



2020 TITLE VI DOCUMENTATION  
FOR THE  
FEDERAL TRANSIT ADMINISTRATION

Revised October 2020

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**INTERURBAN TRANSIT PARTNERSHIP BOARD OF DIRECTORS**

**RESOLUTION No. 102820-1**

**Fiscal Year: 2020-2021**

Moved and supported to adopt the following resolution:

Approval of The Rapid's update to the Title VI Plan.

BE IT RESOLVED that the ITP Board hereby approves The Rapid's updated 2020 Title VI documentation as required by the Federal Transit Administration, in accordance with the information presented to the Board on October 28, 2020.

CERTIFICATE

The undersigned, duly qualified and acting secretary of the Interurban Transit Partnership Board, certifies that the foregoing is a true and correct copy of a resolution adopted at a legally convened meeting of the Interurban Transit Partnership Board.

  
Julie Ilbrink, Board Secretary

10/28/20  
Date

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## **SECTION I. DATA COLLECTION AND REPORTING REQUIREMENTS**

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### **A. Civil Rights Complaints**

There are no active lawsuits naming the Interurban Transit Partnership-The Rapid that alleges discrimination on the basis of race, color, or national origin with respect to service or other transit benefits.

### **B. Pending Grant Applications**

There will be three FY 2021 Applications when the federal apportionments are released. These include:

- Section 5307
- CMAQ
- Section 5339

### **C. Civil Rights Compliance Reviews**

The conducted a Triennial Review of The Rapid in September 2019 and found we were in compliance except for one (1) finding which involved providing Title VI Rights Notices displayed in Spanish at all locates the notices are places. This finding has since been addressed.

### **D. DOT Title VI Assurance**

The Rapid is fully committed to the DOT's Title VI Assurance policies.

### **E. Title VI Submittal**

The Rapid's 2017 Title VI report was submitted to the FTA in December 2017 and is set to expire in January 2021. The 2020 Title VI report, once approved by the FTA, will be valid from January 30, 2021 to January 30, 2024.

### **F. Construction Projects**

The Rapid has worked on several construction projects since 2017:

- Construction of a Light Maintenance and Storage Facility at 851 Freeman Ave SW. This project was completed in August 2020. The facility was constructed to store, maintain, and refuel Laker Line vehicles for the Laker Line Bus Rapid Transit (BRT) service. The project received a Categorical Exclusion (CE) in February 2017.

- Construction of 20 bus rapid transit platforms along the Laker Line route alignment in tandem with the Laker Line BRT project.
- A reconstruction of the Facilities Department Building at 700 Butterworth Ave SW is expected to occur during the life of this plan. This effort will include the demolition of the existing structure on the site and the construction of a new office building and more adequate, covered parking areas for equipment and vehicles. This project is anticipated to begin in the Spring of 2021 and be completed by the end of 2021.

## **SECTION II. TITLE VI NOTIFICATION AND MONITORING**

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### **A. Public Notification of Title VI Rights**

The Rapid uses a number of methods to ensure the public knows its Title VI rights. The following information appears on The Rapid's webpage, is displayed at our Information Center, on the bus transfer station platforms, and on most of The Rapid's buses:

#### **Notification of Your Rights under Title VI**

The Rapid fully complies with Title VI of the Civil Rights Act of 1964 and related statutes and regulations in all programs and activities. The Rapid operates without regard to race, color, national origin, creed, income, gender, age, and disability. Any person who believes him/herself, or any specific class of persons, to be subject to discrimination prohibited by Title VI may by him/herself or by representative file a written complaint with The Rapid. A complaint must be filed no later than 180 days after the date of the alleged discrimination and contain the following information:

- Name, address, and phone number of the Complainant
- Name, address, phone number and relationship of Representative to Complainant (if applicable)
- Basis of complaint (i.e., race, color, national origin)
- Date of alleged discriminatory act(s)
- Date complaint received by the MPO
- A statement of the complaint, including specific details, relevant facts and documentation.

### **B. Response to Title VI Complaints**

The following is The Rapid's official policy for response to Title VI complaints:

*If The Rapid receives a Title VI complaint as described in the Notification of Title VI Rights, the following process will be followed:*

*Within fifteen (15) days, The Rapid shall confirm receipt of the complaint and inform the Complainant of the investigation process. Within sixty (60) days—should the complaint have merit—The Rapid shall commence an investigation of the allegation(s). The purpose of an investigation is to determine whether there is a reason to believe that a failure to comply with Title VI of the Civil Rights Act of 1964 has occurred. In addition, The Rapid will render a recommendation for action in a report of findings or resolution. Within ninety (90) days, The Rapid will notify the Complainant in writing of the final decision reached, including the proposed*

*disposition of the matter. The notification will advise the Complainant of his/her right to file a formal complaint with the Federal Transit Administration (FTA) Title VI Coordinator if they are dissatisfied with the final decision rendered by The Rapid. The Rapid maintains a log of all Title VI complaints received.*

*If a probable cause of a discriminatory practice based on race, color, or national origin is found to exist, The Rapid shall endeavor to eliminate said practice by means of a Remedial Action Plan. The Remedial Plan shall include: a list of all corrective actions accepted by the agency; a description of how the corrective action will be implemented; and a written assurance that the agency will implement the accepted corrective action in the manner discussed in the plan. Where attempts to resolve the complaint fail, the complainant shall be notified in writing of his or her right to submit the complaint to the Federal Transit Administration as cited in FTA C4702.1A.*

### **C. Sub-Recipients and Title VI Monitoring**

The Rapid has no sub-recipients under Title VI monitoring.

### **SECTION III. PUBLIC OUTREACH AND LIMITED ENGLISH PROFICIENCY (LEP) OUTREACH**

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The DOT Guidance outlines four factors recipients should apply to the various kinds of contracts they have with the public to assess language needs and decide what reasonable steps they should take to ensure meaningful access for LEP persons:

1. The number or proportion of LEP persons eligible to be served or likely to be encountered by a program, activity, or service of the recipient or grantee.
2. The frequency with which LEP individuals come in contact with the program.
3. The nature and importance of the program, activity, or service provided by the recipient to the LEP Community.
4. The resources available to The Rapid and overall cost.

This plan uses the recommended four-factor analysis of an individualized assessment considering the four factors outlined above. Each of the following factors is examined to determine the level and extent of language assistance measures required to sufficiently ensure meaningful access to The Rapid services and activities that may affect their quality of life.

#### **A. Factor 1: The Proportion, Numbers and Distribution of LEP Persons**

##### **Census, State, and Local Population Data**

The Rapid's primary service area includes the cities of East Grand Rapids, Grand Rapids, Grandville, Kentwood, Walker, and Wyoming which constitute nearly the entirety of the Grand Rapids Urbanized Area (UA). According to the American Community Survey, there are over 6,000 limited English-speaking households in the Grand Rapids area, or 2.7% of all households in the urbanized area. Given the metro region's recent history of highly-active faith-based refugee re-settlement service organizations, the Grand Rapids area includes a wide variety of distinct language groups originating from all over the world, especially within the City of Kentwood. Of these limited English-speaking households, Spanish-speaking households comprise almost half of Limited English Proficiency households in the service area. Further, all six member communities of The Rapid have Spanish as the largest LEP group. Several neighborhoods within the service area feature a majority-Spanish speaking population, including Southwest Grand Rapids near Grandville and Clyde Park avenues. The table below details the language groups spoken in The Rapid's primary service area.

**Table 1 - Detailed Household Language Spoken by Household Limited English Speaking Status (2018)**

	Grand Rapids Urbanized Area	
	Households	Percent
Total Population	231,533	100.0%
English only	201,011	86.8%
Spanish	16,213	7.0%
Limited English-speaking household	2,983	1.3%
Not a limited English-speaking household	13,230	5.7%
French, Haitian, or Cajun	1,019	0.4%
Limited English-speaking household	119	0.1%
Not a limited English-speaking household	900	0.4%
German or other West Germanic languages	1,448	0.6%
Limited English-speaking household	87	0.0%
Not a limited English-speaking household	1,361	0.6%
Russian, Polish, or other Slavic languages	1,439	0.6%
Limited English-speaking household	69	0.0%
Not a limited English-speaking household	1,370	0.6%
Other Indo-European languages	2,051	0.9%
Limited English-speaking household	212	0.1%
Not a limited English-speaking household	1,839	0.8%
Korean	295	0.1%
Limited English-speaking household	169	0.1%
Not a limited English-speaking household	126	0.1%
Chinese (incl. Mandarin, Cantonese)	770	0.3%
Limited English-speaking household	148	0.1%
Not a limited English-speaking household	622	0.3%
Vietnamese	1,526	0.7%
Limited English-speaking household	827	0.4%
Not a limited English-speaking household	699	0.3%
Tagalog (incl. Filipino)	387	0.2%
Limited English-speaking household	42	0.0%
Not a limited English-speaking household	345	0.1%
Other Asian and Pacific Island languages	1,322	0.6%
Limited English-speaking household	572	0.2%
Not a limited English-speaking household	750	0.3%
Arabic	819	0.4%
Limited English-speaking household	0	0.0%
Not a limited English-speaking household	819	0.4%
Other and unspecified languages	3,233	1.4%
Limited English-speaking household	991	0.4%
Not a limited English-speaking household	2,242	1.0%
Total non-English-speaking households	30,522	13.2%

Limited English-speaking household	6,219	2.7%
Not a limited English-speaking household	24,303	10.5%

Source: 2018 American Community Survey 1-Year Estimates (Table B16002)

Overall, people with Limited English Proficiency make up 16.8% of our service area population, with Spanish-speaking people making up the most significant proportion of this population, representing 10.5% of the total population. Vietnamese speaking people make up 1.4% of the population (0.7% of households) and no other language group makes up more than 1% of the service area population.

Available data from the 2018 American Community Survey estimates indicates the number of people and households with Limited English Proficiency has increased slightly since 2015.

**Table 2 - Summary of LEP population among The Rapid's Charter Member Communities (2018)**

	<b>E. Grand Rapids</b>	<b>Grand Rapids</b>	<b>Grandville</b>	<b>Kentwood</b>	<b>Walker</b>	<b>Wyoming</b>
Population 5 years and over	10,867	183,087	14,736	47,689	23,077	69,747
Speak only English	95.8%	83.9%	92.8%	76.2%	94.8%	78.1%
Speak a language other than English	4.2%	16.1%	7.2%	23.8%	5.2%	21.9%
Spanish or Spanish Creole	1.4%	10.9%	5.4%	6.6%	2.3%	17.2%
Other Indo-European languages	2.3%	1.9%	0.8%	7.7%	1.3%	1.4%
Asian and Pacific Island languages	0.5%	1.6%	1.0%	6.6%	1.0%	3.1%
Other languages	0.1%	1.6%	0.0%	2.9%	0.6%	0.2%

Source: 2018 American Community Survey 5-Year Estimates (Table S1601)

## **B. Factor 2: Frequency of Contact with LEP Individuals**

### **Experience with LEP Persons**

The Rapid has offices accessible to the public and therefore accessible to LEP individuals. Additionally, the board meets monthly and will host public hearings or input meetings as needed, all of which are open to the public and could potentially involve LEP individuals. Given the amount of LEP individuals as displayed in Table #1 (above), the probability of The Rapid's employees to encounter an LEP individual is high.

Utilization of available services by LEP individuals varies. Translation and Travel Training services are implemented upon request. The Language Line is frequently used, mostly for Spanish translation, with somewhat frequent request for Arabic, Bosnian, and Vietnamese. For example, from October 1, 2018 through September 30, 2020 Language Line received 1,549 calls: 6 translations for Vietnamese, 1 for Swahili, 1 for Arabic, 2 for Somali, 7 for Kinyarwanda, 5 for Albanian, 5 for Farsi, 3 for Dari, 1 for Hebrew, and 1,518 for Spanish. Language Line is available for all callers to The Rapid,

and is used primarily by our Special Services department and the Information Center line.

### **C. Factor 3: The Nature and Importance of the Program, Activity, or Service to LEP**

The Rapid provides two main services that are very important to people with Limited English Proficiency:

- Fixed Route bus service
- Door to door paratransit service

If limited English becomes a barrier to accessing these primary services, people will not have the mobility necessary to access what our community has to offer, including jobs, healthcare, shopping, recreation and social opportunities. Specific barriers that could arise because of limited English are:

- Difficulty reading and interpreting route schedules and maps
- Fare systems
- Rules for riding the bus and utilizing our other facilities
- Information on how to ride the systems
- Difficulties scheduling door-to-door paratransit service.
- Determining how to file complaints/suggestions/commendations

### **Community Organizations and Relationships**

Historically, The Rapid (ITP) has worked closely with a variety of community organizations in our service area that work directly with Limited English Proficiency populations. Because these organizations provide critical services to LEP persons beyond transportation, their guidance is integral to the continuing improvement of our existing LEP services. We have implemented a number of their suggestions including holding bus trainings with translators and the Language Line. We will continue to dialogue with them to improve access for people with limited English proficiency.

### **Review of Programs, Activities, and Services**

We have a fully integrated Language Line service in our call centers that can accommodate translations for up to 57 languages. The Rapid also offers correspondence using Google Translate as needed. In addition, the Language Line service availability is highlighted on The Rapid's website in the Title VI section.

The Rapid offers Bus 101 trainings and familiarizations as requested with agencies and schools working with LEP populations, as well as the Clinica Santa Maria (Mercy Health) social workers and outreach personnel and Hispanic Center to offer information and resources, including a 'train the trainer' familiarization trip. Travel Training utilizes on-going contracted translation services with The Hispanic Center of West Michigan.

Our Travel Training department also has an ongoing relationship with the KISD (Kent Intermediate School District's) two locations in the city's Northeast end and Wyoming in the Southwest. These schools work with Adult learners in ESL. This gives the LEP adult learners an overview of The Rapid's service and intercity travel including Amtrak and the Indian Trails buses at this hub.

Interpreters are provided for our paratransit evaluation 'In Person Assessments'. Availability of one-on-one Travel Training or group familiarization trips with interpreters for businesses and community partners.

In addition to transit familiarization trips, our existing services include one-on-one travel training with a Rapid staff member and a contracted translator, a "field-trip" program performed by request during which a translator and a Rapid staff member will take a group on an introductory/learning ride as requested by partner agencies and churches, and our Language Line service.

Our Communications department has all important service-impacting messages translated from English to Spanish, including recorded audio translation (for on-bus announcements) and translated written materials (examples include public hearing announcements, on-bus rules and conduct, and more). Additionally, our Communications department is prioritizing adding Spanish to new external facing campaigns and increasing ad buys with media outlets that have a primarily Spanish speaking audience.

All employees who are primarily in contact with the public (information center staff, paratransit call takers, and travel trainers) receive training about the availability of LEP services and how they are to utilize these services properly so that we may communicate with customers regardless of the language they speak.

#### **D. Factor 4: Resources Available to The Rapid and Overall Costs**

##### **Inventory, Additional Needs, and Budget Analysis**

The main costs associated with our current LEP services include our Language Line service and our contracted translation services. These services account for approximately \$14,300 worth of costs annually (\$13,800 for Language Line Services, \$500 for contracted services from the Hispanic Center of Western Michigan). In addition, our Travel Trainer/ADA Administrator (Sarah Green) is the main coordinator of our various transit orientation programs. Their staff time contributes the cost of providing LEP services. Our Communications department budgets \$5,000 (per year) for English to Spanish translation services (through Michelle Jokisch Polo).

##### **E. Current Practices and Future LEP Activities**

##### **Community Organization and Information Review; Direct Consultation with LEP Persons**

Our interactions with the various community organizations previously mentioned serve as the basis of our continuing adaptation of LEP services to best serve LEP

persons. Many of our partnerships with these organizations are long standing, so our LEP services and programming reflect on-going input and review from our partners.

Currently, we do not have an official program in place to consult directly with the LEP persons we serve to gauge satisfaction with our current services or identify unmet needs. We will continue to consult with the West Michigan Hispanic Chamber of Commerce and other allies to find ways to increase the reach of our LEP services, as well as working to develop a method to solicit direct input and feedback from the LEP persons that we serve.

Depending on the results of these two efforts, we will identify new program needs and/or adjust current programming to reflect any deficiencies in service.

## **SECTION IV. DEMOGRAPHIC DATA**

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### **A. Introduction to Demographic Data**

The Rapid's service area includes a six-city region of southwest Kent County in which a variety of fixed-route and demand-response services such as GO!Bus are offered. The six cities forming the Interurban Transit Partnership comprise the majority of its service area, including route extensions into the townships of Alpine, Byron, Gaines, and Cascade. The service area also extends into Ottawa County's Allendale Township and Tallmadge Township as part of its contracted service with Grand Valley State University and northern Kent County to the cities of Cedar Springs and Big Rapids as part of its contracted service with Ferris State University. Please note that the population data used in this report includes the primary service area of The Rapid: the cities of East Grand Rapids, Grand Rapids, Grandville, Kentwood, Walker, and Wyoming (Kent County) and portions of the townships of Alpine, Byron, Gaines, and Cascade (Kent County).

### **B. Minority and Poverty Population by Route**

Table 3 illustrates total population, minority population, and population in poverty by route within  $\frac{1}{4}$  a mile of stops for each bus route within The Rapid's fixed route network. Nearly all Rapid fixed route services provide service to high poverty areas where 20% or more of the local population is at or below the federal poverty threshold. Several routes, including routes 1, 2, 3, 10, 16, and 24 provide service to areas where more than half of the local population is non-white.

**Table 3 – Minority and Poverty Populations within ¼ Mile of Stops by Route**

<b>Route</b>	<b>Population Served</b>	<b>Population in Poverty</b>	<b>Percent in Poverty</b>	<b>Minority Population</b>	<b>Percent Minority</b>
Silver Line	15,054	4,684	31.1	8,658	57.5
Route 1 Division	21,881	6,212	28.4	12,395	56.6
Route 2 Kalamazoo	25,968	6,070	23.4	15,048	57.9
Route 3 Madison	15,298	4,656	30.4	9,557	62.5
Route 4 Eastern	33,403	7,074	21.2	15,897	47.6
Route 5 Wealthy / Woodland	26,242	4,892	18.6	10,092	38.5
Route 6 Eastown / Woodland	23,066	4,208	18.2	5,330	23.1
Route 7 West Leonard	16,141	3,286	20.4	4,449	27.6
Route 8 Grandville / Rivertown	19,647	3,986	20.3	9,028	45.9
Route 9 Alpine	15,112	4,020	26.6	5,583	36.9
Route 10 Clyde Park	17,904	5,414	30.2	11,812	66.0
Route 11 Plainfield	13,034	3,231	24.8	3,937	30.2
Route 12 West Fulton	11,192	2,723	24.3	2,851	25.5
Route 13 Michigan / Fuller	16,113	3,387	21.0	4,148	25.7
Route 14 East Fulton	15,331	3,723	24.3	4,344	28.3
Route 15 East Leonard	15,097	3,928	26.0	4,744	31.4
Route 16 Wyoming / Metro Health	23,087	5,097	22.1	12,239	53.0
Route 17 Woodland / Airport	2,365	322	13.6	926	39.1
Route 18 Westside	15,468	4,697	30.4	5,732	37.1
Route 24 Burton Crosstown	28,980	6,115	21.1	14,717	50.8
Route 28 28th St Crosstown	19,757	2,885	14.6	7,520	38.1
Route 44 44th St Crosstown	22,708	3,397	15.0	10,031	44.2
<b>System Total</b>	<b>267,427</b>	<b>53,200</b>	<b>19.9</b>	<b>106,963</b>	<b>40.0</b>

Source: 2018 American Community Survey 5-Year Estimates

### C. Service Equity Analysis

The Rapid provides equitable service across its service area to all minority groups. Appendices 1 and 2 demonstrate a high concentration of bus routes in most of the census tracts with high minority population and high concentrations of people in poverty. This is borne out by Table 4, which analyzes the distribution of minority population in the service area against transit ridership and bus frequency.

**Table 4 – Analysis of Minority and Poverty Populations and Transit Service Levels**

<b>Route</b>	<b>Percent in Poverty</b>	<b>Percent Minority</b>	<b>Annual Ridership</b>	<b>% of Ridership</b>	<b>Peak Frequency<sup>1</sup></b>
Silver Line	43.8	31.6	850,726	11.9	15 mins
Route 1 Division	28.4	56.6	515,671	7.2	30 mins
Route 2 Kalamazoo	23.4	57.9	552,667	7.7	15 mins
Route 3 Madison	30.4	62.5	184,444	2.6	30 mins
Route 4 Eastern	21.2	47.6	475,193	6.6	15 mins
Route 5 Wealthy / Woodland	18.6	38.5	255,418	3.6	30 mins
Route 6 Easttown / Woodland	18.2	23.1	321,489	4.5	30 mins
Route 7 West Leonard	20.4	27.6	221,499	3.1	30 mins
Route 8 Grandville / Rivertown	20.3	45.9	285,551	4.0	30 mins
Route 9 Alpine	26.6	36.9	512,259	7.1	15 mins
Route 10 Clyde Park	30.2	66.0	232,348	3.2	30 mins
Route 11 Plainfield	24.8	30.2	285,964	4.0	30 mins
Route 12 West Fulton	24.3	25.5	151,658	2.1	30 mins
Route 13 Michigan / Fuller	21.0	25.7	190,104	2.7	30 mins
Route 14 East Fulton	24.3	28.3	153,890	2.1	30 mins
Route 15 East Leonard	26.0	31.4	298,462	4.2	30 mins
Route 16 Wyoming / Metro Health	22.1	53.0	224,241	3.1	30 mins
Route 17 Woodland / Airport	13.6	39.1	83,057	1.2	30 mins
Route 18 Westside	30.4	37.1	200,576	2.8	30 mins
Route 24 Burton Crosstown	21.1	50.8	204,761	2.9	30 mins
Route 28 28th St Crosstown	14.6	38.1	409,652	5.7	15 mins
Route 44 44th St Crosstown	15.0	44.2	237,701	3.3	30 mins
<b>System Total</b>	<b>19.9</b>	<b>40.0</b>	<b>7,165,496<sup>2</sup></b>	<b>95.6<sup>2</sup></b>	

Source: 2018 American Community Survey 5-Year Estimates; Rapid FY 19 Ridership Data

<sup>1</sup> Service frequencies reflect the most current COVID-response service implemented on August 31, 2020. Services were initially altered on March 26, 2020 at the outset of the COVID-19 pandemic.

<sup>2</sup> Percentages and totals do not add up to 100% due to the omission of the currently-defunct Route 19 Michigan Crosstown. Route 19 was a funded through a joint partnership with the City of Grand Rapids, Spectrum Health, and The Rapid. The service ceased operations in March 2020 due to the coronavirus pandemic.

Several of The Rapid's 15-minute peak service routes coincide with high minority and low-income areas. For instance, the Division Avenue corridor receives 15-minute all day service (6am – 6pm) on weekdays via Silver Line and 30-minute all day service on Route 1 with a total of nine vehicles serving the corridor throughout the day. Silver Line serves a population that is 43.8% low-income and 31.6% minority within a quarter mile of stops along its route, the highest in the system. Further, the Silver Line BRT is The Rapid's flagship route with its highest level of service and stop amenities. Route 10 Clyde Park is one notable exception; however, coupled with Route 16, the majority of the high minority and low-income populations along the alignment (primarily the Grandville Avenue corridor) receive 15-minute all day service on weekdays.

Finally, it is worth noting the vast majority of our service has access to adequate transit service. Using transit planning software, Remix, it was found that 92% of the residents in our primary service area live within ½ mile a fixed route bus line.

## **SECTION V. SERVICE STANDARDS AND POLICIES**

### **A. Vehicle Load**

Vehicle load factor for The Rapid route system is monitored on an ongoing basis. The method used to monitor this activity includes passenger sampling, analysis of ridership data, and use of driver feedback. Since the outbreak of coronavirus in West Michigan around mid-March, overcrowding has been imperative to monitor and control. While ridership decreased drastically during this time period, service levels were reduced correspondingly in order to preserve agency operating resources. Capacity limitations of 15 persons maximum on board per vehicle were instituted system-wide between March and August 2020 in order to allow for proper distancing and reduce likelihood of coronavirus transmission. Additional “shadow” vehicles were dispatched when operators reported vehicles were at capacity limits. Capacity limits were relaxed in late August 2020 when service levels were increased and the number of additional “shadow” vehicles necessary had remained at zero for several weeks. With increased capacity and reduced ridership levels, overcrowding has not been an issue on any route.

In the case where overcrowding consistently occurs on a particular route, The Rapid examines frequency improvements, schedule changes, or enhanced transit modes such as BRT, and brings these suggestions forth to The Rapid’s Board of Directors who provide final approval on major route changes or investments.

The vehicle load factor (ratio of peak hour seats available compared to peak hour boardings) is illustrated below in Table 5. Figures represent weekday service.

**Table 5 – Vehicle Load Factor**

<b>Route</b>	<b>Peak Hour</b>	<b>Frequency</b>	<b>Peak Hour Vehicles</b>	<b>Capacity</b>	<b>Ridership at Peak Hour</b>	<b>Load Factor</b>
Silver Line	4:00-4:59 pm	15	6	240	324	1.35
Route 1 Division	3:00-3:59 pm	30	3	120	194	1.62
Route 2 Kalamazoo	11:00-11:59 am	15	6	240	240	1.00
Route 3 Madison	3:00-3:59 pm	30	2	80	58	0.72
Route 4 Eastern	3:00-3:59 pm	15	7	280	198	0.71
Route 5 Wealthy	3:00-3:59 pm	30	4	160	137	0.86
Route 6 Eastown	3:00-3:59 pm	30	3	120	120	1.00
Route 7 West Leonard	3:00-3:59 pm	30	2.5	100	95	0.95
Route 8 Grandville / Rivertown	4:00-4:59 pm	30	3	120	140	1.17
Route 9 Alpine	3:00-3:59 pm	15	5	200	254	1.27
Route 10 Clyde Park	2:00-2:59 pm	30	2	80	122	1.53
Route 11 Plainfield	4:00-4:59 pm	30	2	80	103	1.29
Route 12 West Fulton	2:00-2:59 pm	30	1.5	80	22	0.28
Route 13 Michigan / Fuller	3:00-3:59 pm	30	1.5	80	75	0.94
Route 14 East Fulton	4:00-4:59 pm	30	2	80	18	0.23

Route	Peak Hour	Frequency	Peak Hour Vehicles	Capacity	Ridership at Peak Hour	Load Factor
Route 15 East Leonard	3:00-3:59 pm	30	2.5	100	113	1.13
Route 16 Wyoming / Metro Health	1:00-1:59 pm	30	3	120	94	0.78
Route 17 Woodland / Airport	3:00-3:59 pm	30	1.5	60	34	0.57
Route 18 Westside	8:00-8:59 am	30	2	80	51	0.64
Route 24 Burton	3:00-3:59 pm	30	4	160	92	0.57
Route 28 28th Street	3:00-3:59 pm	15	6	240	215	0.89
Route 44 44th Street	4:00-4:59 pm	30	4.5	180	134	0.75
				<b>3,000</b>	<b>2,833</b>	<b>0.93</b>

The Rapid regularly monitors vehicle load factors. If a route has a load factor greater than 1.0, the route is flagged for close monitoring. Routes with load factors of greater than 1.5 warrant actions taken to address the issue. Routes with higher load factors include Route 1, Route 10, Silver Line, and Route 9. Routes 1 and 10 have 30-minute all day frequencies opposed to 15-minute peak frequencies on our highest ridership routes, leading to the higher load factors. In the case of the highest load factor, Route 1 – Division, this route shares much of its running way with the Silver Line BRT, meaning there is a very high level of bus service on this corridor already.

If a route’s load factor reaches less than 0.50, we will monitor the situation, and if the load factors fall below 0.30, measures to address this issue will be taken, such as cutting service or modifying existing service. Routes 12 and 14 currently have very low load factors below 0.30, and reduced service for each of these routes is expected to be included in the recommendations brought forth by a Comprehensive Operational Analysis (COA) currently in-progress. Implementation of the COA’s recommendations is anticipated for August 2021.

## B. Vehicle Headways

As of August 2020, five routes provide 15-minute service or greater during weekday peak hours. These routes are the Silver Line, Route 2 – Kalamazoo, Route 4 – Eastern, Route 9 – Alpine, and Route 28 – 28<sup>th</sup> Street. The rest of the system operates every 30 minutes during weekday service. Table 6 illustrates vehicle headways by route.

**Table 6 – Vehicle Headways by Route and Time**

<b>Route</b>	<b>Weekday Peak</b>	<b>Weekday Off Peak</b>	<b>Weekday Evening</b>	<b>Saturday AM</b>	<b>Saturday Mid-day</b>	<b>Saturday PM</b>	<b>Sunday</b>
Silver Line	15	15	30	30	30	30	30
Route 1 Division	30	30	30	30	30	30	30
Route 2 Kalamazoo	15	15	30	60	30	60	30
Route 3 Madison	30	30	60	60	60	60	
Route 4 Eastern	15	15	30	60	30	60	60
Route 5 Wealthy	30	30	60	60	60	60	
Route 6 Eastown	30	30	30	60	30	60	60
Route 7 West Leonard	30	30	60	60	60	60	60
Route 8 Grandville / Rivertown	30	30	60	60	60	60	60
Route 9 Alpine	15	15	30	60	30	60	60
Route 10 Clyde Park	30	30	60	60	60	60	60
Route 11 Plainfield	30	30	60	60	60	60	60
Route 12 West Fulton	30	30	60	60	60	60	
Route 13 Michigan / Fuller	30	30	60	60	60	60	
Route 14 East Fulton	30	30	60	60	60	60	
Route 15 East Leonard	30	30	60	60	60	60	60
Route 16 Wyoming / Metro Health	30	30	60	60	60	60	60
Route 17 Woodland / Airport	30	30	60				
Route 18 Westside	30	60	60	60	60	60	
Route 24 Burton	30	30	60	60	60	60	
Route 28 28th Street	15	15	30	60	30	60	60
Route 44 44th Street	30	30	60	60	60	60	

**Note:**

Weekday Peak: 6:30 AM - 8:45 AM and 2:30 PM - 5:30 PM  
 Weekday Off Peak: 8:45 AM - 2:30 PM and 5:30 PM - 6:45 PM  
 Weekday Evening: 6:45 PM - 11:30 PM  
 Saturday AM: 6:30 AM - 9:30 AM  
 Saturday Mid-day: 9:30 AM - 5:00 PM  
 Saturday PM: 5:00 PM - 10:00 PM  
 Sunday: 8:00 AM - 7:00 PM

### C. On-Time Performance

The Rapid maintains a standard of 83.0% on-time with for the fixed-routes system which is measured on an ongoing basis and reported on a quarterly basis. The standard is based on real-time vehicle information from all its fixed route buses, as opposed to random time checks completed by road supervisors, which was the former method. This has provided a much more comprehensive picture of how well the system is adhering to posted schedules. Various obstacles such as inclement weather, construction, and traffic delays occasionally hinder the overall performance of the system. “On-time” is defined as being less than five (5) minutes late and zero (0) minutes early. Table 7 illustrates the on-time performance by quarter since FY 2018.

**Table 7 – Fixed-Route On-Time Performance Summary**

<b>Quarter</b>	<b>Months</b>	<b>On-Time Performance</b>
FY 2018 1st Quarter	Oct-Dec	80.9%
FY 2018 2nd Quarter	Jan-Mar	87.5%
FY 2018 3rd Quarter	Apr-Jun	87.1%
FY 2018 4th Quarter	Jul-Sep	82.1%
FY 2019 1st Quarter	Oct-Dec	84.8%
FY 2019 2nd Quarter	Jan-Mar	84.3%
FY 2019 3rd Quarter	Apr-Jun	83.9%
FY 2019 4th Quarter	Jul-Sep	81.8%
FY 2020 1st Quarter	Oct-Dec	81.9%
FY 2020 2nd Quarter	Jan-Mar	88.7%
FY 2020 3rd Quarter	Apr-Jun	90.0%
FY 2020 4 <sup>th</sup> Quarter	Jul-Sep	93.9%
	<b>Average</b>	<b>85.6%</b>

### D. Distribution of Transit Amenities

Passenger shelters are generally located at stops that demonstrate at least forty boardings per operating day. On occasion, The Rapid will locate at shelter at stops with less passenger activity that demonstrate a need such as locations near senior housing, sizable disabled population, grocery stores, or in locations where a partnering entity or jurisdiction helps pay for a new shelter and its installation. Currently, The Rapid has 1,745 bus stops. All of The Rapid routes have bus stop signs at intervals of one-tenth to one-quarter of a mile. In addition, all of the stops in the system contain information panels that illustrate route schedules and maps. Furthermore, The Rapid has installed 178 benches and 98 shelters at various stops throughout the system based on boardings per day, transfer locations, proximity to senior or disabled populations, and key destinations such as grocery stores, medical facilities, and schools.

In 2019, The Rapid, in partnership with the City of Grand Rapids Mobile GR and Parking Services Department, embarked on an initiative to improve the bus stop waiting environment at transit stops throughout the city of Grand Rapids. This initiative, referred to as the “Bus Stop Improvement Program,” has resulted in installations of several benches, transit shelters, waste receptacles, and other stop amenities to improve passenger waiting experiences. On the heels of the successful installation of the initial set of improvements last Fall and Winter, a subsequent phase of improvements are planned in order to meet the original goals of the Bus Stop Improvement Program. This program is expected to continue through 2021.

### **E. Service Availability**

The Rapid’s Accessibility Policy is based on the premise that a route is accessible for the general public if the person must travel no more than 2,000 feet (approximately a five-minute walk) to get to the nearest bus stop. In addition, all of The Rapid’s fixed-routes are accompanied by its GO!Bus demand-response paratransit service, available to all residents of The Rapid’s six-city service area who cannot access the fixed route buses as defined by the Americans With Disabilities Act. The Rapid also offers its PASS service, which is a demand response service which can be used by anyone living in The Rapid’s six-city service area. The PASS service is available to destinations more than  $\frac{3}{4}$  of a mile from a Rapid fixed route bus line, and will take riders from their origin/destination to the nearest bus line, to ensure that all areas of our six-city service area are accessible by public transportation.

### **F. Vehicle Assignment**

The Rapid has a fixed-route fleet size of 167 wheelchair-accessible buses. Forty-foot buses are able to seat approximately 40 people and thirty-five foot buses are able to seat approximately 35 people. Buses are predominately assigned based on route ridership with the exception of specific buses allocated to bus rapid transit (BRT) routes (i.e., Silver Line and Laker Line) and two vehicles dedicated for long-distance highway travel between Grand Rapids and Big Rapids contracted with Ferris State University (Route 100). Occasionally other considerations such as bus availability, narrow streets, excessive curbage or operational factors influence how buses are assigned to particular routes; however, vehicles are predominantly assigned to routes at random. In addition, all fixed buses are equipped with automated passenger counters (APCs). In order to achieve accurate national transit database (NTD) reporting information, these buses are randomly dispersed throughout the system. Table 8 details The Rapid’s fleet as of October 2020.

**Table 8 – Vehicle Inventory**

<b>Number in Fleet</b>	<b>Length</b>	<b>Year Manufactured</b>	<b>Company</b>	<b>Model</b>	<b>Fuel</b>	<b>Notes</b>
5	40'	2009	GILLIG	Low Floor	Diesel	
22	35'	2009	GILLIG	Low Floor	Diesel	
11	40'	2011	GILLIG	Low Floor	Diesel	
5	29'	2011	GILLIG	Low Floor	Diesel	DASH
21	40'	2012	GILLIG	Low Floor	Diesel	
10	40'	2013	GILLIG	Low Floor	Diesel	
10	40'	2014	GILLIG	BRT Plus	Hybrid-Electric	Silver Line
1	40'	2016	GILLIG	Low Floor	CNG	
5	35'	2017	GILLIG	Low Floor	CNG	DASH
27	40'	2017	GILLIG	Low Floor	CNG	
20	40'	2018	GILLIG	Low Floor	CNG	
2	60'	2019	NEW FLYER	XN60'	CNG	Laker Line
4	35'	2019	GILLIG	Low Floor	CNG	DASH
10	40'	2020	GILLIG	Low Floor	CNG	
14	60'	2020	NEW FLYER	XN60'	CNG	Laker Line

**G. Transit Security**

The Rapid utilizes various tools to maximize transit security and the safety of passengers. The Rapid employs a full time Security Manager and eight full time Fare Enforcement Officers. The Rapid has 24 hour security at its Rapid Central Station facility and contracts with local law enforcement for assistance during busy times at the station. Furthermore, Central Station is equipped with video surveillance and all buses are equipped with video and audio surveillance. Security and Fare Enforcement Officers are equipped with body-worn cameras that are worn during their shift. The Rapid also exercises a policy of reporting any and all suspicious persons and activities. In addition, all operators and staff have gone through security training programs and emergency response protocols.

## **SECTION VI. TITLE VI MONITORING POLICIES**

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### **A. Overview of The Rapid's Monitoring Policies**

There are three primary tools that The Rapid uses to monitor service. These three tools are monthly ridership and productivity reports, quarterly report cards, and Geographic Information Systems (GIS) technology.

The Ridership and Productivity Report is presented to The Rapid Board each month. This report measures route performance based on passengers per mile, passengers per hour, farebox recovery percentage, and ridership. The culmination of this information determines route effectiveness and efficiency and is a tool used by staff and The Rapid Board to establish planning policy.

Report Cards to the community are presented to The Rapid Board and made available to the public on a quarterly basis (every three months). The report card is designed to measure service quality and safety by reporting system productivity (ridership), safety (accidents per 100,000 miles), customer service (complaints per 100,000 passengers, on time performance, and cost effectiveness (cost per passenger). This report is posted on The Rapid's web site and is given to the local media.

The Rapid Planning staff use Geographical Information Systems (GIS), on-board survey data, and farebox data, passenger surveys and the Remix planning tool to gather and monitor data and ridership patterns for the fixed-route system. Internally, The Rapid's Route and Service Planning Committee uses this data to evaluate and adapt service where necessary. The Rapid uses U.S. Census, LEHD, and BLS data to analyze recent and upcoming route changes and/or enhancements for our current fixed route services.

As of October 2020, The Rapid is undergoing a comprehensive operational analysis (COA) colloquially referred to as *Mobility for All*. Mobility for All is a planning process that explores practical, achievable ways The Rapid can improve its transit network. The final recommendations of the plan will be "cost-neutral" utilizing existing resources to increase system ridership, productivity, and implement new services to better serve the six-city region. More information on the plan at [therapidmobilityforall.com](http://therapidmobilityforall.com).

### **B. Monitoring Service Quality Using Ridership Surveys**

The Rapid conducts statistically significant onboard surveys every two years. The Rapid will use the information gleaned from these surveys to monitor service to quality to Title VI protected classes.

The surveys identify individuals who identify themselves as a member of a minority group and/or in a low income bracket. The Rapid will analyze these responses to see determine if there is significantly differing responses between different demographic groups, whether minority or income. Questions analyzed will include

those that deal with customer satisfaction of the services The Rapid offers, including those dealing with wait times, schedule adherence, and overall satisfaction with The Rapid's services.

If there is a greater than 20% response difference identified for a protected demographic, The Rapid will look at the responses and take corrective action to address the disparity.

### **C. Continual Assessment of Compliance by the Grantee**

In order to allow for ongoing compliance assessments, The Rapid will take the following actions:

- To the extent feasible, the procedure and practices listed in this text will be monitored for assessment and compliance on a quarterly or annual basis.
- The Rapid, through its Route and Service Planning Committee, will monitor new and existing service to assure compliance with Title VI requirements.
- The Rapid will take action to address Title VI deficiencies raised by official reviews.

The Rapid conducts statistically significant onboard surveys every two years. The Rapid will use the information gleaned from these surveys to monitor service to quality to Title VI protected classes.

The surveys identify individuals who identify themselves as a member of a minority groups and/or in low income brackets. The Rapid will analyze these responses to see determine if there is significantly differing responses between different demographic groups, whether minority or income. Questions analyzed will include those that deal with customer satisfaction of the services The Rapid offers, including those dealing with wait times, schedule adherence, and overall satisfaction with The Rapid's services.

If there is a greater than 20% response difference identified for a certain demographic, The Rapid will look at the responses and take corrective action to address the disparity.

The Rapid has had no Title VI complaints in the past three years that have resulted in the need for corrective actions.

## **SECTION VII. CHANGES IN SERVICE FEATURES AND FARE LEVELS**

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### **A. Public Outreach Overview**

At The Rapid, we utilize a variety of methods to continually communicate with and inform the public we serve. English is the most spoken language in our region followed by Spanish. To ensure that the public is able to engage with us, we translate all public outreach materials to Spanish and utilize interpreter services such as Language Line.

#### 1. The Rapid's Website (<http://ridetherapid.org>)

The Rapid's website is an informational hub for our customers and the public at large. All pertinent information for passengers and taxpayers can be found on our website. Most importantly, we utilize this website to notify passengers and the public about pertinent information as needed. The Rapid's website meeting ADA accessibility guidelines and features Google Translate, which supports the translation of the website to more than 100 languages.

#### 2. Social Media

Our social media platforms (Facebook, Twitter, Instagram, LinkedIn, YouTube, etc.) are places that passengers can find relevant information, real-time customer service, and an engagement communication space.

#### 3. Interior Bus Information

The Rapid utilizes internal bus information racks, located behind the bus operator, to notify passengers of detours, rider alerts and other relevant details. When needed, interior bus advertisement space is also used for general outreach to the public regarding information notices.

#### 4. Rider and Public Surveys

Periodically, The Rapid surveys riders, and the general public, to gain information and feedback about who is using the service, overall perceptions of The Rapid, and desired service changes.

#### 5. Public Events

The Rapid routinely attends various events throughout the six-city service area to engage with the public and answer questions, as well as share information. We attend everything from senior fairs to chamber of commerce meetings.

#### 6. Alerts

The Rapid utilizes digital rider alerts that notify passengers of route and service

alerts, as well as other important information that pertains to utilizing The Rapid. Riders can sign up to receive these alerts via text message or email.

#### 7. Email Newsletter

An email newsletter is utilized for various important notifications and public outreach.

#### 8. Public Meetings

When necessary for route and service planning or other important topics, The Rapid utilizes public information meetings or public hearings to gain public feedback and assess needs.

#### 9. News Media

The Rapid routinely works with local news media to notify the public of important information impacting the service.

#### 10. Partnerships

Organizational and business partnerships are a key aspect of public outreach. For example, The Rapid often partners with organizations like Disability Advocates of Kent County to educate and spread awareness about specific route and planning needs, gain feedback and improve our system.

### **B. Threshold for Major Service Changes**

The Rapid's established threshold for a "major" service change is as follows:

*If 25% or greater of either the vehicle revenue miles or the passenger miles on one of The Rapid's routes is to be affected by a service change, this constitutes a Major Service Change for The Rapid and public hearings must be held.*

### **C. The Rapid's Disparate Impact and Disproportionate Burden Policy**

The Rapid Board adopted a Disparate Impact and Disproportionate Burden Policy in February 2014. The preparation for this policy included a rider survey indicating fare types used by demographic. This policy dictates that low income and minority populations will not bear a disparate impact or disproportionate burden of any fare or service changes that The Rapid makes. A copy of the policy can be found in Appendix 5.

### **D. The Rapid's New Facility Construction Outreach Process**

For all new construction projects, The Rapid fully undergoes the FTA environmental review process. This includes analyzing all disproportionate social impacts of the

proposed project to vulnerable populations and an environmental justice review. In addition, The Rapid conducts public outreach to gain community input regarding any proposed construction projects, the level of the outreach depending on the size of the project and potential community impacts. This includes outreach to Title VI populations to ensure their voice is heard as part of the public process.

## **E. Changes in Service Level**

Since the last Title VI Plan was adopted in December 2017, The Rapid has had numerous significant changes in service levels to its fixed route system, all occurring since March 2020 in response to the COVID-19 pandemic. When the coronavirus pandemic appeared in West Michigan in mid-March, ridership levels began to decrease drastically, dropping as low as 90% from the previous year. Further, state-mandated “shelter-in-place” orders were given by the Governor to discourage travel and transmission of the virus. With ridership and general travel throughout the region unprecedentedly low, a modified weekend service was introduced on March 24<sup>th</sup>. This service suspended eight of the system’s lowest ridership/least productive routes as well as Route 19 (a jointly-funded route with external partners Spectrum Health and the City of Grand Rapids) due to funding issues. Span of service was reduced to 7am to 7pm on all routes Monday through Sunday as only the most essential service was chosen to operate on an hourly basis. By late April, several routes experiencing capacity issues (1, 2, 4, 9, and 28) were increased to 30-minute service; however, the same nine routes remained suspended and spans of service remained between 7am to 7pm.

On May 26<sup>th</sup>, a reduced Summer service was implemented as ridership began to increase to approximately 40% from the same time period during the previous year. Spans of service were increased to 5:30am to 10:30pm on weekdays for all routes, and regular weekend hours and spans of service were reintroduced. Routes previously suspended were reintroduced into service at hourly frequency (with the exception of Route 19 and contracted services which remained suspended). Several routes with higher ridership, including Silver Line, Route 1, Route 2, Route 4, Route 9, and Route 28, were operated at 15-minute frequency in order to provide proper distancing opportunity with 15-person on-board capacity limitations still enforced.

The Summer service remained in effect until August 31<sup>st</sup> which saw all routes operating at hourly service upgraded to half-hour frequency and the cessation of on-board capacity limits. Route 1 returned to half hour weekday frequency as it had operated prior to the pandemic.

While several service changes were implemented in relatively rapid succession, it was recognized that the changes were temporary to respond to effects of the COVID-19 pandemic. The comprehensive operational analysis (COA) continued along throughout the pandemic, and at such time that the recommendations of the COA are adopted in early 2021, the appropriate public hearings and disparate impact, disproportionate burden (DIDB) analyses will be conducted on all proposed route changes in order to make them permanent and ensure protected populations are not disproportionality impacted.

## F. Changes in Fare Levels

### Smart Card

The Rapid has been working to implement electronic fare media (colloquially referred to as the Wave Card) since 2017. As part of the implementation of the Wave Card program, a fare structure change was adopted by The Rapid's Board of Directors in May 2017 and implemented in 2018. The electronic fare media included adoption of a fare-capping system (see table below), Prior to adoption and implementation, Rapid staff conducted a robust public outreach campaign regarding proposed fare structure changes. Throughout April 2017, Rapid staff solicited feedback from numerous sources, including social media, email, phone, written, as well as seven public meetings. Materials for social media, email, and notifications were made available in both English and Spanish.

A DIDB analysis was conducted in a series of phases as part of the implementation of the Wave Card. The first phase confirmed that the distribution network where passengers could acquire Wave Cards was adequate. It was found that distribution network for Wave Cards superseded that of the paper ticket distribution network and further provided enhanced opportunities for lower-income and minority populations to access the fare card. The distribution network of retail sites was field-verified to ensure the passes were available were advertised. Further, this first phase included the promotion and distribution of the card where Wave Cards for a brief period of time were made available at no cost. Passengers had the opportunity to come to Rapid Central Station and register a Wave Card in their name for free. Finally, the second phase of the DIDB analysis involved the issue of the elimination of cash fare transfers, cessation of selling and accepting paper tickets, and the elimination of change cards for cash fare. Analysis of these factors determined no DIDB issues were present given the fact Wave Cards were widely available with increased access compared to traditional fare media.

Finally, proposed Wave Card-related fare changes went forward to the public through a public hearing.

**Table 9 – Adopted Wave Card Fare Capping Structure**

Categories	Cash Fare or Cap Increment	10 Ride	31 day	7 day	1 day
<b>Adult</b>	\$1.75	-----	\$47.00	\$16.00	\$3.50
<b>Youth</b>	\$1.25	-----	\$33.75	\$11.25	\$2.50
<b>Reduced</b>	\$0.85	-----	\$30.00	\$10.50	\$2.25
<b>Partner/ Student</b>	\$1.25	-----	-----	\$11.25	-----

## **Restoring Fares within Silver Line Downtown Fare Free Zone and on Route 19**

### **Silver Line**

In September 2016, The Rapid Board approved a 10-month pilot program for the implementation of a fare-free zone for the Silver Line BRT in downtown Grand Rapids (Central Station to Wealthy Street). The fare revenue was agreed upon to be fully reimbursed to The Rapid by the City of Grand Rapids Mobile GR Department and approved by the City of Grand Rapids City Commission. This pilot program was extended annually. However, with the increase of DASH frequencies in August 2018 (7-8 minutes headways all day), changes in mobility patterns in downtown Grand Rapids, and the cost increase of the DASH service contract in 2019, the sponsored fare-free downtown Silver Line became partially redundant (due to increased DASH service) and no longer financially feasible for Mobile GR (due to DASH cost increases).

### **Route 19**

In May 2018, The Rapid Board authorized the approval to execute a contract with Spectrum Health and the City of Grand Rapids for funding to significantly enhance Route 19 with realignment and increased all-day frequencies. This agreement included a provision that all Spectrum employees can ride the entire fixed-route system fare-free, and a provision from Mobile GR that Route 19 become fare-free to all riders. Route 19 had seen significant increases in ridership since the implementation of this enhanced service, and the vast majority of riders are Spectrum employees along the corridor to their park-and-ride lot on Plymouth Ave. However, due to an array of unintended ridership outcomes by providing fare-free service, a large number of concerns emerged from the City of Grand Rapids, Spectrum Health, and other partners. It was determined that concluding the fare free service was the preferred alternative to proceed.

### **Public Outreach**

Staff hosted an array of public input opportunities including:

- Four (4) public meetings on July 1st and July 8th,
- Two (2) Facebook Live Q&A sessions
- Provided email, phone, and mail options for comment, and interacted heavily on social media.

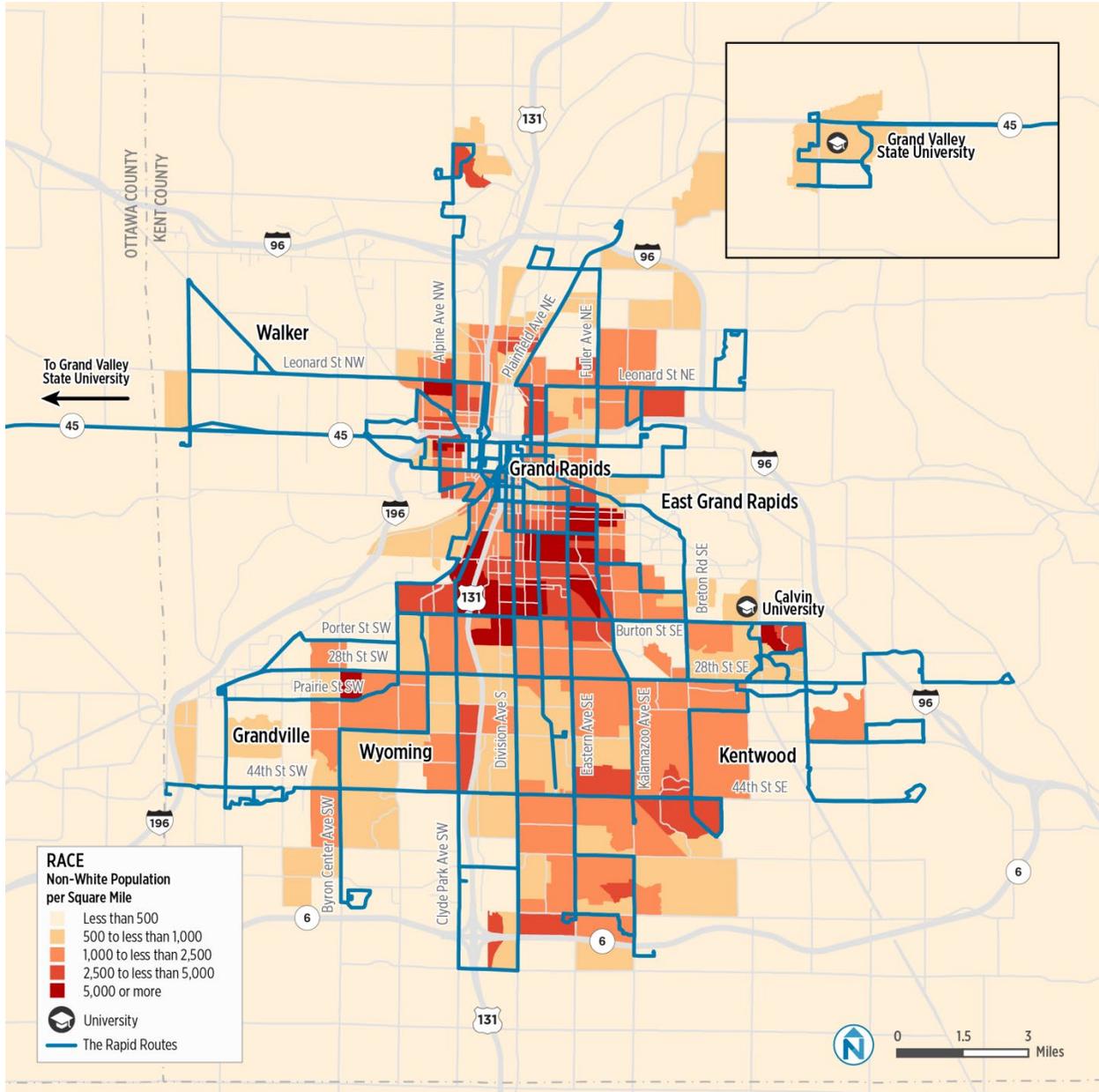
Overall, staff received minimal concerns for the implementation of fares and all public interaction was documented. The Rapid worked collaboratively to communicate this change and provide relevant information and education about resources available to riders by:

- Providing high-visibility notice on buses of the changes to ease the transition on our riders
- Working very closely with transportation staff to mitigate customer service issues as they arise
- Direct coordination with our partner agencies to specifically focus on any potential negative impacts to our most vulnerable riders.

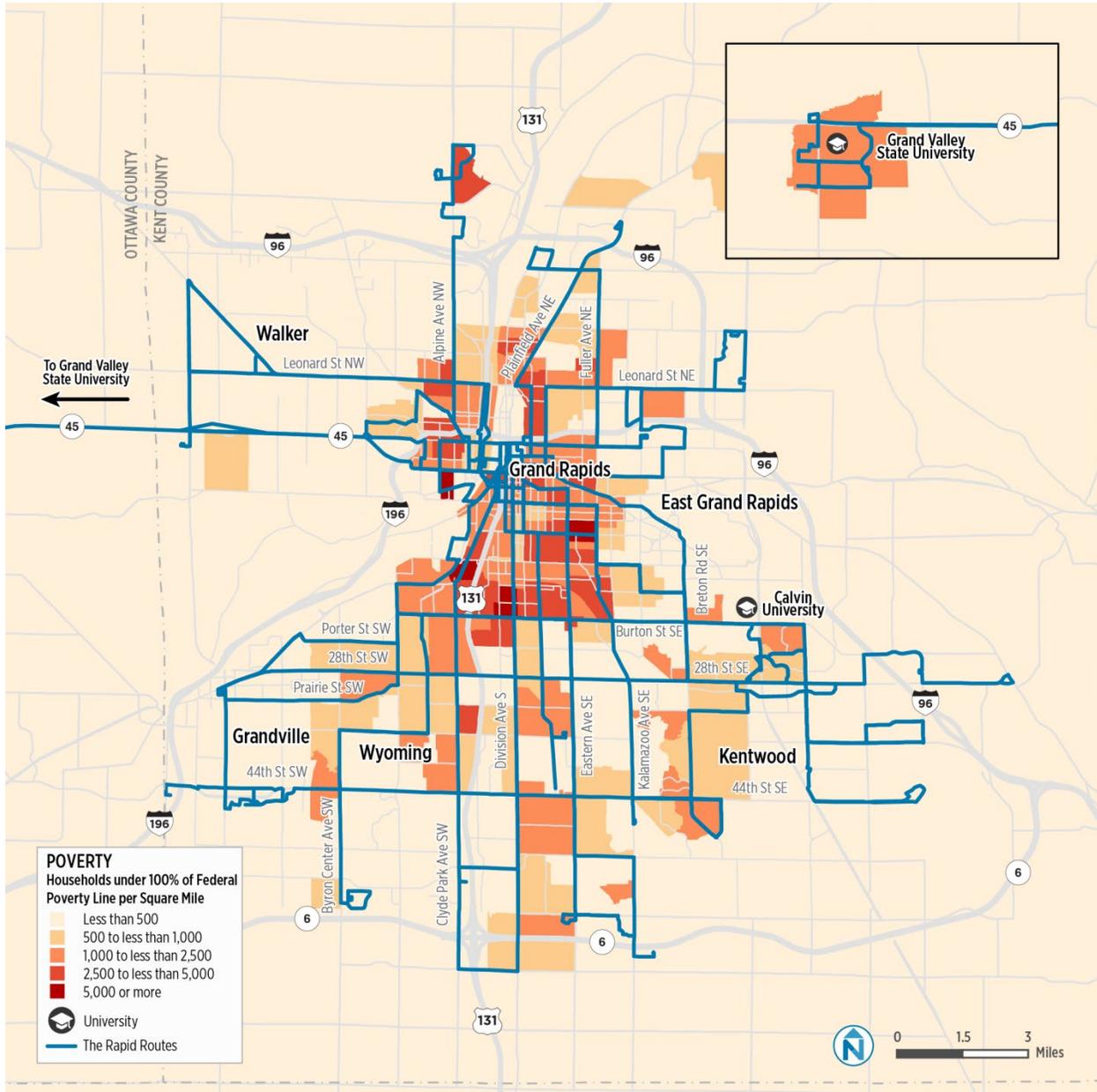
**Title VI Analysis**

Demographic passenger surveys were completed on the downtown Silver Line and Route 19 in early March 2020. In discussions with FTA officials, The Rapid confirmed that widespread public communication of this change, coupled with connections to resources for transit fare assistance for any negatively impacted riders, will suffice as mitigation for any impacts of this change. This determination by FTA officials was predicated on the fact that the no-fare nature of the services were returning to the base fares applied throughout the entire fixed route system. This change to Silver Line and Route 19 occurred during the COVID-19 pandemic and was primarily the result of the funding sources for both no-fare services being eliminated, as well as the suspension of Route 19 per the request of Spectrum Health, the primary contract partner for the route, as opposed to a Rapid-led decision.

**APPENDIX 1: PERCENT MINORITY POPULATION BY CENSUS TRACT (AMERICAN COMMUNITY SURVEY 2018)**



## APPENDIX 2: PERCENT POPULATION IN POVERTY BY CENSUS TRACT (AMERICAN COMMUNITY SURVEY 2018)



## **APPENDIX 3: THE RAPID'S DISPARATE IMPACT & DISPROPORTIONATE BURDEN POLICY**

### **BACKGROUND**

Updated FTA Title VI legislation requires transit providers which operate 50 or more fixed route vehicles in peak service and are located in urbanized areas (UZA) of 200,000 or more people, or will implement the revenue operations of a New/Small Start capital project must now conduct a Service and Fare Equity Analysis. A Service and Fare Equity Analysis is an assessment conducted by a transit provider to determine whether a major service change, fare structure, either existing, increasing or decreasing, will result in a *disparate impact* and/or *disproportionate burden* on populations of low-income and/or minorities. This evaluation must occur every five (5) fiscal years and must be administered for all fare changes and for major service reductions and expansions. Maintaining compliance with FTA Title VI guidance is critical for The Rapid to obtain federal funding.

The Rapid's existing policy to determine a "major service change" occurs when at least 25% of the route or ridership is being affected by a proposed change. A "fare structure" change occurs when any existing fare type, class, and/or cost is being considered for modification.

*Disparate impact* is defined as a policy or practice that disproportionately affects members of a protected class identified by race, color, or national origin. The disparate impact threshold defines statistically significant disparity and may be presented as a statistical percentage of impacts between minority populations and of non-minority populations.

*Disproportionate burden* is defined as a policy or practice that affects low-income populations more than non-low income populations.

### **REQUIREMENTS**

Per Title VI compliance, the FTA requires transit agencies to analyze what service and fare type both minority & low-income riders are using. The analysis will consist of personally administered rider surveys that are statistically significant utilizing an adequate sample size with a high degree of confidence. This data will be evaluated in order to determine any disadvantaged impact and/or burden to the concerned populations.

If any service and/or fare alteration is proposed, the service and fare equity analysis will be consulted to ensure compliance with Title VI regulations. Additionally, The Rapid will maintain the commitment to a thorough and comprehensive effort of providing opportunities for public input whenever system-wide changes are

proposed. Consequently, The Rapid will engage in a series of outreach from, but not limited to: public hearings, website, social media, email, telephone, and posting on The Rapid facilities.

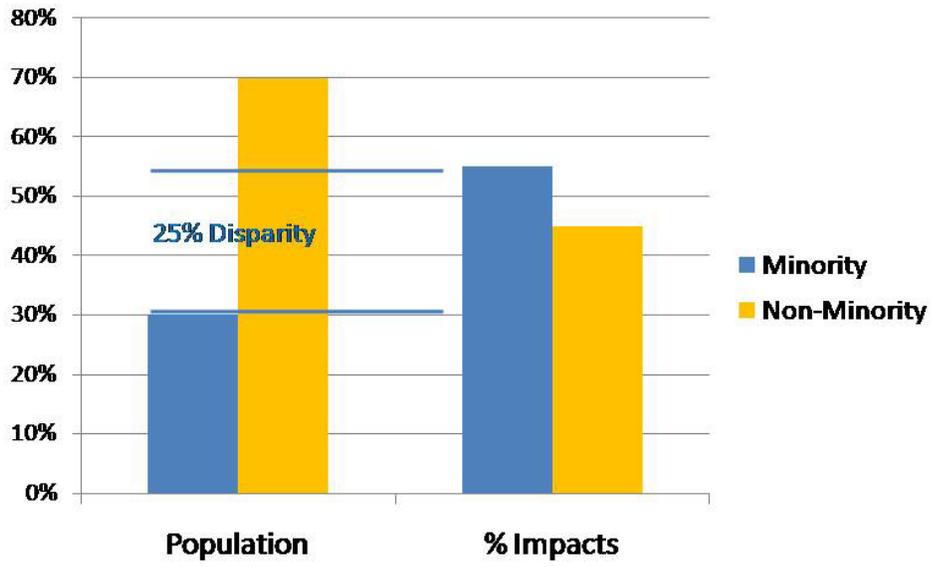
### **DISPARATE IMPACT AND DISPROPORTIONATE BURDEN POLICY**

If The Rapid finds that either low-income and/or minority populations will bear a disparate impact and/or a disproportionate burden of either existing and/or proposed service and/or fare changes, The Rapid will take steps to avoid, minimize, or mitigate impacts where practicable. If The Rapid chooses not to alter the proposed fare changes, the agency may implement these changes if there is substantial and legitimate justification for the change by demonstrating that there are no satisfactory alternatives that would lessen a negative impact on low-income and minority populations.

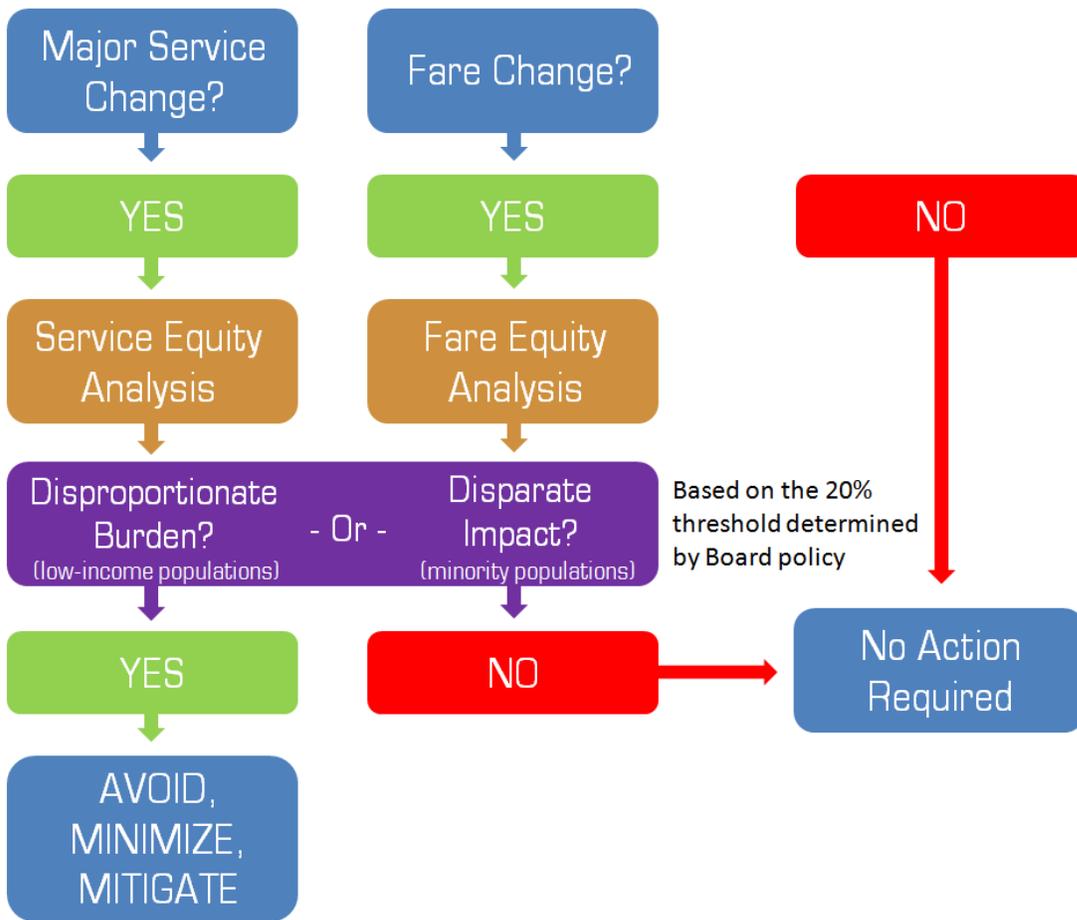
Staff proposed to establish the disparate impact & disproportionate burden threshold at twenty (20) percent based on the cumulative impact of the existing and any proposed service and/or fare changes. This threshold applies to the difference of the impacts borne by minority & low-income populations compared to the same impacts borne by non-minority and non-low-income populations.

For example, if minorities make up 30 percent of the overall population, but would bear 55 percent of the impacts, there may be a disparate impact insofar as the minority group bears 25 percent more than its expected share, from 55 percent of the burden to 30 percent of the population (see Figure 1); while the non-minority group bears 25 percent less than its expected share of 45 percent of burden compared to 70 percent of population—even though the absolute majority of the burden rests with the non-minority group. Applying the twenty percent threshold, the provider will find a disparate impact and must therefore consider Chap. IV-14 FTA C 4702.1B modifying the proposed changes in order to avoid, minimize, or mitigate the disparate impacts of the proposed changes.

Note: The twenty (20%) percent threshold is commonly adopted among many other national transit agencies.



**Figure 1: Minorities bear 25% higher impacts as compared to population**



**Figure 2: Diagram to determine if a service and/or equity analysis is required.**

## **APPENDIX 4: THE RAPID'S TITLE VI COMPLAINT PROCESS**

*Effective October 2009*

If The Rapid receives a Title VI complaint as described in the Notification of Title VI Rights, the following process will be followed:

Within fifteen (15) days, The Rapid shall confirm receipt of the complaint and inform the Complainant of the investigation process. Within sixty (60) days—should the complaint have merit—The Rapid shall commence an investigation of the allegation(s). The purpose of an investigation is to determine whether there is a reason to believe that a failure to comply with Title VI of the Civil Rights Act of 1964 has occurred. In addition, The Rapid will render a recommendation for action in a report of findings or resolution. Within ninety (90) days, The Rapid will notify the Complainant in writing of the final decision reached, including the proposed disposition of the matter. The notification will advise the Complainant of his/her right to file a formal complaint with the Federal Transit Administration (FTA) Title VI Coordinator if they are dissatisfied with the final decision rendered by The Rapid. The Rapid maintains a log of all Title VI complaints received.

If a probable cause of a discriminatory practice based on race, color, or national origin is found to exist, The Rapid shall endeavor to eliminate said practice by means of a Remedial Action Plan. The Remedial Plan shall include: a list of all corrective actions accepted by the agency; a description of how the corrective action will be implemented; and a written assurance that the agency will implement the accepted corrective action in the manner discussed in the plan. Where attempts to resolve the complaint fail, the complainant shall be notified in writing of his or her right to submit the complaint to the Federal Transit Administration as cited in FTA C4702.1A.

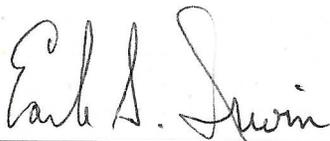
## **APPENDIX 5: FEDERAL TRANSIT ADMINISTRATION CIVIL RIGHTS ASSURANCE**

The Rapid (hereinafter referred to as The Rapid) HEREBY CERTIFIES THAT; as a condition of receiving Federal financial assistance under the Federal Transit Act of 1964, as amended, it will ensure that:

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

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

Date: 10/30/20

  
\_\_\_\_\_

Earle Irwin, Interim Chief Executive Officer

## **APPENDIX 6: DEPARTMENT OF TRANSPORTATION TITLE VI ASSURANCE**

The Rapid (hereinafter referred to as the “recipient”) HEREBY AGREES THAT as a condition to receiving any Federal financial assistance from the Department of Transportation, it will comply with Title VI of the Civil Rights Act of 1964, 78 Stat.252, 42 U.S.C. 2000d-42 U.S.C. 2000d-4 (hereinafter referred to as the Act), and all requirements imposed by or pursuant to Title 49, Code of Federal Regulations, Department of Transportation, Subtitle A, Office of the Secretary , Part 21, Nondiscrimination in Federally-Assisted Programs of the Department of Transportation-Effectuation of Title VI of the Civil Rights Act of 1964 (hereinafter referred to as the Regulations) and other pertinent directives, to the end that in accordance with the Act, Regulations, and other pertinent directives, 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 for which the Recipient receives Federal financial assistance from the Department of Transportation, including the Federal Transit Administration and HEREBY GIVES ASSURANCE THAT it will promptly take any measures necessary to effectuate this agreement. This assurance is required by subsection 21.7 (a) of the Regulations.

More specifically and without limiting the above general assurance, the Recipient hereby gives the following specific assurances with respect to any FTA program:

1. That the Recipient agrees that each “program” and each “facility” as defined in subsections 21.23(e) and 21.23(b) of the Regulations, will be (with regard to a “program”) conducted, or will be (with regard to a “facility”) operated in compliance with all requirements imposed by, or pursuant to, the Regulations.
2. That the Recipient shall insert the following notification in all solicitations for bids for work or material subject to the Regulations and made in connection with all U.S. Department of Transportation Programs and, in adapted form in all proposals for negotiated agreements:

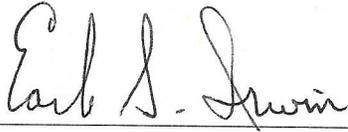
The Rapid, in accordance with the Title VI of the Civil Rights Act of 1964, 78 Stat. 252, 42 U.S.C. 2000d to 2000d-4 and Title 49, Code of Federal Regulations, Department of Transportation, Subtitle A, Office of the Secretary, Part 21, Nondiscrimination in Federally-Assisted programs of the Department of Transportation issued pursuant to such Act, hereby notifies all bidders that it will affirmatively insure that in any contract entered into pursuant to this advertisement, minority business enterprises will afforded full opportunity to submit bids in response to

this invitation and will not be discriminated against on the grounds of race, color, or national origin in consideration for an award.

3. That the Recipient shall insert the clauses of Appendix A of this assurance in every contract subject to this Act and the Regulations.
4. That the Recipient shall insert the clauses of Appendix B of this assurance, as a covenant running with the land, in any deed from the United States effecting a transfer of real property, structures, or improvements thereon, or interest therein.
5. That where the Recipient receives Federal financial assistance to construct a facility, or part of a facility the assurance shall extend to the entire facility and facilities operated in connection therewith.
6. That where the Recipient receives Federal financial assistance in the form, or for the acquisition of real property or an interest in real property, the assurance shall extend to rights to space on, over, or under such property.
7. That the Recipient shall include the appropriate clauses set forth in Appendix C of this assurance, as a covenant running with the land, in any future deeds, leases, permits, licenses, and similar agreements entered into by the Recipient with other parties: (a) for the subsequent transfer of real property acquired or improved under any FTA program: and (b) for the construction or use of or access to space on, over, or under real property acquired or improved under any FTA program.
8. That this assurance obligates the Recipient for the period during which Federal financial assistance is extended to the program, except where the Federal financial assistance is to provide, or is in the form of, personal property, or real property or interest therein or structures or improvements thereon, in which case the assurance obligates the Recipient or any transferee for the longer of the following periods: (a) the period during which the property is used for a purpose for which the Federal financial assistance is extended, or for another purpose involving the provision of similar services or benefits; or (b) the period during which the Recipient retains ownership or possession of the property.
9. The Recipient shall provide for such methods of administration for the program as are found by the Secretary of Transportation or the official to whom he/she delegates specific authority to give reasonable guarantee that it, other recipients, sub grantees, contractors, subcontractors, transferees, successors in interest, and other participants of Federal financial assistance under such program will comply with all the requirements imposed or pursuant to the Act, the Regulations and this assurance.
10. The Recipient agrees that the United States has a right to seek judicial enforcement with regard to any matter arising under the Act, the Regulations and this assurance.

THIS ASSURANCE is given in consideration of and for the purpose of obtaining any and all Federal grants, loans, contracts, property, discounts or other Federal financial assistance extended after the date hereof to the Recipient by the Department of Transportation under any Federal Transit Administration program and is binding on it, other recipients, contractors, subcontractors, transferees, successors in interest and other participants in any FTA program. The person or persons whose signatures appear below are authorized to sign this assurance on behalf of the Recipient.

Date: 10/30/20

A handwritten signature in cursive script that reads "Earle S. Irwin". The signature is written in black ink and is positioned above a horizontal line.

Earle Irwin, Interim Chief Executive Officer

Attachments:

Appendices A, B, C, D

(APPENDIX A TO TITLE VI ASSURANCE)

During the performance of this contract, the contractor, for itself, its assignees and successors in interest (hereinafter referred to as the "contractor") agrees as follows:

- (1) Compliance With Regulations: The contractor shall comply with the Regulations relative to nondiscrimination in federally assisted programs of the Department of Transportation (hereinafter, "DOT") Title 49, Code of Federal Regulations, Part 21, as they may be amended from time to time, (hereinafter referred to as the Regulations), which are herein incorporated by reference and made a part of this contract.
- (2) Nondiscrimination: The contractor, with regard to the work performed by it during the contract, shall not discriminate on the grounds of race, color, or national origin in the selection and retention of subcontractors, including procurements of materials and leases of equipment. The contractor shall not participate either directly or indirectly in the discrimination prohibited by Section 21.5 of the Regulations, including employment practices when the contract covers a program set forth in Appendix B of the Regulations.
- (3) Solicitations for Subcontracts, Including Procurement for Materials and Equipment: In all solicitations either by competitive bidding or negotiation made by the contractor for work to be performed under a subcontract, including procurements of materials or leases of equipment, each potential subcontractor or supplier shall be notified by the contractor of the contractor's obligations under this contract and the Regulations relative to nondiscrimination on the grounds of race, color, or national origin.
- (4) Information and Reports: The contractor shall provide all information reports required by the Regulations or directives issued pursuant thereto, and shall permit access to its books, records, accounts, or other sources of information, and its facilities as may be determined by The Rapid or the Federal Transit Administration to be pertinent to ascertain compliance with such Regulations, orders, and instructions. Where any information required of a contractor is in the exclusive possession of another who fails or refuses to furnish this information this contractor shall so certify to The Rapid,

or the Federal Transit Administration as appropriate, and shall set forth what efforts it has made to obtain the information.

(5) Sanctions for Noncompliance: In the event of the contractor's noncompliance with nondiscrimination provisions of this contract, The Rapid shall impose contract sanctions as it or the Federal Transit Administration may determine to be appropriate, including but not limited to:

- (a) withholding of payments to the contractor under the contract until the contractor complies; and/or
- (b) cancellation, termination, or suspension of the contract, in whole or in part
- (c) withholding of payments to the contractor under the contract until the contractor complies; and/or
- (d) cancellation, termination, or suspension of the contract, in whole or in part

(6) Incorporation of Provisions: The contractor shall include the provisions of paragraph (1) through (6) in every subcontract, including procurements of materials and leases of equipment, unless exempt by the Regulations, or directives issued pursuant thereto. The contractor shall take such action with respect to any subcontract or procurement as The Rapid or the Federal Transit Administration may direct as a means of enforcing such provisions including sanctions for noncompliance. Provided, however, that in the event a contractor becomes involved in, or is threatened with, litigation with a subcontractor or supplier as a result of such direction, the contractor may request The Rapid to enter into such litigations to protect the interests of The Rapid, and in addition, the contractor may request the United States to enter into such litigation to protect the interests of the United States.

(APPENDIX B TO TITLE VI ASSURANCE)

The following clauses shall be included in any and all deeds effecting or recording the transfer of real property, structures or improvements thereon, or interest therein from the United States.

(GRANTING CLAUSE)

NOW THEREFORE, the Department of Transportation, as authorized by law, and upon the condition that The Rapid will accept title to the lands and maintain the project constructed thereon, in accordance with Title VI of the 1964 Civil Rights Act, the Regulations for the Administration of the Federal Transit Administration's programs and the policies and procedures prescribed by the Federal Transit Administration of the Department of Transportation and, also in accordance with and in compliance with all requirements imposed by or pursuant to Title 49, Code of Federal Regulations, Department of Transportation, Subtitle A, Office of the Secretary, Part 21, Nondiscrimination in Federally -Assisted Programs of the Department of Transportation (herein referred to as the Regulations) pertaining to and effectuating the provisions of Title VI of the Civil Rights Act of 1964 (78 Stat. 252; 42 U.S. C. 2000d to 2000d-4), does hereby remise, release, quitclaim and convey unto The Rapid all the right, title and interest of the Department of Transportation in and to said lands described in Exhibit "A" attached hereto and made a part hereof.

(HABENDUM CLAUSE)

TO HAVE AND TO HOLD said lands and interests therein unto The Rapid and its successors forever, subject, however, to the covenants, conditions, restrictions and reservations herein contained as follows, which will remain in effect for the period during which the real property or structures are used for a purpose for which Federal financial assistance as extended or for another purpose involving the provision of similar services or benefits and shall be binding on The Rapid, its successors and assigns.

The Rapid, in consideration of the conveyance of said lands and interests in lands, does hereby covenant and agree as a covenant running with the land for itself, its successors and assigns, that (1) no person 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 with regard to any facility located or wholly or in part on, over or under such lands hereby conveyed [,] [and] \* (2) that The Rapid shall use the lands and interest in lands and interests in lands so conveyed, in compliance with all requirements imposed by or pursuant to Title 49, Code of Federal Regulations, Department of Transportation, Subtitle A, Office of Secretary.

Part 21, Nondiscrimination in Federally-Assisted Programs of the Department of Transportation Effectuation of Title VI of the Civil Rights Act of 1964, and as said Regulations may be amended, and (3) that in the event of breach of any of the above-mentioned nondiscrimination conditions, the Department shall have a right to re-enter said land, and the above described land and facilities shall thereon revert to and vest in and become the absolute property of the Department of Transportation and its assigns as such interest existed prior to this to this instruction.\*

\*Reverter clause and related language to be used only when it is determined that such a clause is necessary in order to effectuate the purposes of Title VI of the Civil Rights Act of 1964.

(APPENDIX C TO TITLE VI ASSURANCE)

The following clauses shall be included in all deeds, licenses, lease, permits, or similar instruments entered into by The Rapid pursuant to the provisions of Assurance 7(a).

The (grantee, licensee, lessee, permittee, etc., as appropriate) for herself/himself, his/her heirs, personal representatives, successors in interest, and assigns, as a part of the consideration hereof, does hereby covenant, and agree [in the case of deeds and leases add "as a covenant running with the land] that in event facilities are constructed, maintained, or otherwise operated on the said property described in this (deed, license, permit, etc.) for a purpose for which a Department of Transportation program or activity is extended or for another purpose for involving the provision of similar services or benefits, the (grantee, licensee, lessee, permittee, etc.) shall maintain and operate such facilities and services in compliance with all other requirements imposed pursuant to Title 49, Code of Federal Regulations, Department of Transportation, Subtitle A, Office of the Secretary, Part 21, Nondiscrimination of Federally-Assisted Programs of the Department of Transportation-Effectuation of Title VI of the Civil Rights Act of 1964, and as said Regulations may be amended.

[Include in license, leases, permits, etc.]\*

That in the event of breach of any of the above nondiscrimination covenant, The Rapid shall have the right to terminate the [license, lease, permit, etc.] and to re-enter and reposes said land and the facilities thereon, and hold the same as if said [licenses, lease, permit, etc.] had never been made or issued.

[Include in deeds]\*

That in the event of breach of any of the above nondiscrimination covenants, The Rapid shall have the right to re-enter said lands and facilities thereon, and the above described lands and facilities shall thereupon revert to and vest in and become the absolute property of The Rapid and its assigns.

## APPENDIX D

### APPLICATION OF TITLE VI REQUIREMENTS TO FEDERAL FINANCIAL ASSISTANCE OF THE FEDERAL TRANSIT ADMINISTRATION

Examples: Nondiscrimination on FTA Projects

The following examples, without being exhaustive, illustrate the application of the nondiscrimination provisions of this part to projects receiving Federal financial assistance under the programs of certain Department of Transportation operating administrations.

1. Any person who is, or seeks to be, a patron of any public vehicle which is operated as a part of, or in conjunction with, a project shall be given the same access, seating, and other treatment with regard to the use of such vehicle as other persons without regard to their race, color, or national origin.
2. No person who is, or seeks to be an employee of the project sponsor or lessees, concessionaires, contractors, licensees, or any organization furnishing public transportation service as a part of, or in conjunction with, the project shall be treated less favorably than any other employee or applicant with regard to hiring, dismissal, advancement, wages, or any other conditions above described lands and facilities shall thereupon revert to and vest in and become the absolute property of *The Rapid* and its assigns.

The following shall be included in all deeds, licenses, leases, permits, or similar agreements entered into by *The Rapid* pursuant to the provisions of Assurance 7(b).

The (grantee, licensee, lessee, permittee, etc., as appropriate) for herself/himself, his/her personal representatives, successors in interest, and assigns, as a part of the consideration hereof, does hereby covenant and agree (in case of deeds, and leases add "as a covenant running with the land") that (1) no person on the grounds of race, color, or national origin shall be excluded from participation in, be denied the benefits of, or be otherwise subjected to discrimination in the use

## **APPENDIX 7: THE RAPID'S TITLE VI NOTIFICATION FORM**

### **Notification of Your Rights under Title VI**

The Rapid fully complies with Title VI of the Civil Rights Act of 1964 and related statutes and regulations in all programs and activities. The Rapid operates without regard to race, color, national origin, creed, income, gender, age, and disability. Any person who believes him/herself, or any specific class of persons, to be subject to discrimination prohibited by Title VI may by him/herself or by representative file a written complaint with The Rapid.

Any person who believes him/herself, or any specific class of persons, to be subject to discrimination prohibited by Title VI may by him/herself or by a representative file a written complaint with The Rapid.

A complaint must be filed no later than 180 days after the date of the alleged discrimination and contain the following information:

- Name, address, and phone number of the Complainant
- Name, address, phone number and relationship of Representative to Complainant (if applicable)
- Basis of complaint (e.g., race, color, national origin)
- Date of alleged discriminatory act(s)
- Date complaint received by The Rapid
- A statement of the complaint, including specific details, relevant facts, and documentation

Once a complaint has been received they are processed by the following:

- The complainant will be contacted within 48 hours by phone, mail, or email
- The complaint is ticketed and processed by the Title VI officer
- Internal review is conducted within one week of receipt of the complaint
- The complainant will be contacted a second time following the internal review with regard to the findings and necessary actions taken by The Rapid

Please submit Title VI complaints, comments, or questions to The Rapid by mail or email:

**Mail**

Attn: Title VI Coordinator  
Planning Department  
300 Ellsworth SW  
Grand Rapids, MI 49503

**Email**

[titlevi@ridetherapid.org](mailto:titlevi@ridetherapid.org)

YOUR RIGHTS UNDER THE TITLE VI CIVIL RIGHTS ACT OF 1964

Title VII of the Civil Rights Act of 1964, 42 USC 2000e, makes it unlawful for an employer to hire or discharge any individual, or otherwise to discriminate against any individual with respect to his/her compensation, terms, conditions or privileges of employment, because of an individual's race, color, religion, sex, or national origin. This covers hiring, firing, promotions, and all workplace conduct.



Title VI Complaint Form

Title VI of the Civil Rights Act of 1964 states that, "No person in the United States shall on the basis of race, color, or national origin, be excluded from participation in, be denied the benefit of, or otherwise be subjected to discrimination in any program, service, or activity receiving federal financial assistance."

The Rapid fully complies with Title and related statutes and regulations in all programs and activities. The Rapid operates without regard to race, color, national origin, creed, income, gender, age, and disability. Any person who believes him/herself or any specific class of persons, to be subject to discrimination prohibited by Title VI may file this form. **If you need assistance completing this form, please contact us by phone at 616-456-7514.**

<b>Section I:</b>			
Name:			
Address:			
Telephone (Home):		Telephone (Work):	
Electronic Mail Address:			
Accessible Format Requirements?	Large Print	Audio Tape	
	TDD	Other	
<b>Section II:</b>			
Are you filing this complaint on your own behalf?		Yes*	No
*If you answered "yes" to this question, go to Section III.			
If not, please supply the name and relationship of the person for whom you are complaining:			
Please explain why you have filed for a third party:			
Please confirm that you have obtained the permission of the aggrieved party if you are filing on behalf of a third party.		Yes	No





### Formulario de quejas del Título VI

El Título VI del Acta de Derechos Civiles de 1964 sostiene que "Ninguna persona en los Estados Unidos será excluida, negada beneficios o discriminado debido a su raza, color o nacionalidad, en cualquier programa o actividad que recibe asistencia financiera federal."

The Rapid acata las normativas del Título VI y otros estatutos y reglamentos relacionados en todos sus programas y actividades. The Rapid opera sin distinción a raza, color, nacionalidad, credo, ingresos, genero, edad o discapacidades. Cualquier persona que crea que ha sido perjudicado/a por una práctica discriminatoria prohibido bajo el Título VI puede llenar este formulario. **Para asistencia adicional, favor de contactarnos por telefono a 616-456-7514.**

<b>Sección I:</b>			
Nombre:			
Dirección:			
Teléfono (casa):		Teléfono (trabajo):	
Dirección de correo electrónico:			
Requiere un formato accesible?	Fuente incrementado	Grabación de audio	
	TDD	Otro	
<b>Sección II:</b>			
Está completando este formulario por si mismo?		Sí*	No
*Si su respuesta es "sí," pase a la sección III.			
Si no, por favor indique el nombre de la persona por quien está completando esta queja y su relación a usted:			
Por favor explique porqué está completando este formulario por parte de otra persona: _____			
Por favor confirme que ha obtenido la autorización de la persona afectada si está solicitando por parte de otra persona.		Sí	No



## **APPENDIX 8: TITLE VI PUBLIC INVOLVEMENT PLAN**

### **A. Public Outreach Overview**

At The Rapid, we utilize a variety of methods to continually communicate with and inform the public we serve. English is the most spoken language in our region followed by Spanish. To ensure that the public is able to engage with us, we translate all public outreach materials to Spanish and utilize interpreter services such as Language Line.

#### 1. The Rapid's Website (<http://ridetherapid.org>)

The Rapid's website is an informational hub for our customers and the public at large. All pertinent information for passengers and taxpayers can be found on our website. Most importantly, we utilize this website to notify passengers and the public about pertinent information as needed. The Rapid's website meeting ADA accessibility guidelines and features Google Translate, which supports the translation of the website to more than 100 languages.

#### 2. Social Media

Our social media platforms (Facebook, Twitter, Instagram, LinkedIn, YouTube, etc.) are places that passengers can find relevant information, real-time customer service, and an engagement communication space.

#### 3. Interior Bus Information

The Rapid utilizes internal bus information racks, located behind the bus operator, to notify passengers of detours, rider alerts and other relevant details. When needed, interior bus advertisement space is also used for general outreach to the public regarding information notices.

#### 4. Rider and Public Surveys

Periodically, The Rapid surveys riders, and the general public, to gain information and feedback about who is using the service, overall perceptions of The Rapid, and desired service changes.

#### 5. Public Events

The Rapid routinely attends various events throughout the six-city service area to engage with the public and answer questions, as well as share information. We attend everything from senior fairs to chamber of commerce meetings.

#### 6. Alerts

The Rapid utilizes digital rider alerts that notify passengers of route and service

alerts, as well as other important information that pertains to utilizing The Rapid. Riders can sign up to receive these alerts via text message or email.

#### 7. Email Newsletter

An email newsletter is utilized for various important notifications and public outreach.

#### 8. Public Meetings

When necessary for route and service planning or other important topics, The Rapid utilizes public information meetings or public hearings to gain public feedback and assess needs.

#### 9. News Media

The Rapid routinely works with local news media to notify the public of important information impacting the service.

#### 10. Partnerships

Organizational and business partnerships are a key aspect of public outreach. For example, The Rapid often partners with organizations like Disability Advocates of Kent County to educate and spread awareness about specific route and planning needs, gain feedback and improve our system.

### **B. Threshold for Major Service Changes**

The Rapid's established threshold for a "major" service change is as follows:

*If 25% or greater of either the vehicle revenue miles or the passenger miles on one of The Rapid's routes is to be affected by a service change, this constitutes a Major Service Change for The Rapid and public hearings must be held.*

### **C. The Rapid's Disparate Impact and Disproportionate Burden Policy**

The Rapid Board adopted a Disparate Impact and Disproportionate Burden Policy in February 2014. The preparation for this policy included a rider survey indicating fare types used by demographic. This policy dictates that low income and minority populations will not bear a disparate impact or disproportionate burden of any fare or service changes that The Rapid makes. A copy of the policy can be found in Appendix 5.

### **D. The Rapid's New Facility Construction Outreach Process**

For all new construction projects, The Rapid fully undergoes the FTA environmental review process. This includes analyzing all disproportionate social impacts of the

proposed project to vulnerable populations and an environmental justice review. In addition, The Rapid conducts public outreach to gain community input regarding any proposed construction projects, the level of the outreach depending on the size of the project and potential community impacts. This includes outreach to Title VI populations to ensure their voice is heard as part of the public process.

## **E. Changes in Service Level**

Since the last Title VI Plan was adopted in December 2017, The Rapid has had numerous significant changes in service levels to its fixed route system, all occurring since March 2020 in response to the COVID-19 pandemic. When the coronavirus pandemic appeared in West Michigan in mid-March, ridership levels began to decrease drastically, dropping as low as 90% from the previous year. Further, state-mandated “shelter-in-place” orders were given by the Governor to discourage travel and transmission of the virus. With ridership and general travel throughout the region unprecedentedly low, a modified weekend service was introduced on March 24<sup>th</sup>. This service suspended eight of the system’s lowest ridership/least productive routes as well as Route 19 (a jointly-funded route with external partners Spectrum Health and the City of Grand Rapids) due to funding issues. Span of service was reduced to 7am to 7pm on all routes Monday through Sunday as only the most essential service was chosen to operate on an hourly basis. By late April, several routes experiencing capacity issues (1, 2, 4, 9, and 28) were increased to 30-minute service; however, the same nine routes remained suspended and spans of service remained between 7am to 7pm.

On May 26<sup>th</sup>, a reduced Summer service was implemented as ridership began to increase to approximately 40% from the same time period during the previous year. Spans of service were increased to 5:30am to 10:30pm on weekdays for all routes, and regular weekend hours and spans of service were reintroduced. Routes previously suspended were reintroduced into service at hourly frequency (with the exception of Route 19 and contracted services which remained suspended). Several routes with higher ridership, including Silver Line, Route 1, Route 2, Route 4, Route 9, and Route 28, were operated at 15-minute frequency in order to provide proper distancing opportunity with 15-person on-board capacity limitations still enforced.

The Summer service remained in effect until August 31<sup>st</sup> which saw all routes operating at hourly service upgraded to half-hour frequency and the cessation of on-board capacity limits. Route 1 returned to half hour weekday frequency as it had operated prior to the pandemic.

While several service changes were implemented in relatively rapid succession, it was recognized that the changes were temporary to respond to effects of the COVID-19 pandemic. The comprehensive operational analysis (COA) continued along throughout the pandemic, and at such time that the recommendations of the COA are adopted in early 2021, the appropriate public hearings and disparate impact, disproportionate burden (DIDB) analyses will be conducted on all proposed route changes in order to make them permanent and ensure protected populations are not disproportionality impacted.

## F. Changes in Fare Levels

### Smart Card

The Rapid has been working to implement electronic fare media (colloquially referred to as the Wave Card) since 2017. As part of the implementation of the Wave Card program, a fare structure change was adopted by The Rapid's Board of Directors in May 2017 and implemented in 2018. The electronic fare media included adoption of a fare-capping system (see table below), Prior to adoption and implementation, Rapid staff conducted a robust public outreach campaign regarding proposed fare structure changes. Throughout April 2017, Rapid staff solicited feedback from numerous sources, including social media, email, phone, written, as well as seven public meetings. Materials for social media, email, and notifications were made available in both English and Spanish.

A DIDB analysis was conducted in a series of phases as part of the implementation of the Wave Card. The first phase confirmed that the distribution network where passengers could acquire Wave Cards was adequate. It was found that distribution network for Wave Cards superseded that of the paper ticket distribution network and further provided enhanced opportunities for lower-income and minority populations to access the fare card. The distribution network of retail sites was field-verified to ensure the passes were available were advertised. Further, this first phase included the promotion and distribution of the card where Wave Cards for a brief period of time were made available at no cost. Passengers had the opportunity to come to Rapid Central Station and register a Wave Card in their name for free. Finally, the second phase of the DIDB analysis involved the issue of the elimination of cash fare transfers, cessation of selling and accepting paper tickets, and the elimination of change cards for cash fare. Analysis of these factors determined no DIDB issues were present given the fact Wave Cards were widely available with increased access compared to traditional fare media.

Finally, proposed Wave Card-related fare changes went forward to the public through a public hearing.

**Table 9 – Adopted Wave Card Fare Capping Structure**

Categories	Cash Fare or Cap Increment	10 Ride	31 day	7 day	1 day
Adult	\$1.75	-----	\$47.00	\$16.00	\$3.50
Youth	\$1.25	-----	\$33.75	\$11.25	\$2.50
Reduced	\$0.85	-----	\$30.00	\$10.50	\$2.25
Partner/ Student	\$1.25	-----	-----	\$11.25	-----

## **Restoring Fares within Silver Line Downtown Fare Free Zone and on Route 19**

### **Silver Line**

In September 2016, The Rapid Board approved a 10-month pilot program for the implementation of a fare-free zone for the Silver Line BRT in downtown Grand Rapids (Central Station to Wealthy Street). The fare revenue was agreed upon to be fully reimbursed to The Rapid by the City of Grand Rapids Mobile GR Department and approved by the City of Grand Rapids City Commission. This pilot program was extended annually. However, with the increase of DASH frequencies in August 2018 (7-8 minutes headways all day), changes in mobility patterns in downtown Grand Rapids, and the cost increase of the DASH service contract in 2019, the sponsored fare-free downtown Silver Line became partially redundant (due to increased DASH service) and no longer financially feasible for Mobile GR (due to DASH cost increases).

### **Route 19**

In May 2018, The Rapid Board authorized the approval to execute a contract with Spectrum Health and the City of Grand Rapids for funding to significantly enhance Route 19 with realignment and increased all-day frequencies. This agreement included a provision that all Spectrum employees can ride the entire fixed-route system fare-free, and a provision from Mobile GR that Route 19 become fare-free to all riders. Route 19 had seen significant increases in ridership since the implementation of this enhanced service, and the vast majority of riders are Spectrum employees along the corridor to their park-and-ride lot on Plymouth Ave. However, due to an array of unintended ridership outcomes by providing fare-free service, a large number of concerns emerged from the City of Grand Rapids, Spectrum Health, and other partners. It was determined that concluding the fare free service was the preferred alternative to proceed.

### **Public Outreach**

Staff hosted an array of public input opportunities including:

- Four (4) public meetings on July 1st and July 8th,
- Two (2) Facebook Live Q&A sessions
- Provided email, phone, and mail options for comment, and interacted heavily on social media.

Overall, staff received minimal concerns for the implementation of fares and all public interaction was documented. The Rapid worked collaboratively to communicate this change and provide relevant information and education about resources available to riders by:

- Providing high-visibility notice on buses of the changes to ease the transition on our riders
- Working very closely with transportation staff to mitigate customer service issues as they arise
- Direct coordination with our partner agencies to specifically focus on any potential negative impacts to our most vulnerable riders.

**Title VI Analysis**

Demographic passenger surveys were completed on the downtown Silver Line and Route 19 in early March 2020. In discussions with FTA officials, The Rapid confirmed that widespread public communication of this change, coupled with connections to resources for transit fare assistance for any negatively impacted riders, will suffice as mitigation for any impacts of this change. This determination by FTA officials was predicated on the fact that the no-fare nature of the services were returning to the base fares applied throughout the entire fixed route system. This change to Silver Line and Route 19 occurred during the COVID-19 pandemic and was primarily the result of the funding sources for both no-fare services being eliminated, as well as the suspension of Route 19 per the request of Spectrum Health, the primary contract partner for the route, as opposed to a Rapid-led decision.