



**Regional Transit Authority
Of Southeast Michigan**

Title VI Plan: 2026-2028

REVISED: NOVEMBER 2025

Information found in this document can be provided in an alternative format upon request. Please contact the Regional Transit Authority at 313-402-1020 to speak to a representative or e-mail info@rtamichigan.org. The RTA will do its best to provide the requested alternative format within a reasonable time.

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of Southeast Michigan

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Section A - Introduction

The Regional Transit Authority of Southeast Michigan (RTA) was created through State legislation on December 19, 2012 (MI P.A. 387, 2012). The RTA service area comprises Macomb, Oakland, Washtenaw, and Wayne Counties. The mission of the RTA is to manage and secure transportation resources that significantly enhance mobility options, improve the quality of life for the residents, and increase the economic viability of the four-county area and the city of Detroit.

The Federal Transit Administration's (FTA) Title VI Circular 4702.1B requires that "no person in the United States shall, on the grounds of race, color, or national origin, be excluded from participation in, be denied the benefits of, or be subjected to discrimination under any program or activity receiving federal financial assistance." The term national origin includes those individuals with limited English proficiency (LEP), defined as a person who does not speak English as their primary language and has limited ability to read, write, or understand English. As such, the RTA is obligated to comply with these requirements for all programs, policies, transit services, and activities. The FTA requires that the RTA document this compliance by submitting a Title VI Program to the FTA Office of Civil Rights once every three years. The Title VI Program must be approved by the RTA Board of Directors which is responsible for policy decisions before submitting the Title VI Program to the FTA.

As of October 2024, the RTA operates the QLINE, a 3.3-mile streetcar system along Woodward Avenue between Congress Street and Grand Boulevard in Detroit, Michigan. The RTA also contracts two express bus services – Detroit to Ann Arbor (D2A2) between downtowns Detroit and Ann Arbor, Michigan, and Detroit Air Xpress (DAX) between downtown Detroit and Detroit Metro Airport (DTW). The RTA is required to follow the FTA Circular 4702.1B "General Requirements" set forth in Chapter III and some elements under Chapter IV for fixed-route transit providers. Since the RTA does not operate more than 50 vehicles of transit service during peak service, it is not required to report on all requirements within Chapter IV (i.e., collect and report data, evaluate service and fare changes, and monitor transit service) as described in Chapter IV. Only transit providers that operate 50 or more fixed-route vehicles in peak service and are in an urbanized area (UZA) of more than 200,000 in population are required to meet these additional requirements.

NON-DISCRIMINATION POLICY STATEMENT

It is the policy of the RTA that no person shall on the grounds of race, color, or national origin, be excluded from participation in, be denied the benefits of, or be subjected to discrimination in any program, activity, or operation of the RTA services as provided by Title VI of the Civil Rights Act of 1964 and related statutes.

This policy applies to all of the RTA's services and operations of RTA, including its contractors and anyone who acts on behalf of the RTA. The RTA distributes federal aid funds to other subrecipients. All written agreements will include Title VI language and will be monitored by the RTA for compliance. Federal financial assistance includes grants, training, use of equipment, donations of surplus property, and other assistance.

Discrimination refers to any action or inaction, whether intentional or unintentional, in any program or activity of a federal aid recipient, subrecipient, or contractor that results in disparate treatment, disparate impact, or perpetuation of the effects of prior discrimination based on race, color, or national origin.

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

Disproportionate burden refers to a neutral policy or practice that disproportionately affects low-income populations more than non-low-income populations. A finding of disproportionate burden requires the recipient to evaluate alternatives and mitigate burdens where practicable.

Disparate treatment refers to actions that result in circumstances where similarly situated persons are intentionally treated differently (i.e., less favorably) than others because of their race, color, or national origin.

Examples of prohibited types of discrimination based on race, color, or national origin include denial to an individual of any service, financial aid, or other benefit; distinctions in the quality, quantity, or manner in which a benefit is provided; segregation or separate treatment; restriction in the enjoyment of any advantages, privileges, or other benefits provided; discrimination in any activities related to highway and infrastructure or facility built or repaired; and discrimination in employment.

Title VI compliance is a condition of receipt of federal funds. The Title VI officer is authorized to ensure compliance with this policy, Title VI of the Civil Rights Act of 1964, 42 U.S.C. § 2000d et seq.; Federal Transit Laws, Title 49, United States Code, Chapter 53; 49 CFR § 1.51; 49 CFR part 21; 28 CFR § 42.401 et seq.; and the guidelines provided by FTA C 4702.1B.

Ben Stupka	Date
Executive Director	
Regional Transit Authority of Southeast Michigan	

The Title VI Officer is responsible for ensuring the Title VI Plan is implemented and for the overall management of the day-to-day administration of the Title VI Plan. The current information for this individual is as follows:

RTA Title VI Officer

Mshadoni Smith-Jackson, Transit Planning Manager
Regional Transit Authority of Southeast Michigan
1001 Woodward Avenue, Suite 1400
Detroit, MI 48226
Phone: (313) 402-1020
Email: CivilRights@RTAmichigan.org

The Title VI Officer is responsible for Title VI compliance; and is assigned the responsibility for implementing, monitoring, and ensuring the RTA's compliance with the Title VI regulations. The Title VI Officer's responsibilities are as follows:

- Maintaining knowledge of Title VI requirements.
- Attending training on Title VI and other nondiscrimination authorities when offered and, when feasible, by FTA or any other regulatory agency.
- Disseminating Title VI information to the public including in languages other than English, when necessary.
- Developing a process to collect data related to race, gender, and national origin of service area population to ensure low-income, minorities, and other underserved groups are included and not discriminated against.
- Implementing procedures for the prompt processing of Title VI complaints.
- Investigating and resolving Title VI complaints.

OVERVIEW OF GENERAL RTA ACTIVITIES

In addition to operating QLINE Streetcar and express bus services, the RTA's purpose is to coordinate the activities of the existing transit agencies within its jurisdiction and secure funding to improve and enhance public transportation within the four-county area and the city of Detroit. Functionally, the RTA is responsible for developing and updating a Regional Master Transit Plan, engaging in coordinated planning activities with the existing transit providers, partnering on service improvements with the existing transit providers, administering regional programs, and programming a portion of the State and federal transportation funds that are apportioned to urbanized areas in Detroit and Ann Arbor urbanized areas.

The RTA's activities are largely interdependent with several other organizations operating within southeast Michigan including:

- Ann Arbor Area Transportation Authority (TheRide)
- Detroit Department of Transportation (DDOT)
- Detroit Transportation Corporation (DTC/People Mover)
- Michigan Department of Transportation (MDOT)
- Southeast Michigan Council of Governments (SEMCOG)
- Suburban Mobility Authority for Regional Transportation (SMART)
- Washtenaw Area Transportation Study (WATS)

The RTA endeavors to work with these organizations to coordinate public information and engagement. In the case of the Southeast Michigan Council of Governments (SEMCOG), the RTA is reliant on its public outreach process to support the annual FTA 5307 program of projects (POP). That process is described in Appendix B of this document.

RTA GOVERNANCE

A 10-member board governs the RTA and includes two representatives from each participating county, one representative from the City of Detroit, and one non-voting member appointed by the governor who serves as the chair. These committees set the direction of the RTA through policymaking, budget considerations, and coordination of existing transit services.

Section B - Requirement to Prepare and Submit a Title VI Program

The RTA is required to submit an updated Title VI program every three years. This revised report covers Fiscal Year (FY) 2026 through FY 2028.

RTA's Title VI revised submission contains the following:

- Title VI notice to the public
- Instructions to the public on how to file a Title VI complaint
- List of transportation-related Title VI investigations, complaints, or lawsuits
- Public Participation Plan
- Four-Factor Analysis and Language Assistance Plan (LAP Plan) for Persons with Limited English Proficiency (LEP)
- Table of Non-Elected Planning Boards, Advisory Councils or Committees
- Monitoring Subrecipients
- Service Standards for QLINE, D2A2, and DAX
- RTA Title VI Program Approval

This revised report was reviewed and approved by the RTA Board of Directors on December 4, 2025.

Section C - Notice to The Public

The RTA has developed a public notice to inform customers of their rights under Title VI as noted in 49 CFR Section 21.9(d), which is posted on the RTA's website as well at the locations identified below:

Location Name	Address	City
Main Office	1001 Woodward, Suite 1400	Detroit

A notice is also posted at QLINE stations, inside streetcar vehicles and express buses, and on RTA websites. The public notice states the following:

The Regional Transit Authority of Southeast Michigan (RTA) is committed to ensuring that no person is excluded from participation in or denied the benefits of its programs and services on the basis of race, color, and national origin in accordance with Title VI of the Civil Rights Act of 1964.

This notice is also translated into the RTA's LEP languages identified in the RTA's Four-Factor Analysis.

For information about the RTA's nondiscrimination obligations, or to file a complaint if you believe you have been subjected to unlawful discrimination, please contact the RTA by email at TitleVI@rtamichigan.org or U.S. mail at the Regional Transit Authority of Southeast Michigan, 1001 Woodward, Suite 1400, Detroit, MI 48226; or by email at TitleVI@rtamichigan.org.

For translation assistance, call (313) 402-1020.

Para asistencia de traducción, llame (313) 402-1020.

للترجمة 1020-402-313 للمساعدة

Section D - Complaint Procedures

The RTA has a Title VI Complaint Procedure in place that outlines the process for the local disposition of Title VI complaints and is consistent with guidelines in Chapter III of the FTA C 4702.1B. If a person believes that RTA's federally funded programs have violated their civil rights based on race, color, or national origin, they may file a written complaint by following the procedure outlined below:

FILING

Any person who believes that they or any specific class of persons has been subjected to discrimination or retaliation prohibited by civil rights laws, based upon race, color, or national origin, including language discrimination, may file a written complaint to RTA's Title VI officer. A formal complaint must be filed within 180 calendar days of the alleged occurrence or when the alleged discrimination became known to the complainant. The complaint must meet the following requirements:

- Complaints must be in writing and include the complainant's name, address, and telephone number.
- Complaints must include the date of the alleged act(s) of discrimination (date when the complainant[s] became aware of the alleged discrimination); the date on which the conduct was discontinued; or the latest instance of the conduct.
- Complaints must present a detailed description of the issues including names, job titles, and addresses of those individuals perceived as parties in the action complained against. Complaints must be completed on the RTA complaint form, provided in Appendix A, and on the RTA website (www.rtamichigan.org). The complaint form is also available in RTA's LEP languages.
- In the case where assistance is requested to file a Title VI complaint, customers may contact RTA offices by phone (313) 402-1020, come in person to RTA offices, or file through our website (About – RTA of Southeast Michigan www.rtamichigan.org). Complaints should be mailed to:

Title VI Officer
Regional Transit Authority of Southeast Michigan
1001 Woodward Avenue, Suite 1400
Detroit, MI 48226

Note: If a Title VI complaint is received regarding an MDOT-related contract against RTA, the MDOT is responsible for investigating the complaint. Upon receipt of a

complaint filed against the RTA, the complaint and any pertinent information will be immediately forwarded to the MDOT, Office of Civil Rights Programs.

RECEIPT AND ACCEPTANCE

Upon receipt of the complaint, the Title VI officer will determine its jurisdiction and the need for additional information.

To be accepted, a complaint must meet the following criteria:

- The complaint must be filed within 180 calendar days of the alleged occurrence or when the alleged discrimination became known to the complainant.
- The allegation(s) must involve a covered basis such as race, color, and national origin.
- The allegation(s) must involve a program or activity provided by the RTA.

DISMISSAL

A complaint may be recommended for dismissal for the following reasons:

- The complainant requests withdrawal of the complaint.
- The complainant fails to respond to repeated requests for additional information needed to process the complaint.
- The complainant cannot be located after reasonable attempts to contact the complainant.

INVESTIGATION OF COMPLAINTS

Upon receipt of the complaint, the RTA's Title VI officer, or designee, shall appoint one or more staff, as appropriate, to evaluate and investigate the complaint in consultation with the RTA's legal counsel. If necessary, the complainant shall meet with the staff to further explain his or her complaint. The staff shall complete their review no later than 60 calendar days after receipt of the complaint. If more time is required, the Title VI officer, or designee, shall notify the complainant of the estimated timeframe to complete the review. Upon completion of the review, staff shall make a recommendation regarding the merit of the complaint and whether remedial actions are available to provide redress. If the Title VI officer, or designee, concurs, they shall issue a written response to the complainant. If the complainant is dissatisfied with the resolution of the complaint, an appeal can be submitted to the Executive Director for consideration. Upon review of the complaint, the Executive Director will provide a response agreeing with the initial determination or changing the response, if not in agreement with the initial determination.

SUBMISSION OF COMPLAINT TO THE FEDERAL TRANSIT ADMINISTRATION

If the complainant is dissatisfied with the complaint resolution, they may also submit a written complaint within 60-days after the alleged date of discrimination to the FTA for further investigation at the following address:

FTA Office of Civil Rights
1200 New Jersey Avenue SE
Washington, DC 20590

Section E - Investigations, Complaints, and Lawsuits

In accordance with 49 CFR 21.9(b), the RTA must record and report any investigations, complaints, or lawsuits involving allegations of discrimination. Records of these events shall include the date that the investigation, lawsuit, or complaint was filed; a summary of the allegations; the status of the investigation, lawsuit, or complaint; actions taken by the RTA in response to the investigation, lawsuit, or complaint; and final findings related to the investigation, lawsuit, or complaint. The records for the previous three years shall be included in the Title VI Plan when it is submitted to the FTA.

The RTA has had no Title VI complaints between October 2022 and September 2025.

Section F - Public Participation Plan

PURPOSE OF THE PUBLIC PARTICIPATION PLAN

This plan specifies the RTA's underlying goals as well as strategies and techniques to be considered and employed in achieving the goals of the public participation process. The goals of the public participation process are to define the following:

- Tools the RTA uses to provide the public with access to information on its programs and projects.
- Tools the RTA uses to receive input for its programs and projects.
- Measures of effectiveness for the RTA's public engagement.

The RTA provides transit services through the QLINE, D2A2, and DAX, it may also provide funding to existing transit providers to augment service. Therefore, the RTA will collaborate with the existing providers to ensure that all the appropriate Title VI processes that govern major service changes and fare equity analyses requirements are followed.

DEMOGRAPHIC INFORMATION

Based on regional totals developed by SEMCOG, minority persons comprise 35.3 percent of the region's total population. In addition, 13.0 percent of households in the region live at or below the poverty level.

Because of the importance of public involvement, the RTA will endeavor to meet with representatives from various Title VI-protected populations and encourage their involvement in the planning process. Specific actions taken by the RTA to reach out to Title VI populations include placing advertisements in various news publications reaching Black and/or African American, Asian American, and/or Pacific Islanders, Tribal and/or Native American, and Hispanic communities, focusing efforts to meet with and present information to these various groups in English and LEP population languages. Information is also disseminated through transit providers, local block clubs, libraries, and various grassroots organizations.

TECHNIQUES FOR PUBLIC INFORMATION ACCESS

The RTA will use a variety of methods to educate and inform the public. Holding public meetings is an essential part of the PPP. Therefore, the RTA endeavors to ensure that all venues are accessible and close to the QLINE Streetcar and major bus routes for ease of travel. The methods will include:

- Providing information at RTA's Standing Committee and Board of Directors meetings
- Holding additional public meetings and hearings at convenient and accessible locations and times
- Making public information available in an electronically accessible format and means such as social media, the RTA website (www.rtamichigan.com), press releases, and e-blast notices
- Placing flyers, signage, and brochures inside the QLINE Streetcar and on-board express buses
- With the permission of the transit providers, posting information through rider alerts, interior bus and train signage, and stop and station signage

TECHNIQUES FOR GARNERING PUBLIC INPUT

The RTA will use a variety of methods to garner public input. The methods will include:

- Verbal public comments at the RTA Board of Directors meetings, and additional public meetings
- Written comments at RTA Board of Directors meetings, and additional public meetings; and through RTA general email or project-specific email
 - » Verbal comments by RTA general phone, or project-specific phone
 - » Social media discussions and dedicated surveys
 - » General public or targeted stakeholder surveys
 - » Survey ride-alongs
 - » Charrette-style discussions
 - » Virtual meetings
 - » Other non-traditional methods to reach LEP communities and disability communities

TOOLS FOR MEASURING EFFECTIVENESS

As part of future updates to this policy, the RTA will evaluate its public involvement process, ensuring that the RTA is effective in facilitating full and open access to the regional planning process for all citizens. This requirement will be completed using an evaluation that identifies the following:

- Public meeting dates versus actual meetings held
- Public meetings: locations, promotion, number of comments generated (if requested at the meeting)
- Number of additional comments received and the means of receipt at official public hearings
- If applicable, the RTA will supplement this report with more detailed reports on large-scale public outreach efforts (e.g., the Regional Master Transit Plan)

ROLE OF THE SOUTHEAST MICHIGAN COUNCIL OF GOVERNMENTS (SEMCOG)

The Southeast Michigan Council of Governments (SEMCOG) is designated by the federal government as the Metropolitan Planning Organization (MPO) for the Southeast region of the state of Michigan. SEMCOG is responsible for coordinating transportation planning activities within the MPO boundary, including all of Wayne, Oakland, Macomb, and Washtenaw Counties. SEMCOG works with federal and local governments, state departments of transportation, transit agencies, area stakeholders, and customers to ensure that the plans and projects developed enhance the region toward achieving consistent quality-of-life measures that are beneficial to all.

The public is included in the planning process through informational meetings, public hearings, community meetings, surveys, and one-on-one meetings. The RTA coordinates efforts with SEMCOG to solicit public response on major projects, as well as the annually funded program of projects. SEMCOG incorporates RTA projects into the Transportation Improvement Program (TIP) and the Regional Transportation Plan (RTP). Via SEMCOG's various committee meetings, participants review, discuss, comment, and recommend actions relevant to transportation planning on transit projects. In addition to notices, SEMCOG publicizes the final program of projects and provides notice of scheduled meetings. Public comment is ongoing and is received via public hearings, letters, phone calls, emails, and in person verbally.

Federal legislation requires MPOs to produce documents that govern regional transportation investments and planning activities, including the development of the Unified Planning Work Program, the Long-Range Transportation Plan, the Transportation Improvement Program, and the Public Participation Plan.

SUMMARY OF OUTREACH FROM OCTOBER 2022 THROUGH SEPTEMBER 2025

Increased Social Media Presence and Participated in Community Engagement and Education Events in the Region (2022)

Engagement activities included:

Launched Monthly Newsletters and “Ask RTA” and “Did You Know” Campaigns

RTA's monthly newsletter launched in January 2022 and reaches over 3,000 people, providing information and news on transit in Southeast Michigan. RTA increased its social media presence and launched the “Ask RTA” and “Did You Know?” campaigns, which provide information on transit services and are a way to directly engage with the public. RTA is active on Facebook, Instagram, and Twitter, and is growing its presence on LinkedIn and TikTok to reach a wider audience and different demographics.

Participated in Community Engagement and Education Events

RTA participated in a number of community engagement and education events, including meetings with regional chambers of commerce. RTA was a project partner in the University of Detroit Mercy's Community Development Program. Students completed a transit and mobility innovation capstone project in the City of Detroit, and RTA helped them with program planning and community engagement in multiple neighborhoods.

2023 Detroit Air Xpress (DAX) Bus Service - (March 2023)

The RTA held a hybrid formal public hearing in March 2023 (Detroit and Ann Arbor) to receive public comments on the new pilot express bus service connecting Detroit and the metro airport. To ensure people had access, the hearing was hosted virtually and at the Southeast Michigan Council of Governments (SEMCOG), which is centrally located near public transportation and is in Detroit, a majority-minority community.

2023 Regional Transit Master Plan (RTMP) Update (August – September 2023)

From August to September of 2023, RTA set up booths at 11 events across the four counties and spoke with riders at three regional transit centers. Staff talked to the public about transit services and asked attendees to place stickers on an interactive board to identify which goals and strategies from the 2022 RTMP update they felt were the highest

priorities. RTA also conducted an online survey from September through early November where participants were asked to prioritize RTA's goals and strategies, and to give feedback on ongoing and potential projects. Over 600 people participated in the interactive board and the survey, providing input that helped shape the development of RTA's regional transit priorities. RTA also coordinated with local transit agencies to ensure that the RTMP is aligned with their goals and initiatives, and with what they have heard from the public in recent engagement around their plans and projects.

Mobility 4 All (M4A) Program (August 2024 - July 2025)

From August to November of 2024, RTA set up booths at 13 events across the four counties and spoke with residents, riders, and transit providers. Staff efforts focused on gathering feedback about the RTA's new program Mobility 4 All (M4A), a regional initiative to improve transit solutions in Southeast Michigan, with a particular focus on assisting people with disabilities, older adults, and those with limited incomes. Although this engagement was centered around M4A, much of the input that was gathered is applicable to the RTMP and RTA's long-term vision for transit in Southeast Michigan. From April 2025 to July 2025, RTA engaged with the public at 5 additional popular community events and through an online survey to understand transportation patterns, needs, challenges, and barriers, especially related to seniors and Americans with Disabilities Act (ADA) paratransit and other demand response services. Surveys were shared at public events, distributed to transit providers, and made available on RTA's website. The Technical Working Group members (stakeholders) and other human and social service industry stakeholders helped distribute the survey to collect over 1,200 responses, including more than 700 responses from people representing M4A target populations (e.g., older adults, people with disabilities, and limited-income individuals).

Community Survey (January 2025 – March 2025)

To help gauge the general public's priorities and perception of transit, the RTA conducted a community survey in 2025. This survey was administered to residents across the four-county region about their current use of transit, potential use of transit, transit benefits, and transit priorities. The survey shows that while only 35 percent of respondents have used transit within the past year, 87 percent think that improved transit would provide a significant or very major benefit to the region as a whole. Additionally, there was 63 percent support for a truly major expansion of all types of bus and rail services to all parts of the four-county region. These survey results show that there is a strong desire for regional transit expansion in Southeast Michigan.

Community Engagement Plan (January 2025 – December 2025)

To further strengthen its engagement strategy, the RTA is currently developing a comprehensive Community Engagement Plan for fiscal year (FY) 2026 in the fall. This plan will outline community engagement standards, best practices, and detailed guidelines to foster greater impactful interactions with the public. This pivotal plan will equip the RTA and its consultants with the essential tools and processes to foster meaningful community engagement, ensuring stakeholders' voices play a role in driving engagement progress.

Section G - Language Assistance Plan

LANGUAGE ASSISTANCE PLAN (LAP) FOR PERSONS WITH LIMITED ENGLISH PROFICIENCY (LEP)

Introduction

The purpose of this plan is to document RTA's strategy to serve persons with LEP in accordance with Title VI of the Civil Rights Act of 1964 and Executive Order 13166. A person with LEP does not speak English as their primary language and has limited ability to read, write, or understand English. LEP individuals may be competent in English for certain types of communication (e.g., speaking or understanding), but still have LEP for other types of communication (e.g., reading or writing). Title VI prohibits discrimination based on race, color, or national origin under any program that receives federal financial assistance. Executive Order 13166 titled "Improving Access to Services for Persons with Limited English Proficiency," defines national origin discrimination to include different treatment based upon a person's inability to speak, read, write, or understand English. Under these provisions, the RTA is required to take reasonable steps to ensure meaningful access to RTA programs and services for people with LEP.

This plan details how RTA staff can identify a person who may need language assistance, identify the ways in which assistance may be provided, provide training to staff, notify LEP persons that assistance is available, and provide information for future updates.

To develop the plan, the RTA undertook a U.S. Department of Transportation (USDOT) four-factor LEP analysis that considered the following: (1) the number or proportion of people with LEP in the RTA service area who may be served by or encounter an RTA program, activity, or service; (2) the frequency with which individuals with LEP come in contact with an RTA program, activity, or service; (3) the importance of the program, activity, or service provided by the RTA to the LEP population; and (4) the resources available to RTA and overall costs to provide assistance to people with LEP. A brief description of these considerations is provided in the following section.

Safe Harbor Stipulation

Federal law provides a “Safe Harbor” stipulation so that recipients can ensure with greater certainty that they comply with their obligation to provide written translations of vital documents in languages other than English. The RTA defines “Safe Harbor” vital documents as follows.

RTA Definition: Vital Document - The RTA will consider the following documentation as vital unless otherwise requested by the public:

A document, record or file that is necessary to create, recreate, or organize operations and survival of an organization. It shall include, but not be limited to:

- Consent and complaint forms
- Notice of denials, losses, or decreases in benefits or services
- Notice of a person’s rights under Title VI
- Notice of service and fare changes

Furthermore, if a recipient provides written translation in certain circumstances, such action will be considered compelling evidence of compliance with the recipient’s written translation obligations under Title VI. The RTA defines an interpreter as “a person who translates spoken language orally,” as opposed to a translator, who translates written language or who transfers the meaning of written text from one language into another. The person who translates orally is not a translator, but an interpreter. The RTA will, upon request, make an interpreter available in circumstances where written translations are not required.

Failure to provide written translations under certain circumstances does not mean there is non-compliance, but provides a guide for recipients who would like greater certainty of compliance than can be provided by the RTA.

Compelling evidence of compliance with the recipient’s written translation obligations under “Safe Harbor” includes providing written translations of vital documents for each eligible LEP language group that constitutes 5 percent or 1,000, whichever is less, of the population of persons eligible to be served or likely to be affected or encountered. Translation of other documents, if needed, can be provided orally.

This “Safe Harbor” provision applies to the translation of written documents only. It does not affect the requirement to provide meaningful access to LEP individuals through competent oral interpreters where oral language services are needed and reasonable.

Four-Factor Analysis

USDOT LEP guidance provides that federal funding recipients are required to take reasonable steps to ensure meaningful access to their programs and activities by LEP persons. While designed to be a flexible and fact-dependent standard, the starting point is an individualized assessment that balances the following four factors:

- The number or proportion of LEP persons eligible to be served or likely to be encountered by the program or grantee
- The frequency with which LEP individuals come in contact with the program
- The nature and importance of the program, activity, or service provided by the program to people's lives
- The resources available to the grantee/recipient or agency, and costs

After applying the above four-factor analysis to the various kinds of contacts a recipient has with the public, the recipient may conclude that different language assistance measures are sufficient to ensure meaningful access to the different types of programs or activities in which it engages. Sections below describe analyses for each factor in detail.

Factor 1: Proportion, Numbers, and Distribution of LEP Persons

Under Factor 1, RTA presented the number and calculated the proportion of LEP persons in the RTA service area who may be served by or encounter an RTA program, activity, or service. The RTA service area includes all of Macomb, Oakland, Washtenaw, and Wayne Counties. Per the 2023 American Community Survey (ACS), there are 4,049,734 persons five years old and older within the RTA service area. Of that total, 227,254, 5.6 percent, speak English less than “very well”, less than “well”, “not well,” or “not at all”. Table 1 below breakdown the estimated LEP population by county:

Table 1: Estimated LEP Population by County. Data Obtained from Census Table B16004: Age by Language Spoken at Home by Ability to Speak English for The Population 5 Years and Over, 2023 5-Year ACS

AGE BY LANGUAGE SPOKEN AT HOME BY ABILITY TO SPEAK ENGLISH FOR THE POPULATION 5 YEARS AND OVER

	Macomb County, Michigan <u>Estimate</u>	Oakland County, Michigan <u>Estimate</u>	Washtenaw County, Michigan <u>Estimate</u>	Wayne County, Michigan <u>Estimate</u>	Total	Percent
Total Over age 5:	831,063	1,206,210	351,275	1,661,186	4,049,734	
"Well"	30,506	37,017	10,028	55,508	133,059	3.29%
"Not well"	15,793	16,212	4,559	34,594	71,158	1.76%
"Not well at all"	4,336	4,610	945	13,146	23,037	0.57%
% (per county)	2.4%	1.7%	1.6%	2.9%		
Total					227,254	5.61%

The RTA also analyzed the different languages spoken within the service area to

determine which were most likely to be encountered within the service area. The RTA used the Detailed Household Language by Household Limited English-Speaking Status: American Community Survey 2023 table (Census ACS table) for a more detailed survey of languages. Table 2 on the next page summarizes the LEP populations by language spoken throughout the region for each county. Arabic has the highest percentage of LEP speakers at 1.6% of the total population, followed by Spanish at 1.1% of the total population. “Other Indo-European Languages” collectively have the third highest number of LEP speakers in the region at 1.1%, just a few hundredths less than Spanish LEP speakers. However, this category is not further broken down into individual languages in the Census ACS table and can include more than 10 languages such as Italian, Greek, and Hindi. The following few categories – “Russian, Polish, or other Slavic Languages”, “Other Asian and Pacific Island Languages”, “Chinese (including Mandarin, Cantonese)”, and “Other and Unspecified Languages” each has between 0.3% to 0.4% of total population. Of these four categories, “Russian, Polish, or other Slavic Languages”, “Other Asian and Pacific Island Languages” and “Other and Unspecified Languages” each could include multiple languages. While specific languages within this category may not be identifiable as Safe Harbor languages under Factor 1, RTA seeks to determine if there are unmet needs within these language groups that may result in some languages being included for written translations via other means.

Table 2: Languages Spoken Throughout the Region by County by LEP Status (Speaking English Less than “Very Well”). Data Obtained from Census Table C16001: Language Spoken at Home for the Population 5 Years and Over, 2023 5-Year ACS

LANGUAGE SPOKEN AT HOME FOR THE POPULATION 5 YEARS AND OVER BY LIMITED ENGLISH-SPEAKING STATUS

	Macomb County, Michigan	Oakland County, Michigan	Washtenaw County, Michigan	Wayne County, Michigan	Total	Percentage of Total Population
Label	Estimate	Estimate	Estimate	Estimate		
Total Over Age 5:	831,063	1,206,210	351,275	1,661,186	4,049,734	
Total LEP:	24,807	36,282	11,615	82,456	227,254	5.61%
English only	704,491	1,015,778	297,173	1,401,495	3,418,937	
Arabic	10,486	6,624	1,367	46,515	64,992	1.60%
Spanish	3,974	10,435	3,467	26,456	44,332	1.09%
Other Indo-European Languages	14,838	9,768	2,048	17,131	43,785	1.08%
Russian, Polish, or other Slavic Languages	5,683	5,752	723	3,273	15,431	0.38%

LANGUAGE SPOKEN AT HOME FOR THE POPULATION 5 YEARS AND OVER BY LIMITED ENGLISH-SPEAKING STATUS

	Macomb County, Michigan	Oakland County, Michigan	Washtenaw County, Michigan	Wayne County, Michigan	Total	Percentage of Total Population
Other Asian and Pacific Island Languages	2,752	8,768	1,076	2,215	14,811	0.37%
Chinese (including Mandarin, Cantonese)	1,260	6,907	3,833	2,242	14,242	0.35%
Other and Unspecified Languages	8,238	3,021	793	1,446	13,498	0.33%
Korean	537	3,156	1,132	787	5,612	0.14%
Vietnamese	1,120	1,203	489	980	3,792	0.09%
Tagalog (including Filipino)	1,199	599	211	1,279	3,288	0.08%
French, Haitian, or Cajun	297	966	173	734	2,170	0.05%
German or other West Germanic Languages	251	640	220	190	1,301	0.03%

Based on data presented in Table 2, Arabic and Spanish represent the two languages spoken the most among LEP speakers, above 1% of people in the RTA service area. In addition, 8 other specific languages meet the Safe Harbor threshold, for a total of 10 languages:

- Arabic
- Spanish
- Russian
- Polish
- Chinese
- Korean
- Vietnamese
- Tagalog
- French
- German

Factor 2: Frequency of Contact with LEP Individuals

Under Factor 2, RTA evaluated the frequency with which individuals with LEP come in contact with an RTA program, activity, or service. RTA informally surveyed its employees, SEMCOG Title VI coordinators, and RTA-affiliated transit providers (DDOT, DTC, SMART, and TheRide) on the nature and frequency of their contact with persons with LEP while performing daily job functions. The responses indicate that employees most frequently encountered LEP population speaking Spanish and Arabic, followed by Chinese and Korean. Based on the responses, RTA also anticipates that further interaction with persons with LEP is limited. However, the RTA office is publicly accessible, and numerous public engagement events are part of the public transit planning processes. Programs, services, and activities that have a potential impact on persons with LEP include:

- Public involvement and public engagement meetings and hearings for transit projects affecting communities or individuals with LEP communities or individuals.
- Federal funding subrecipients (transit providers)
- Internet access: websites must be accessible to LEP persons
- Phone communications, notices, and greetings in languages other than English
- Language Line monthly call summarized by language
- Community member surveys in LEP languages
- Employee surveys

Factor 3: Nature and Importance of the Program, Activity, or Service to LEP Individuals

Under Factor 3, RTA assessed the importance of the program, activity, or service provided by the RTA to the LEP population. The RTA used the Census table Means of Transportation to Work by Language Spoken at Home and Ability to Speak English: 2023 ACS to identify percentage of LEP workers over the age of 16 using public transit. While this table does not fully represent all the mobility needs, it does present a snapshot of commuters who would likely rely on public transit to access their jobs. As presented in Table 3, approximately 1% of LEP people use public transit to commute to work, compared to 1.4% of the general population. LEP populations were less likely to use public transit for their commute in all but Washtenaw County. In addition to operating public transit services, the RTA is responsible for completing a Regional Master Transit Plan, and planning and coordinating public transportation in the four-county region, including the City of Detroit. The nature of the RTA's planning activities is especially important to LEP communities to ensure access to public transit services for all populations. Given the number of LEP individuals in the region, the RTA will ensure reasonable accessibility to all our programs, services, and activities consistent with USDOT Guidance.

Table 3: Transit Use by County by LEP Status. Data Obtained from Census Table B08113: Means of Transportation to Work by Language Spoken at Home and Ability to Speak English, 2023 5-Year ACS

MEANS OF TRANSPORTATION TO WORK BY LANGUAGE SPOKEN AT HOME AND ABILITY TO SPEAK ENGLISH

	Macomb County, Michigan	Oakland County, Michigan	Washtenaw County, Michigan	Wayne County, Michigan	Percent
All Workers 16 years and over	0.58%	0.34%	3.77%	2.15%	1.38%
English only and Speaking English "very well"	0.60%	0.34%	3.60%	2.24%	1.40%
Speaking English less than "very well"	0.27%	0.32%	7.41%	0.65%	1.01%

Factor 4: Resources Available to RTA and Overall Cost

Under Factor 4, RTA reviewed the resources available to RTA and overall costs to provide assistance to people with LEP. USDOT Policy Guidance Concerning Recipients' Responsibilities to LEP Persons published in the Federal Register: December 14, 2005 (Volume 70, Number 239) states:

A recipient's level of resources and the costs imposed may have an impact on the nature of the steps it should take in providing meaningful access for LEP persons. Smaller recipients with more limited budgets are not expected to provide the same level of language services as larger recipients with larger budgets. In addition, "reasonable steps" may cease to be reasonable where the costs imposed substantially exceed the benefits. Recipients should carefully explore the most cost-effective means of delivering competent and accurate language services before limiting services due to resource concerns.

RTA-funded planning activities have funds dedicated to interpreter services at public meetings and document translation. Contractor and subcontractor activities are also covered under these resources. The RTA will endeavor to provide translation and interpreter services, requesting, at minimum, a 72-hour notice.

Conclusion of Four-Factor Analysis

RTA has reviewed the data as well as its available resources and deemed that, upon request, it will translate vital documents into the language requested to ensure accessibility. In Arabic and Spanish, the RTA will also translate vital documents including Title VI Notice to the public, Complaint Procedures, Complaint Forms, Notice of Denials, and LAP policy. The RTA has language identification cards and translation services (interpreters) available on demand. On average, written translation requests of vital documents will strive to be made available within five to seven business days.

PROVIDING NOTICE TO LEP PERSONS

USDOT LEP guidance says:

Once an agency has decided, based on the four factors, that it will provide language services, the recipient must notify LEP persons of the services available free of charge. Recipients should provide this notice in languages LEP persons would

understand. The guidance provides several examples of notification, including:

1. Signage in languages that an LEP individual would understand when free language assistance is available with advance notice.
2. Stating in outreach documents that free language services are available from the agency.
3. Working with community-based organizations and other stakeholders to inform LEP individuals of the recipient's services, including the availability of language assistance services.

Statements in languages that an LEP individual would understand will be placed in public information and public notices informing LEP individuals that those requiring language assistance and/or special accommodations will be provided the requested service free of charge, with reasonable advance notice to the RTA.

Options and Proposed Actions

Options

Federal fund recipients have two ways to provide language services: oral interpretation, either in person or via telephone interpretation service, and written translation. The correct mix should be based on what is both necessary and reasonable, considering the four-factor analysis.

Considering the size of the RTA planning area, the concentration of LEP individuals in the service area, and RTA's financial resources, it is necessary to limit language aid to the most basic and cost-effective services. Other than the previously mentioned vital documents, if there are additional language assistance measures required for LEP individuals, RTA shall proceed with interpretation options to meet all requests for those language groups to ensure equal access, while also complying with LEP regulations.

Proposed Actions

RTA Definition: Interpreter - “a person who translates spoken language orally,” as opposed to a translator, who translates written language or who transfers the meaning of written text from one language into another. The person who translates orally is not a translator, but an interpreter.

- Notify the public that interpreter services are available upon request, with seven days advance notice.
- With advanced notice of seven calendar days, the RTA will provide an interpreter services at public meetings, including language translation and signage for the hearing impaired.
- RTA will use the Translators Resource List as provided by MDOT for translation services and verbal interpretation.
- The Census Bureau’s “I-speak” Language Identification Card will be distributed to all employees who may potentially encounter LEP individuals.
- Once the LEP individual’s language has been identified, an agency from the Translators Resource List will be contacted to provide interpretation services.
- RTA’s Title VI web page will be published in English, Arabic, and Spanish.
- Publications of RTA’s Title VI Complaint Form and Title VI Plan will be made available on RTA’s website in English, Arabic, and Spanish, as well as other languages upon request.
- Translation of other vital RTA documents will be made available upon request.
- In the event that an RTA employee encounters a LEP individual, they are required to proceed as follows:

Office Encounter:

1. An I-speak Language Identification Card will be provided to the LEP individual to determine the language they speak.
2. Once the foreign language is determined, the LEP individual’s information will be provided to the Title VI coordinator, who will then contact an interpreter from MDOT’s Translators Resource List.
3. If a document needs to be translated, the Title VI Officer will have the document translated and provide it to the requester as soon as possible.

In Writing:

1. Once a letter has been received, it will be immediately forwarded to the Title VI Officer.
2. The Title VI Officer will contact a translator from the MDOT’s Translators Resource List to determine the specifics of the letter request information.
3. The Title VI Officer will work with the selected agency to provide the requested service to the individual in a timely manner.

Over the Phone:

1. If someone calls into the RTA's office speaking another language, every attempt will be made to keep that individual on the line until an interpreter can be conferenced into the line and, if possible, determine the language spoken by the caller.
2. Once the language spoken by the caller has been identified, the RTA will proceed with providing the requested assistance to the LEP individual.

LEP COMPLAINT PROCEDURES

Complaints of discrimination involving LEP, Title VI, and related statutes will be investigated using the Title VI complaint procedures and form described in the Title VI Plan.

MONITORING AND UPDATING THE LAP

This plan is subject to revision based on the changes in demographics as reported by the U.S. Census Bureau and any Environmental Justice (EJ) analysis done by the RTA or SEMCOG. This plan is viewed as a work in progress and will be updated every three years and reviewed annually. During LAP updates, the RTA will also use self-reported information from public meeting sign-in sheets during LAP updates. The LAP will be examined and updated based on the following:

- How the needs of LEP persons have been addressed
- Whether local language assistance programs have been effective and sufficient to meet the needs of LEP persons
- Whether the RTA's financial resources are sufficient to fund language assistance resources
- Whether complaints have been received concerning the agency's failure to meet the needs of LEP individuals.

RTA STAFF TRAINING

RTA staff who interact with LEP persons will receive training on the requirements for providing meaningful access to services for LEP persons. RTA employees will be trained or made aware of the Title VI and LAP policies and complaint procedures through regular staff training. Key staff with a higher potential to interact with LEP persons will receive in-depth training on their roles and responsibilities related to LEP persons.

LAP ACCESS

A copy of the LAP document can be requested at the RTA's central office during normal business hours and will be available on the RTA website at www.rtamichigan.org. Any person or agency may also request a copy by contacting:

Regional Transit Authority of Southeast Michigan
1001 Woodward Avenue, Suite 1400
Detroit, MI 48226
(313) 402-1020

Section H - Advisory Boards

The RTA has two advisory committees to assist in the organization's decision-making and development of the organization. The Public Transportation Provider's Advisory Council consists of each transit provider that falls under the jurisdiction of the RTA. Their purpose is to discuss opportunities for coordination and evaluate the impacts of decisions being made by the RTA on their respective organizations. A Citizens Advisory Committee (CAC) was formed as part of the development of the Board of Directors by-laws to ensure that the public is represented across the jurisdiction of the RTA and that advocates for ADA, elderly, faith-based, business, civic leadership, and transit riders would have the opportunity to provide feedback to the RTA.

MEMBERSHIP OF NON-ELECTED COMMITTEES AND COUNCILS

The CAC is the only transit-related, non-elected planning board, advisory council, or committee for which the RTA selects the members. The CAC shall consist of public transit region residents and shall be composed of senior citizens or persons with disabilities, and two users of public transportation from each county (Oakland, Macomb, Wayne, and Washtenaw). The CAC advises the RTA Board of Directors on issues of concern to people with disabilities and senior citizens. Meetings occur every other month and are open to anyone who wishes to attend; all who attend are encouraged to participate. The CAC's membership is conferred on anyone who attends more than one meeting. The following table presents minority representation on committees and councils selected. All 30 members completed the questionnaire.

Table 4 below presents minority representation on committees and councils selected by the RTA CAC.

Table 4: Race/Ethnicity Composition of CAC Members Compared to Service Area Population. Data Obtained from Census Table B03002: Hispanic or Latino Origin by Race, 2023 5-Year ACS.

Race/Ethnicity		Population	CAC Members
Hispanic/Latino		5.6%	0.0%
Not Hispanic/Latino	Native American/Indigenous	0.2%	0.0%
	Asian or Pacific Islander	4.2%	6.7%
	Black or African American	17.2%	23.3%
	White/Caucasian	68.8%	70.0%
	Two or more races	4.0%	0.0%

Section I - Subrecipient Management

PROVIDING ASSISTANCE

To ensure that all subrecipients comply with Title VI regulations, the RTA provides its subrecipients with sample notices and procedures for tracking Title VI complaints. The RTA will also provide its subrecipients' demographic information and any other information pertinent to Title VI upon request.

MONITORING SUBRECIPIENTS

The RTA requires all subrecipients to sign an agreement that ensures that they comply with Title VI regulations. In addition, the Title VI coordinator monitors the performance of subrecipients annually. The following is a summary of the subrecipient monitoring process:

- Ensure that project agreements with subrecipients contain all required federal clauses.
- Request that subrecipients provide the RTA with a copy of a Title VI Plan.
- File a copy of the agreement or contract and Title VI Plan, if available, with the RTA.
- Review the Title VI Plan for compliance and issue a letter of concurrence. RTA of Southeast Michigan monitored compliance with the Title VI requirements for one subrecipient - Area Agency on Aging 1-B (AgeWays) since 2023

There have been no Title VI complaints, investigations, or lawsuits for RTA subrecipients over the past three years. RTA uses the attached questionnaire as part of the monitoring program (see Appendix B).

TITLE VI EQUITY ANALYSIS FOR CONSTRUCTION OF FACILITIES

Since the last Title VI program update, The RTA or its subrecipients have not constructed a new facility requiring Title VI equity analysis. The RTA is not currently planning to construct additional facilities. The RTA understands that per 49 CFR 21.9(b)(3), it may not select a site or location of facilities with the purpose or effect of excluding persons from, denying the benefits of, or subjecting them to discrimination on the basis of race, color, or national origin. The RTA will adhere to the above-mentioned regulations for any future facility construction.

Section J - Chapter IV Requirements - Service Standards

QLINE SERVICE STANDARDS

Vehicle Load Standards

Table 5: QLINE Vehicle Load Standards

Vehicle Type	Peak Hours – Seated Capacity	Peak Hours – Standing Capacity	Peak Hours – Maximum Load Factor	Off Peak Hours – Seated Capacity	Off Peak Hours – Standing Capacity	Off Peak Hours – Maximum Load Factor
Streetcar	36	22	1:2	36	17	1:1.5

Vehicle Headway Standards

Table 6: QLINE Headway Standards

Day	Average	Peak	Evening
Weekday	15	15	15
Saturday	15	15	15
Sunday	15	15	15

On-Time Performance

A vehicle is considered on time if it departs from a scheduled stop no more than 3 minutes early and no more than 3 minutes late. The RTA's on-time performance objective is 90 percent or greater. The RTA continuously monitors on-time performance, and system results are published and posted as part of monthly performance reports covering all aspects of operations.

Service Availability

Twenty QLINE stations are located along the 3.3-mile route, and stations are no more than a half mile apart.

Service Policies

Vehicle Assignment Policy

All vehicles in the streetcar fleet are identical. Each vehicle is 66.5 feet long; 8 feet, 8 inches wide; and air-conditioned. The vehicles include over 70 percent low-floor area and station-level passenger boarding and are capable of transporting passengers in

wheelchairs. The streetcars use automated stop announcement systems.

Transit Amenities Policy

Rider amenities at every QLINE station include heating, concrete bench seating, sufficient lighting, Wi-Fi access, a security camera, ticket vending machines, an emergency phone, and next-vehicle alert screens. All stations are street-level and handicap accessible, including braille signage.

EXPRESS BUS SERVICE STANDARDS

Vehicle Load Standards

Table 7: Express Bus Vehicle Load Standards

Vehicle Type	Peak Hours – Seated Capacity	Peak Hours – Standing Capacity	Peak Hours – Maximum Load Factor	Off Peak Hours – Seated Capacity	Off Peak Hours – Standing Capacity	Off Peak Hours – Maximum Load Factor
Bus	58	0	1:1	58	0	1:1

Vehicle Headway Standards

Table 8: Express Bus Headway Standards

Day	Average	Peak	Evening
Weekday	60	60	90
Saturday	90	90	120
Sunday	90	90	120

On-Time Performance

A vehicle is considered on time if it departs from a scheduled stop no more than 3 minutes early and no more than 3 minutes late. The RTA's on-time performance objective is 90 percent or greater. The RTA continuously monitors on-time performance, and system results are published and posted as part of monthly performance reports covering all aspects of operations.

Service Availability

Two stops are available for D2A2 – one located in downtown Detroit, the other located in downtown Ann Arbor. Three stops are available for DAX – one located in downtown Detroit, two located in the Detroit International Airport, with one at each terminal.

Service Policies

Vehicle Assignment Policy

All vehicles in the express bus fleet are identical. Each vehicle is 45-foot long, three-axle coach, with a lift to load riders with mobility assistive devices, and is air-conditioned.

Transit Amenities Policy

Rider amenities at every express bus stop include signage and concrete landing pad.

RTA service standards are included in Appendix D.

RTA Title VI Program Approval

The Board Approval Minutes for this Title VI plan will be included at the end of this document after Board approval on December 4, 2025.

Appendix A - Discrimination Complaints

Title VI of the 1964 Civil Rights and related nondiscrimination statutes and regulations require that no person in the United States shall on the grounds of race, color or national origin be excluded in participation in, be denied the benefits of, or be subjected to discrimination under any program or activity receiving federal financial assistance.

The following information is necessary to assist the RTA in processing your complaint. Should you require any assistance in completing this form, please let us know.

Complete and return this form to:

Regional Transit Authority of Southeast Michigan
Mshadoni Smith-Jackson, Title VI Officer
1001 Woodward Avenue, Suite 1400
Detroit, MI 48226

RTA DISCRIMINATION COMPLAINT FORM

Last Name	First Name	<input type="checkbox"/> Male	<input type="checkbox"/> Female
Mailing Address	City/State	Zip	
Home Telephone	Other Telephone	Email Address	
Do you wish to remain anonymous? <input type="checkbox"/> Yes <input type="checkbox"/> No			
Alleged Discrimination: <input type="checkbox"/> Race <input type="checkbox"/> Color <input type="checkbox"/> National Origin <input type="checkbox"/> Age <input type="checkbox"/> Religion <input type="checkbox"/> Disability <input type="checkbox"/> Sex/Gender			
Race of Complainant: <input type="checkbox"/> Black <input type="checkbox"/> White <input type="checkbox"/> Hispanic <input type="checkbox"/> Asian American <input type="checkbox"/> American Indian <input type="checkbox"/> Alaska Native <input type="checkbox"/> Pacific Islander <input type="checkbox"/> Other _____			
How were you discriminated against? Please explain your complaint as clearly as possible. Include how other persons were treated differently. Use additional sheet(s), if necessary. Attach supporting documents if available.			
Date and place of the alleged discriminatory action(s). Please include the earliest date of discrimination and the most recent date(s) of discrimination.			
The law prohibits intimidation or retaliation against anyone because they have either taken action, or participated in action, to secure rights protected by the laws. If you feel that you have been retaliated against, separate from the discrimination alleged above, please explain the circumstances below. Describe the action you took which you believe was the cause for the alleged retaliation.			

Name(s) of individual(s) responsible for the discriminatory action(s).

Name(s) of person(s) who may be contacted for additional information to support or clarify your complaint. (Attach additional sheets, if necessary).

Return form and supporting documentation to: Regional Transit Authority of Southeast Michigan, 1001 Woodward Avenue, Suite 1400, Detroit, MI 48226

RTA Discrimination Complaint Form in Arabic and Spanish can be found on **<https://www.rtamichigan.org/title-vi>**.

Appendix B - Title VI Notice of Rights in all Languages

RTA Title VI Notice of Rights in English, Arabic, and Spanish can be accessed at <https://www.rtamichigan.org/title-vi>.

Appendix C – Subrecipient Questionnaire

Subrecipients of federal funds are required to complete an annual desktop review questionnaire as part of the RTA's risk-based subrecipient monitoring procedure. If several topics do not apply to your agency for FY 2025, please enter "n/a." Please enter your responses into the light blue highlighted cells and return to **msjackson@rtamichigan.org** along with copies of any agency plans and policies that have changed. The RTA will review your responses and may request additional documentation or schedule a meeting or site visit as needed.

SECTION 1 Agency Information

Q. Please provide your organization's name.

Q. Please provide a staff contact for federally funded projects

SECTION 2 Legal/Lobbying

Federal Requirement: Subrecipients are prohibited from using appropriated Federal funds to lobby for Federal funds. If the subrecipient uses local funds to lobby for transit purposes, subrecipients must file OMB Standard Form LLL quarterly.

Q. Did your organization pay for lobbying activities during the reporting period?

Q. If yes, what type of funds were used?

SECTION 3 Financial Management and Capacity

Federal Requirement: Subrecipients must have financial management systems that meet standards for financial reporting, accounting records, internal control, budget control, allowable cost, source documentation, and cash management. Requirements for use of indirect cost when reimbursement is sought from a federal award program must be met.

Q.: Describe your organization's financial management systems, especially the method of accounting, how financial reports are prepared, and systems for internal control and cash management.

Q.: Does your organization use Federal funds to pay for indirect operating costs? (If yes, someone from the RTA will contact you to review the calculation method.)

SECTION 4 Satisfactory Continuing Control

Federal Requirement: Subrecipients must use FTA-funded property for project purposes

Q. What vehicles, equipment, and property has your agency acquired with the assistance of FTA funds (e.g., Section 5310/5311), and how are these items being used in accordance with their intended project purpose?

Q: Has your agency used any FTA-funded property for purposes other than purposes identified in a grant contract or subrecipient agreement?

SECTION 5 Maintenance

Federal Requirement: Subrecipients that use FTA assistance to purchase assets must have maintenance programs for those assets. Such assets must be maintained in good condition and good operating order.

Q: Does your organization have a maintenance program for FTA-funded assets? (If yes, please ensure a copy has been provided to the RTA.)

Q: Does the program address maintenance of wheelchair lifts and other accessibility features?

Q: Is your organization following your program for preventive maintenance inspections? (Please attach any relevant documentation.)

Q: Are your organization's FTA-funded assets under warranty, and are warranty claims pursued?

SECTION 6 Title VI (Civil Rights Act of 1964)

Federal Requirement: Subrecipients must ensure that no person, on the basis of race, color, or national origin, be excluded from participating in, be denied the benefits of, or be subject to discrimination under any program or activity receiving Federal funds. All transit services and related benefits must be distributed in an equitable manner.

Q: Does your organization have a Title VI program in place? (If yes, please ensure your current Title VI Plan has been provided to the RTA.)

Q: If yes, have the Language Assistance Plan, complaint procedures, and/or public participation procedures been implemented as described?

Q: How does your organization notify the public of its rights under Title VI?

Q: Has your organization received any discrimination complaints in the past three years, FY 2022-2025? (If yes, please describe the nature of the complaint and the outcome and attach any relevant documentation.)

SECTION 7 Americans with Disabilities Act (ADA)

Federal Requirement: Subrecipients must comply with ADA. No entity shall discriminate against an individual with a disability in connection with the provision of public transportation service. Subrecipients must track, resolve, and respond to ADA-related complaints. All new bus vehicles purchased or leased for use in fixed-route service by public entities must be accessible. Used bus vehicles must be made accessible for use to the maximum extent feasible. Vehicles used in contracted fixed-route service must be accessible. Vehicles used in demand-responsive service must be accessible unless equivalent service is provided. Newly constructed and altered facilities must meet US DOT accessibility requirements. Service must comply with the US DOT ADA regulations and be accessible to and usable by persons with disabilities.

Q: How does your agency track, resolve, respond to, and retain records of ADA-related complaints?

Q: Has your organization received any ADA-related complaints in the past three years, FY 2022-2025? (If yes, please describe the nature of the complaint and the outcome and attach any relevant documentation.)

Q: Are public transportation facilities constructed or altered during the reporting period accessible to and usable by individuals with disabilities?

Q: Describe how your organization follows ADA provision of service requirements (e.g., lift/ramp availability, priority seating, stop identification, employee training, accessible information formats, reasonable modification requests).

SECTION 8 Equal Employment Opportunity (EEO)

Federal Requirement: A full EEO program must be submitted to the RTA if your organization employs 100 or more transit-related employees and requests or receives capital or operating assistance > \$1 million in a fiscal year, or requests or receives planning assistance > \$250,000 in a fiscal year. An abbreviated program must be submitted to the RTA if your organization employs 50-99 transit-related employees and requests or receives capital or operating assistance in excess of \$1 million in a fiscal year, or requests or receives planning assistance in excess of \$250,000 in a fiscal year.

Q: Is your organization required to submit an EEO program based on the thresholds above? (If yes, please ensure it has been submitted to the RTA.)

SECTION 9 Drug and Alcohol Program

Federal Requirement: Subrecipients must have a board-adopted anti-drug and alcohol misuse policy. Subrecipients are required to provide at least 60 minutes of drug and alcohol training for covered employees and at least 120 minutes of training for supervisors and other officers authorized by the employer to make reasonable suspicion determinations. Subrecipients must obtain previous drug and alcohol testing program records from prior employers for employees performing safety-sensitive functions and must retain drug and alcohol testing program records for all covered employees in a secure location with controlled access. Medical Review Officers, substance abuse professionals, breath alcohol technicians, and collectors in the drug and alcohol program must have required certifications.

Q: Does your agency have a board-adopted drug and alcohol misuse policy? (If yes, please ensure it has been submitted to the RTA.)

Q: Does the policy include the following elements: proof of policy adoption by a governing body, identification of D&A program contact, employee categories subject to testing, prohibited behavior, testing circumstances, consequences for refusing tests or positive tests with alcohol concentrations of 0.04 or greater, consequences for positive tests with alcohol concentrations of 0.02 or higher but lower than 0.04?

Q: Does your organization provide the minimum required trainings and reasonable suspicion testing?

Q: Does your organization obtain drug and alcohol testing records from prior employers, and are records stored in a secure location with controlled access?

Q: Do all medical review officers, substance abuse professionals, breath alcohol technicians, and collectors in the drug and alcohol testing program have the required qualifications, and are the qualifications records kept on file by your

SECTION 10 Additional Requirements

Please indicate below if the following service types are applicable to your agency, and someone from the RTA will reach out to you for additional information.

Q: Does your organization operate school bus or school tripper service?

Q: Does your organization operate charter bus service?

Q: Does your organization provide ADA complementary paratransit service (required of public transit agencies operating fixed routes)?

SECTION 11 Conclusion

Q: Do you have any questions, concerns, or additional information to share regarding your agency's compliance with federal requirements and capacity to carry out federally funded projects?

Q: Will you be sending any attachments with your response or as a follow-up? (If so, please summarize the contents so files can be collated.)

Appendix D – Service Standards

Section A - Introduction

The Federal Transit Administration's (FTA) Title VI Circular 4702.1B requires that the Regional Transit Authority of Southeast Michigan (RTA) to develop and maintain a set of quantitative service standards and qualitative service policies aimed at helping its efforts to provide quality transit service in a cost-effective manner that is consistent and equitable for transit riders, regardless of their race, color, or national origin.

The service standards include:

- Vehicle load
- Vehicle headways
- On-time performance
- Service availability

The service policies include:

- Vehicle assignment
- Transit amenities

RTA will use these service standards and policies to:

- Design services
- Determine appropriate service levels for its fixed route services
- Establish minimum levels of service performance

The following sections describe the service standards and service policies for each mode. The Board Approval Minutes for the service standards is included at the end of this document.

Section B –Service Standard for QLINE

Vehicle Load Standards

Table A - 1: QLINE Vehicle Load Standards

Vehicle Type	Peak Hours – Seated Capacity	Peak Hours – Standing Capacity	Peak Hours – Maximum Load Factor	Off Peak Hours – Seated Capacity	Off Peak Hours – Standing Capacity	Off Peak Hours – Maximum Load Factor
Streetcar	36	22	1:2	36	17	1:1.5

Vehicle Headway Standards

Table A - 2: QLINE Headway Standards

Day	Average	Peak	Evening
Weekday	15	15	15
Saturday	15	15	15
Sunday	15	15	15

On-Time Performance

A vehicle is considered on time if it departs from a scheduled stop no more than 3 minutes early and no more than 3 minutes late. The RTA's on-time performance objective is 90 percent or greater. The RTA continuously monitors on-time performance, and system results are published and posted as part of monthly performance reports covering all aspects of operations.

Service Availability

Twenty QLINE stations are located along the 3.3-mile route, and stations are no more than a half mile apart.

Service Policies

Vehicle Assignment Policy

All vehicles in the streetcar fleet are identical. Each vehicle is 66.5 feet long; 8 feet, 8 inches wide; and air-conditioned. The vehicles include over 70 percent low-floor area and station-level passenger boarding and are capable of transporting passengers in wheelchairs. The streetcars use automated stop announcement systems.

Transit Amenities Policy

Rider amenities at every QLINE station include heating, concrete bench seating, sufficient lighting, Wi-Fi access, a security camera, ticket vending machines, an emergency phone, and next-vehicle alert screens. All stations are street-level and ADA accessible, including braille signage.

Section C – Service Standard for Express Bus Services

Vehicle Load Standards

Table A - 3: Express Vehicle Load Standards

Vehicle Type	Peak Hours – Seated Capacity	Peak Hours – Standing Capacity	Peak Hours – Maximum Load Factor	Off Peak Hours – Seated Capacity	Off Peak Hours – Standing Capacity	Off Peak Hours – Maximum Load Factor
Bus	58	0	1:1	58	0	1:1

Vehicle Headway Standards

Table A - 4: Express Bus Headway Standards

Day	Average	Peak	Evening
Weekday	60	60	90
Saturday	90	90	120
Sunday	90	90	120

On-Time Performance

A vehicle is considered on time if it departs from a scheduled stop no more than 3 minutes early and no more than 3 minutes late. The RTA's on-time performance objective is 90 percent or greater. The RTA continuously monitors on-time performance, and system results are published and posted as part of monthly performance reports covering all aspects of operations.

Service Availability

Two stops are available for D2A2 – one located in downtown Detroit, the other located in downtown Ann Arbor. Three stops are available for DAX – one located in downtown Detroit, two located in the Detroit International Airport, with one at each terminal.

Service Policies

Vehicle Assignment Policy

All vehicles in the express bus fleet are identical. Each vehicle is 45-foot long, three-axle coach, with a lift to load riders with mobility assistive devices, and is air-conditioned.

Transit Amenities Policy

Rider amenities at every express bus stop include signage and concrete landing pad.