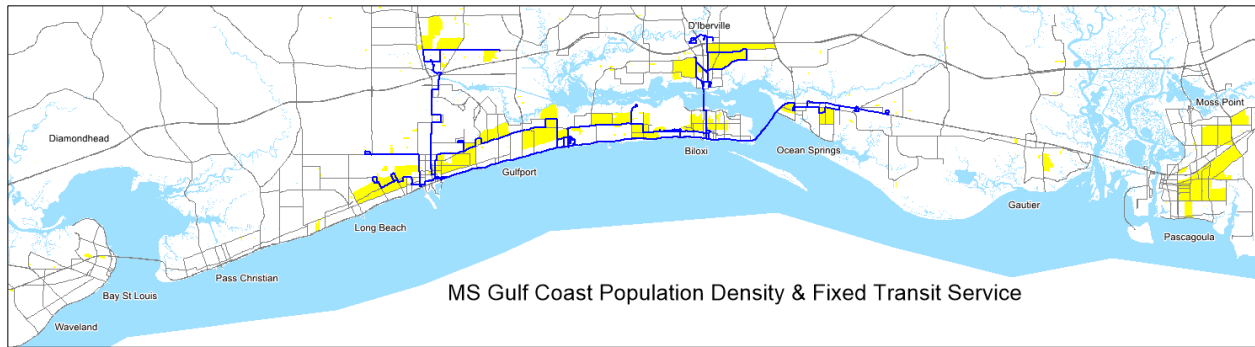
## On-Time Performance

Maintaining good on-time performance is very important to CTA’s system because of the high percentage of its customers making transfers at the transit centers. On-time performance is tracked by performance reports that consider on-time performance to all CTA stops including mid-route stops and CTA hubs. On-time performance is measured periodically at the CTA hubs specifically through manual surveys. CTA field supervisors also regularly monitor on-time performance and counsels drivers who consistently fail to meet on-time performance standards that are within their control. Discussions with drivers are also used to identify vehicle scheduling and routing issues which are corrected through the annual Service Review Plan. Guidelines to help evaluate CTA fixed route on-time performance include:

- 85 percent of bus trips on each route should depart CTA transit centers not more than three minutes late and never early.
- 85 percent of bus trips on each route should arrive at the CTA transit centers not more than five minutes late.
- 85 percent of bus trips on each route should reach each mid-route scheduled time point not more than five minutes late.

## Service Availability

The current fixed route transit system services are offered primarily within a core market from west Gulfport to Ocean Springs within the more dense population on the Gulf Coast. As funding becomes available or opportunities to shuffle services come about, priority should be given to provide service areas of dense population currently not serviced by fixed route transit. Factors which influence the assignment of route location include the availability of local funding, the route miles and number of anticipated stops and layovers, areas of dense population of 2500 persons per square mile or more (presented on the map below), presence of supporting infrastructure to help convey passengers to the route, as well as the presence of potential trip demand generators either for employment or receipt of services.



## Direct Travel

CTA bus routes are designed to operate as directly as possible, using major arterial streets. Route deviations bring service closer to a trip generator, reducing walk access travel time for customers to/from the generator, which makes the route desirable to new customers. The deviation, however, imposes a burden on customers who are not boarding from the generator. When making the decision to deviate from the route to service a generator, the number of new customers that should be expected must be weighed against the potential losses to travel time and on-time performance of the existing route. The total route deviation should not exceed five minutes and should have a minimum of 100 riders per month.

## Bus Stop Spacing

There is an important balance to be found when determining the distance between stops. More closely spaced stops provide customers with more convenient access with a shorter walk to the nearest bus stop. However, the more stops result in a longer ride for customers if demand for boarding and alighting is more often than needed because of the number of times it takes the bus to decelerate, come to a complete stop and then accelerate and re-enter traffic. To maintain operating speeds, CTA bus stops should normally not be placed closer than  $\frac{1}{4}$  mile (1320 feet) apart and no further than  $\frac{1}{2}$  mile (2640 feet) apart. Population densities of 2500 persons per square mile or more are used to indicate areas where spacing should be  $\frac{1}{4}$  mile. Employment and other high use transit generators also influence the general distribution and precise placement of bus stops.

## Bus Stop Location

Far-side bus stops are preferable wherever possible. A bus stop placed after an intersection allows the bus to go through the intersection before stopping for passenger boarding and alighting. This allows the bus to reenter traffic in gaps created by traffic signals at the intersection. Bus stops located on the far side of intersections encourage pedestrians to cross behind the bus, which improves safety. CTA's policy is when a far-side stop is used, there must be 50 to 60 feet between the rear of the bus and the corner of the intersection measured from a point where the curb or edge of pavement line for the intersecting roadways meet.

Near-side bus stops are located before an intersection. The benefit of these stops is that passengers can load and unload during a red light however, the dwell time for boarding and alighting may result in the bus sitting through an extra light cycle which has an impact on the route's travel time. Near-side stops also have a conflict with right turning traffic and should be avoided where possible. CTA's policy is when providing for a nearside stop, there must be 50 to 60 feet between the front of the bus and the corner of the intersection measured from a point where the curb or edge of pavement line for the intersecting roadways meet.

In addition, variations may be applied to locating stops on state highways (such as US Highway 90 or US Highway 49) because bus stops cannot be located on a state highway unless a turning lane or other pull over lane is available. Variations can also be made when it is determined that such are in the best interest of pedestrian safety.

## **Distribution of Transit Amenities**

Transit amenities refer to items of comfort and convenience available to the general riding public. They are distributed on a system-wide basis. These items include, but are not limited to, benches, shelters, route maps, timetables, and trash receptacles along bus routes as well as "park-and-ride" facilities, and transit centers. The location of transit amenities is determined by factors such as ridership, access to right-of-way, individual requests, and staff recommendations.

Transit centers and park and ride facilities are used at route termini and transfer point locations. These facilities provide added comfort for passengers seeking to access the transit system.

Locations with 100 or more boardings a month are considered for shelter, route map, schedules, bike rack and trash receptacles placement. At the present, all shelters are installed and maintained by Coast Transit Authority (CTA). CTA currently regulates the content of all advertising which appears on the shelters. CTA will periodically evaluate the placement and distribution of amenities.

## **Vehicle Assignment**

CTA bases its vehicle assignments on a combination of passenger volume and operating environment. All transit bus class vehicles operating in fixed route service are lift equipped, air conditioned and have padded seats (vinyl or cloth). Each vehicle carries stations for wheelchair passengers. Some include jump seats which can convert these areas to additional seating areas for passengers. All have grab bars to accommodate standees.

### **Fixed Route Vehicle Assignment**

The newest buses in the fleet, GILLIG low floor buses, are used on routes with a higher passenger volume operating in areas considered more urban and densely developed with a more complex street network containing sidewalks, crosswalks, and traffic signals. The OPTIMA buses are used on the Beachcomber (Highway 90) and Biloxi's Casino district utilizing the traditional trolley look

of the buses to promote Mississippi Gulf Coast heritage. Deviations in these assignments may be made in response to changes in vehicle load patterns or under emergency conditions/situations. The other routes use the GLAVAL buses for their comfort.

Bus Make	Route Used
GILLIG	Route 34 – Pass Road Route 24 – Keesler
GLAVAL	Route 4 – D’ Iberville Route 7 – Ocean Springs Route 37 – Orange Grove Route 38 – West Gulfport Route 8 – D’ Iberville Festival Hopper
OPTIMA	Casino Hopper
SUPREME	Beachcomber

#### Demand-Response Vehicle Assignments

The 13 demand response routes use GLAVAL buses.

DIBERVILLE SENIORS	HARRISON COUNTY
LYM 2	HARRISON COUNTY
LYM 1	HARRISON COUNTY
BLX D	HARRISON COUNTY
GPT D	HARRISON COUNTY
GPT SENIORS MEDS	HARRISON COUNTY
MEDS	HARRISON COUNTY
JACKSON CO ADA	JACKSON COUNTY
HSC 1	HANCOCK COUNTY
MEDS	HARRISON COUNTY
NGPT D	HARRISON COUNTY
IFC	HARRISON COUNTY
HANCOCK 2	HANCOCK COUNTY
MHA	HARRISON COUNTY

#### Vanpool Vehicle Assignment

Vehicle assignments within the vanpool program are based upon passenger volume information identified through the subscriptions collected at participating employers. Vans operated on the Coast Commuter service range from 15-passenger to small 7/8 passenger minivans.

## SERVICE REVIEW PLAN

The Service Review Plan, which takes place annually, provides for a general evaluation of all transit services considering changes in the local environment (funding, population, development). The Plan identifies new transit services or significant changes to existing services for the following year. The Plan identifies changes that are designed to achieve specific service goals and opportunities for service expansion and improvement. The Service Review Plan provides a process with which to measure and evaluate system performance on a year-to-year basis. When planning for transit service expansion or reduction, an evaluation process should be followed to determine if service reduction or expansion is warranted. The evaluation process guidelines considered will include but are not limited to:

- Local funding availability from the entity where the service is located
- Service or portion of the service is not performing to an acceptable ridership level
- Unserved areas which are identified as transit-supportive based on population density
- New or unserved trip generators including, employment centers, shopping, educational facilities, medical institutions, government/community facilities and tourist attractions
- Travel time adjustments to improve failing on-time performance
- Consider opportunities for headway reduction
- Consider impacts on those areas served created by a reduction or loss of service
- Consider the role the route may play in connecting to the larger transit network. Important transfer points and mobility routes should be given additional review
- Consider existing duplication in services from the overlap of service areas from two or more routes

CTA will make all attempts to reduce the impact on customers that rely on the transit service to their daily needs and will only implement the service change if they can demonstrate substantial justification for the proposed service change and show there are no alternatives that would have less impact on riders but would also still accomplish their goals.

### Route Changes

Anytime route changes or adjustments are proposed, CTA performs an analysis to determine the impacts that would result from changes. CTA wants to evaluate and consider impacts to minority customers, low-income customers and overall ridership. As written in FTA Circular 4702.1B, the requirement to formally evaluate service and fare changes applies to fixed route providers with 50+ vehicles. CTA does not meet that criteria. However, CTA is still responsible for complying with the DOT Title VI regulations which prohibit disparate impact discrimination and low-income populations are not a protected class under Title VI. However, recognizing the inherent overlap of environmental justice principles in this area, and because it is important to evaluate the impacts of service and fare changes on passengers who are transit-dependent, FTA requires transit providers to evaluate proposed service and fare changes to determine whether low-income populations will bear a disproportionate burden of the proposed changes.

## Type of Change

CTA shall analyze adverse effects related to changes in transit service. The adverse effect is measured by the change between the existing and proposed service levels that would be deemed significant. CTA shall consider the degree of adverse effects, and analyze those effects, when planning their service changes. A service change will be presented as a numerical standard, such as a change that affects “x” percent of the service area of the route or “x” percent of the revenue miles. CTA will begin by determining if the proposed service change is considered “major” or “minor” based on the table below. This will dictate the level of public involvement and outreach that will be required to implement the changes as indicated on the table below.

<b>MAJOR CHANGE</b>	<ul style="list-style-type: none"><li>• Adding a new service route (25% or greater)</li><li>• Revenue route miles reduction to a route (25% or greater)</li><li>• Service area reduction to a route (25% or greater)</li><li>• Span of service changes to a route (25% or greater)</li><li>• All system fare increases</li><li>• System wide changes to process and/or standards</li><li>• Route elimination</li><li>• All headway changes</li></ul>
<b>MINOR CHANGE</b>	<ul style="list-style-type: none"><li>• Revenue route miles reduction to a route (less than 25%)</li><li>• Service area reduction to a route (less than 25%)</li><li>• Span of service changes to a route (less than 25%)</li><li>• Administrative changes to service standards</li><li>• Load factor changes</li><li>• Vehicle type change</li></ul>

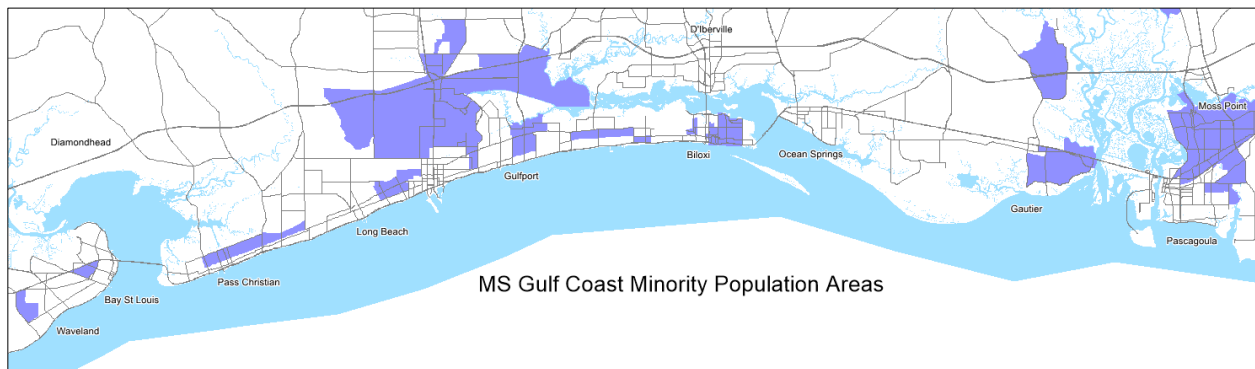
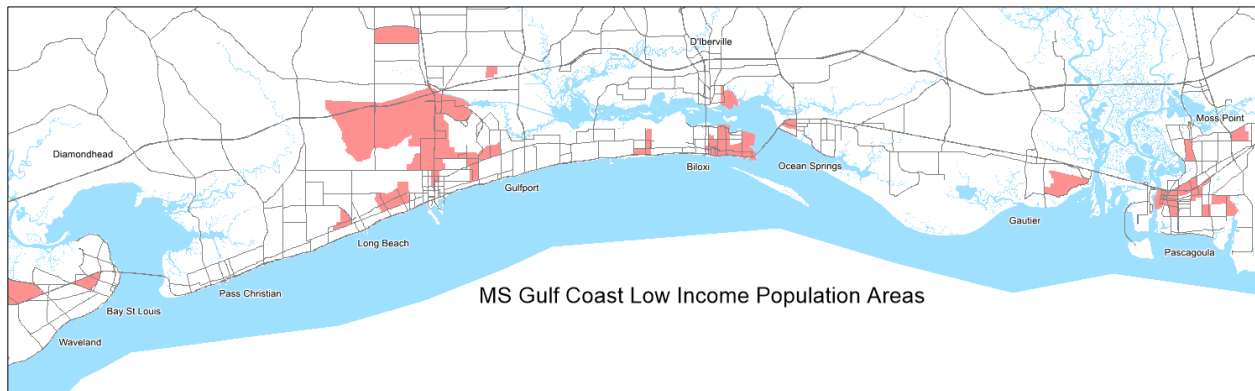
*\*Temporary addition of service or demonstration projects that last less than 12 months can be exempt from these requirements.*

## Customer Impact Analysis

CTA will define and analyze adverse effects related to changes in transit service to all types of changes. Changes in service that have an adverse effect on overall ridership, a disparate impact to minority populations or a disproportionate burden on low-income populations from reductions in service will be considered. Elimination of a route or reduction of revenue miles will generally have a greater adverse impact than a change in headways. Additions to service may also result in disparate impacts, especially if they come at the expense of reductions in service on other routes. CTA shall consider the degree of adverse effects, and analyze those effects, when planning their service changes. The typical measure to determine the customer impact is an analysis of the persons who are likely to be adversely affected by the change and the proportion of persons in protected classes who are likely to be adversely affected. There are two comparison methods including described below.



- **Census block data.** CTA will analyze the cumulative impacts of each type of service change on minority populations and low-income populations in its service area. The analysis is based on block-level Census demographic data and therefore does not represent ridership directly. The affected population is the Census blocks within the route's one-quarter mile service area. CTA's ultimate determination of disparate impact on minority riders or disproportionate burden on low-income riders would depend on analyzing the ridership data along the affected route.
- **Ridership data.** CTA collects ridership data that when incorporated into GIS maps shows number of bus boardings for each stop location. Using this data CTA can foresee the impact to a stop from proposed service changes. This data is used to evaluate impacts to CTA's overall ridership as well as impacts to stops in minority or low-income areas.



## **PUBLIC PARTICIPATION**

Public participation is a critical component of the transportation planning process. CTA uses a documented participation plan that defines a process for providing citizens, affected public agencies, private providers of transportation, representatives of users of public transportation, vulnerable populations, and other interested parties with reasonable opportunities to be involved in the planning process.

The Coast Transit Authority (CTA) closely follows the public participation plan used by Gulf Regional Planning Commission (GRPC), the Mississippi Gulf Coast Metropolitan Planning Organization. CTA works in partnership with the MPO staff to meet all public engagement and outreach requirements. CTA refers to the MPO's Public Participation Plan (PPP) for specific engagement strategies.

### **Board of Commissioners**

Board of Commissioners of CTA will be review and consider approval of information and/or changes to operations or service as recommended made by the CTA Executive Director.

### **Public Comment Period**

The period for public comment and public notice will contain a summary of information and/or proposed changes to operations or service for review and comment. Notice of the review period, as well as the locations where it will be made available for public review will be placed in *The Sun Herald*, the CTA website, the MPO's website, advertised in CTA transit centers (Gulfport, Biloxi) and in all CTA transit vehicles.

Comments received as a result of the notice will be accepted by mail, email, facsimile until the end of the review period.

Concurrent with the notice of public review is notification of the same to key stakeholder groups and agencies located in the CTA service area, as well as the Mississippi Department of Transportation's Public Transit Division and the Federal Transit Administration Region IV office in Atlanta, GA. This notice includes a description of the purpose and summary of information for review and comment and review locations, methods for submitting comments.

### **Public Meetings**

In order to provide meaningful opportunities for members of the community to participate in the transit planning process, CTA hosts public meetings to share information and to gather public feedback on proposals. As required, concurrent with the notice of public review is notification of

public meetings hosted by CTA staff. These are formal meetings that are specifically used as an outreach effort to present to the public a summary of information and/or changes to operations or service for comment. Notice of the public meetings will be placed in *The Sun Herald*, CTA's website, the MPO's website, advertised in CTA transit centers (Gulfport, Biloxi), CTA transit vehicles and in any community requiring targeted outreach.

## **Informational Meetings**

As needed, CTA will host informational meetings to provide customers with material about CTA service. These meetings are informal, with the purpose of informing CTA customers and other interested parties of system changes, upgrades, new services, document modifications, etc. These meetings will be advertised in CTA Transit Centers (Gulfport, Biloxi) and in all CTA transit vehicles.

## **Targeted Outreach**

In order to seek out and consider the needs and input of those traditionally underserved by existing transportation systems, such as minority, low-income and LEP persons, who may face challenges accessing employment and other services, targeted outreach is used as needed. Targeted outreach is triggered when, through staff analysis, one or more of the affected low-income, minority or LEP areas will be directly impacted by a proposed change or update. Specific targeted outreach efforts will vary. Strategies to be implemented will be determined on a case-by-case basis, as every community is unique and the most effective method(s) of outreach will vary widely. Some examples of targeted effort include partnering with a local elected official or faith-based organization to inform the community about the proposed action, it could mean that an additional public meeting will be scheduled and held within that immediate community, it may require setting up a table at an event, building or in a city center to talk with people in the community, door-to-door surveys could be conducted and fliers and notices in appropriate languages may be posted broadly within the affected area. Typically a combination of several strategies will be employed to ensure meaningful access and participation opportunities are being provided.

As needed, other vulnerable populations may also receive some targeted outreach. Although not automatically initiated as part of the Customer Impact Analysis, other groups like the disabled, elderly and young, may be greatly affected by a proposed action, whether positive or negative. As CTA becomes aware of this potential impact, they'll develop an outreach strategy to specifically engage those additional individuals in the planning process.

## **Public Comment Report**

All of the public comments gathered as a result of outreach efforts are compiled into a summary report. CTA staff will consider all public comments and provide necessary responses to comments and alternate actions or changes as a result of public comments will be documented. Copies of all

comments received and actions taken to consider the feedback will be presented to the CTA Board of Commissioners as they review and vote to adopt the updated plan or service change.

Transit System Changes Public Review	
<b>MAJOR CHANGE</b>	<ul style="list-style-type: none"> <li>• CTA Board of Commissioners approval</li> <li>• 30-day public comment period</li> <li>• Public meeting</li> <li>• Targeted outreach to affected low-income, minority and LEP areas</li> <li>• Targeted outreach to other vulnerable populations</li> <li>• Public comment report</li> <li>• Customer Impact Analysis</li> </ul>
<b>MINOR CHANGE</b>	<ul style="list-style-type: none"> <li>• CTA Board of Commissioners approval</li> <li>• Informational meeting</li> <li>• Customer Impact Analysis</li> </ul>

Planning Documents Public Review	
<b>FULL UPDATE</b>	<ul style="list-style-type: none"> <li>• CTA Board of Commissioners approval</li> <li>• 30-day public comment period</li> <li>• Public meeting as needed</li> <li>• Public comment report</li> </ul>
<b>AMENDMENTS</b>	<ul style="list-style-type: none"> <li>• 10-day public comment period</li> </ul>
<b>MODIFICATIONS</b>	<ul style="list-style-type: none"> <li>• None</li> </ul>

## Past Outreach Efforts

Outreach efforts performed since CTA's last Title VI Plan that resulted from the annual Service Review Plan.

### 2016 Changes

CTA made several small adjustments to routes in order to improve on-time percentages. The changes were considered "minor". Impacts to the routes were evaluated in "CTA Fixed Route

Adjustments & Impact Analysis". CTA also held two informational meetings to present the changes to its customers.

- Adjustments to Route #4 to include the Grand Theater
- Service the D'Iberville Transit Center two times instead of one
- Change Route #7 to continue on Government St turn north on Hanley Rd to Hwy 90
- Shorten loop inside the VA Hospital property
- Eliminate the leg of Route #37 that goes to down Seaway Rd
- Add service to the western end of Deadeux Rd on Route #37
- Eliminate service on Railroad St on Route #38

### **2015 Changes**

Changes to CTA's transit system in 2015 were significant. Since the proposed changes were considered "major", CTA initiated a review period and public meetings to accept comment. Significant comments were received and addressed in the "FY 2015 CTA Route Reductions Impact Analysis" document. Changes included:

- Elimination of the Route #31
- Reduction of Casino Hopper route from three to two buses
- Elimination of Casino Hopper Sunday service
- Elimination of Casino Hopper service on Friday and Saturday nights
- Eliminate Beachcomber service on Sunday
- Add service to Route #37 on Sunday
- Change the Casino Hopper service to a circular route
- Add service to Route #38 on Sunday

## TITLE VI COMPLAINTS

CTA is required to provide a specified procedure for acceptance of Title VI complaints related to providing programs, services, and benefits. The complaint process, procedure and complaint form are presented in this section. Electronic copies are available on the CTA website [www.coasttransit.com](http://www.coasttransit.com). The complaint process and contact information is included in CTA's Rider's Guides and posted on the CTA website, transfer hubs and main office.

### Past Title VI complaints

CTA maintains a list of any of the following that allege discrimination on the basis of race, color, or national origin including:

- Active investigations conducted by FTA and entities other than FTA
- Lawsuits
- Complaints naming CTA

This list shall include the date that the transit-related Title VI 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.

### Title VI Statement of Policy

Coast Transit Authority (CTA), a federal grant recipient, is required by the Federal Transit Administration (FTA) to conform with Title VI of the Civil Rights Act of 1964 and its amendments. Title VI of the Civil Rights Act of 1964 requires that no person in the United States, shall, on the grounds of race, color or national origin, be excluded from, be denied the benefits of, or be subjected to discrimination, under any program or activity receiving federal financial assistance. Presidential Executive Order 12898 addresses environmental justice in minority and low-income populations. Presidential Executive Order 13166 addresses services to those individuals with Limited English proficiency. The rights of women, the elderly and the disabled are protected under related statutes. These Presidential Executive Orders and the related statutes fall under the umbrella of Title VI.

CTA is committed to enforcing the provisions of Title VI and protecting the rights and opportunities of all persons associated with CTA or affected by its programs. This commitment includes vigorously enforcing all applicable laws and regulations that affect CTA and those organizations, both public and private, which participate and benefit through CTA's programs. CTA will take positive and realistic affirmative steps to ensure that all persons and/or firms wishing to participate in its programs are given an equal and equitable chance to participate. All sub-recipients and contractors are required to prevent discrimination and ensure nondiscrimination in all of their programs, activities and services.

CTA's Executive Director is responsible for providing leadership, direction and policy to ensure compliance with Title VI of the 1964 Civil Rights Act. Any person(s) or firm(s) who feels that they have been discriminated against is encouraged to report such violations to CTA at:

Coast Transit Authority (CTA)  
333 DeBuys Road  
Gulfport, MS 39507

## Title VI Complaint Procedures

This procedure outlines the Title VI complaint procedures related to providing programs, services, and benefits. It does not deny the complainant the right to file formal complaints with the Secretary of the US Department of Transportation, Equal Employment Opportunity Commission (EEOC), Federal Highway Administration (FHWA), Federal Transit Administration (FTA), or to seek private counsel for complaints alleging discrimination, intimidation, or retaliation of any kind that is prohibited by law.

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

1. Any person who believes that they have been subjected to discrimination may file a written complaint with Coast Transit Authority (CTA). Complaints should be filed within 180 calendar days of the alleged incident.
2. The complainant may download the complaint form from the CTA website ([www.coasttransit.com](http://www.coasttransit.com)) or request the complaint form from the Executive Director. The complainant may also submit a written statement that contains all of the information identified in Section 3 a through f
3. The complaint will include the following information:
  - a. Name, address, and telephone number of the complainant.
  - b. The basis of the complaint i.e., race, color, national origin, sex, elderly or disabled.
  - c. The date or dates on which the alleged discriminatory event or events occurred.
  - d. The nature of the incident that led the complainant to feel discrimination was a factor.
  - e. Names, addresses, and telephone numbers of persons who may have knowledge of the event.
  - f. Other agencies or courts where complaint may have been filed and a contact name.
  - g. Complainant's signature and date.
  - h. If the complainant is unable to write a complaint, CTA staff will assist the complainant.
  - i. The complaint may be sent or faxed to the following address:  
Coast Transit Authority (CTA), 333 DeBuys Road, Gulfport, MS 39507  
(228) 896-8081 (Fax)
  - j. The complaint may be sent via email to: [kcoggin@coasttransit.com](mailto:kcoggin@coasttransit.com).

3. The complainant also has the right to file a Title VI claim with the US Department of Transportation, Federal Transit Administration, Office of Civil Rights, Region IV. 230 Peachtree, NW, Suite 800, Atlanta, GA 30303, **within** the 180 day timeframe.
4. CTA will begin an investigation within fifteen (15) working days of receipt of a complaint.
5. CTA will contact the complainant in writing no later than thirty (30) working days after receipt of complaint for additional information, if needed to investigate the complaint. If the complainant fails to provide the requested information in a timely basis, CTA may administratively close the complaint.
6. CTA will use its best effort to complete the investigation of Title VI complaints within ninety (90) days of receipt of the complaint. A written investigation report will be prepared by the investigator. The report shall include a summary description of the incident, findings, and recommendations for disposition.



## TITLE VI Complaint Form – Coast Transit Authority

Individuals or organizations who believe they have been denied the benefits of, excluded from participation in, or subject to discrimination on the grounds of race, color, or national origin by a recipient of Federal Transit Administration(FTA) funding can file an administrative complaint under Title VI of the Civil Rights Act of 1964. Title VI of the Civil Rights Act of 1964 states “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 assistance”.

This protection and same opportunity to file a complaint extends to the public through Executive Order 12898, “Federal Actions To Address Environmental Justice in Minority Populations and Low Income Populations,” and the Department of Transportation’s Guidance to Recipients on Special Language Services to Limited English Proficient (LEP) Beneficiaries.

Individuals and organizations may file a complaint by completing and submitting the following Title VI complaint form. Assistance is available upon request. Complaints must be signed and include contact information and should be sent via mail or delivered to: Coast Transit Authority, 333 DeBuys Road, Gulfport, MS 39507. Alternatively, it can be faxed to 228/896-8081 or emailed to [kcoggin@coasttransit.com](mailto:kcoggin@coasttransit.com).

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1. Complainant’s Name: \_\_\_\_\_

2. Address: \_\_\_\_\_

3. City: \_\_\_\_\_ State: \_\_\_\_\_ Zip: \_\_\_\_\_

4. Telephone No. (Home): \_\_\_\_\_ Cell: \_\_\_\_\_ Business: \_\_\_\_\_

5. Email Address: \_\_\_\_\_ TDD/Other: \_\_\_\_\_

6. Are you filing this complaint on your own behalf? *(check the appropriate box)*

[ ] Yes *(go to question 10)* [ ] No

7. If No, please give us the following information on the person discriminated against:

Name: \_\_\_\_\_

Address: \_\_\_\_\_

City: \_\_\_\_\_ State: \_\_\_\_\_ Zip: \_\_\_\_\_

Telephone: \_\_\_\_\_ Email Address: \_\_\_\_\_

Relationship to Complainant: \_\_\_\_\_

8. Which of the following best describes why you think the discrimination took place? Was it because of your:

<input type="checkbox"/>
<input type="checkbox"/>
<input type="checkbox"/>

Race/Color

National Origin

Low Income

<input type="checkbox"/>
<input type="checkbox"/>
<input type="checkbox"/>

Sex

Disability

Age

☐ Limited English Proficiency

9. What date did the alleged discrimination take place? : \_\_\_\_\_

10. In your own words, describe the alleged discrimination. Explain what happened and whom you believe was responsible. Please attach additional sheets of paper if more space is required.

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11. Have you filed this complaint with any other federal, state or local agency, or with any federal or state court? (*check appropriate box*) [ ] Yes [ ] No

If answer is yes, check each box that applies:

☐ Federal Agency  
☐ Federal Court  
☐ State Agency  
☐ State Court

☐ Local Agency (Other than Coast Transit Authority)  
☐ Other:

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Please provide contact person information for the agency or court you also filed the complaint with (*attach more sheets if necessary*):

Name/Agency: \_\_\_\_\_

Address: \_\_\_\_\_

City: \_\_\_\_\_ State: \_\_\_\_\_ Zip: \_\_\_\_\_

Telephone No.: \_\_\_\_\_ Date Filed: \_\_\_\_\_

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

Signed: \_\_\_\_\_ Date: \_\_\_\_\_

(*Note: we cannot accept your complaint without a signature, Thank You!*)

## Título VI Declaración de Pólizas

Coast Transit Authority (CTA), un beneficiario del subsidio federal, es requerido por la Administración Federal de Tránsito (FTA) para cumplir con el Título VI del Acta de Derechos Civiles de 1964 y sus enmiendas. Título VI del Acta de Derechos Civiles de 1964 requiere que ninguna persona en los Estados Unidos podrá, por motivos de raza, color u origen nacional, sea excluido de, negado los beneficios de, ó sea sujeto a discriminación bajo cualquier programa ó actividad que reciba asistencia financiera federal. Orden Ejecutiva Presidencial 12898 aborda la justicia ambiental en poblaciones minoritarias y de bajos ingresos. Orden Ejecutiva Presidencial 13166 aborda los servicios a las personas con dominio limitado del inglés. Los derechos de las mujeres, los ancianos y los discapacitados están protegidos por las leyes correspondientes. Estas órdenes ejecutivas presidenciales y de los estatutos relacionados caen bajo el del Título VI.

CTA se compromete a cumplir las disposiciones del Título VI y la protección de los derechos y oportunidades de todas las personas relacionadas con la CTA ó afectados por sus programas. Este compromiso incluye vigorosamente la aplicación de todas las leyes y reglamentos que afectan a CTA y esas organizaciones, tanto públicas como privadas, que participan y se benefician a través de programas del CTA. CTA tomará medidas afirmativas positivas y realistas para asegurar que todas las personas y / ó empresas que deseen participar en sus programas se les dé una oportunidad igual y equitativa para participar. Todos los sub-beneficiarios y contratistas tienen la obligación de prevenir la discriminación y garantizar la no discriminación en todos sus programas, actividades y servicios.

El Director Ejecutivo de la CTA es responsable de proporcionar liderazgo, dirección y pólizas para asegurar el cumplimiento con el Título VI del Acta de Derechos Civiles de 1964. Cualquier persona (s) ó empresa (s) que siente que ha sido discriminado se anima a informar tales violaciones a CTA a:

Coast Transit Authority (CTA)  
333 DeBuys Rd.  
Gulfport, MS 39507

## Título VI Procedimientos de Quejas

Este procedimiento describe los procedimientos del Título VI de quejas relacionadas con los programas que ofrecen, servicios y beneficios. No niega al demandante el derecho a presentar quejas formales ante el Secretario del Departamento de Transporte de EE.UU., Equal Employment Opportunity Commission (EEOC), Administración Federal de Carreteras (FHWA),

Administración Federal de Tránsito (FTA), ó buscar un abogado privado para denuncias de discriminación, intimidación ó represalia de ningún tipo que está prohibido por la ley



Título VI del Acta de Derechos Civiles de 1964 requiere que ninguna persona en los Estados Unidos, por motivos de raza, color u origen nacional, sea excluido de, negado los beneficios de, ó sea sujeto a discriminación bajo cualquier programa ó actividad que reciba asistencia financiera federal.

1. Cualquier persona que crea que ha sido objeto de discriminación puede presentar una queja por escrito ante Coast Transit Authority (CTA). Las quejas deben ser presentadas dentro de los 180 días siguientes alegados al incidente.
2. El demandante puede descargar el formulario de queja por medio de CTA ([www.coasttransit.com](http://www.coasttransit.com)) ó solicitar el formulario de quejas del Director Ejecutivo. Asimismo, el demandante puede presentar una declaración escrita que contenga toda la información que se indica en la Sección 3 A á la F.
3. La denuncia incluirá la siguiente información:
  - a. Nombre, dirección y número de teléfono del denunciante.
  - b. La base de la denuncia, es decir, color, raza, origen nacional, sexo, edad ó discapacitadas.
  - c. La fecha ó fechas en que el presunto acto discriminatorio ó hechos.
  - d. La naturaleza del incidente que llevó al autor a sentir la discriminación que fue un factor.
  - e. Nombres, direcciones y números telefónicos de las personas que puedan tener conocimiento del evento.
  - f. Otros organismos ó tribunales donde denuncia haya sido presentada y un nombre de contacto.
  - g. Firma del demandante y la fecha.
  - h. Si el demandante no puede escribir una queja, CTA asistirá al demandante.
  - i. La denuncia podrá ser enviada ó enviada por fax a la siguiente dirección:  
Coast Transit Authority (CTA), 333 DeBuys Rd., Gulfport, MS 39507, (228) 896-8081 (Fax)
  - j. La queja puede ser enviada vía correo electrónico a: [kcoggin@coasttransit.com](mailto:kcoggin@coasttransit.com).

3. Asimismo, el demandante tiene derecho a presentar una reclamación Título VI con el Departamento de Transporte de EE.UU., Federal Transit Administration, Office of Civil Rights, IV Región. 230 Peachtree, NW, Suite 800, Atlanta, GA 30303, dentro del plazo de 180 días.

4. CTA se iniciará una investigación dentro de los quince (15) días hábiles siguientes a la recepción de una queja.

5. CTA se pondrá en contacto con el demandante por escrito no más tarde de treinta (30) días hábiles siguientes a la recepción de la comunicación para obtener información adicional, si es necesario para investigar la denuncia. Si el demandante no proporciona la información solicitada en forma oportuna, CTA administrativamente puede cerrar la queja.

6. CTA hará uso de su mejor esfuerzo para completar la investigación del Título VI quejas dentro de los noventa (90) días siguientes a la recepción de la queja. Un informe de investigación escrito será preparado por el investigador. El informe incluirá un resumen descriptivo de los hechos, las conclusiones y las recomendaciones para su disposición.

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## Título VI Formulario para Quejas- Coast Transit Authority

Las personas u organizaciones que creen que se les ha negado los beneficios de, excluidos de participar en, ó sujetos a discriminación por motivos de raza, color u origen nacional de un recipiente de la Administración Federal de Tránsito (FTA) de financiación puede presentar una queja administrativa con respecto al Título VI de la Ley de Derechos Civiles de 1964. Título VI del Acta de Derechos Civiles de 1964 establece que "Ninguna persona en los Estados Unidos, por motivos de raza, color u origen nacional, sea excluida de participar en, sea negado los beneficios de, o sea sujeto a discriminación bajo cualquier programa ó actividad que reciba asistencia federal".

Esta protección y oportunidad igual para presentar una queja se extiende al público a través de la Orden Ejecutiva 12898, "Acciones federales para abordar la justicia ambiental en poblaciones minoritarias y de bajos ingresos", y el Departamento de Orientación de Transporte a los recipientes de Servicios especiales sobre el lenguaje para Dominio Limitado del Inglés (LEP) Beneficiarios.

Los individuos y las organizaciones pueden presentar una queja llenando y enviando el siguiente formulario de queja Título VI. La ayuda está disponible a petición. Las quejas deben ser firmadas é incluyendo información de contacto y deben ser enviados por correo o entregados a: Coast Transit Authority, 333 DeBuys Road, Gulfport, MS 39507. Alternativamente, se puede enviar por fax al 228/896-8081 ó por correo electrónico a [kcoggin@coasttransit.com](mailto:kcoggin@coasttransit.com).

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12. Nombre del Querellante: \_\_\_\_\_

13. Dirección: \_\_\_\_\_

14. Pueblo \_\_\_\_\_ Estado: \_\_\_\_\_ Código:: \_\_\_\_\_

15. No. de Teléfono (Casa): \_\_\_\_\_ Cel.: \_\_\_\_\_ Trabajo:: \_\_\_\_\_

16. Correo Electrónico: \_\_\_\_\_ Otro: \_\_\_\_\_

17. Se está quejando por sí mismo? (*Marque el apropiado*)

[ ] Si (*vaya a la pregunta #10*) [ ] No

18. Si No, denos la información a quien discriminaron en contra:

Nombre: \_\_\_\_\_

Dirección: \_\_\_\_\_

Pueblo: \_\_\_\_\_ Estado: \_\_\_\_\_ Código: \_\_\_\_\_

Teléfono: \_\_\_\_\_ Correo Electrónico: \_\_\_\_\_

Relación al Querellante:

19. Cuál de las siguientes mejor describe como discriminaron en contra del querellante y porque piensa que discriminaron en contra del querellante? Fue por?

<input type="checkbox"/>
<input type="checkbox"/>
<input type="checkbox"/>
<input type="checkbox"/>

Raza/Color  
Origen de Nacionalidad  
Bajos Ingresos  
Limite del Ingles

<input type="checkbox"/>
<input type="checkbox"/>
<input type="checkbox"/>

Sexo  
Disabilidad  
Edad

20. Fecha en que discriminaron? : \_\_\_\_\_

21. En sus propias palabras describa la alegación de discriminación. Explique qué paso, y quien usted piensa que fue responsable. Por favor una más hojas de papel si el espacio no es bastante si lo requiere.


22. A usted apelado dicha querella con cualquier otra agencia federal, estado local ó cortes federales ó estatales? (*Marque el apropiado*) [ ] Si [ ] No

Si es Si, marque las cajas que le corresponda:

<input type="checkbox"/>
<input type="checkbox"/>
<input type="checkbox"/>
<input type="checkbox"/>

Agencia Federal  
Corte Federal  
Agencia del Estado  
Corte del Estado

<input type="checkbox"/>
<input type="checkbox"/>

Agencia Local (edemas de Coast Transit Authority)  
Otro:


Sírvanse proporcionar información sobre la persona de la agencia ó tribunal en donde usted también presentó la queja. (Una más hojas si es necesario):

Nombre de Agencia: \_\_\_\_\_

Dirección: \_\_\_\_\_

Pueblo: \_\_\_\_\_ Estado: \_\_\_\_\_ Código: \_\_\_\_\_

Teléfono.: \_\_\_\_\_ Fecha de queja: \_\_\_\_\_

2. Por Favor firme. Usted puede unir más hojas ó cualquier otra información si le es necesario para su queja.

Firme: \_\_\_\_\_ Fecha: \_\_\_\_\_

(Nota No Podemos aceptar su queja sin la firma. Muchas Gracias!)

## LIMITED ENGLISH PROFICIENCY PLAN

This document complies with the requirements of Executive Order 13166, “Improving Access to Services for Persons with Limited English Proficiency. It incorporates implementation guidance published through the Federal Transit Administration and the U.S. Department of Transportation. The goal of this plan is to identify actions which will be taken to reduce language barriers for LEP individuals in Hancock, Harrison and Jackson County, MS who seek to utilize services provided by Coast Transit Authority (CTA). To achieve this goal, CTA will undertake reasonable steps required to ensure meaningful access by LEP persons interested in participating in the agency’s programs, services and activities. CTA will ensure that language will not prevent staff from effectively providing information and responding to inquiries made by LEP individuals. In turn, LEP individuals will not be prohibited from accessing program information, understanding rules and operational changes, participating in proceedings and any other agency activity.

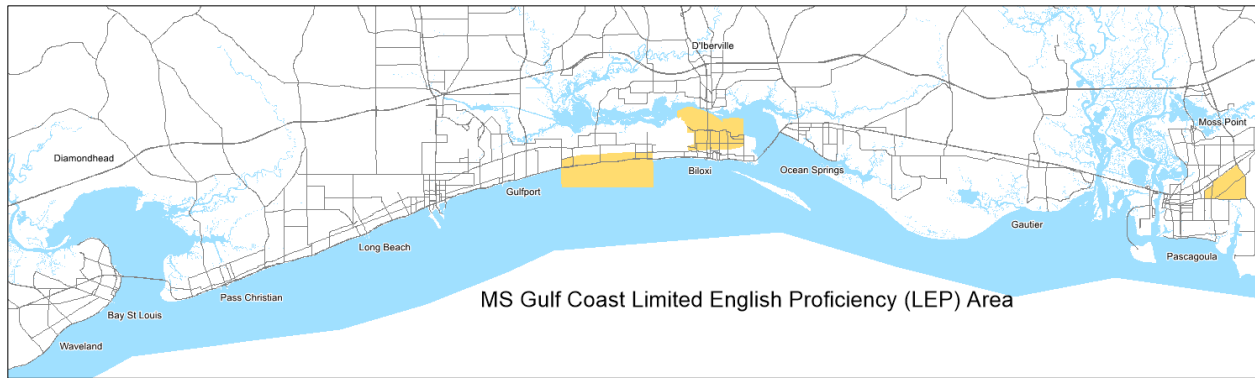
### Legal basis for language assistance requirements

Title VI of the Civil Rights Act of 1964 states that “no person in the United States shall, on the grounds of race, color, or national origin, be excluded from participation in, be denied the benefits of, or be otherwise subjected to discrimination under any program or activity that receives Federal financial assistance.” The Supreme Court, in *Lau v. Nichols*, 414 U.S. 563 (1974), held that this requirement prohibits conduct that has a disproportionate effect on LEP persons because such conduct constitutes national origin discrimination.

Executive Order 13166 states that recipients must take reasonable steps to ensure meaningful access to their programs and activities by LEP persons. U.S. DOT published guidance for its recipients on December 14, 2005, which clarified that their recipients are required to take responsible steps to ensure meaningful access to the benefits, services, information, and other important portions of their programs and activities for individuals who are LEP.

### Who are the Limited English Proficient (LEP)?

LEP individuals do not speak English as their primary language and have a limited ability to read, write, speak, or understand English. Many LEP persons are in the process of learning English and may read, write, speak, and/or understand some English, but not proficiently. LEP status may be context specific – an individual may have sufficient English language skills to communicate basic information (name, address etc.) but may not have sufficient skills to communicate detailed information (e.g., medical information, eyewitness accounts, information elicited in an interrogation, etc.) in English. The MS Gulf Coast region consists of three LEP areas presented below. The LEP map uses Census Tract Level data. Percentage thresholds were defined based on the population structure within the metropolitan planning urbanized area (UZA).



## Four Factor Analysis

In order to ensure meaningful access to programs and activities, CTA uses the information obtained in the Four Factor Analysis to determine the specific language services that are appropriate to provide. A careful analysis can help a recipient determine if it communicates effectively with LEP persons and will inform language access planning. The Four Factor Analysis is an individualized assessment that balances the following four factors:

**Factor #1: Assessing the number and proportion of LEP persons served or encountered in the eligible service population**

US Census Bureau data for the three county Coast Transit Authority (CTA) service area has been obtained for the year 2010 to complete this analysis. 2010 census data summary for the MS Gulf Coast Spanish v Vietnamese LEP populations.

County	Spanish speakers with low or no English Proficiency	Vietnamese speaking with low or no English Proficiency
Harrison County	1831	235
Hancock County	159	0
Jackson County	905	46

Per this data it is clear that the regular LEP outreach priority should be focused on reaching the Spanish speaking population, however, CTA staff has, in their analysis, still considered the needs of Vietnamese speaking individuals.

Since the 2000 Census reports, the Vietnamese population has seen significant changes. Populations in Biloxi reduced from 1707 to 1034, a 39.4% decrease. D'Iberville grew from 432 to 609, a 41% increase and Ocean Springs saw an 18.6% increase from 215 to 255 residents. It is reported that the changes are due to the effect of Hurricane Katrina, the rise of insurance costs near the coast and the impact of the BP oil disaster on local fishing communities (*Asian Americans for Change. 2011*). These statistics, however, are the total number of people who have identified themselves as Vietnamese. Only a small portion of these do not speak English as their primary



language. As shown above, there are no individuals needing Vietnamese translation services in Hancock County, very few in Jackson County and Harrison County.

CTA has considered these changes and has determined the following:

- It is no longer fiscally responsible to translate regional outreach materials into Vietnamese
- Vietnamese interpretation services will still be available upon request at events and meetings
- Targeted outreach will be conducted when proposed projects will directly impact mapped Vietnamese concentrations in Harrison County
- Vietnamese publications will be utilized as needed to encourage participation and to inform residents of their option to be involved in the transportation planning process.

**Factor #2: Assessing the frequency with which LEP individuals come into contact with the program, activity, or service**

CTA drivers noticed an increase in individuals using transit who appeared not to speak or understand English. Some of this increase is attributed to a rise in migrant labor that came to work on recovery and reconstruction projects following Hurricane Katrina and elected to stay in the region permanently.

In 2006, CTA implemented a program of providing Spanish-language materials (schedules, flyers, fare information and public announcements) to address the growing number of Spanish-speaking riders in the system. The 2010 census data confirms a 106% increase in the Spanish population across the three coastal counties.

As part of the ongoing Title VI Demographic review of the system, on-board passenger surveys are conducted to monitor passenger characteristics and demographics. The results of these surveys include information on the number of riders who speak or understand English “not well” or “not at all”. Survey results consistently indicate that 97% of respondents identify English as their primary language. Of those indicating another language, the majority identified Spanish as their primary language.

**Factor #3: Assessing the nature and importance of the program, activity, or service provided by the program**

CTA provides general public transportation to individuals who have no or very limited English skills on a daily basis. Some of these individuals, based upon CTA staff comments and observations, have a limited knowledge of English or travel with individuals who possess the necessary skills to communicate with the bus driver.

However, recognizing an increase in the Spanish speaking, CTA has taken steps to accommodate LEP individuals in the CTA service area. These steps are outlined in the following Section.

#### **Factor #4: Assessing the resources available to the recipient and costs**

Without a dedicated local source of match for FTA funds, local funding comes from a combination of local government appropriations and fare revenues. As such, the amount of local funding for operations will vary from year-to-year based upon passenger volume and competing local demands of other community service providers.

However, CTA has taken several steps to enhance its ability to communicate effectively with the local LEP population and provide the necessary language and translation services to those who require assistance. This includes the provision of news bulletins and schedules in Spanish and English. Translation services are made available, upon request, at all public hearings.

A bi-lingual coordinator is on-staff to handle phone calls and inquiries from the Spanish population. Access to a Vietnamese translator is available through local social service agencies and constituency groups (Boat People SOS). Outreach continues to be made to the local groups in order to monitor service needs and issues regarding access.

### **Language Assistance Plan**

CTA uses results of the four factor analyses to determine which language assistance services are appropriate.

#### **Language Assistance Measures**

CTA uses a variety of methods to provide support for those who may require language assistance in order to fully participate in offered services, programs and activities including:

- Provision of Spanish-language materials for all CTA route schedule announcements posted on vehicles and in the two transit centers (Gulfport and Biloxi).
- CTA maintains staff qualified to translate documents, translate for walk in clients and to help LEP callers with Spanish and Vietnamese languages.
- Update to the CTA Riders Guide continue to include English and Spanish-language schedules (newspapers, schedule books) for the general public.
- Title VI Complaint forms and notices included in this plan are translated to Spanish.
- Publishing public notices and engagement materials in both Spanish and English.
- LEP targeted outreach is conducted as needed for participation community events.
- Coordination of interpreters for meetings and other events.

In the event that the CTA in-house translators are unavailable CTA will coordinate with other community organizations to arrange for interpretive services. These organizations may include: Our Lady of Fatima, Boat People SOS, United Methodist Church, Buddhist Congregation of Biloxi, Village El Pueblo Outreach Services and Mississippi Gulf Coast Community College.

CTA also makes available its management and operations staff to meet with groups to discuss options available within its service area and individual communities. These sessions include orientation to routes and help understanding schedules and existing services. Requests to have such meetings or events can be made by the community to the Executive Director's office.

### **Training Staff**

CTA staff is instructed to direct LEP persons to the designated Spanish and Vietnamese language specialists on CTA's permanent staff. Phone calls which come into the CTA offices from LEP persons are connected to these individuals. If CTA personnel (drivers or staff) encounter an individual on-route that is LEP, they place this individual in radio contact with the appropriate CTA staff for translation.

### **Providing Notice to LEP Persons**

CTA makes available all public notices regarding changes and updates in services provided in English and Spanish language through the following outlets:

- CTA Administrative Offices, 333 DeBuys Road, Gulfport, MS.
- CTA Transit Center Facilities: Biloxi Transit, Gulfport Transit Center and Edgewater Mall
- Posting on all CTA fixed route and demand-response buses for a period of at-least 30 days in advance of all advertised changes.

The following service-related items are made available at no cost to the LEP population:

- Provision of Spanish-language materials for all CTA route schedule announcements posted on vehicles and in the two transit centers (Gulfport and Biloxi).
- Update to the general schedule books continue to include English and Spanish-language schedules (newspapers, schedule books) for the general public.
- All announced changes in CTA services in response to natural disaster or general public emergency, are made in English, Spanish and Vietnamese.

Based upon the 2010 census data, documents will no longer be automatically translated into Vietnamese. However, translated documents can be made available to anyone who requests it at least 5 business days in advance. CTA does have an in house Vietnamese interpreter for immediate communication needs.

### **Monitoring and Updating the LEP Plan**

This plan will be reviewed and re-evaluated every three years as part of the Title VI Plan update process required by FTA. The review will determine if changes in the LEP population within the CTA service area require an update to currently used measures to provide information and communication. At a minimum, this review will follow the identified Title VI program schedule for service expansion/retraction. Level of current LEP populations in the CTA service area;

- Frequency of LEP population encounters, based upon CTA surveys and staff reports;
- Requests for translation and second language information to CTA staff;
- Review of contact with community agencies and others representing LEP persons and requests made for transit information and services;

- Participation of LEP groups (or their representatives) at public meetings or hearings regarding changes in service;
- Whether the materials provided and methods used are meeting the needs of the LEP population.

The following items, at a minimum, will be assessed using the checklist provided below:

<b>Monitoring Checklist, LEP Populations in CTA Service Area</b>	
<u>Transit Centers</u> – locations on the CTA system where transfers would occur between 2 or more CTA Fixed-routes or from CTA Demand-Response services to Fixed-Route	Have translated instructions on how to make fare payments been made available?
	Have translated schedules, route maps, or information on how to use the system been made available?
	Has the information been placed in a visible location?
	Can a person who speaks limited English or another language receive assistance from CTA staff when asking for directions? How is this assistance provided?
<u>CTA Revenue Vehicles</u> – All buses which are used in revenue service on the fixed-route and demand-response systems	Have translated instructions on how to make fare payments been made available?
	Is the same information included in existing schedules and route books?
	Has the information been placed in a visible location on all vehicles?
<u>Customer Service</u> – All interactions with the public by CTA transit service personnel (Administrative staff, Drivers) regarding services provided	How many customer service calls come in from an individual who speaking languages other than English?
	Can customer service representatives describe to a caller what language assistance the agency provides and how to obtain translated information or oral interpretation?
	Can a person speaking limited English or a language other than English request information from a customer service representative?
<u>Community Outreach</u> – All interactions with the public by CTA transit service personnel (Administrative staff, Drivers) regarding updates/changes in services and programs	Have translators been requested or made present at community meetings?
	Are translated versions of any written materials that are handed out at a meeting provided?
	Can members of the public provide oral as well as written comments in languages other than English?
	Are meeting notices, press releases, and public service announcements requested to be translated into languages other than English?

**Dissemination of the LEP Plan**

The LEP plan has been incorporated into the CTA Title VI Plan to provide a single source for non-discrimination compliance. Electronic copies of the complete draft plan can be downloaded from the CTA website or requested via email to [ctainfo@coasttransit.org](mailto:ctainfo@coasttransit.org). Printed copies are available for review at the CTA administrative office on Debuys Road, at the Biloxi and Gulfport Transit Centers. People requesting a copy in an alternative format should mail their request to 333 DeBuys Road, Gulfport MS 39507, can email their request or call in their request to 228-896-8080.

# APPENDIX

CTA Board Resolution

CTA Title VI Assurance

Public Notice of Protection under Title VI

Title VI Plan Review Notices

Stakeholders

Agency	Address	City	Zip	Contact
Diocese of Biloxi	1790 Popps Ferry Road	Biloxi	39532	Jennifer Williams, Director, Catholic Social and Community Services
Area Agency on Aging (SMPDD)	9229 US Highway 49	Gulfport	39503	Robert Moore
Transportation Equity Network				
NAACP Mississippi State Conference	1072 West J.R. Lynch Street	Jackson	39203	Derrick Johnson, State President
NAACP Hancock County Unit #5290				Thaddeus Williams, President
NAACP Harrison County Unit #5298		Gulfport		Chris Fisher, President
NAACP Harrison County Unit #5266		Biloxi		James Crowell, President
NAACP Jackson County Unit #5313		Moss Point		Curley Clark, President
Gulf Coast Latin American Association	938 Howard Avenue	Biloxi	39530	Andres Guerra
Boat People, SOS Biloxi Chapter	179 Lameuse Street	Biloxi	39530	
Hancock Cty Human Resources Agency	3066 Longfellow Road	Bay St. Louis	39520	
Harrison County Human Resources Agency	842 Commerce Street	Gulfport	39507	
WIN Job Center (Gulfport)	12121 US Highway 49 North	Gulfport	39503	
WIN Job Center (Biloxi)	2306 Pass Road	Biloxi	39531	
WIN Job Center (Hancock County)	454 Highway 90, Suite C	Waveland	39576	
WIN Job Center (Pascagoula)	1604 Denny Avenue	Pascagoula	39567	

Keesler Air Force Base	Wall Studio, 709 H Street, Room 201A	Keesler Air Force Base	39534	
NCBC Gulfport	5401 Snead Street	Gulfport	36950	
MS Department of Transportation, Public Transit Division	PO Box 1850	Jackson	39215	Charles Carr
MS Gulf Coast MPO (Gulf Regional Planning Commission)	1232 Pass Road	Gulfport	39501	Elaine Wilkinson
Federal Transit Administration Region IV	230 Peachtree, NW, Suite 800	Atlanta	30303	Yvette G. Taylor
AARP Gulf Coast Chapter	84123 Bayou Drive	Diamondhead	39525	Mary Munt
Gulf Coast Community Action Agency	1709 31st Avenue	Gulfport	39501	
Gulf Coast Community Action Agency	500 24th Street	Gulfport	39507	
Jackson County Civic Action Committee	PO Box 8723	Moss Point	39562	Diane Payne