



2026 Title VI Program Update

City of Madison, Wisconsin

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Introduction

Metro Transit is a Division of the Department of Transportation within the City of Madison that provides fixed-route and paratransit services to the City of Madison and its service partners. With a staff of over 500 employees, Metro Transit is committed to providing high-quality transit service to its customers. In 2025, Metro Transit provided approximately 12.4 million rides.

As a direct recipient of Federal Transit Administration (FTA) funding, Metro Transit is required to document its compliance with Title VI of the Civil Rights Act of 1964, which prohibits discrimination on the basis of race, color, or national origin in programs and activities that receive federal funds.

[FTA Circular 4702.1B](#) provides guidance on Title VI compliance for transit agencies. In accordance with the guidance provided in this circular, Metro Transit provides a Title VI Program Update on a triennial basis. The following document outlines Metro Transit's Title VI policies and activities from 2023 – 2025 inclusive.

General Requirements

Title VI Notice to the Public

Metro Transit provides notice of Title VI protections to the public through multiple means, including postage on all Metro Transit vehicles, printed ride guides, within Metro's administrative offices, and on every page of the Metro website. The notice is printed in all languages that meet the Safe Harbor Requirement in Metro Transit's service area: Spanish, Hmong, and Chinese. A copy of the posted notice is available in Appendix A.

Title VI Complaint Procedures

Metro Transit provides several methods for filing a Title VI complaint. These include filing an official complaint form, filing an online complaint on the Metro Transit website, and filing a complaint with the City of Madison's Department of Civil Rights. Guidance on how to file a complaint is included in Metro Transit's Title VI Notice. A copy of the official complaint form is included in Appendix B.

Metro Transit maintains a record of all complaints in a customer feedback database. This includes all phone call and email complaints made to its customer service center. A Metro Transit operations supervisor as well as Metro Transit's customer service manager review database entries daily and follow up on any feedback that could potentially violate Metro Transit's Title VI policies. A copy of Metro Transit's detailed complaint procedures can be found in Appendix C.

Title VI Investigations, Complaints, and Lawsuits

Metro Transit maintains a record of all Title VI complaints, investigations, and lawsuits. A list of all complaints filed during the current reporting period (2023 – 2025) can be found in Appendix D.

Monitoring Subrecipient Compliance with Title VI

Metro Transit collaborates with the City of Madison's Department of Civil Rights (DCR) to monitor subrecipient compliance with Title VI requirements. Metro Transit provides a Title VI template to assist subrecipients in completing their Title VI plan (template attached in Appendix E). Subrecipient Title VI Plans are collected by Metro Transit staff and reviewed by DCR for compliance. Following review, DCR sends a notice of approval to the subrecipient. Once approved, subrecipient plans are valid for 3 years.

Subrecipient Title VI Program Status

Name	Status	Address	Plan Approved	Plan Expiration
Colonial Club Inc	Active	301 Blankenheim Ln. Sun Prairie, WI 53590	3/11/2024	3/31/2027
Community Living Connections	Active	6515 Watts Rd. Suite 100 Madison, WI 53719	1/30/2024	1/30/2027
MARC	Active	901 Post Rd. Madison, WI 53719	11/28/2023	11/28/2026
Options in Community Living	Active	22 North 2nd St. Madison, WI 53704	12/10/2024	12/10/2027
Van Go Taxi	Active	700 Cottage Grove Rd. Madison, WI 53716	6/10/2022	6/10/2025*
YWCA Madison	Active	101 E. Mifflin St. Madison, WI 53703	3/15/2024	3/31/2027
City of Stoughton	Inactive	207 S Forrest St. Stoughton, WI 53598	1/14/2021	1/14/2024
City of Sun Prairie	Inactive	300 E Main St. Sun Prairie, WI 53590	2/7/2022	2/7/2025

* Plan lapsed due to sale of company. Staff working with new company to renew the Title VI Program.

** Inactive programs refer to organizations that were subrecipients in Metro Transit's previous Title VI Program, but are no longer subrecipients.

Language Assistance Plan

FTA Circular 4702.1B requires transit agencies to create a plan for providing language assistance to populations within their service area that have Limited English Proficiency (LEP). This includes the completion of a four-factor analysis that identifies LEP populations, how often they interact with Metro services, the nature and importance of the service being provided, and the available resources the agency has to provide language assistance. Metro Transit's four-factor analysis and language assistance plan are described in the following sections.

Four Factor Analysis

Factor 1: The number or proportion of LEP persons eligible in the Metro Transit service area who may be served or likely to encounter a Metro Program, activity, or service.

A four-factor analysis identifies LEP individuals within Metro Transit's service area who may need language assistance. Based on U.S. Census Bureau 2020 – 2024 American Community Survey (ACS) five-year estimates, the Metro Transit service area is home to approximately 406,794 people with 15,814 identifying as LEP individuals. Spanish is the most spoken language in the Metro Transit service area other than English, comprising 5.64% of the total

population. The table below lists the LEP populations in Metro Transit's service area according to the language classifications listed in ACS Table C16001.

The Safe Harbor Provision, adopted by the Department of Transportation from the Department of Justice, states that "if a recipient provides written translation of vital documents for each eligible LEP language group that constitutes five percent (5%) or 1,000 persons, whichever is less, of the total population of persons eligible to be served or likely to be affected or encountered, then such action will be considered strong evidence of compliance with the recipient's written translation obligations." Based on this analysis, there are two languages in the Metro Transit service area that meet the Safe Harbor Provision – Spanish and Chinese. Metro Transit has also identified Hmong as frequently spoken language in its service area and includes Hmong in its vital document translations.

English Language Proficiency in Metro Transit Service Area

Language	Population	Percent of Population	LEP Population	Percent of Population with LEP	Percent of Population with LEP (within language group)
English	350,869	86.25%	-	-	-
Spanish	22,932	5.64%	8,895	2.2%	38.79%
French	1,118	0.27%	89	0.0%	7.96%
German	1,413	0.35%	83	0.0%	5.87%
Russian	2,058	0.51%	280	0.1%	13.61%
Korean	1,083	0.27%	333	0.1%	30.75%
Chinese	7,208	1.77%	3,265	0.8%	45.30%
Vietnamese	711	0.17%	100	0.0%	14.06%
Tagalog	583	0.14%	213	0.1%	36.54%
Arabic	1,234	0.30%	401	0.1%	32.50%
Other	17,585	4.32%	3,695	0.9%	21.01%
Total	406,794	100.00%	17,354	4.27%	-

Factor 2: The frequency with which LEP persons came in contact with our transit programs, activities, or services.

Call Center Requests for Interpretation

All calls to Metro Transit's call center are available for translation services. Metro Transit's call center receives approximately 12,500 calls per year, with approximately 3,000 of these calls requesting interpreter services.

Metro Transit has a bilingual marketing specialist on staff. This staff member maintains a Spanish version of Metro Transit's website and provides in-house translation for flyers, posters and other printed materials. They also manage a Spanish only Twitter account and sends translated text message notices to a Spanish subscription group.

Additionally, Metro Transit strives to hire bilingual customer service representatives. Customer service representatives assist LEP individuals via phone calls by using a Language Line service that offers multiple interpreters and multiple languages. Metro Transit does not track these interactions.

Printed Document Translation Requests / Public Meeting Interpretation Services

Metro Transit maintains translated copies of its Title VI Notice and Title VI complaint form in Spanish, Chinese, and Hmong. Additional printed materials are available for translation in any language upon request.

Website Information

Metro Transit's full website is available in Spanish. Online trip planning and bus tracking data are provided through Metro Transit's Bus Tracker Application, which is also available in Spanish.

Factor 3: The nature and importance of programs, activities, or service provided to the LEP population.

In 2025, Metro Transit provided approximately 12.4 million unlinked passenger trips on its fixed-route services. These services provide access to employment, healthcare, education, shopping, and other essential destinations. For individuals with Limited English Proficiency (LEP), language barriers can create additional challenges in accessing and using public transportation services. Because transit plays a vital role in connecting people to essential opportunities and services, Metro Transit is committed to providing translated materials and interpretation services to help ensure meaningful access for LEP populations.

Factor 4: The resources available to our transit system and the overall cost to provide language assistance.

As described above, Metro Transit is committed to providing meaningful access to its services for LEP populations and has the appropriate vendors in place to provide that access. As a department of the City of Madison, Metro Transit also has access to additional language

assistance resources through the Civil Rights Department LEP resources and guideline documents, which include, but are not limited to:

- Document Interpretation/ Translation Services (including Braille)
- Interpreter/ Translation services for events, meetings, etc. (including American Sign Language)
- Front Desk Communication Document – includes commonly used phrases in 21 different languages and a step-by-step instructional guide
- Printable PDF Language Chart (“I speak” cards)

Language Assistance Measures and Tactics

Metro Transit currently offers the following language assistance services:

Oral Translations

- LEP customers who call the Customer Service call center have direct access to Spanish-speaking staff on-site and full interpreter services through the Language Line service.
- Metro Transit’s website is screen-reader friendly.
- Metro Transit and the City of Madison provide free interpreter service for all public hearings and meetings upon request. All hearing and meeting announcements contain the following statement: “If you need an interpreter, translator, materials in alternate formats or other accommodations to access this service, activity or program, please contact Metro Transit at (608) 266-4904 at least three business days prior to the meeting.”

Resources are available on request at the City of Madison Civil Rights Office, Metro Transit Administrative Office, or online on the City’s Intranet.

Written Translations

Metro Transit provides written translation of vital documents for languages that meet the Safe Harbor Provision. In the Metro Transit service area, these include Spanish, Chinese, and Hmong. In accordance with FTA Circular 4702.1B, vital documents include the following:

- Title VI Notice to the Public
- Title VI Complaint Form
- ADA Complaint Form
- Paratransit Eligibility Form

Additionally, Metro Transit provides free translation services for all of its written materials upon request. Notice of this service is provided in Metro Transit’s Ride Guide and on the Metro Transit website.

Public Outreach

Metro Transit translates informational materials upon request. Notice of this service is provided in Metro Transit's Ride Guide and on the Metro Transit website. Customer service staff are trained to identify the need for additional translated materials.

Metro Staff Training

Metro Transit trains staff that are most likely to come in contact with LEP people on available resources and effective techniques for providing language assistance. Metro Transit's language assistance information is reviewed on an annual basis with Metro Transit's customer service representatives and front office staff.

Monitoring, Evaluating, and Updating the Plan

In accordance with FTA Circular 4702.1B, Metro Transit updates its Title VI Program, including the Language Assistance Plan and Public Participation Plan, on a triennial basis. Metro Transit staff may periodically review and update the plans as needed between program updates. All changes are approved by the City of Madison Transportation Commission and included in the subsequent Title VI Program update.

Dissemination of the Language Assistance Plan

Metro Transit's Title VI documents are available online at mymetrobus.com. This plan will also be available upon request in desired language to any person(s) requesting the document via phone, in-person, postal mail, e-mail or feedback request.

Contact Information

Questions, comments and requests can be filled out online at mymetrobus.com/feedback or sent to:

Name: Mike Dentice
Title: Customer Service Manager
Address: 1245 E. Washington Ave. Suite 201, Madison, WI 53703
Telephone: 608-266-4466
E-mail: mdentice@cityofmadison.com

Public Participation Plan

Metro Transit encourages active public involvement and strives to deliver information regarding its programs and engagement opportunities in a timely and consistent manner. The following Public Participation Plan reflects Metro Transit's commitment to ensuring all members of the public, including minority and Limited English Proficiency (LEP) populations, have meaningful opportunities to participate in the decision-making process.

Goal

The goal of Public Participation Plan is to provide meaningful and equitable opportunities for public involvement in Metro Transit's decision-making process.

Effective Strategies

1. Engage a variety of socioeconomic, ethnic, and cultural perspectives, including minority, low income, and Limited English Proficiency (LEP) populations.
2. Provide materials and comment opportunities that meet the cultural and language preference of all individuals and communities within the Metro Transit service area.
3. Work with elected representatives, community-based organizations, and diverse media outlets to help build awareness and encourage participation.
4. Provide comment opportunities and feedback on multiple platforms, at various times and locations to ensure all voices are heard and considered equally.
5. Review United States Census and American Community Survey data to identify the spatial distribution of low-income, minority, and LEP populations in the Metro Transit service area.
6. Place marketing and public information materials at a variety of convenient and easily accessible locations, such as bus stops, on the Metro Transit and City of Madison website, targeted media, mailed newsletters, social media, etc.
7. Continue to use bilingual marketing specialist to ensure Metro Transit's website is translated and available in Spanish.
8. Provide interpretation services for public meetings upon request.
9. Provide translation services for written documents upon request.

Oversight Committees

As a department with the City of Madison, Metro Transit is governed by the City of Madison Common Council and the City of Madison Transportation Commission. The primary governing body for Metro Transit is the Transportation Commission, which reviews and approves all service changes, fare changes, bus stop changes, and contracts. The Transportation Commission comprises both City of Madison Alders and appointed members of the public. A full description of the roles and responsibilities of the Transportation Commission are described below.

City of Madison Transportation Commission – established 7/2018

The Transportation Commission shall decide the transportation issues listed below in a manner that is consistent with the transportation policies and plans adopted by the Common Council

(a) Transit.

1. Transit service standards;
2. Transit fares;
3. Transit route additions, extensions or contractions;
4. Transit changes in schedules and hours of service;
5. Rules necessary to ensure safety for bus passengers;
6. Regional transit contracts (services and pass programs);
7. Bus routes and stops;
8. Charter service, taxis, limousines, courtesy cars, hotel buses, jitney services hire-and-drive service, ride-sharing, car-sharing, transportation network companies, subscription bus service, park and ride facilities, and any other issues pertaining to the operation of the City's transit and services;
9. Transit for people with disabilities; and
10. Other items referred by the Common Council, Transportation Policy and Planning Board, or Director of Transportation.

(b) Parking.

1. Off-street parking rates;
2. Provide recommendations to the Common Council regarding on-street parking rates;
3. Rules necessary to ensure safe and proper operation of parking facilities;
4. Revenue collection technology and systems; and
5. Other items referred by the Common Council, Transportation Policy and Planning Board, or Director of Transportation.

(c) Pedestrian, Bicycle, and Motor Vehicle.

1. Pedestrian and bicycle safety, enforcement, and facility maintenance programs;
2. School crossings;
3. Safety programs and projects;
4. Traffic signals;
5. Crossing guard assignments;

6. Traffic calming;
7. Provide recommendations to the Board of Public Works regarding right-of-way use and geometric design on arterial and collector street projects;
8. Development Review; and
9. Other items referred by the Common Council, Transportation Policy and Planning Board, or Director of Transportation.

Communication Formats & Techniques

Public Hearings/ Meetings

Transportation Commission meetings are available and open for public participation. Regularly scheduled meetings are held on Wednesdays at 5 p.m. in the Madison Municipal Building or another centrally located government building that meets accessibility needs, while public hearings are typically scheduled to start at 6 p.m. to be more convenient for the general public to attend and participate.

Metro Transit posts notices of a public hearing (30) calendar days prior to the hearing. Posters are placed at high volume stops. All notices encourage those that cannot attend to fill out a feedback form, write a letter, send an email, or call Metro.

Polls/ Surveys

Metro Transit periodically conducts surveys or polls to gather information on usage trends or public opinion on proposed initiatives. Surveys are disseminated online, on all fixed-route vehicles, in-person (at stops, transfer points and on-vehicle) and are sent via postal mail to those living near the affected area. The results of Metro Transit's 2024 on-board survey or located in Appendix I.

News Releases

News releases are written and distributed through the City of Madison's electronic dissemination system to local media outlets including those with predominantly minority audiences. Public hearing news releases are sent approximately (14) calendar days prior to the hearing. All news releases are translated and posted in Spanish. Other alternative language and formats are available upon request.

Rider Update Emails

More than 2,500 riders are subscribed to our General Rider Updates e-newsletter. This is a weekly newsletter containing service updates/announcements, public hearing/ meeting announcements (links in English, Spanish, and Hmong), Metro news, rider reminders, detours, etc. The e-newsletter is available to anyone that signs up online.

Riders can also subscribe to more tailored newsletter groups to receive targeted updates, including Aviso al Pasajero (general service updates in Spanish), Employment Alerts, Paratransit ADA Alerts, Supplemental Service Alerts, specific route alerts and more.

Text Alerts

More than 6,000 riders are subscribed to our Rider Alert text messaging service. Metro Transit sends out text reminders and updates containing service updates, employment opportunities, public hearing/meeting announcements, weather and detour updates, etc. The text messaging service is available to anyone that signs up online through the City of Madison.

Riders can subscribe to tailored text groups to receive targeted updates, including general information, winter weather notifications, detour notices, and Aviso al Pasajero (general service updates in Spanish).

Social Media

Metro Transit has an active English X (formerly Twitter) account (@mymetrobus) with approximately 4,000 followers that participate in various conversations regarding service updates, live delays, public announcements/meetings, detour/weather updates, etc.

As of May 2026, Metro Transit's Facebook page (/mymetrobus) has 2,550 followers. Metro staff post regularly throughout the week, sharing updates that may include service changes, detours, lost & found information, weather impacts, job opportunities, citywide events, and other informational and educational content.

The Metro Transit Instagram account currently has 1,651 active followers as of May 2026, which also receives periodic updates. Metro is focused on continued growth of its Instagram audience.

Each social media page includes URL links to the Social Media Content Policy and Civil Rights & Title VI information for public reference.

Metro Transit also encourages all social media followers to submit feedback via the feedback form when sharing complaints, compliments, or suggestions in posts or comments. Staff maintains an open, responsive dialogue with customers through social media, via messages and comments when necessary.

Printed Newsletters

Metro Transit produces two Paratransit ADA newsletters per year. Newsletters are sent via postal mail and go to all ADA paratransit riders. If paratransit individuals have marked LEP status on their application, we provide the newsletter in their preferred language or alternative format.

Website

The Metro Transit website is available in both English and completely translated into Spanish. In 2025, approximately 230,000 visits were recorded.

Metro Transit's online feedback form is available at mymetrobus.com/feedback or in the drop-down menu on the homepage. Supervisors and staff are required to sort and respond to all complaints, compliments and suggestions on a daily basis. In the past year, the online feedback form was visited around 3,600 times.

The homepage also features the latest news and highlights. All public participation opportunities are posted in the "Rider Updates" section at least thirty (30) calendar days prior to the event, as previously stated.

Visitors can access the Civil Rights/ Title VI information on all every page throughout the site in both English and Spanish. The Civil Rights/ Title VI English page received around 289 views last year.

Interior and Exterior Bus Advertising

All fixed-route buses include Civil Rights/ Title VI Notice to the Public interior cards in English, Spanish, Hmong, and Chinese. Metro Transit also posts important updates and notices on bus exterior advertising.

Civil Rights/ Title VI Notices are posted at the Metro Administration Office reception window where customers can purchase tickets, retrieve lost and found, or receive any customer service needed.

Bus Flyers

As funding allows, Metro Transit will periodically place bus flyers regarding important fare, service, and policy announcements in the interior of the bus. Riders are encouraged to take a copy with them. When flyers are used, it is Metro Transit's policy to distribute them on all fixed-route and paratransit vehicles at least ten (10) days prior to the public engagement event being noticed. Informational flyers are also shared with partner jurisdictions.

Bus Stops

Flyers are posted at bus stops affected by a proposed or approved upcoming change, such as bus stop closure or relocation, detour, or service change.

Other Media Outlets

Metro utilizes print, radio and online paid advertisements including those with predominately minority audiences (La Movida Radio). Per Metro policy, paid advertisements will appear in local media approximately seven (7) calendar days prior to a public input event.

Public Participation for Major Service Changes and Fare Changes

All proposed Major Service Changes and proposed fare changes are subject to a public hearing. A detailed legal notice will be published in the City's official paper. This notice will inform the public of the proposed change(s) and the scheduled date, time, and location of the public hearing. The notice will also indicate the location of building's accessible entrance and will state that if someone needs an interpreter, materials in alternate formats or other

accommodations to access this hearing, they should contact Metro Transit at (608) 266-4904 at least ten (10) days prior to the hearing date so that proper arrangements can be made in a timely fashion. Efforts will be made to publish the public hearing notice approximately thirty (30) calendar days prior to the hearing.

A news release will be distributed to all local media via the City of Madison's electronic news release dissemination system. In addition, approximately fourteen (14) calendar days prior to the public hearing, staff will distribute news releases using all available information distribution systems and processes including but not limited to Metro Transit's website, text and email subscription lists, social media postings, and any other future information dissemination systems that are deemed appropriate by Metro Transit staff. Staff will maintain a list of all outreach efforts.

Flyers will be installed on all Metro Transit vehicles approximately ten (10) calendar days prior to the public hearing. Paid advertisements will appear in the City's official paper approximately seven (7) calendar days prior to the public hearing.

The Transportation Commission (TC) will consider the views of all who comment on proposed fare or service changes prior to its voting on the adoption of staff's recommendations. If deemed appropriate, the TC will modify the proposed changes prior to adoption. If a public hearing is held regarding a reduction in service, and if it is the consensus of the public that fares should be increased in order to avoid a reduction in service, and if the TC decides to adopt a fare increase instead of a reduction in service, a second public hearing need not be conducted in order to gather public comments on the fare increase.

However, if the public does not comment on or is not in consensus as to whether fares should be increased in order to avoid a service reduction, yet the TC decides that it would prefer fare increases to staff's proposed service reductions, a second public hearing would be held in order to gather public comments on said changes to staff's recommendations.

The TC may submit a report on the approved changes to the Common Council at their request, and the Common Council may request that the TC reconsider its vote following review of the report.

The TC meetings are open to the public and, therefore, noticed according to the State of Wisconsin's Open Meeting Law.

Evaluation and Update of Public Participation Plan

Metro Transit periodically monitors and evaluates its public participation methods to effectively communicate with the public. Metro Transit continues to search for new, effective communication techniques and formats to increase public awareness, accessibility, and equity in all planning and decision processes. The public participation plan is updated on a triennial basis as part of Metro Transit's Title VI Program.

Dissemination of Public Participation Plan

When changes are made to the Public Participation Plan, draft versions will be posted on its website at mymetrobus.com for public comment. Printed versions will be made available at the Metro Administration Office or can be mailed to individual customers upon request. Customers can request a printed version by calling (608) 266-4466 or emailing mymetrobus@cityofmadison.com.

Notices to the public that the plan will be available for review will be posted online at mymetrobus.com, on bus flyers, through email and text alerts, social media and posters at Metro Transit's reception window. Notices will include information on how to leave feedback including use of Metro Transit's online feedback form, how to submit by phone to Metro Transit's customer service center, or in writing by email or mail to Metro Transit's administrative offices.

Requirements for Transit Providers

Service Policies

[FTA Circular 4702.1B](#) requires transit agencies to adopt policies that establish thresholds to determine major service changes, disparate impacts, and disproportionate burdens. Metro Transit's policies are described in the following sections.

Public Engagement for Setting Major Service Change Policies

When setting its Major Service Change, Disparate Impact, and Disproportionate Burden policies, Metro Transit follows the same public engagement process described in the Public Participation for Major Service Changes and Fare Changes section of this document. Please refer to that section for more information.

Adverse Effects Definition

In accordance with [FTA Circular 4702.1B](#), Metro Transit defines an adverse effect as a negative impact experienced by riders resulting from a fare or service change. Examples include elimination of routes, reductions in service frequency or span, or increased fares.

Major Service Change Policy

Metro Transit has defined a Major Service Change policy to determine when a service change may have a significant impact. Major Service Changes require additional analysis and public engagement. In general, a Major Service Change requires review by Metro Transit's Service Development Committee, a Title VI Equity Analysis, a public hearing, and approval by the City of Madison Transportation Commission. A Major Service Change is defined as any of the following:

- The elimination of a route;
- A change in at least 25 percent of an existing route's directional mileage;
- A change in a route's span of service of at least 25 percent;
- A change in a route's revenue hours of at least 25 percent;
- A change in regular days of service on any route.

The following activities are not considered a Major Service Change:

- Service for special events,
- Route changes to address construction or road closures, and
- Service added or reduced to address emergencies.

Disparate Impact Policy

If the minority population share of the population impacted by a Major Service Change exceeds Metro Transit's service area average by more than 15 percentage points, then the service change may result in a disparate impact. In accordance with FTA Circular 4702.1B, such findings require evaluation of alternative service plans to demonstrate that other service alternatives could not accomplish the same program goals with a less disparate impact.¹

Example: Metro Transit decides to reduce the headway on Route X by 50%. A Service Equity Analysis is required. Minority populations account for 20% of Metro Transit's total service area population. Minority populations account for 36% of the population within ¾ miles of Route X. The minority population of Route X exceeds the area average by 16 percentage points, indicating a potential disparate impact. In this case, Metro Transit would analyze alternatives to demonstrate that other service alternative could not accomplish the same program goals with a less disparate impact.

Disproportionate Burden Policy

If the low-income population share of the population impacted by a Major Service Change exceeds Metro Transit's service area average by more than 15 percentage points, then the service change constitutes a disproportionate impact. In accordance with FTA Circular 4702.1B, Metro Transit will take steps to avoid, minimize, or mitigate impacts where practicable.²

Vehicle Assignment

Metro's fixed-route fleet consists of 40-foot diesel coaches and 60-foot battery electric buses (BEBs), all of which are ADA-compliant, low-floor, and ramp-equipped. Approximately one-third of the fleet is composed of BEBs. Vehicle assignments are determined by two factors: route designation and maintenance condition. Specific routes are designated for BEB operation, while the remaining routes are served by 40-foot diesel coaches. Additionally, Metro Transit has committed to providing nine (9) BEBs on Route 80 as part of its 2023 Section 5339c Low-No Emission award.

Within those designations, buses in full operational condition are assigned to all-day blocks, while buses with minor deficiencies that remain safe for revenue service are placed on shorter blocks (supplemental service, AM/PM peak-only runs, etc.) so that maintenance staff can address those issues during off-peak hours.

¹ FTA Circular 4702.1B Chapter IV-16

² FTA Circular 4702.1B Chapter IV-18

Fare Change Policy

In accordance with FTA Circular 4702.1B, all fare increases or decreases, including the elimination of fares, are subject to Fare Equity Analysis.³

Fare Change Disparate Impact Policy

If a fare change affects fare categories where the share of minority population fare usage exceeds the share of the overall population fare usage by more than 15 percentage points, then the fare change constitutes a disparate impact, and mitigation measures are required.

Fare Change Disproportionate Impact Policy

If a fare change affects fare categories where the share of low-income population fare usage exceeds the share of the overall population fare usage by more than 15 percentage points, then the fare change constitutes a disproportionate impact, and mitigation measures are required.

Service Standards

Metro Transit operates two modes of fixed route service: Motor Bus and Rapid Bus. The following service standards are established for each mode in Metro Transit's Service Standards and Design Guidelines document and were developed in accordance with the guidance provided in [FTA Circular 4702.1B](#). Additionally, Metro Transit classifies its Motor Bus operations based on the type of service provided. The following standards reflect these classifications.

Vehicle Load Standards

Vehicle load is a measure of the number of riders on a bus at a given point in time along a route and is a required service standard under [FTA Circular 4702.1B](#). Transit planning staff use this metric to determine when and where vehicles are experiencing high passenger volumes. Metro Transit considers vehicle loads of up to 1.5 times seated capacity to be acceptable. The following load standards reflect these capacities. When vehicle loads consistently exceed this threshold, it indicates a need for additional service.

Maximum Vehicle Load Standard

Route Class	Maximum Vehicle Load	
	40' Bus	60' Bus
Bus Rapid Transit	NA	85
Frequent	55	85
Standard	55	85
Coverage	55	85
Peak Only Bus	55	85
Supplemental	55	85

³ FTA Circular 4702.1B Chapter IV-19

Vehicle Headway Standards

Route frequency, also referred to as headway, describes how often a bus is scheduled to arrive at a given timepoint and is a key measure of service supply as well as a required service standard under [FTA Circular 4702.1B](#). Headway is typically expressed as the time interval in minutes between consecutive trips on a route and is a primary driver of how long riders wait between buses.

Route Frequency Standards

Route Class	Typical Frequency (Minutes)			
	Peak	Off-Peak	Saturday	Sunday
Bus Rapid Transit	15	15	15	30
Frequent	15	15	30	30
Standard	30	60	30-60	30-60
Coverage	60	60	60	60
Peak Only Bus	30	-	-	-
Supplemental	Varies	Varies	-	-

Service Availability Standards

Service span is used by Metro Transit as a measure of service availability, which is a requirement under [FTA Circular 4702.1B](#). Service span refers to the length of time a route operates in revenue service and is a key measure of service availability. In general, Metro Transit's fixed-route service operates for at least 14 hours. Some routes, such as peak-only and supplemental routes, operate a shorter span focused on peak travel periods to meet specific demand. Additionally, high-frequency services, such as BRT, operate over a longer span to accommodate off-peak travel demand.

Service Span Standard

Route Class	Service Span (Hours)
Bus Rapid Transit	18
Frequent	18
Standard	16
Coverage	14
Peak Only Bus	6
Supplemental	2

Distribution of Transit Amenities

Metro Transit locates amenities based on need, availability of equipment, and space availability at the bus stop. In general, bus stop amenities are distributed based on the average daily weekday boardings at the stop. Amenity locations overlayed with minority and low-income population distributions can be found in Appendix F.

Bus Stop Amenity Placement Guidelines

Average Daily Boardings	Appropriate amenities
Lower use stop – 0 to 15 boardings per day	Boarding pad, sign
Medium use stop – 15 to 30 boardings per day	Boarding pad, sign, bench
High use stop – 30 to 500 boardings per day	Boarding pad, sign, shelter and bench
Very high use stop – more than 500 boardings per day	Consider multiple shelters

On – Time Performance Standards

On-time performance is an indicator of transit reliability that measures how often vehicles depart their timepoints within a defined window of their scheduled time and is a required service standard under [FTA Circular 4702.1B](#). Metro Transit encourages riders to arrive at their stop up to five (5) minutes ahead of the published schedule. However, vehicles should not depart a timepoint early as riders plan their arrival time at stops based on the published schedule. Metro Transit considers a vehicle on-time if it departs a timepoint no more than one (1) minute early and no more than five (5) minutes late relative to its scheduled time.

On-Time Performance Standards

Route Category	On-Time Performance Standard
Bus Rapid Transit	85%
Frequent	80%
Standard	80%
Coverage	80%
Peak Only Bus	80%
Supplemental	80%

Service Monitoring Report

FTA Circular 4702.1B requires transit agencies to monitor the performance of their minority and non-minority routes relative to their adopted service policies and standards. The proportion of Metro Transit's service area that are minority populations is 30.12% and the proportion that is low-income populations is 19.72%. The FTA requires this monitoring report no less than once every three years as part of Metro Transit's Title VI Program update. Please refer to Appendix H for more information on data sources used in the Service Monitoring Report.

Metro Transit Low-Income and Minority Route Classifications

Route	Minority Population	Low-Income Population	Minority Route	Low-Income Route
A	27.21%	31.89%	No	Yes
B	31.13%	38.02%	Yes	Yes
C	23.93%	34.66%	No	Yes
D	29.09%	24.90%	No	Yes
E	27.58%	32.67%	No	Yes
F	26.73%	34.66%	No	Yes
G	35.90%	19.02%	Yes	No
H	45.09%	18.74%	Yes	No
J	25.15%	38.10%	No	Yes
L	29.25%	18.74%	No	No
O	29.60%	53.21%	No	Yes
P	39.47%	14.85%	Yes	No
R	26.99%	32.81%	No	Yes
S	28.67%	11.00%	No	No
W	32.45%	12.35%	Yes	No
28	25.78%	39.98%	No	Yes
38	23.96%	34.12%	No	Yes
55	30.80%	8.77%	Yes	No
60	36.01%	20.38%	Yes	Yes
61	31.67%	15.69%	Yes	No
62	35.21%	12.83%	Yes	No
63	31.23%	33.39%	Yes	Yes
64	32.23%	30.74%	Yes	Yes
65	26.94%	45.87%	No	Yes
75	30.46%	34.94%	Yes	Yes
80	26.22%	56.74%	No	Yes
81	24.89%	56.20%	No	Yes
82	24.82%	56.53%	No	Yes
84	27.16%	60.97%	No	Yes
Area Average	30.12%	19.72%	-	-

Route Frequency / Headway

The following tables reflect Metro Transit Weekday, Saturday, and Sunday typical route frequencies. Metro Transit approaches frequency monitoring by comparing the typical frequency for a route against expected minimum frequency established in Metro Transit's Service Standards. Based on this analysis, Metro Transit does not identify evidence of potential Disparate Impacts or Disproportionate Burden resulting from route frequency.

Metro Transit Weekday Route Frequencies

Route Types				Headway (Weekday)		
Route	Route Classification	Minority Route	Low-Income Route	AM Peak	Midday	PM Peak
A	Bus rapid transit	No	Yes	15	15	15
B	Frequent	Yes	Yes	15	15	15
C	Frequent	No	Yes	15	15	15
D	Frequent	No	Yes	15	15	15
E	Standard	No	Yes	30	30	30
F	Standard	No	Yes	30	30	30
G	Standard	Yes	No	30	30	30
H	Standard	Yes	No	30	30	30
J	Standard	No	Yes	30	30	30
L	Coverage	No	No	75	75	75
O	Coverage	No	Yes	60	60	60
P	Standard	Yes	No	30	30	30
R	Standard	No	Yes	30	30	30
S	Standard	No	No	60	60	60
W	Standard	Yes	No	30	30	30
28	Standard	No	Yes	30	30	30
38	Standard	No	Yes	30	30	30
55	Peak only	Yes	No	30	-	30
60	Supplemental	Yes	Yes	-	-	-
61	Supplemental	Yes	No	-	-	-
62	Supplemental	Yes	No	-	-	-
63	Supplemental	Yes	Yes	-	-	-
64	Supplemental	Yes	Yes	-	-	-
65	Peak only	No	Yes	30	-	30
75	Peak only	Yes	Yes	30	-	30
80*	Frequent	No	Yes	7	4	5
81	Peak only	No	Yes	-	-	-
82	Peak only	No	Yes	-	-	-
84*	Frequent	No	Yes	15	15	15

* Frequencies reflect UW academic year service levels.

Metro Transit Saturday Route Frequencies

Route Types				Headway (Saturday)		
Route	Route Classification	Minority Route	Low-Income Route	AM Peak	Midday	PM Peak
A	Bus rapid transit	No	Yes	15	15	15
B	Frequent	Yes	Yes	15	15	15
C	Frequent	No	Yes	30	30	30
D	Frequent	No	Yes	30	30	30
E	Standard	No	Yes	60	60	60
F	Standard	No	Yes	30	30	30
G	Standard	Yes	No	30	30	30
H	Standard	Yes	No	30	30	30
J	Standard	No	Yes	30	30	30
L	Coverage	No	No	75	75	75
O	Coverage	No	Yes	60	60	60
P	Standard	Yes	No	30	30	30
R	Standard	No	Yes	30	30	30
S	Standard	No	No	60	60	60
W	Standard	Yes	No	-	-	-
28	Standard	No	Yes	-	-	-
38	Standard	No	Yes	-	-	-
55	Peak only	Yes	No	-	-	-
60	Supplemental	Yes	Yes	-	-	-
61	Supplemental	Yes	No	-	-	-
62	Supplemental	Yes	No	-	-	-
63	Supplemental	Yes	Yes	-	-	-
64	Supplemental	Yes	Yes	-	-	-
65	Peak only	No	Yes	-	-	-
75	Peak only	Yes	Yes	-	-	-
80*	Frequent	No	Yes	45	25	25
81	Peak only	No	Yes	-	-	-
82	Peak only	No	Yes	-	-	-
84*	Frequent	No	Yes	-	-	-

* Frequencies reflect UW academic year service levels.

Metro Transit Sunday Route Frequencies

Route Types				Headway (Sunday)		
Route	Route Classification	Minority Route	Low-Income Route	AM Peak	Midday	PM Peak
A	Bus rapid transit	No	Yes	30	30	30
B	Frequent	Yes	Yes	30	30	30
C	Frequent	No	Yes	30	30	30
D	Frequent	No	Yes	30	30	30
E	Standard	No	Yes	30	30	30
F	Standard	No	Yes	30	30	30
G	Standard	Yes	No	30	30	30
H	Standard	Yes	No	30	30	30
J	Standard	No	Yes	30	30	30
L	Coverage	No	No	75	75	75
O	Coverage	No	Yes	60	60	60
P	Standard	Yes	No	30	30	30
R	Standard	No	Yes	30	30	30
S	Standard	No	No	60	60	60
W	Standard	Yes	No	-	-	-
28	Standard	No	Yes	-	-	-
38	Standard	No	Yes	-	-	-
55	Peak only	Yes	No	-	-	-
60	Supplemental	Yes	Yes	-	-	-
61	Supplemental	Yes	No	-	-	-
62	Supplemental	Yes	No	-	-	-
63	Supplemental	Yes	Yes	-	-	-
64	Supplemental	Yes	Yes	-	-	-
65	Peak only	No	Yes	-	-	-
75	Peak only	Yes	Yes	-	-	-
80	Frequent	No	Yes	45	25	25
81	Peak only	No	Yes	-	-	-
82	Peak only	No	Yes	-	-	-
84	Frequent	No	Yes	-	-	-

* Frequencies reflect UW academic year service levels.

Vehicle Load

Metro Transit monitors vehicle load for each route mode and classification in accordance with its service standards. This analysis identifies the percentage of trips that were overloaded for each route category. Per Metro Transit's Disparate Impact and Disproportionate Burden policies, if the difference between minority / non-minority or low-income / non-low-income populations is greater than 15 percentage points, then there is evidence of a potential Disparate Impact or Disproportionate Burden.

The results of this analysis show a potential Disproportionate Burden in Metro Transit's supplemental service route category. In accordance with FTA Circular 4702.1B, Metro Transit will take steps to avoid, minimize, or mitigate the potential Disproportionate Burden. The results of these mitigation steps will be included in Metro Transit's 2029 Title VI Program update (covering report years 2026 – 2028 inclusive).

Vehicle Load Monitoring: Minority Populations

Route Classification	Minority	Non-Minority	Disparate Impact
Bus rapid transit			NA
Max load Trips	NA	50	
Total trips	NA	9,298	
Percent of Max Load Trips	NA	0.54%	
Coverage			NA
Max load Trips	NA	0	
Total trips	NA	6,249	
Percent of Max Load Trips	NA	-	
Frequent			None
Max load Trips	0	961	
Total trips	9,939	21,679	
Percent of Max Load Trips	0.00%	4.43%	
Peak only			None
Max load Trips	86	45	
Total trips	3,320	2,549	
Percent of Max Load Trips	2.6%	1.8%	
Standard			None
Max load Trips	1	724	
Total trips	13,045	24,608	
Percent of Max Load Trips	0.01%	2.94%	
Supplemental			NA
Max load Trips	367	NA	
Total trips	3,090	NA	
Percent of Max Load Trips	11.88%	NA	

Vehicle Load Monitoring: Low-Income Populations

Route Classification	Low-Income	Non-Low-Income	Disproportionate Burden
Bus rapid transit			NA
Max load Trips	50	NA	
Total trips	9,298	NA	
Percent of Max Load Trips	0.54%	NA	
Coverage			None
Max load Trips	0	0	
Total trips	3,855	2,394	
Percent of Max Load Trips	0.00%	0.00%	
Frequent			NA
Max load Trips	961	NA	
Total trips	31,618	NA	
Percent of Max Load Trips	3.04%	NA	
Peak only			None
Max load Trips	126	5	
Total trips	4,499	1,370	
Percent of Max Load Trips	2.80%	0.36%	
Standard			None
Max load Trips	724	0	
Total trips	24,608	13,045	
Percent of Max Load Trips	2.94%	0.00%	
Supplemental			Yes
Max load Trips	335	32	
Total trips	1,369	1,721	
Percent of Max Load Trips	24.47%	1.86%	

On-Time Performance Monitoring

Metro Transit monitors on-time performance for each route mode and classification in accordance with its service standards. Per Metro Transit's Disparate Impact and Disproportionate Burden policies, if the difference between minority / non-minority or low-income / non-low-income populations is greater than 15 percentage points, then there is evidence of a potential Disparate Impact or Disproportionate Burden. Based on the analysis below, Metro Transit has not identified evidence of a potential Disparate Impact or Disproportionate Burden.

On-Time Performance Monitoring: Minority Populations

Route Classification	Minority	Non-Minority	Disparate Impact
Bus rapid transit	NA	69%	NA
Coverage	NA	73%	NA
Frequent	70%	70%	None
Peak only	75%	62%	None
Standard	79%	71%	None
Supplemental	68%	NA	NA

On-Time Performance Monitoring: Low-Income Populations

Route Classification	Low-Income	Non-Low-Income	Disproportionate Burden
Bus rapid transit	NA	69%	NA
Coverage	73%	73%	None
Frequent	70%	NA	NA
Peak only	65%	76%	None
Standard	71%	79%	None
Supplemental	66%	71%	None

Service Span / Service Availability Monitoring

Metro Transit monitors service availability using its service span standard for each route mode and classification. Per Metro Transit's Disparate Impact and Disproportionate Burden policies, if the difference between minority / non-minority or low-income / non-low-income populations is greater than 15 percentage points, then there is evidence of a potential Disparate Impact or Disproportionate Burden. Based on the analysis below, Metro Transit has not identified evidence of a potential Disparate Impact or Disproportionate Burden.

Service Span / Service Availability: Minority Populations

Route Classification	Weekday	Saturday	Sunday	Disparate Impact
Bus rapid transit	NA	NA	NA	NA
Minority	NA	NA	NA	
Non-Minority	19:51	18:33	18:28	
Coverage	NA	NA	NA	NA
Minority	NA	NA	NA	
Non-Minority	18:07	16:31	16:31	
Frequent	10.5%	32.3%	35.6%	None
Minority	19:19	18:26	18:26	
Non-Minority	17:28	13:56	13:35	
Peak only	-12.0%	NA	NA	None/NA
Minority	6:29	NA	NA	
Non-Minority	7:22	5:37	4:57	
Standard	4.3%	15.4%	15.4%	None
Minority	17:01	13:30	13:23	
Non-Minority	16:19	11:42	11:36	
Supplemental	NA	NA	NA	NA
Minority	NA	NA	NA	
Non-Minority	NA	NA	NA	

Service Span / Service Availability Monitoring: Low-Income Populations

Route Classification	Weekday	Saturday	Sunday	Disproportionate Burden
Bus rapid transit	NA	NA	NA	NA
Low-Income	19:51	18:33	18:28	
Non-Low-Income	NA	NA	NA	
Coverage	13.2%	8.2%	8.2%	None
Low-Income	19:15	17:10	17:10	
Non-Low-Income	17:00	15:52	15:52	
Frequent	NA	NA	NA	NA
Low-Income	17:50	18:32	18:12	
Non-Low-Income	NA	NA	NA	
Peak only	40.1%	NA	NA	None/NA
Low-Income	7:27	8:26	7:26	
Non-Low-Income	5:19	NA	NA	
Standard	1.5%	-0.1%	-0.4%	None
Low-Income	16:41	16:58	16:49	
Non-Low-Income	16:26	17:00	16:53	
Supplemental	NA	NA	NA	NA
Low-Income	NA	NA	NA	
Non-Low-Income	NA	NA	NA	

Transit Amenity Monitoring

In accordance with FTA Circular 4702.1B, Metro Transit provides demographic maps showing the geographic distribution of minority and low-income populations in the Metro Transit service area. The location of transit amenities, such as shelters and benches, have been overlaid with these maps. Please see Appendix F for more information.

Service and Fare Equity Analysis Results

Over the course of this reporting period (2023 – 2025), Metro Transit has conducted both a Service Equity Analysis for Major Service Changes and a Fare Equity Analysis for updates to its fare tariff. Neither analysis resulted in evidence of a potential Disparate Impact or Disproportionate Burden. The results of both analyses are included in Appendix G.

Results of Transit Related Surveys

In collaboration with the Greater Madison Metropolitan Planning Organization, Metro Transit completed an on-board survey in 2024. The full survey results are included in Appendix I.

Appendix A – Title VI Notice to the Public

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BRT Bus Front/Driver

1. Notice Driver Assault Sign
2. Civil Rights Sign

Notice

Assaulting a transit driver is a felony that can result in prison time, a fine, and give you a criminal record.

 metro transit

Civil Rights & Title VI

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 under any program or activity. To learn more or submit a complaint, contact:

Metro Transit
(608) 266-4466
mymetrobus@cityofmadison.com

Department of Civil Rights
(608) 266-4910
dcr@cityofmadison.com

 metro transit

Título VI de la Ley de Derechos Civiles
Ninguna persona será excluida de su participación por motivos de raza, color o nacionalidad, no se le negarán beneficios, y no será sujeta a ninguna forma de discriminación en ningún programa o actividad. Para obtener más información o para presentar una demanda, comuníquese con:

Metro Transit
(608) 266-4466
mymetrobus@cityofmadison.com
Departamento de Derechos Civiles
(608) 266-4910
dcr@cityofmadison.com

Pøj Xeem Cov Cai thiab Nqe Cai VI
Tsis puib muaj kev cai toog hauv neeg, cov nqaj daim tawv, los sis lub tub xhaws yug twg hauv kev koam meev rau hauv yuav tsis raug tois kam lees txais rau cov tsuj ntug ntawm, los sis kam paim kev ntawd ntawg hauv cov khooj hauv los sis las qe ruam. Yog xav koam paub ntawv los sis xa lus tsis txaus siab, thov tiv tawj.

民權法案(第六卷)
任何人士不得因種族、膚色或原籍而受到排除在參與任何項目或活動之外、不得被剝奪其從中可獲的權利、或以其他方式受到歧視。如需了解更多信息或提出投訴，請聯系：

公共交通局 (Metro Transit)
(608) 266-4466
mymetrobus@cityofmadison.com
民權部
(608) 266-4910
dcr@cityofmadison.com



Appendix B – Title VI Complaint Form

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Title VI Complaint Form

The City of Madison and Metro Transit assure that no person shall on the grounds of race, color, or national origin, as provided by Title VI of the Civil Rights Act of 1964, and the Civil Rights Restoration Act of 1987 (P.L. 100-259) be excluded from participation in, be denied the benefits of, or be otherwise subjected to discrimination under any program or activity.

Furthermore, Madison General Ordinance (M.G.O.) Sec. 39.02(8) mandates the execution of this operational requirement. The City of Madison and Metro Transit further assure every effort will be made to ensure nondiscrimination in all of its federally funded program activities.

Any person(s) or organization(s) believing they have been a victim of discrimination based on race, color, or national origin may file a complaint with Metro Transit or with the City of Madison Department of Civil Rights.

COMPLAINTS CAN BE FILED BY CALLING:

Metro's customer service center at (608) 266-4466 or the City of Madison Department of Civil Rights at (608) 266-4910.

COMPLAINTS CAN BE EMAILED:

Please email Metro Transit at mymetrobus@cityofmadison.com or the City of Madison Department of Civil Rights at dcr@cityofmadison.com.

YOU CAN ALSO COMPLETE THE COMPLAINT FORM BELOW. MAIL COMPLETED FORMS TO:

Metro Transit, Attn: Title VI Complaint, 1245 E. Washington Ave., Madison, WI 53703.

Your Name: _____

Home Phone: _____ Cell Phone: _____

Street Address: _____

City: _____ State: _____ Zip Code: _____

Date of Incident: _____

Person(s) discriminated against (if other than complainant). List all names: _____

Which of the following best describes the reason the alleged discrimination took place? Please check your answer:

- ☐ Race
- ☐ Color
- ☐ National Origin (Limited English Proficiency)

Metro Transit

Madison, Wisconsin

Please describe the alleged discrimination incident. Provide the names and title of all Metro Transit employees involved if available. Explain what happened and whom you believe was responsible. Please use the back of this form if additional space is required.

This image shows a single sheet of white paper with horizontal blue or grey ruling lines. The lines are evenly spaced and run across the width of the page. There are approximately 20 lines visible. The paper has a slight shadow on the right side, suggesting it's resting on a surface.

Have you filed a complaint with any other federal, state, or local agencies? ☐ Yes ☐ No

If so, list agency/agencies and contact information below:

Contact Name: _____

Contact Name: _____

Agency: _____

Agency: _____

Street Address:

Street Address:

City, Zip, State: _____

City, Zip, State: _____

Phone:

Phone:

I affirm that I have read the above charge and that is true to the best of my knowledge, information & belief.

Signature: _____

Date: _____

Print or Type Name of Complainant: _____

Office Use Only:

Date Received:	Received By:
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Appendix C – Title VI Complaint Procedures

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Customer Feedback Definitions/ Process

Customer Service Unit

January 2025

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All customer feedback funnels through the Metro Customer Service unit.

- Metro Customer Service Manager is ultimately responsible for all feedback and complaints, with Customer Service Supervisor providing assistance and initial review
 - CS supervisor completes initial review of all feedback collected through feedback database and Clever feedback. Supervisor ensures accurate categorization and flags all high priority feedback, including ADA and Title VI complaints/ incidences.
 - CS manager assigns feedback work to outside applicable departments and/or individuals.
- Complaints/ incidences are handled on a hierarchical system, rather than a sequential first come, first serve basis ensuring that serious or more imminent feedback will be answered more swiftly.

Serious feedback includes:

- Life, Safety or Welfare
 - Incidences occurring in real-time
 - Title VI, ADA, or harassment (APM 3-5)
 - High profile concerns
-

Handling Prioritized Feedback/ Incidences

1. Life, Safety or Welfare
 - a. Incidences or complaints that impact the life, safety or wellbeing of our passengers, staff and the community as a whole (lost persons, fighting, report of weapons, etc.)
 - b. Complaint or incident is reported to Metro CS staff
 - c. CS staff instructed to alert CS supervisor and/or manager.
 - d. Operations Dispatch, Safety Coordinator and other applicable impacted staff are notified in real-time.
 - e. If call is made, email to follow for documentation, mass communication and debrief with executive team as needed.
 - f. In cases of operation incidences, Dispatch/ Ops Management handles all remaining follow through, including video, service disruptions decisions, etc.
2. Non-threatening incidences occurring in real-time
 - a. Non-threatening incidences or complaints occurring in real-time (lost items, in-person requests, behavioral deescalations, etc.)

- b. Operations Dispatch and other applicable staff are notified in real-time.
 - c. CS staff email or call Operations Dispatch and/or other applicable impacted staff in real-time.
 - d. CS staff directed to notified CS supervisor and/or manager if real-time solution cannot be completed.
- 3. Title VI, ADA or harassment (APM 3-5)
 - a. Incidences or complaints that potentially or allegedly violates Metro's [Title VI policy](#), [ADA rules & regulations](#) or City of Madison [APM 3-5](#) policy.
 - b. CS staff process feedback through our database.
 - c. In daily reviews, CS supervisor and/or manager reviews feedback for key indicators including but not limited to:
 - i. [Protected classes](#)
 - ii. Disparate treatment/ impacts
 - iii. Harrassment / Slurs
 - iv. Retaliation
 - d. CS Manager assesses feedback and puts situation under investigation – consults with Operations Dispatch/ Management for video and service review (60 days or less).
 - e. CS supervisor/manager acknowledges receipt of feedback with the complainant.
 - f. Depending on severity, consultation can occur with outside agencies – City Attorney's Office, Department of Civil Rights, Human Resources, etc.
- 4. High profile concerns
 - a. Incidences or complaint that potentially could garner high attention (accident, blocked traffic, aldermanic/ mayoral complaint, etc.)
 - b. CS staff process feedback through database
 - c. In daily reviews CS supervisor and/or manager reviews feedback, and alerts necessary staff in real-time.
 - d. If call is made, email to follow for documentation, targeted communciation and debrief with executive team as needed.
 - e. CS Manager and/or executive team to complete review.

Appendix D – Title VI Complaints, Investigations, and Lawsuits

	Date	Summary	Status	Actions Taken
Investigations				
N/A				
Complaints				
	8/4/24	FTA complaint claiming inaccuracies with equity analysis for route redesign and BRT system	Believed closed	Submitted response to FTA
	11/6/23	Complaint submitted to FTA alleging discrimination based on disability and race due to roll out of route redesign and BRT system	Believed closed	Submitted response to FTA
	7/16/25	Passenger claimed driver was rude to person of color	Closed	Video reviewed. Determined driver didn't interact with person of color
	7/4/25	Passenger claimed driver racially profiling when requesting fare	Closed	Video reviewed and didn't support claim. Response sent to customer.
	11/30/22	A number of Title VI complaints were presented as part of a public hearing to authorize a 2023 route redesign and 2024 BRT launch. Folder of complaints attached in submission	Closed	Oversight transportation commission and City council were presented with complaints/concerns and authorized Metro to move

				forward with service redesign.
	7/2/25	Operator failing to yield to pedestrians due to race	Unfounded	
	8/5/24	Operator passed up passenger due to disability	Unfounded	Operator took wrong turn before passenger's bus stop
	2/28/24	Operator mistreats a passengers due to race	Unfounded	Operator and passenger in a heated exchange after a video confirmed miscommunication. Operator received coaching.
	9/12/23	Operator yelled at passenger due to race	Situation Founded	
	9/3/23	Operator singles out passengers due to race	Unfounded	
	7/16/23	Operator refused ramp due to disability	Unfounded	
	2/16/23	Operator yelled at passenger due to race	Situation Founded	
	3/13/2025	Probationary employee alleges employment discrimination based on race, age, disability and retaliation.	No probable cause finding	Wisconsin ERD case dismissed; employee has not requested a review by the EEOC as of 6/8/26.
Lawsuits				
	2023	State of WI ERD/ DWD complaint discrimination based on a disability for	Case Dismissed	

		unequal enjoyment of a public accommodation filed by a customer		
	2025	City MEOD, State of WI ERD/ DWD complaint discrimination based on homelessness and age/ disability for unequal treatment filed by customer	Case Pending	
	11/5/2024	Wisconsin small claims complaint alleging race discrimination filed by bus rider who complained that the Metro G Route does not travel south as long as the Metro Route A travels east and west.	Cased dismissed on the merits after a hearing.	24-SC-07424

Appendix E – Subrecipient Template

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City of Madison Title VI Requirement and Template



The City of Madison is committed to providing compliance with Title VI of the Civil Rights Act of 1964; 49 CFR, part 21; and related statutes and regulations so that, no person in the state of Wisconsin shall, on the ground of race, color, national origin, sex, age, disability, low-income or limited English proficiency (LEP) be excluded from participation in, be denied the benefits of, or be otherwise subjected to discrimination under any program or activity of the Department. The Title VI Program is required under federal provisions to have an approved Title VI/Nondiscrimination Plan and Assurances.

REQUIREMENT TO PREPARE AND SUBMIT A TITLE VI PROGRAM

Title 49 CFR Section 21.9(b) requires recipients to “keep such records and submit to the Secretary timely, complete, and accurate compliance reports at such times, and in such form and containing such information, as the Secretary may determine to be necessary to enable him to ascertain whether the recipient has complied or is complying with this [rule].” FTA requires that all direct and primary recipients document their compliance with DOT’s Title VI regulations by submitting a Title VI Program to their FTA regional civil rights officer once every three years or as otherwise directed by FTA. For all recipients (including subrecipients), the Title VI Program must be approved by the recipient’s board of directors or appropriate governing entity or official(s) responsible for policy decisions prior to submission to FTA. For State DOTs, the appropriate governing entity is the State’s Secretary of Transportation or equivalent. Recipients shall submit a copy of the board resolution, meeting minutes, or similar documentation with the Title VI Program as evidence that the board of directors or appropriate governing entity or official(s) has approved the Title VI Program. FTA will review and concur or request the recipient provide additional information.

Subrecipients shall submit Title VI Programs to the primary recipient from whom they receive funding in order to assist the primary recipient in its compliance efforts. Such Programs may be submitted and stored electronically at the option of the primary recipient. Subrecipients may choose to adopt the primary recipient’s notice to beneficiaries, complaint procedures and complaint form, public participation plan, and language assistance plan where appropriate. Operational differences between the primary recipient and subrecipient may require, in some instances, that the subrecipient tailor its language assistance plan. Subrecipients shall develop and submit to the primary recipient a list of complaints, investigations, or lawsuits. Subrecipients that have transit-related non-elected planning boards, advisory councils, or committees, the membership of which is selected by the subrecipient, must provide a table depicting the racial breakdown of the membership of those committees, and a description of efforts made to encourage the participation of minorities on such committees. Subrecipients must submit all the above information to the primary recipient on a schedule requested by the primary recipient. Collection and storage of subrecipient Title VI Programs may be electronic at the option of the primary recipient.

Requirements (Chapter III, found in this circular:

www.transit.dot.gov/sites/fta.dot.gov/files/docs/FTA_Title_VI_FINAL.pdf)

A template for subrecipients is provided on the next page and can be found on the WisDot page wisconsin.dot.gov/Pages/doing-bus/local-gov/astnce-pgms/transit/compliance/title6.aspx

Title VI Plan

City Of USA/Organization Name/Organization Name

POLICY STATEMENT

The **City Of USA/Organization Name/Organization Name** as a recipient of Federal Transit Administration (FTA) grant dollars either directly from FTA or through the City of Madison will comply with the Title VI of the Civil Rights Act of 1964 (42 U.S.C. 2000d) and the U.S. Department of Transportation implementing regulations.

TITLE VI PLAN ELEMENTS

The **City Of USA/Organization Name's** Title VI plan includes the following elements:

- 1. EVIDENCE OF POLICY APPROVAL**
- 2. LOG OF POLICY UPDATES**
- 3. CONTACT INFORMATION/PROGRAM ADMINISTRATION**
- 4. NOTICE TO THE PUBLIC**
- 5. COMPLAINT PROCEDURE**
- 6. COMPLAINT FORM**
- 7. LIST OF TRANSIT RELATED TITLE VI INVESTIGATIONS, COMPLAINTS AND LAWSUITS**
- 8. PUBLIC PARTICIPATION PLAN**
- 9. LANGUAGE ASSISTANCE PLAN**
- 10. MINORITY REPRESENTATION TABLE AND DESCRIPTION**
- 11. ADDITIONAL ITEMS, IF REQUIRED:**
 - FACILITY LOCATION EQUITY ANALYSIS (IF CONSTRUCTING A FACILITY)**
 - FIXED ROUTE SERVICE STANDARDS (IF A FIXED-ROUTE PROVIDER)**
 - MPO DEMOGRAPHIC DATA, ANALYSIS AND PROCEDURES (IF AN MPO)**

1. EVIDENCE OF POLICY APPROVAL

Revised on: _____

Adopted by: _____

Adopted on: _____

This policy is hereby adopted and signed by:

CITY OF USA/ORGANIZATION NAME

Executive Name/Title: _____

Executive Signature: _____

2. LOG OF POLICY UPDATES

The **City Of USA/Organization Name** will review its policy on an annual basis to determine if modifications are necessary.

The **City Of USA/Organization Name** will use the table below to record reviews/revisions made to the plan.

As applicable, **City Of USA/Organization Name** will discuss Title VI plan requirements with its third-party transit providers on an annual basis to ensure compliance with Title VI plan requirements.

Policy Updates – Activity Log

Date	Activity (Review/Update/Addendum/ Adoption/Distribution)	Person Responsible	Remarks

3. CONTACT INFORMATION/PROGRAM ADMINISTRATION

CHIEF EXECUTIVE

The **City Of USA/Organization Name's** Chief Executive will ensure compliance with Title VI of the Civil Rights Act of 1964 (42 U.S.C. 2000d) and the U.S. Department of Transportation implementing regulations.

Name: _____
Email: _____
Phone: _____

TRANSPORTATION MANAGER

The **City Of USA/Organization Name's** Transportation Manager will ensure implementation of the **City Of USA/Organization Name's** federally funded transportation program. The Transportation Manager has other duties and responsibilities in addition to Title VI. This position has a direct reporting relationship and access to **City Of USA/Organization Name's** Chief Executive.

Name: _____
Email: _____
Phone: _____

CIVIL RIGHTS COORDINATOR

The **City Of USA/Organization Name's** Civil Rights Coordinator ensures Title VI compliance in accordance with the **City Of USA/Organization Name's** federally funded transportation program. The Civil Rights Coordinator has other duties and responsibilities in addition to Title VI. This position has a direct reporting relationship and access to the **City Of USA/Organization Name's** Chief Executive.

Name: _____
Email: _____
Phone: _____

The Civil Rights Coordinator is responsible for initiating, monitoring, and ensuring compliance of the **City Of USA/Organization Name's** Title VI requirements, including the following activities:

- Program Administration
 - Ensure compliance with federal Title VI requirements
 - Develop and implement the **City Of USA/Organization Name's** Title VI Plan
 - Update and maintain Title VI program policies and procedures
- Complaints
 - Review, track, investigate and close Title VI complaints
- Employee Training
 - Educate staff on Title VI issues and regulations
- Reporting
 - Prepare and submit Title reports per state and federal regulations
- Public Dissemination
 - Notify the public of the **City Of USA/Organization Name's** Title VI program requirements via the **City Of USA/Organization Name's** public area, on its website, in vehicles, etc.
- Oversight
 - Ensure contractors and lessees adhere to Title VI requirements

4. NOTICE TO THE PUBLIC¹

The **City Of USA/Organization Name's** Notice to the Public is as follows:

Notifying the Public of Rights Under Title VI CITY OF USA/ORGANIZATION NAME • The City Of USA/Organization Name operates its programs and services without regard to race, color, and national origin in accordance with Title VI of the Civil Rights Act. Any person who believes she or he has been aggrieved by any unlawful discriminatory practice under Title VI may file a complaint with the City Of USA/Organization Name. • For more information on the City Of USA/Organization Name's civil rights program, and the procedures to file a complaint, contact _____, (for hearing impaired, please use Wisconsin Relay 711 service); email _____; or visit our administrative office at _____. For more information, visit _____. • A complainant may file a complaint directly with the Federal Transit Administration by filing a complaint with the Office of Civil Rights, Attention: Title VI Program Coordinator, East Building, 5th Floor-TCR, 1200 New Jersey Ave., SE Washington, DC, 20590. • If information is needed in another language, contact _____. Si se necesita informacion en otro idioma de contacto, _____. Yog muaj lus qhia ntxiv rau lwm hom lus, hu rau _____.
--

The **City Of USA/Organization Name's** Notice to the Public is posted in the following locations: (check all that apply)

- ☐ Agency Website: _____
- ☐ Public areas of the agency office (common area, public meeting rooms, etc.)
- ☐ Public areas of the agency office (common area, public meeting rooms, etc.)
- ☐ Inside vehicles
- ☐ Rider Guides/Schedules
- ☐ Transit shelters and stations
- ☐ Other: _____

¹ Title VI regulations require informing customers and the public of their rights under Title VI regulations by posting a Title VI public notice. The Title VI notice must include:

- A statement that the agency operates programs without regard to race, color or national origin.
- Information on how to request additional information about the agency's Title VI obligations, including information on how to file a complaint, the location of the complaint form, etc.
- Information on how to request Title VI information in another language, if required.

The Public Notice should be posted in the following locations: website, public areas of the agencies office, inside vehicles, rider guides/schedules and transit shelters/facilities.

5. COMPLAINT PROCEDURE

The **City Of USA/Organization Name's** Complaint Procedure is made available in the following locations: *(check all that apply)*

- ☐ Agency website, either as a reference in the Notice to Public or in its entirety
- ☐ Public areas of the agency office (common area, public meeting rooms, etc.)
- ☐ Available in appropriate languages for LEP populations, meeting the Safe Harbor Threshold.
- ☐ Other: _____

Complaint Procedure Language:

Any person who believes they've been discriminated against on the basis of race, color, or national origin, religion, gender, disability or age by the **City Of USA/Organization Name** may file a complaint by completing and submitting the agency's Complaint Form.

The Complaint Form may also be used to submit general complaints to the **City Of USA/Organization Name**.

The **City Of USA/Organization Name** investigates complaints received no more than 180 business days after the alleged incident. The **City Of USA/Organization Name** will process complaints that are complete.

Once the complaint is received, the **City Of USA/Organization Name** will review it to determine if it has jurisdiction. The complainant will receive an acknowledgement letter stating whether the complaint will be investigated by the **City Of USA/Organization Name**.

The **City Of USA/Organization Name** has _____ business days to investigate the complaint. If more information is needed to resolve the case, the **City Of USA/Organization Name** may contact the complainant.

The complainant has _____ business days from the date of the letter to send requested information to the investigator assigned to the case.

If the investigator is not contacted by the complainant or does not receive the additional information within _____ business days, the **City Of USA/Organization Name** can administratively close the case. A case can be administratively closed also if the complainant no longer wishes to pursue their case.

After the investigator reviews the complaint, one of two (2) letters will be issued to the complainant: a closure letter or a letter of finding (LOF).

- A **closure letter** summarizes the allegations and states that there was not a Title VI violation and that the case will be closed.
- A **letter of finding (LOF)** summarizes the allegations and the interviews regarding the alleged incident, and explains whether any disciplinary action, additional training of the staff member, or other action will occur.

If the complainant wishes to appeal the decision, the complainant has _____ business days after the date of the letter or the LOF to do so.

A person may also file a complaint directly with the Federal Transit Administration, at FTA Office of Civil Rights, 1200 New Jersey Avenue SE, Washington, DC 20590.

If information is needed in another language, then contact _____ .
Si se necesita informacion en otro idioma de contacto _____ .
Yog muaj lus qhia ntxiv rau lwm hom lus, hu rau _____ .

6. COMPLAINT FORM

City Of USA/Organization Name - Complaint/Comment Form

City Of USA/Organization Name is committed to providing you with safe and reliable transportation services and we want your feedback. Please use this form for suggestions, compliments, and complaints.

Please submit this form electronically at _____ or in person at the address below.

City Of USA/Organization Name: _____

Street Address: _____

City, State, Zip: _____

Email: _____

You may also call us at xxx-xxx-xxxx. Please make sure to provide your contact information in order to receive a response.

SECTION I: TYPE OF COMMENT (Choose One) – provide detail in ‘Comment Details’ below

☐ Compliment ☐ Suggestion ☐ Complaint Other: _____

Title VI:	☐ Race	☐ Color	☐ National Origin
ADA/(Disability):	☐ Yes	☐ No	
Service:	☐ Yes	☐ No	
Other:	☐ Gender	☐ Religion	☐ Age ☐ Limited English Proficient

SECTION II: CONTACT INFORMATION

Name: _____

Rider ID (if applicable): _____

Street Address: _____

City, State, Zip: _____

Phone: _____

Email: _____

Accessible Format Requirements: (choose preferred format(s))

☐ Large Print ☐ TDD/Relay ☐ Audio Recording ☐ Other _____

Are you filing this complaint on your own behalf?

☐ Yes ☐ No

If you answered “yes” to this question, go to Section IV.

If not, please provide the name and relationship of the person for whom you are complaining:

Please explain why you have filed for a third party:

Please confirm that you have obtained the permission of the aggrieved party if you are filing on behalf of a third party.

☐ Yes ☐ No

SECTION III: COMMENT DETAILS

Transit Service:
(Choose one, as applicable)

☐ Bus☐ Paratransit☐ Shared-Ride Taxi

Date of Occurrence:

Time of Occurrence:

Name/ID of Employee(s) or
Others Involved:

Vehicle ID/Route Name or
Number:

Direction of Travel:

Location of Incident:

Mobility Aid Used (if any):

If above information is
unknown, please provide
other descriptive
information to help identify
the employee:

Description of Incident:

As applicable, explain as clearly as
possible what happened and why
you believe you were
discriminated against. If more
space is needed, please add
additional pages.

SECTION IV: FOLLOW-UP

May we contact you if we need more details or information?

☐ Yes☐ No

What is the best way to reach you? (choose one)

☐ Phone☐ Email☐ Mail

If a **phone call** is preferred, what is the best day and time to reach you? _____

SECTION V: DESIRED OUTCOME

What steps have you taken to address the conflict or problem? _____

What type of corrective actions took place? _____

What remedy are you seeking? _____

SECTION VI: ADDITIONAL INFORMATION

Have you previously filed a complaint with this agency?

☐ Yes☐ No

Have you filed this complaint with any other Federal, State or Local agency,
or with any Federal or State Court?

☐ Yes☐ No

If yes, to the question above, list all agencies contacted: _____

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

Name: _____

Agency: _____

Address: _____

Phone: _____

Email: _____

Please attach any documents you have which support the allegation. Then date and sign this form and send it to
the **City Of USA/Organization Name:**

Complainant Signature

Date

Print Your Name

7. LIST OF TRANSIT RELATED TITLE VI INVESTIGATIONS, COMPLAINTS AND LAWSUITS²

The **City Of USA/Organization Name** maintains a list or log of all investigations, complaints and lawsuits, pertaining to its transit-related activities.

Check One:

- ☐ There have been **no** investigations, complaint and/or lawsuits filed against us during the report period.
- ☐ There have been investigations, complaints and/or lawsuits filed against us. *See list below. Attach additional information as needed.*

	Date (Month, Day, Year)	Complainant's Name/Address	Basis of Complaint³	Summary Complaint Description	Status	Action(s) Taken
Investigations						
Complaints						
Lawsuits						

² **Lawsuit:** The protected classes under Title VI are Race, Color and Nation Origin.

³ **Basis of Complaint:** Specify Race, Color, National Origin, Religion, Gender, Disability, Age, Other

8. PUBLIC PARTICIPATION PLAN

STRATEGIES AND DESIRED OUTCOMES

To promote inclusive public participation, the **City Of USA/Organization Name** will employ the following strategies, as appropriate:

- Provide for early, frequent and continuous engagement by the public.
- Select accessible and varied meeting locations and times
- Employ different meeting sizes and formats
- Provide childcare and food during meetings, if possible.
- Use social media in addition to other resources as a way to gain public involvement
- Use radio, television or newspaper ads on stations and in publications that serve LEP populations. Outreach to LEP populations may also include audio programming available on podcasts.
- Expand traditional outreach methods by visiting ethnic stores/markets and restaurants, community centers, libraries, faith-based institutions, local festivals, etc.

PUBLIC OUTREACH ACTIVITIES

The **City Of USA/Organization Name** maintains a log/record of the various types of outreach activities it uses to promote inclusive public participation. On an annual basis, the **City Of USA/Organization Name** reviews its log of outreach activities to determine if additional or different strategies are needed to promote inclusive public participation.

The direct public outreach and involvement activities conducted by the **City Of USA/Organization Name** are summarized in the table below. *Efforts include meetings, surveys, focus groups, attendance at community events, etc.*

Information collected on the size, location, meeting format, number of attendees, etc. as well as the scope of the distribution method (i.e., posters were placed in all shopping centers in the affected area) will be used for future planning efforts. Examples of additional supporting materials include copies of meeting announcements, agendas, posters, attendee list, etc.

Event Date	City Of USA/Organization Name Staffer(s)	Event	Date Publicized and Communication Method (Public Notice, Posters, Social Media)	Outreach Method (Meeting, Focus Group, Survey, etc.)	Notes

9. LANGUAGE ASSISTANCE PLAN

PLAN COMPONENTS

As a recipient of federal US DOT funding, the **City Of USA/Organization Name** is required to take reasonable steps to ensure meaningful access to our programs and activities by limited-English proficient (LEP) persons.

Limited English Proficient (LEP) refers to persons for whom English is not their primary language and who have a limited ability to read, write, speak or understand English. This includes those who have reported to the U.S. Census that they speak English less than very well, not well, or not at all.

The **City Of USA/Organization Name's** Language Assistance Plan includes the following elements:

1. The results of the *Four Factor Analysis*, including a description of the LEP population(s), served.
2. A description of how language assistance services are provided by language
3. A description of how LEP persons are informed of the availability of language assistance service
4. A description of how the language assistance plan is monitored and updated
5. A description of how employees are trained to provide language assistance to LEP persons
6. Additional information deemed necessary

METHODOLOGY

To determine if an individual is entitled to language assistance and what specific services are appropriate, the **City Of USA/Organization Name** has conducted a Four Factor Analysis⁴ of the following areas: 1) Demography, 2) Frequency, 3) Importance and 4) Resources and Costs.

LEP Four Factor Analysis

Factor 1: Demography: Identifies the number or proportion of LEP persons served and the languages spoken in the service area.

The first factor of the *Four Factor Analysis* is the basis of the Language Assistance Plan. It requires the **City Of USA/Organization Name** to review its US Census data to determine if it meets the *LEP Safe Harbor Threshold*.

US Census and American Community Survey (ACS) Data⁵

The **City Of USA/Organization Name** did the following:

1. Inserted a copy of the _____ county LEP data in the Title VI plan. This data was found at the WisDOT website www.dot.wisconsin.gov/localgov/docs/title6-lep.pdf or the US Census Bureau American Fact Finder website <http://factfinder.census.gov/faces/nav/jsf/pages/index.xhtml>
2. Analyzed the LEP demographic data for the **City Of USA/Organization Name's** program and/or service area by calculating the *Safe Harbor Threshold* for two to three of the largest language groups identified other than English.
 - a. The *Safe Harbor Threshold* is calculated by dividing the population estimate for a language group that "Speaks English less than very well" by the total population of the county.
 - i. The *LEP Safe Harbor Threshold* provision stipulates that for each LEP group that meets the LEP language threshold (5% or 1,000 individuals, whichever is less, of the population to be served) the **City Of USA/Organization Name** must provide translation of vital documents in written format for the non-English users.
 - ii. Examples of written translation of vital documents include the Title VI policy statement and/or Notice to the Public (Appendix 2), Title VI Complaint

⁴ DOT LEP guidance <https://www.transportation.gov/civil-rights/civil-rights-awareness-enforcement/dots-lep-guidance>

⁵ The ACS publishes data in many forms on the Census Bureau American Fact Finder website <http://factfinder2.census.gov/faces/nav/jsf/pages/searchresults.xhtml>

Procedure (Appendix 3), Title VI Complaint Form (Appendix 4), and ADA paratransit eligibility forms.

3. Explained the results of the analysis of the county LEP data in the demographic section of the *Four Factor Analysis*.

Factor 2: Frequency: Identifies the frequency staff (and transit provider/lessee, if applicable) comes into contact with LEP persons.

LEP persons are persons identified as speaking English less than very well, not well or not at all. Just because a person speaks a language other than English doesn't mean they don't speak English or are identified as LEP.

The summary below discusses the frequency with which **City Of USA/Organization Name** staff, and/or its contractor/lessee come into contact with LEP persons. It also provides information on the how staff is instructed to meet the needs of LEP persons. **City Of USA/Organization Name** staff persons are encouraged to use LEP resource materials to assist LEP persons.

Factor 3: Importance: Explains how the program, service or activity affects people's lives.

The summary below discusses how the **City Of USA/Organization Name's** program and services impact the lives of persons within the community. The **City Of USA/Organization Name** will specify the community organizations that serve LEP persons, if available.

Factor 4: Resources and Costs: Discusses funding and other resources available for LEP outreach.

The summary below discusses the low-cost methods the **City Of USA/Organization Name** uses to provide outreach to LEP persons as well as train staff (and transit provider/lessee, if applicable) on Title VI and LEP principles.

Additional Required Elements

In addition to the *Four Factor Analysis (listed below as item #1)*, the **City Of USA/Organization Name** addresses the following elements:

- Item #2: A description of how language assistance services are provided by language
- Item #3: A description of how LEP persons are informed of the availability of language assistance service
- Item #4: A description of how the language assistance plan is monitored and updated
- Item #5: A description of how employees are trained to provide language assistance to LEP persons

And, any additional information deemed necessary.

City Of USA/Organization Name – Summary of the Language Assistance Plan Components

Item #1 – Results of the Four Factor Analysis (including a description of the LEP population(s) served)

Factor 1 – Demography

The **City Of USA/Organization Name** contracts with a transit provider/lessee to provide transportation service for the **City Of USA/Organization Name** and in USA County.

The US Census Bureau – American Fact Finder (2011-2015) reports there are numerous languages spoken in USA County. Some of these languages include Spanish, German, Russian, Japanese, Hmong, and Vietnamese. After English, the second largest language group is Spanish.

The Safe Harbor Threshold is calculated by dividing the population estimate for a language group that “speaks English less than very well” by the total population of the county. The LEP Safe Harbor Threshold provision stipulates that for each LEP group that meets the LEP language threshold (5% or 1,000 individuals, whichever is less), the **City Of USA/Organization Name** must provide translation of vital documents in written format for non-English speaking persons.

In USA County, with a population estimate of _____, _____ persons have identified themselves as Spanish speaking and “speaks English less than well”. This language group is less than 1% and below the 5% or 1,000 persons threshold of the population to be served. This means the **City Of USA/Organization Name** is not required to provide written translation of vital documents. All the other language groups listed above are also below the Safe Harbor Threshold. This means, at this time, the **City Of USA/Organization Name** is also not required to provide written translation of vital documents in these languages.

Even though the **City Of USA/Organization Name** is below the Safe Harbor Threshold and is not required to provide written translation of vital documents, it publishes a timetable and route map in Spanish on its website.

In the future, if the **City Of USA/Organization Name** meets the Safe Harbor Threshold for any language group, it will provide written translation of vital documents in such languages and consider measures needed for oral interpretation.

Factor 2 – Frequency

The **City Of USA/Organization Name** and its transit provider/lessee will be trained on what to do when they encounter a person that speaks English less than well. The **City Of USA/Organization Name** with assistance from its transit provider/lessee tracks the number of encounters and consider adjustments as needed to its outreach efforts to ensure meaningful access to all persons and specifically to LEP and minority populations of the **City Of USA/Organization Name's** programs and services.

Log of LEP Encounters

Date	Time	Language Spoken By Individual (if available)	Name and Phone Number of Individual (if available)	Service Requested	Follow Up Required	Staff Member Providing Assistance	Notes

The **City Of USA/Organization Name's** transit provider/lessee provides rides to _____ persons per year. While formal data has not been collected, the transit provider/lessee has indicated it has encountered _____ LEP persons using the service within the last year.

The **City Of USA/Organization Name** and its transit provider/lessee has an open-door policy and will provide rides to any person who requests a ride. If an individual has speech limitations, the dispatcher or driver will work with the Transit Manager and the **City Of USA/Organization Name** to ensure the individual receives access to the transportation service.

The "I Speak" Language identification card listed below is a document that can be placed in our transit provider/lessee's vehicles and used by the **City Of USA/Organization Name** staff to assist LEP individuals. Additional languages can be added as needed to match the demographic changes of the **City Of USA/Organization Name's** service area.

"I Speak" Language Identification Card

Mark this Box if you speak...	Language Identification Chart	Language
☐	I speak English	English
☐	Yo hablo español	Spanish
☐	Kug has lug Moob	Hmong
☐	我說中文	Chinese
☐	E nói tiếng Việt	Vietnamese
☐	나는한국어를	Korean
☐	Marunong akong mag-Tagalog	Tagalog
☐	Ich spreche Deutsch	German
☐	Я говорю по-русски	Russian
☐	Ja говорим српски	Serbian
☐	मैं हिंदी बोलते हूँ	Hindi
☐	میں نے اردو بولتے ہیں	Urdu

Note: For additional languages visit the US Census Bureau website: <http://www.lep.gov/ISpeakCards2004.pdf>

Factor 3 – Importance

The **City Of USA/Organization Name** and our transit provider/lessee understands an LEP person with language barrier challenges also faces difficulties obtaining health care, education, access to employment and nutrition meal sites, recreational services and socialization. A transportation system is a key link to connecting LEP persons to these essential services.

The **City Of USA/Organization Name** has identified activities and services which would have serious consequences to individuals if language barriers prevented access to information or the benefits of those programs. The activities and services include providing emergency evacuation instructions in our facilities and vehicles and providing information to the public on security awareness or emergency preparedness.

The **City Of USA/Organization Name's** assessment of the programs, activities and services that are most critical include contact with community organization(s) that serve LEP persons, as well as contact with LEP persons themselves to obtain information on the importance of the modes or the types of services that are provided to the LEP populations.

Factor 4 – Resources and Costs

Even though the **City Of USA/Organization Name** does not have a separate budget for LEP outreach, it has worked with our transit provider/lessee to implement low cost methods of reaching LEP persons.

City Of USA/Organization Name staff conducts outreach activities to LEP communities throughout the year to inform the public of transportation services available. These outreach/resource awareness efforts are low cost methods and are accomplished by existing staff resources and the use of posting website information and developing and printing brochure/materials.

In addition, the **City Of USA/Organization Name** and our transit provider/lessee uses a variety of low cost outreach methods to reach LEP communities such as visiting ethnic stores/markets and restaurants, community centers, libraries, faith-based institutions and local festivals. The cost is relatively low but the ability to reach the LEP population is high.

Item # 2 – Description of how Language Assistance Services are Provided, by Language
--

The **City Of USA/Organization Name** has a bilingual speaking person on staff. In addition, we work with our transit provider/lessee to ensure mechanisms are in place to reach LEP persons in the service area. For example, our transit provider/lessee has a special brochure printed and is available in each vehicle to assist LEP populations in understanding the transportation service.

In addition, the **City Of USA/Organization Name** has developed relationships with language teachers in area schools as well as local Hmong leaders to use a resource to assist in meeting the need of LEP persons, if needed.

Item # 3 - Description of how LEP Persons are Informed of the Availability of Language Assistance Service

The **City Of USA/Organization Name** and our transit provider/lessee does the following to inform LEP persons of the availability of language assistance services:

- Review outreach activities and the frequency of contact with LEP individuals to determine whether additional language assistance services are needed.
- Utilize the bilingual speaking person on staff to assist with the development of bilingual outreach materials, including pictograms and other symbols.
- Prioritize the hiring of bilingual staff, as needed.
- Utilize Wisconsin Relay 7-1-1, the state of Wisconsin resource to assist with communication needs <http://www.wisconsinrelay.com> and <http://www.wisconsinrelay.com/features>.

Item # 4 – Description of how the Language Assistance Plan is Monitored and Updated

*The **City Of USA/Organization Name** reviews its plan on an annual basis or more frequently as needed. The **City Of USA/Organization Name** will evaluate the information collected on encounters with LEP persons as well as public outreach efforts to determine if adjustments should be made to the delivering of programs and services to ensure meaningful access to minority and LEP persons.*

*In addition, the **City Of USA/Organization Name** meets with our transit provider/lessee on an annual basis to ensure the Title VI requirements are met. The last approval and site-visit of the contractor/transit provider was on .*

Item # 5 – Description of how Employees are Trained to Provide Language Assistance to LEP Persons

***City Of USA/Organization Name** employees are oriented on the principles of Title VI and the **City Of USA/Organization Name's** Language Assistance Plan. New employees will be provided guidance on the needs of clients served and how best to meet their needs. The **City Of USA/Organization Name** will ensure its transit provider/lessee, as applicable also educates its staff on Title VI requirements, and specifically LEP provisions.*

*If a driver, dispatcher or employee needs further assistance related to LEP individuals, they will work with the **City Of USA/Organization Name's** and/or our transit provider/lessee's Transit Manager to identify strategies to meet the language needs of the participants of the program or service.*

*As part of our annual check in meeting, the **City Of USA/Organization Name** will meet with our transit provider/lessee, as applicable to discuss updates the **City Of USA/Organization Name's** Language Assistance Plan.*

10. MINORITY REPRESENTATION TABLE AND DESCRIPTION

A. Minority Representation Table⁶

The table below depicts the **City Of USA/Organization Name's** non-elected committees/councils related to transit.

Body	Caucasian	Hispanic	African American	Asian American	Native American	Two or More Races
County Population	44%	28%	14%	8%	4%	2%
Access Committee	57%	23%	10%	7%	0%	3%
Citizens Advisory Council	36%	25%	20%	10%	5%	4%
Bicycle Pedestrian Committee	45%	30%	15%	4%	5%	1%

B. Efforts to Encourage Minority Participation

The **City Of USA/Organization Name** understands diverse representation on committees, councils and boards results in sound policy reflective of its entire population. As such, the **City Of USA/Organization Name** encourages participation of all its citizens.

As vacancies on boards, committees and councils become available, the **City Of USA/Organization Name** will make efforts to encourage and promote diversity.

To encourage participation on its boards, committees and councils, the **City Of USA/Organization Name** will continue to reach out to community, ethnic and faith-based organizations to connect with all populations. In addition, the **City Of USA/Organization Name** will use creative ways to make participating realistic and reasonable. Such as, scheduling meetings at times best suited to its members and consider providing transportation, if needed for its members.

Minority Representation Data Collection Form (Sample Document)

Name of board, commission, council, etc.

Date:

Dear Member,

As the **City Of USA/Organization Name** is a recipient of federal funds, we are required under Title VI of the Civil Rights statute to ascertain the racial/ethnic make-up of any non-elected boards, commissions, councils, etc.

Data from this section is used for statistical and reporting purposes. The information may be subject to disclosure under federal or state law or rule.

Anti-Discrimination Notice

It is unlawful for the **City Of USA/Organization Name** to fail or refuse to provide services, access to services or activities, or otherwise discriminate against an individual because of an individual's race, color, religion, sex, national origin, disability or veteran status.

As a council under the jurisdiction of the **City Of USA/Organization Name**, we invite council members to voluntarily self-identify their race/ethnicity in order for us to comply with FTA Title VI regulations. This information will be used according to the provisions of applicable federal and state laws, executive orders and regulations, including those requiring the information to be summarized and reported to the federal government for civil rights enforcement purposes.

⁶ County data by race is available at the WisDOT website www.dot.wisconsin.gov/localgov/transit/title6.htm or the US Census Bureau American Fact Finder website <http://factfinder.census.gov/faces/nav/jsf/pages/index.xhtml>

Race/Ethnicity

If you choose to self-identify, please mark the **one box** describing the race/ethnicity category with which you primarily identify:

- ☐ *Asian or Pacific Islander:* All persons having origins in any of the peoples of the Far East, Southeast Asia, the Indian subcontinent, or the Pacific Islands. This area includes, for example, China, Japan, Korea, the Philippine Islands and Samoa.
- ☐ *Black and/or African American (not of Hispanic origin):* All persons having origins in any of the Black racial groups of Africa.
- ☐ *Hispanic:* All persons of Mexican, Puerto Rican, Cuban, Central or South American, or other Spanish culture or origin, regardless of race.
- ☐ *American Indian or Alaskan Native:* All persons having origins in any of the original peoples of North America, and who maintain cultural identification through tribal affiliation or community recognition.
- ☐ *Caucasian (not of Hispanic origin):* All persons having origins in any of the original peoples of Europe, North Africa or the Middle East.

11. ADDITIONAL ITEMS, IF REQUIRED:

Facility Location Equity Analysis (For recipients constructing a facility)

COMPLETED BY

Name: _____

Date: _____

Subrecipient: _____

Facility Type: _____

Site Location Address: _____

Project Description: _____

Project Timeline: _____

Analysis of Site Location: _____
Compare the equity impact of various site alternatives

Site Justification: _____

Outreach Activities: _____
List outreach methods used to engage persons potentially impacted by the facility site

NOTES:

- *The definition of “facility” includes storage facilities, maintenance facilities and operation centers. For purposes of this requirement, “facilities” **does not** include bus shelters, transit stations, power substations, as these are transit amenities and are evaluated during project development and the NEPA process.*
- *The Title VI equity analysis must occur before the selection of the preferred site.*
- *If the recipient determines that the location of the project will result in a disparate impact on the basis of race, color, or national origin, the recipient may locate the project in that location if there is a substantial legitimate justification for locating the project there, and where there are no alternative locations that would have a less disparate impact on the basis of race, color, or national origin.*

Fixed Route Service Standards

(For all Fixed Route Transit Providers)

Vehicle Load Standards

1. *Expressed in writing*

The average of all loads during the peak operating period should not exceed vehicles' achievable capacities, which are 30 passengers for a t 15' mini-bus, 51 passengers for low-floor 40-foot buses, 60 passengers or standard 40-foot buses, and 133 passengers on a light rail car.

2. *Expressed in tabular format*

Vehicle Type	Average Passenger Capacities		
	Seated	Standing	Total
15' Mini-Bus	28	2	30
40' Low Floor Bus	39	12	51
40' Standard Bus	43	17	60
Light Rail Vehicle	64	69	133

Vehicle Headway Standards

1. *Expressed in writing*

Service operates on regional trunk lines 15 minutes or better from early morning to late in the evening, seven days a week. On weekdays, 15 minutes or better service should begin no later than 6:00 a.m. and continue until 10:30 p.m. On weekends, 15 minute or better service should begin by 8:00 a.m. and continue until 10:30 p.m.

Scheduling involves the consideration of a number of factors including: ridership productivity, transit/pedestrian friendly streets, density of transit-dependent population and activities, relationship to the Regional Transportation Plan, relationship to major transportation developments, land use connectivity, and transportation demand management.

2. *Expressed in tabular format*

Policy Headways and Periods of Operation				
WEEKDAY	Peak	Base	Evening	Night
Regional Trunk	10	15	15	30
Urban Radial	15	15	30	60
Cross-Town	15	15	30	--
Secondary Radial	30	30	60	--
Feeder	30	30	60	--
Peak Express	30	--	--	--
Employer Feeder	60	--	--	--

*Peak 7-9 am and 4-6pm; Base 9 am-4pm; Evening 6-9:30pm; Night: 9:30pm-midnight
 "--" means no service is provided during that time period

SATURDAY	Peak	Evening	Night		SUNDAY	Peak	Evening	Night
Regional Trunk	15	30	30		Regional Trunk	30	60	--
Urban Radial	30	60	--		Urban Radial	30	60	--
Cross-Town	15	30	--		Cross-Town	30	--	--
Secondary Radial	60	60	--		Secondary Radial	--	--	--
Feeder	60	60	--		Feeder	--	--	--
Peak Express	--	--	--		Peak Express	--	--	--
Employer Feeder	--	--	--		Employer Feeder	--	--	--

*Day 7 am-6pm; Evening 6-9:30 pm; Night 9:30 pm-Midnight

"--" means no service is provided during that time period

On-Time Performance Standards

Sample 1

Ninety-five (95) percent of the **City Of USA/Organization Name's** transit vehicles will complete their established runs no more than five minutes early or late in comparison to the established schedule/published timetables.

Sample 2

A vehicle is considered on time if it departs a scheduled time point no more than one minute early and not more than five minutes late. The **City Of USA/Organization Name's** on-time performance objective is 90% or greater. The **City Of USA/Organization Name** continuously monitors on-time performance and system results are published and posted as part of monthly performance reports covering all aspects of operations.

Service Availability Standards

1. Expressed in writing

The **City Of USA/Organization Name** will distribute transit service so that 90% of all residents in the service area are within a 1/4-mile walk of bus service or within a ½ mile walk of rail service.

and/or

Local bus stops will not be more than three blocks apart. Express bus stops will be one-half to three-quarters of a mile apart.

Fixed Route Service Policy

(For all Fixed Route Transit Providers)

Vehicle Assignment Policy

Expressed in Writing

Vehicles will be assigned to the South, North and East depots such that the average age of the fleet serving each depot does not exceed “x” years. Low-floor buses are deployed on frequent service and other high-ridership lines, so these busses carry a higher share of ridership than their numerical proportion of the overall bus fleet. Low-floor buses are also equipped with air conditioning and automated stop announcement systems.

All rail cars are equipped with air conditioning, and high-floor rail cars are always paired with a low car to provide accessibility.

Bus assignments take into account the operating characteristics of buses of various lengths, which are matched to the operating characteristics of buses of various lengths, which are matched to the operating characteristics of the route. Local routes with lower ridership may be assigned 30-foot buses rather than the 40-foot buses. Some routes requiring tight turns on narrow streets are operated with 30-foot rather an 40-foot buses.

Transit Amenities Policy

TRANSIT AMENITIES POLICY

Expressed in Writing

Installation of transit amenities along bus routes are based on the number of passenger boardings at the stops along those routes.

MPO Demographic Data, Analysis and Procedures

(For MPOS)

In addition to the Title VI appendices 1-8 (and appendices 10 and 11, if the MPO is a provider of fixed route public transportation), the MPO is also required to include the elements listed below:

- a. A demographic profile of the metropolitan area that includes identification of the locations of minority populations in aggregate.
- b. A description of the procedures by which the mobility needs of minority populations are identified and considered within the planning process.

This information helps ensure members of minority communities are provided with full opportunities to engage in the transportation planning process. This includes actions to eliminate language, mobility, temporal, and other obstacles to allow minority populations to participate fully in the process.

- c. Demographic maps that overlay the percent minority and non-minority populations as identified by Census or ACS data, at Census tract or block group level, and charts that analyze the impacts of the distribution of State and Federal funds in the aggregate for public transportation purposes, including Federal funds managed by the MPO.
- d. Analysis of the impacts identified in (c) that identifies any disparate impacts on the basis of race, color, or national origin, and, if so, determines whether there is a substantial legitimate justification for the policy that resulted in the disparate impacts, and if there are alternatives that could be employed that would have a less discriminatory impact.

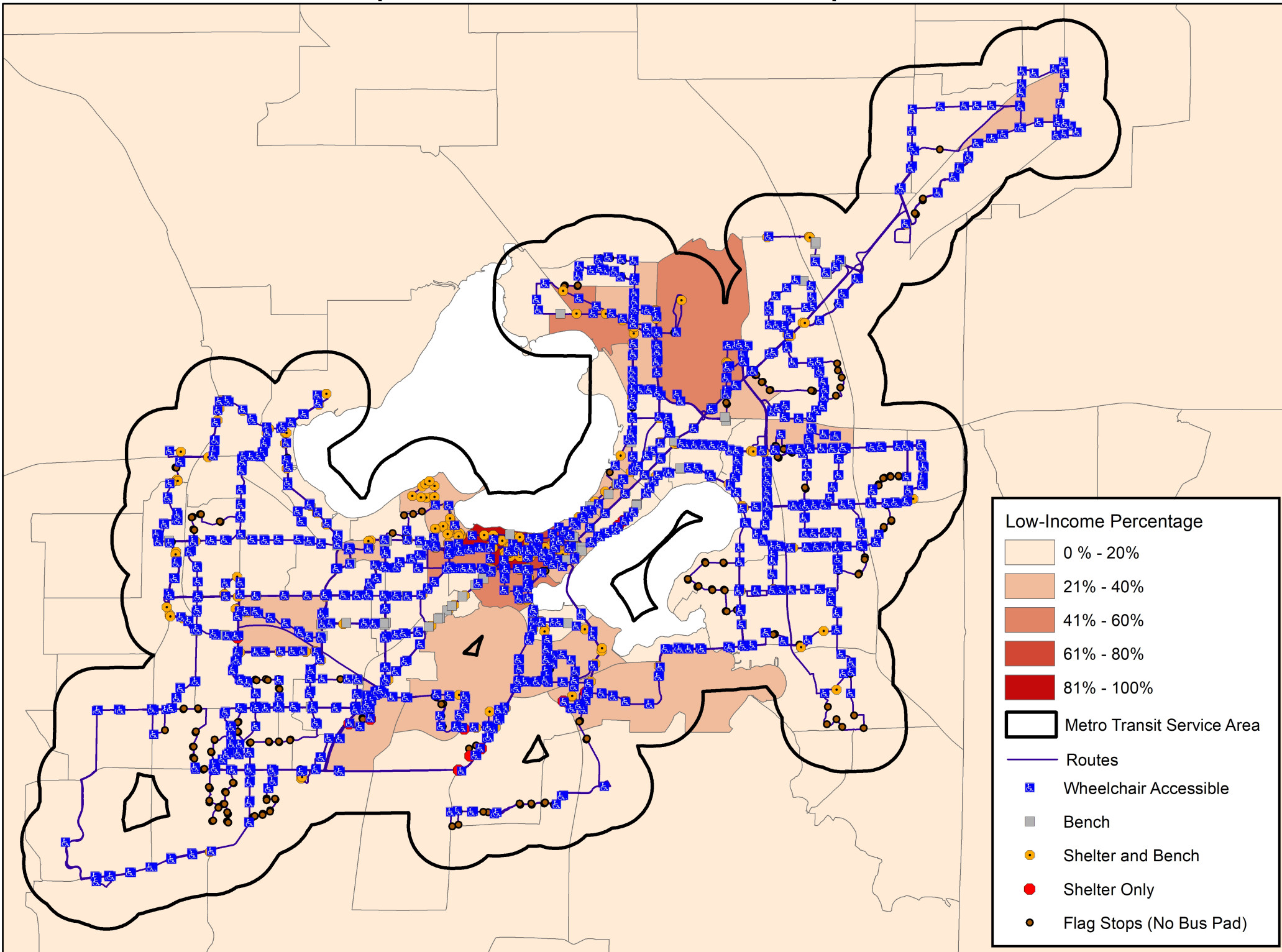
NOTES:

- If the MPO is a direct recipient, the MPO will be required to submit additional information to FTA per Chapter VI-1 of FTA Circular 4702.1B (October 1, 2012).
- All MPOs are required to self-certify compliance with all applicable federal requirements. Planning certification reviews conducted jointly by FTA and FHWA of the metropolitan transportation planning processes of transportation management areas include a review of Title VI compliance.

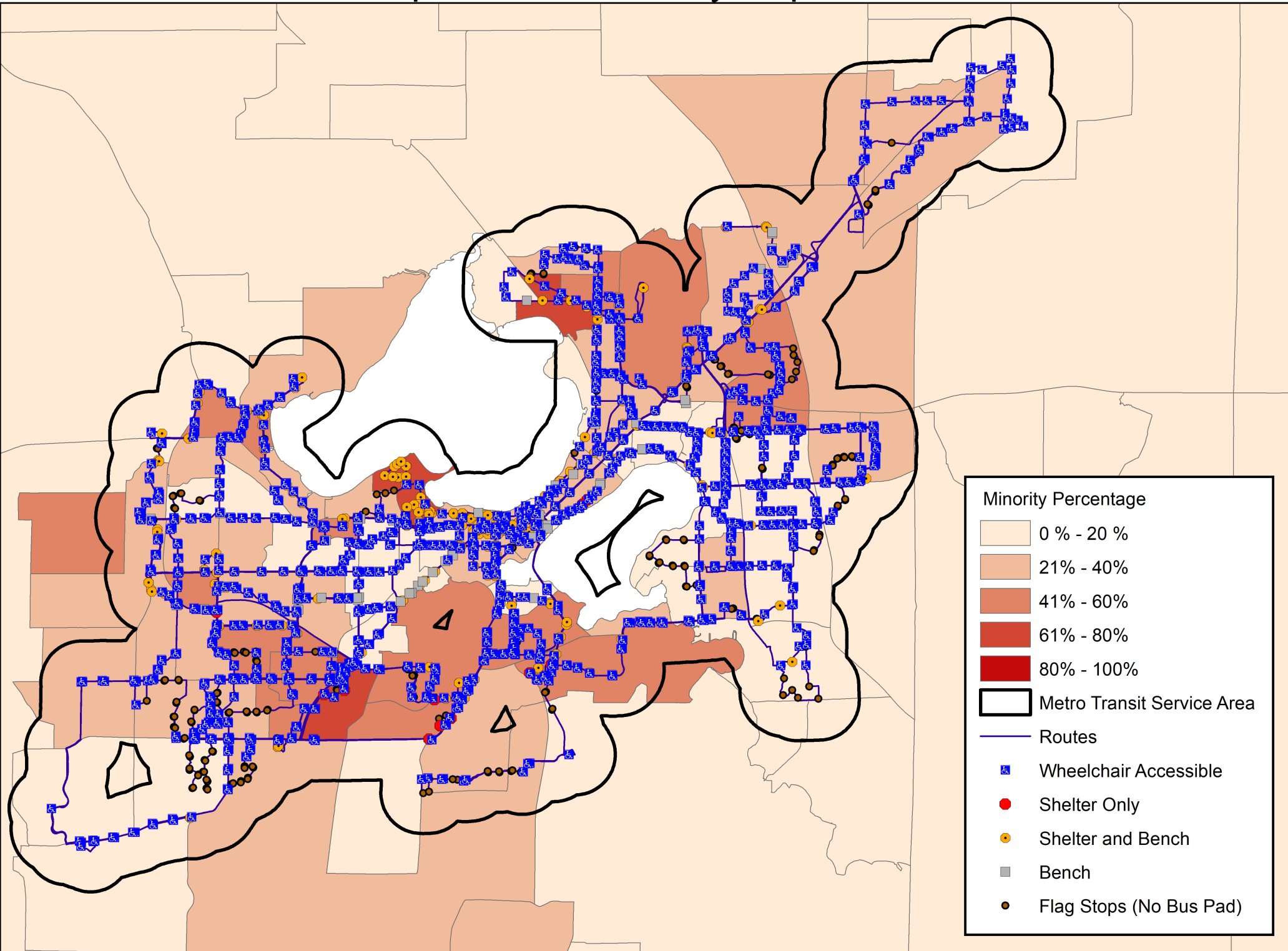
Appendix F – Demographic Maps

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Proportion of Low-Income Population



Proportion of Minority Population



Appendix G – Results of Service and Fare Equity Analysis

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Title VI Service Equity Analysis

July 31st, 2024

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1 – Introduction

In June 2023, Metro Transit (Metro) overhauled its network design for the first time in 25 years with the Transit Network Redesign. Throughout this transition, Metro actively sought feedback from riders to create a system that better meets their needs. Over the past year, Metro has carefully considered this feedback and implemented a series of incremental improvements. Some of these service improvements were temporary solutions, while others have become permanent fixtures in Metro's regular service plan.

As a recipient of Federal funding through the Federal Transit Administration (FTA), Metro is required to comply with the Title VI regulations established in FTA Circular 4702.1B. This includes a requirement to conduct a Service Equity Analysis of Major Service Changes. The FTA allows for an exception for temporary service additions that would otherwise qualify as a Major Service Change, so long as they are in service no longer than 12-months. As it has been a year since the Redesign, this Service Equity Analysis includes all service changes that were implemented since the Transit Network Redesign that have been included in Metro's regular service plan.

2 – Title VI Regulatory Requirements

Section 601 of Title VI of the Civil Rights Act of 1964 states:

“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 subject to discrimination under any program or activity receiving federal financial assistance.”

As one of ten operating agencies within the United States Department of Transportation, The Federal Transit Administration (FTA) provides financial assistance to develop, operate, and maintain transit systems across the country. The FTA requires all recipients of financial assistance to comply with Title VI and has established regulatory guidance in FTA Circular 4702.1B. As a recipient of financial assistance from the FTA, Metro Transit is required to comply with all applicable regulations contained in Circular 4702.1B.

2.1 – Requirement to Conduct Service Equity Analysis

Chapter IV of FTA Circular 4702.1B establishes requirements and guidelines specific to fixed route transit providers. The requirements in this chapter are scaled based on the size of the transit provider, with smaller providers have fewer reporting requirements. Transit providers that operate 50 or more fixed route vehicles in peak service, or that operate within an urbanized area with a population greater than 200,000 are required to conduct a Service Equity Analysis for any service change that qualifies as a Major

Service Change.¹ The FTA allows temporary service additions that would otherwise qualify as a Major Service Change, so long as they are in service no longer than 12-months.²

As a transit provider that operates in an urbanized area with a population greater than 200,000 and has more than 50 buses operating in peak service, Metro is required to conduct a Service Equity Analysis for Major Service Changes. Service Equity Analyses utilize quantitative methods to determine if there is evidence of a potential Disparate Impact on minority populations or Disproportionate Burden on low-income populations. Major Service Changes, Disparate Impacts, and Disproportionate Burdens are defined by the FTA as the following:³

Major Service Change: The FTA requires transit providers to establish a policy that defines when service changes are considered “major service changes”. This is typically numerical standard, such as the percentage of route hours or miles. See section 3.1 for Metro Transit’s Major Service Change Policy.

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

Disproportionate Burden: A Disproportionate Burden refers to a neutral policy or practice that disproportionately affects low-income populations more than non-low-income populations.

3 – Metro Transit Title VI Policies

FTA Circular 4702.1B requires transit providers to establish several policies that will be used when conducting Service and Fare Equity Analyses. These include the major service change policy, disparate impact policy, and disproportionate burden policy. These policies are established with public input and are enumerated in Metro’s Title VI Program, which is updated every three years. Metro’s policies are described below.

3.1 – Major Service Change Policy

Metro Transit’s Major Service Change Policy in compliance with applicable federal requirements (Title VI of the Civil Rights Act 1964, 49 CFR Section 21 and FTA Circular 4702.1B). The Federal Transit Administration (FTA) requires that recipients of FTA funding prepare and submit service equity analyses for proposed major service changes. The purpose of this policy is to establish a threshold that defines a major

¹ FTA Circular 4702.1B Chapter IV-12

² FTA Circular 4702.1B Chapter IV-13

³ FTA Circular 4702.1B Chapter I-2.

service change and a recipient's definition of an adverse effect caused by a major service change.

Currently, Metro Transit will consider any service changes that qualify for a public hearing as "major" and in need of analysis under Title VI. Service changes that require a public hearing are currently defined as:

- The establishment of new bus routes
- A substantial geographical alteration on a given route of more than 25% of its route miles
- The elimination of any bus service
- A major modification which causes a 25% or greater change in the number of daily service hours provided

All major service changes will be subject to an equity analysis which includes an analysis of adverse effects. An adverse effect is defined as a geographical or temporal reduction in service which includes but is not limited to: elimination of a route, rerouting an existing route and a decrease in frequency. Metro Transit shall consider the degree of adverse effects, and analyze those effects, when planning major service changes.

3.2 – Disparate Impact & Disproportionate Burden Policies

FTA Circular 4702.1B requires transit providers to establish Disparate Impact and Disproportionate Burden policies that establish thresholds to determine whether the adverse effects of a proposed service or fare change are excessively borne by minority or low-income populations. Metro Transit's Disparate Impact and Disproportionate Burden policy thresholds were approved by the City of Madison Transportation Commission on September 13th, 2023 as part of its Title VI Program update. Metro has not made any changes to these policy thresholds since they were originally adopted as part of its 2019 Title VI Program update. Therefore, for the purposes of this analysis, Metro utilized the following definitions to identify potential Disparate Impacts or Disproportionate Burdens:

“The Disparate Impact threshold is described as follows for Metro Transit: Should the burden of any major service change require a minority population/ridership (33% threshold) to bear adverse effects greater or less than 2% than those borne by the non-minority population/ridership, that impact will be considered a disparate impact.”

4 – Service Change Summary

Following the Redesign's rollout in June 2023, Metro began assessing rider feedback to fine-tune its service. Some modifications were initially intended as short-term remedies while staff gathered data and explored alternative service options, but many of these changes that responded to ridership demand were subsequently integrated into Metro's standard service plan. The following sections provide a summary of each of these service adaptations. Given this analysis's focus on service changes sustained for over a year, only adjustments included in Metro's regular service plan are included. A previous equity analysis was completed for the main June 2023 Redesign as part of the approval of those changes by the Transportation Commission and Common Council and this new equity analysis is intended to be the follow up document.

4.1 – Short Turn Routes

Much of the planning for the Redesign occurred in the midst of the COVID-19 pandemic, when there were major changes to peak demand for bus service and much of the impact of the peak on the new Redesign service was unknown. Since the Redesign launched in the summer without extra peak demands from students, Metro waited until the regular August service change before implementing some of this service, which were traditionally run as seasonal extra trips Pre-COVID.

In September 2023, the University of Wisconsin began its Fall semester, bringing thousands of students back to the Madison area and straining the capacity of several Metro routes serving the UW campus and surrounding areas. Metro staff then analyzed overload complaints and customer feedback.

This resulted in the addition of extra service, which operated on the busiest part of a corridor to reduce congestion on regularly scheduled service. These 'short-turn' buses were placed on existing routes A, F, R, 28, and 38. Due to our lead time requirements for registering new trips in our data system, many of these extra buses originally ran off a 'paper' service outside of real-time apps that was meant to be temporary, with the eventual plan to formalize this service. This was done as part of the March 2024 service changes which also provided real-time information for passengers.

Figure 1 – Route 38 Short Turn

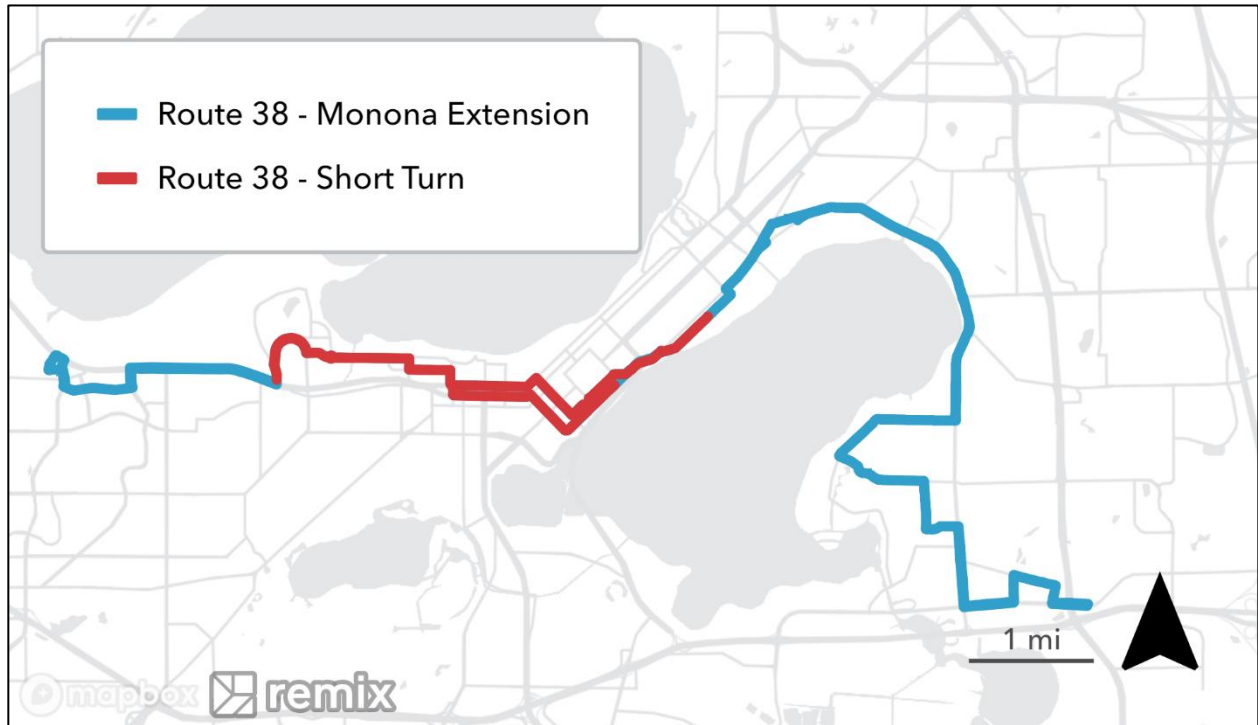


Figure 2 – Route 28 Short Turn



Figure 3 – Route A Short Turn

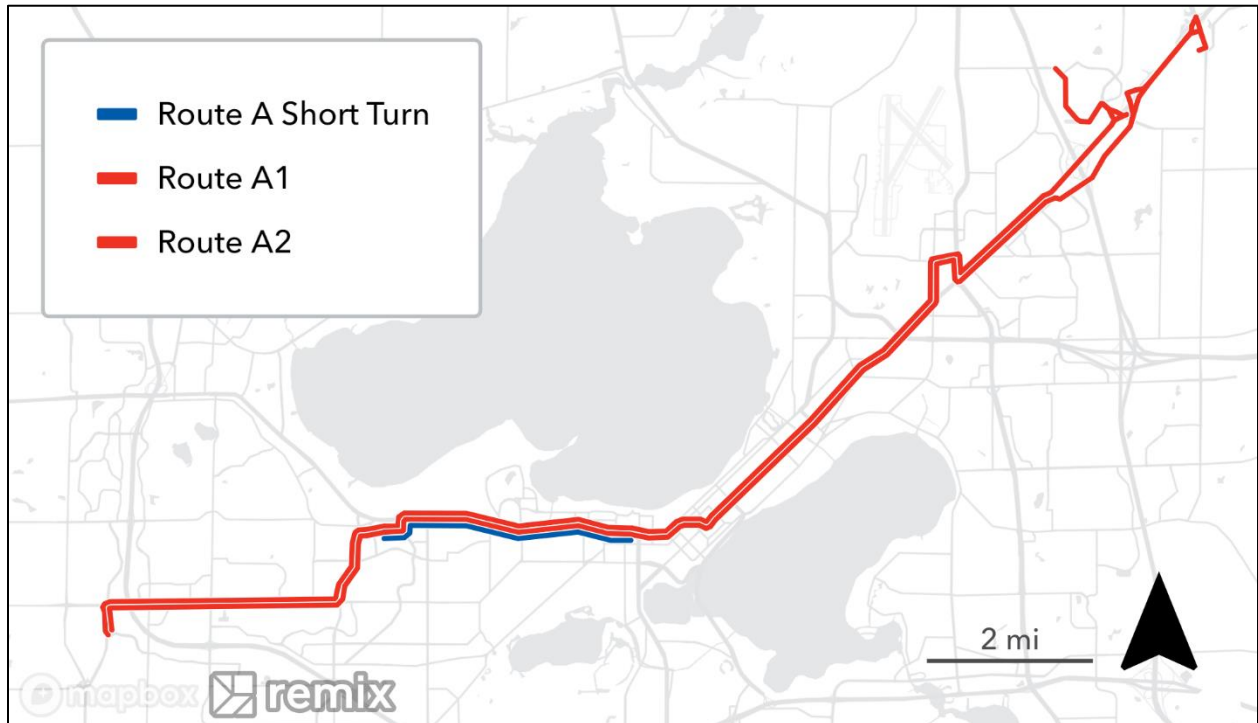


Figure 4 – Route R Short Turn

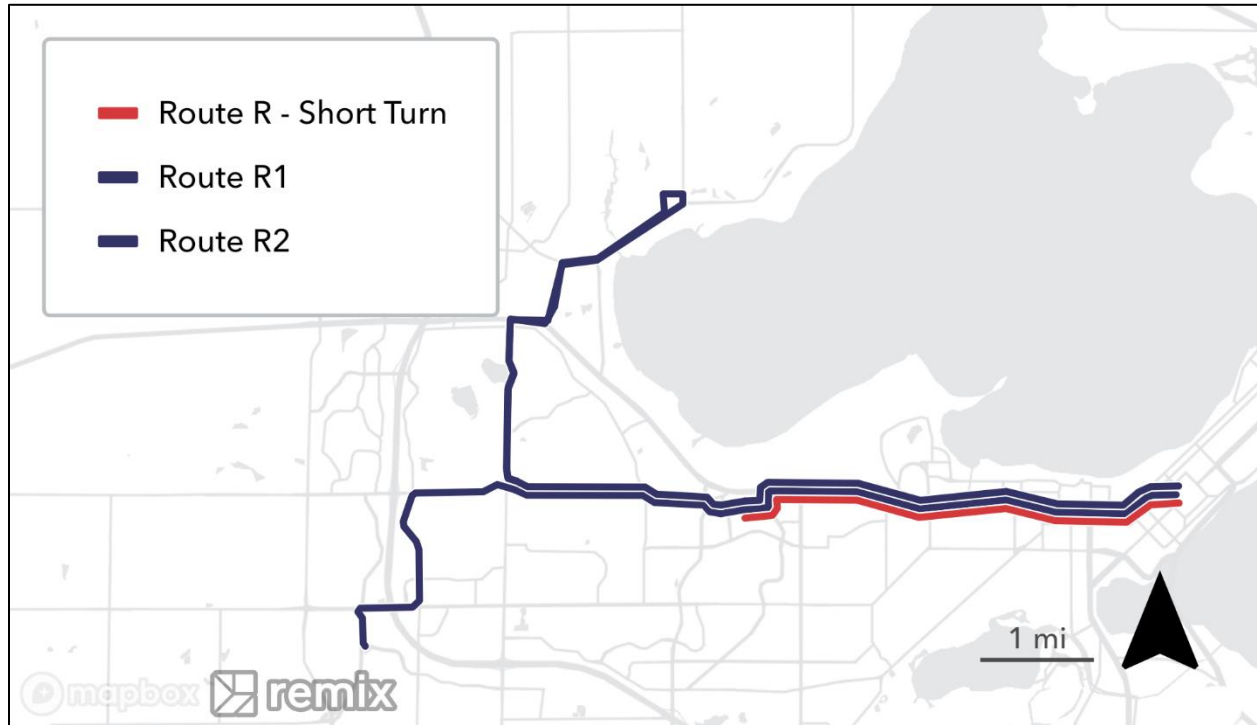
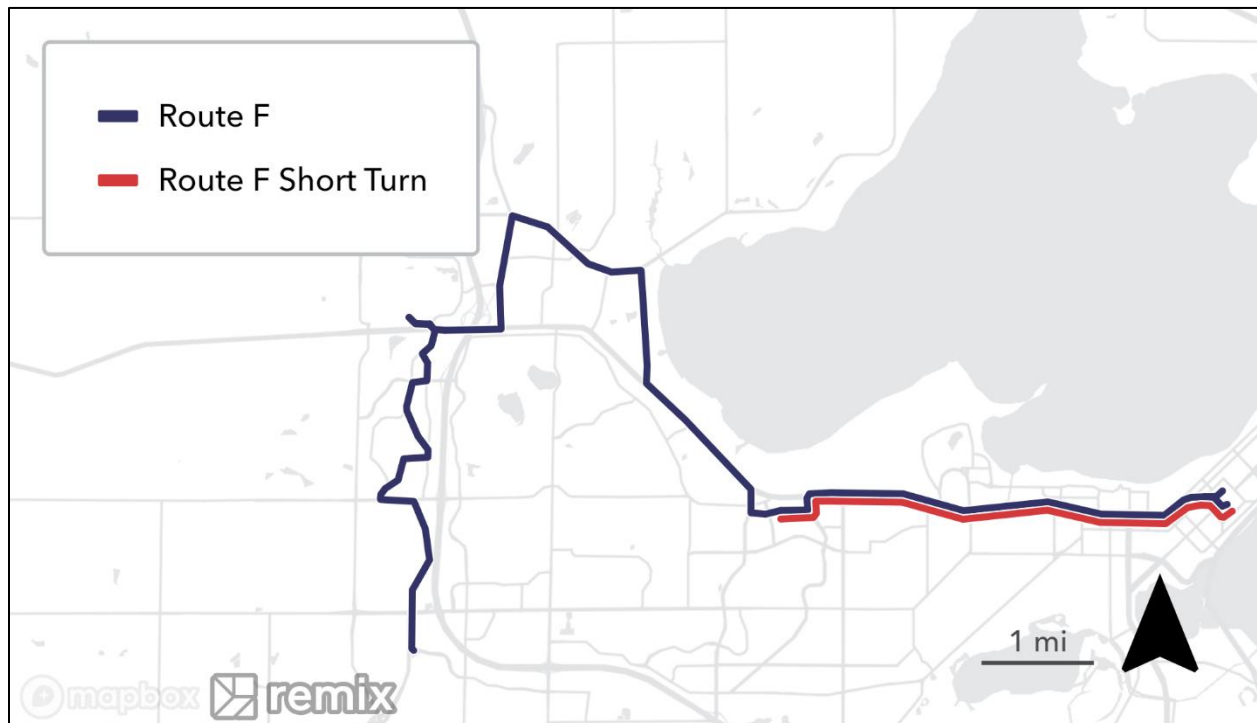


Figure 5 – Route F Short Turn



4.2 – Route 28 Extension

The June 2023 Redesign retained parts of the old Route 28, with a new western terminus at the intersection of University Bay Drive and University Avenue. In September, the University of Wisconsin (UW) began its Fall session, and an influx of students returned to Madison. This additional demand created capacity and on-time performance problems for several routes (A, F, R, 38) serving Sheboygan Avenue, which had a large proportion of students and UW Hospital staff. To address the increased demand, Metro extended the alignment of Route 28 further west down its original routing with its December service changes, locating the new terminus at the intersection of Sheboygan Ave and Whitney Way. In March, Metro extended Route 28 further to the west to its original pre-Redesign terminus at University Row, which is adjacent to a large apartment complex and UW Hospital branch with better break facilities for bus drivers.

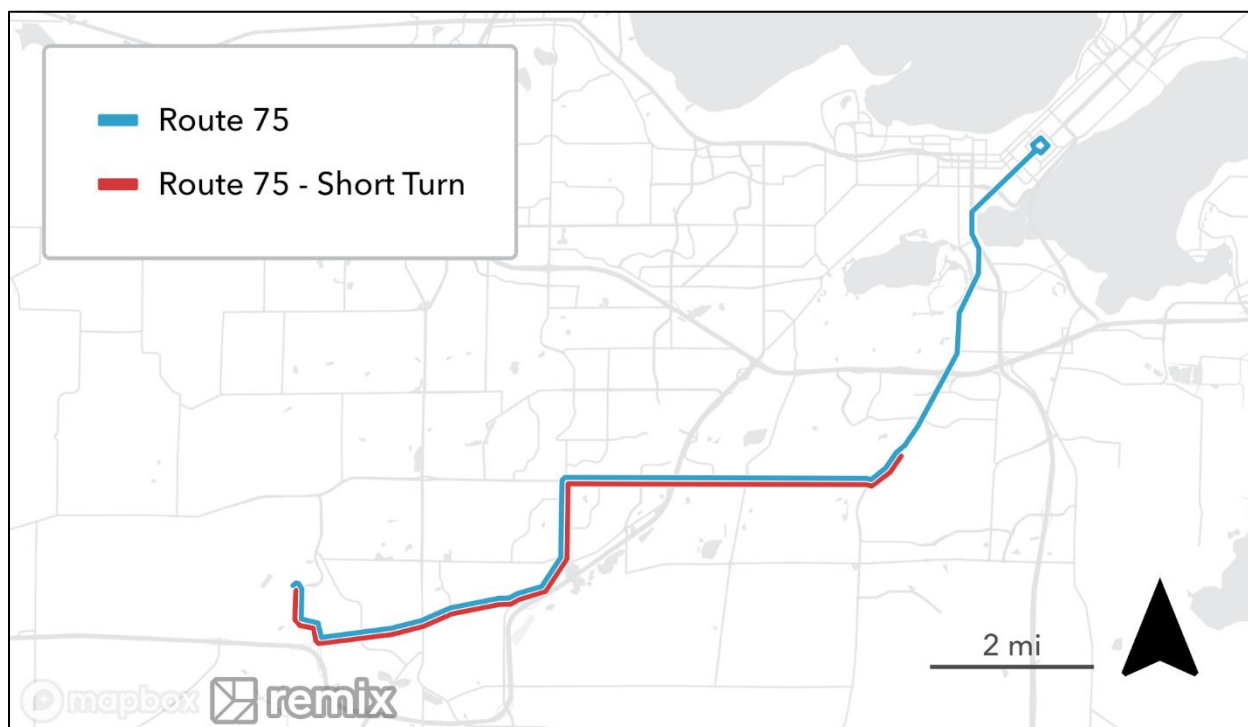
Figure 6 – Route 28 Extension



4.3 – Route 75 Short Turn

Route 75 is a weekday peak commuter route operating between downtown Madison and the Epic campus in the City of Verona that is funded by the Epic Systems. Seeing significant demand for additional service, Metro’s partners at Epic requested options for additional bus service. In order to maximize efficient use of resources, Metro proposed, and subsequently implemented, ‘short-turn’ Route 75 trips that begin at the Epic campus and terminate at Fish Hatchery Road and Caddis Bend. Riders then have an opportunity to connect to Route B, which is the future North-South BRT route with a 15-minute headway.

Figure 7 – Route 75 Short Turn

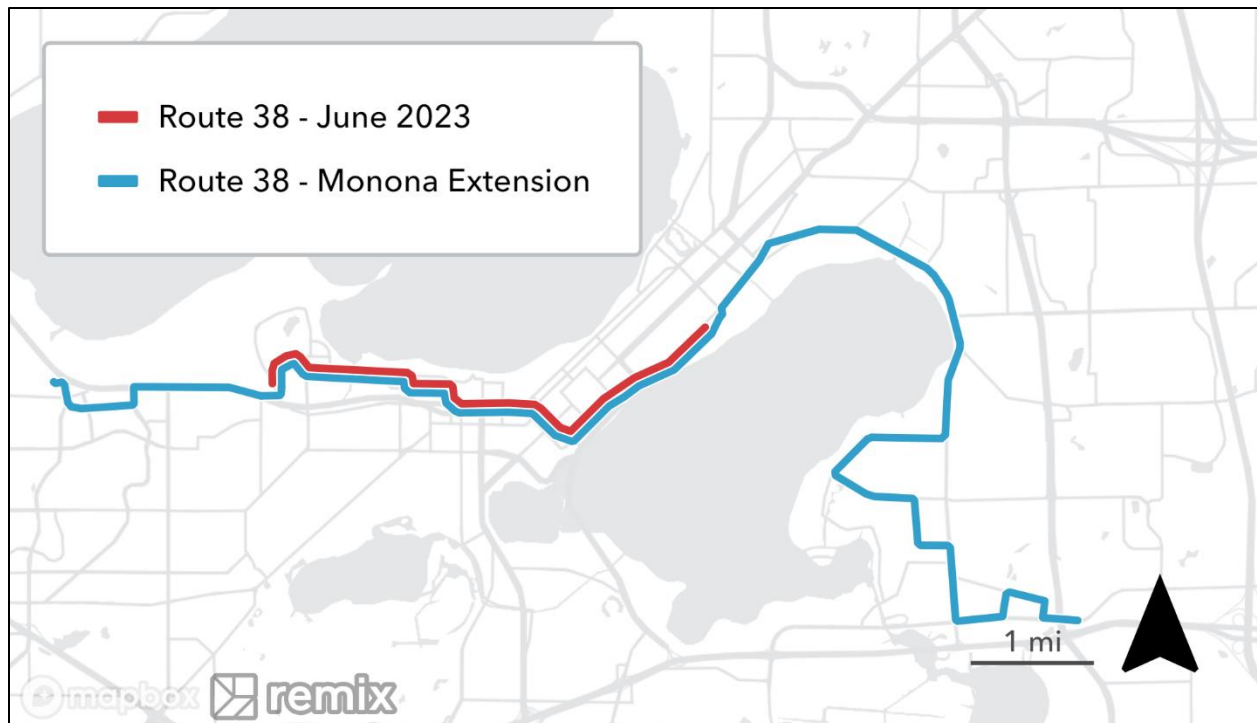


4.4 – Route 38 Extension to the City of Monona

After the launch of the June Redesign, Metro received significant feedback from riders requesting that the original alignment of Route 38 be restored along University Ave to Sheboygan Avenue and Eau Claire Avenue. In response to this rider request and boarding data, this change was implemented in Metro's August 2023 service changes. In March, Metro extended Route 38 further to the west, terminating at University Row, which is the original terminus of the Pre-Redesign Route 28 and 38, once again for better break facilities and ridership generators.

In December 2023, the City of Monona's Transit Commission passed a resolution directing its staff to enter into an agreement to provide Metro service to its residents. The approved plan will extend Metro's Route 38 into the Monona City Limits and adds stops within the City of Monona on Routes G & H. This service is planned to be launched in March 2025 and is included in this equity analysis.

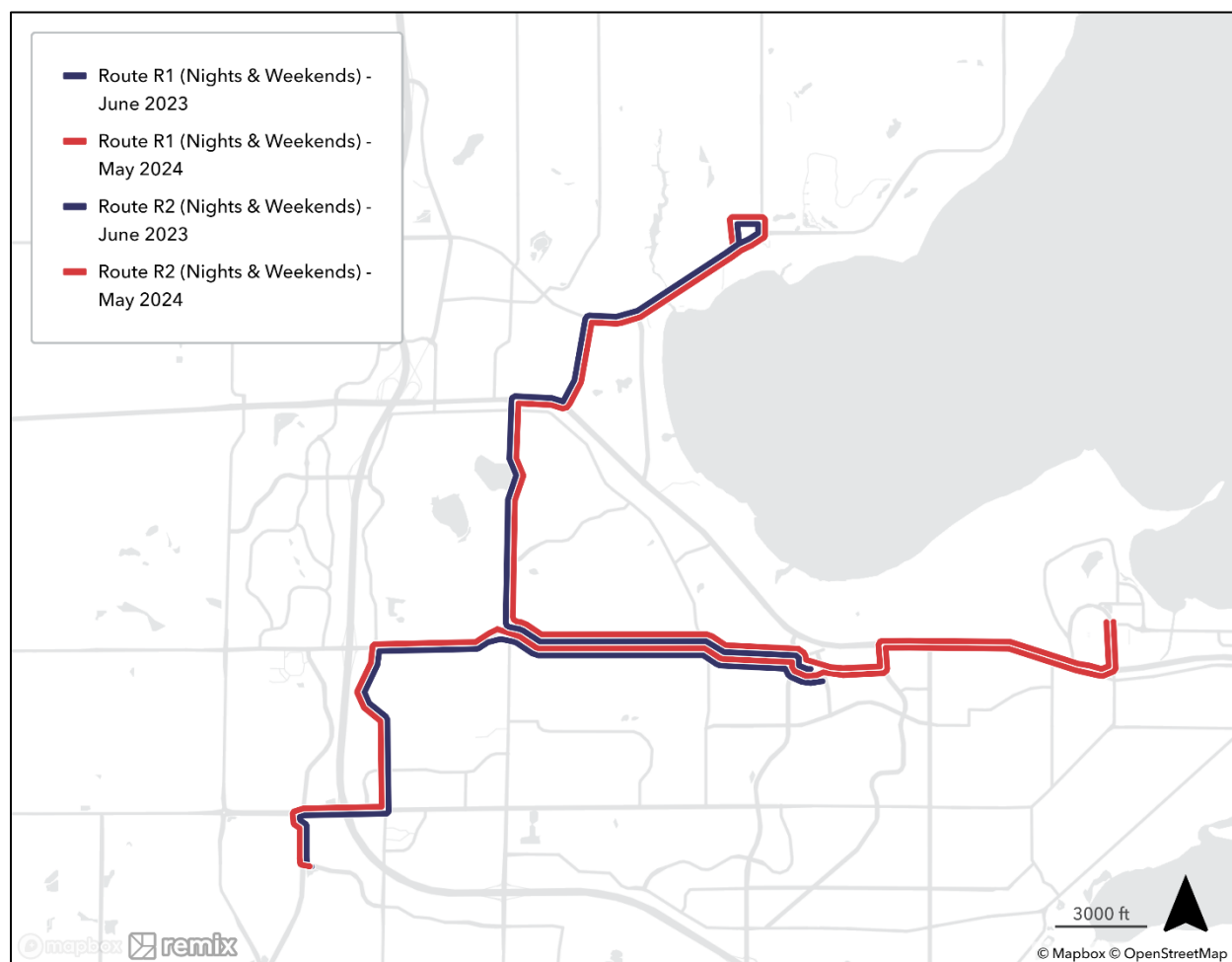
Figure 8 – Route 38 Monona Extension



4.5 – Routes R & C Interline

The original service plan in the Transit Network Redesign planned for Route R to terminate at the intersection of Sheboygan Avenue and Eau Claire Avenue after 7 PM on weekdays and all day on weekends. Metro received feedback that there was a significant number of riders that desired a direct connection to the UW hospital via Route R, especially in off-peak times when Routes 28 and 38 were not running. To accomplish this economically, Metro thru ran or interlined Route R and Route C at the UW hospital off-peak allowing riders to stay on the bus from C-R or R-C. Implemented in the December Pick, this change has been popular with riders.

Figure 9 – Routes R & C Interline



5 – Quantitative Analysis

As required by FTA Circular 4702.1B, Metro analyzed the impact of the refinements to the Transit Network Redesign to determine if there is evidence of potential Disparate Impacts or Disproportionate Burdens resulting from these changes. This analysis utilizes the 2% threshold established in Metro's Disparate Impact Policy to make this determination. The methodology and results of this analysis are described below.

5.1 – Methodology

Metro staff utilized Remix software to conduct the quantitative analysis. Remix utilizes a “people-trips” methodology to compare the impact of service changes on minority and low-income populations. In general, the people-trips methodology calculates the number of people within ¼ mile of a transit stop and multiplies that number by the annual number of trips that serve that stop. This results in the number of trips possible in a particular service scenario.

The total number people-trips, along with the proportion of minority and low-income people trips, is compared between scenarios. This is then compared to the area average for minority and low-income populations to determine if the difference exceeds Metro's established thresholds. If the difference does exceed the thresholds, and the impact of the changes imposes an adverse effect, then there is evidence of a potential Disparate Impact or Disproportionate Burden. A detailed explanation of the methodology employed in this study can be found below:⁴

Data sources

- Demographic data comes from the US Census Bureau, 2018-2022 American Community Survey (ACS) 5-Year Estimates.
- Population is coded by table B03002, field B03002001.
- Low-income status is set at 150% of the US federal poverty level. This is coded by the appropriate fields in table C17002.
- Minority status is coded by table B03002, by subtracting the white, non-Hispanic population (B03002003) from the total population (B03002001).
- Service area is a set of block groups determined by a shapefile your agency provides.

⁴ <https://help.remix.com/en/articles/1439215-remix-101-using-the-remix-title-vi-engine>

Methodology

1. Get the population near a route, including its low-income and minority percentage.
 - For each route, build a shape that represents the area within quarter-mile of any of its stops.
 - Intersect the catchment area with 2018-2022 ACS 5-year estimates. Get a list of block groups and the percentage overlap with each.
 - For each block group, take the percentage of overlap and multiply it by the block group's statistics.
 - Get the population, minority population, and low-income population for each group and sum them together. This is the total population a route could serve.
 2. Compare the number of people-trips, before and after.
 - Multiply the population near a route by the number of trips it makes (per year) to get "people-trips".
 - Repeat for low-income and minority populations to get "low-income people-trips" and "minority people trips".
 - Compare these numbers between the before and after versions of the route, to get a set of people-trip differences. We match before and after using routes that have the same name.
 3. Get the total difference in people-trips across the transit system.
 - Repeat the process above for every route in the transit system.
 - Sum together the difference in people trips. This will return three numbers: total difference in people-trips, total difference in low-income people-trips, and total difference in minority people trips.
 4. Calculate the change borne by low-income and minority populations.
 - Divide the total difference in low-income people trips by the total difference in people-trips to get the percentage of change borne by those with low incomes.
 - Repeat for minority people-trips.
 5. Compare the percentage change to the average in the service area.
 - Calculate the average percentage of low-income and minority populations across the entire service area.
 - Subtract from the change borne by those populations.
-

- Get two final numbers: the delta between the impact this set of transit changes had on low-income and minority populations compared to any average change.

5.2 – Quantitative Analysis Results

The results of the quantitative analysis indicate that Metro's service adjustments since the implementation of the Transit Network Redesign have not resulted in Disparate Impacts or Disproportionate Burdens. Since June 2023, Metro's service changes have resulted in an estimated increase of 1.3 billion people-trips. Minority and low-income populations saw an increase in service as a result of these changes. More details on these findings are discussed in the following sections.

5.2.1 – Disproportionate Burden Analysis

Approximately 650 million (49.3%) of the 1.3 billion people-trips added since June 2023 are considered low-income (Table 1). Within Metro's service area, this demographic accounts for about 18%, as detailed in Figures 10-13. Evidence of a potential Disproportionate Burden is found if there are adverse effects imposed by the service change, and the difference in people-trips for low-income populations and the area average for low-income people is greater than 2%. The increase in low-income people-trips exceeds the area average by 31 percentage points, indicating that low-income populations benefit from these service additions. Since the service changes have not imposed any adverse effects, there is no evidence of a potential Disproportionate Burden on low-income populations.

Table 1 - Disproportionate Burden Analysis

Change in People Trips	Low-Income People Trips	Percent of Total	Area Average	Delta	Disproportionate Buden
1,322,732,990	651,772,926	49.3%	18%	31.3%	No

Figure 10 – Proportion of Low-Income Population (Metro Service Area)

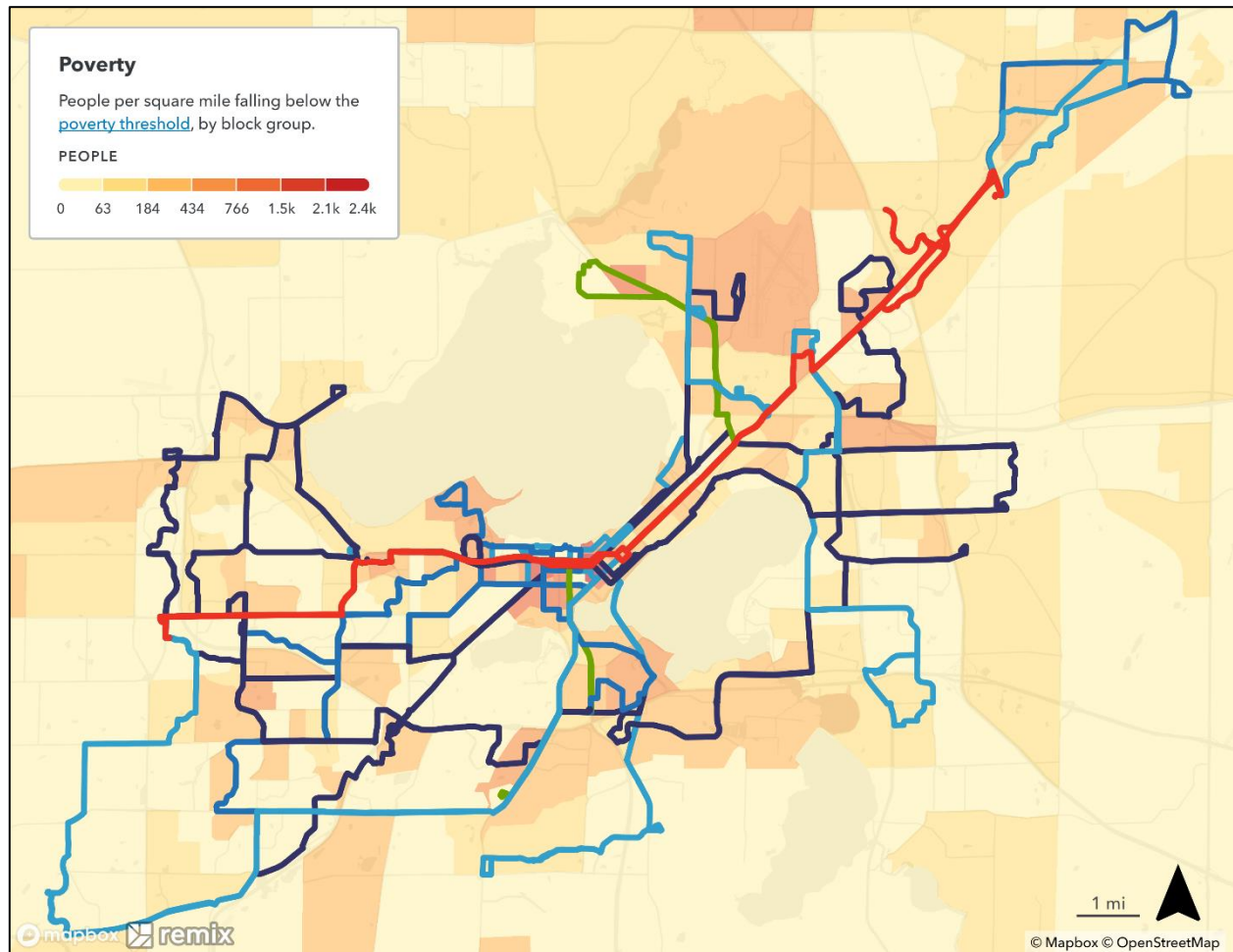


Figure 11 – Percent of Low-Income Population (Service Change Overlay)

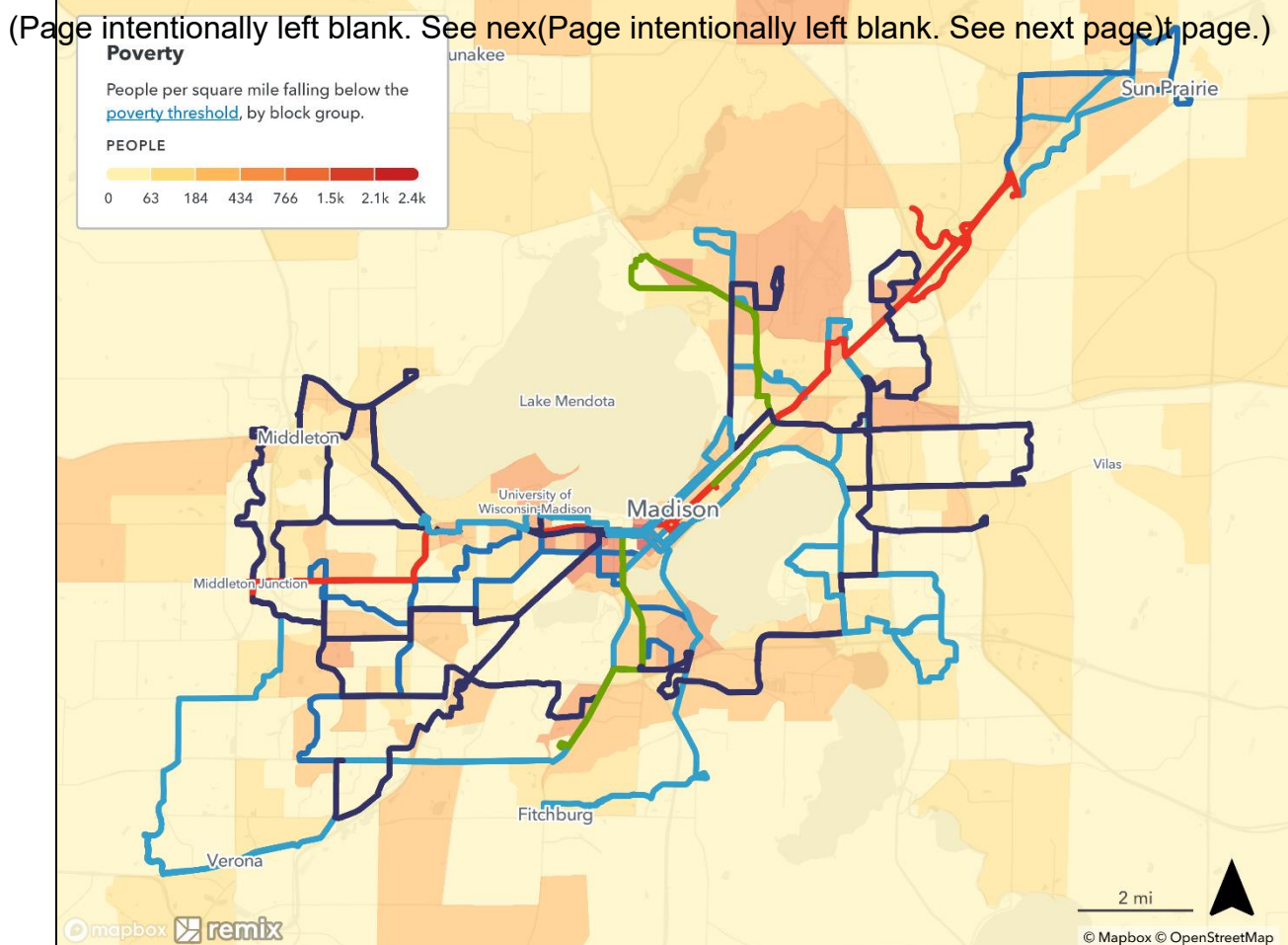


Figure 12 - Proportion of Low-Income Population (Downtown Madison)

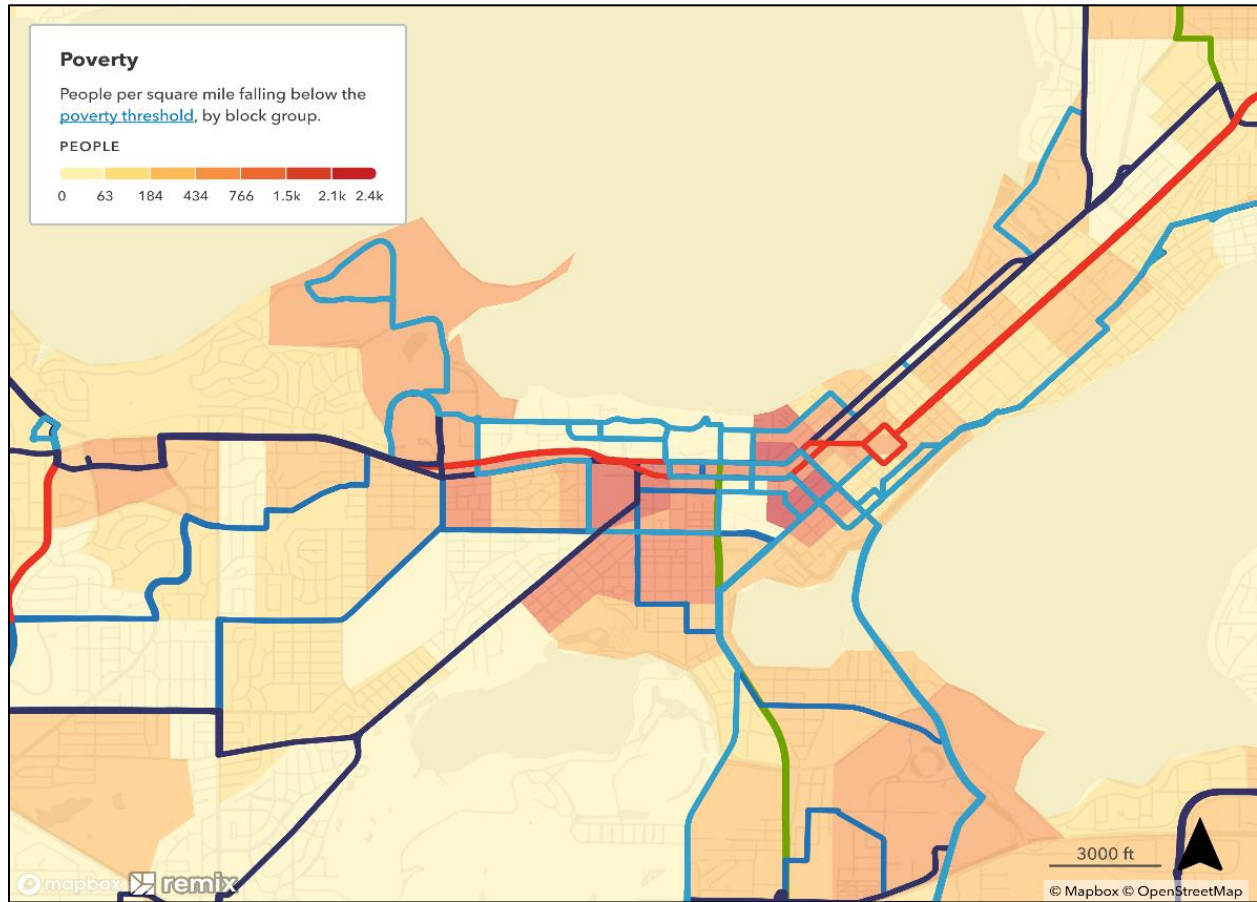
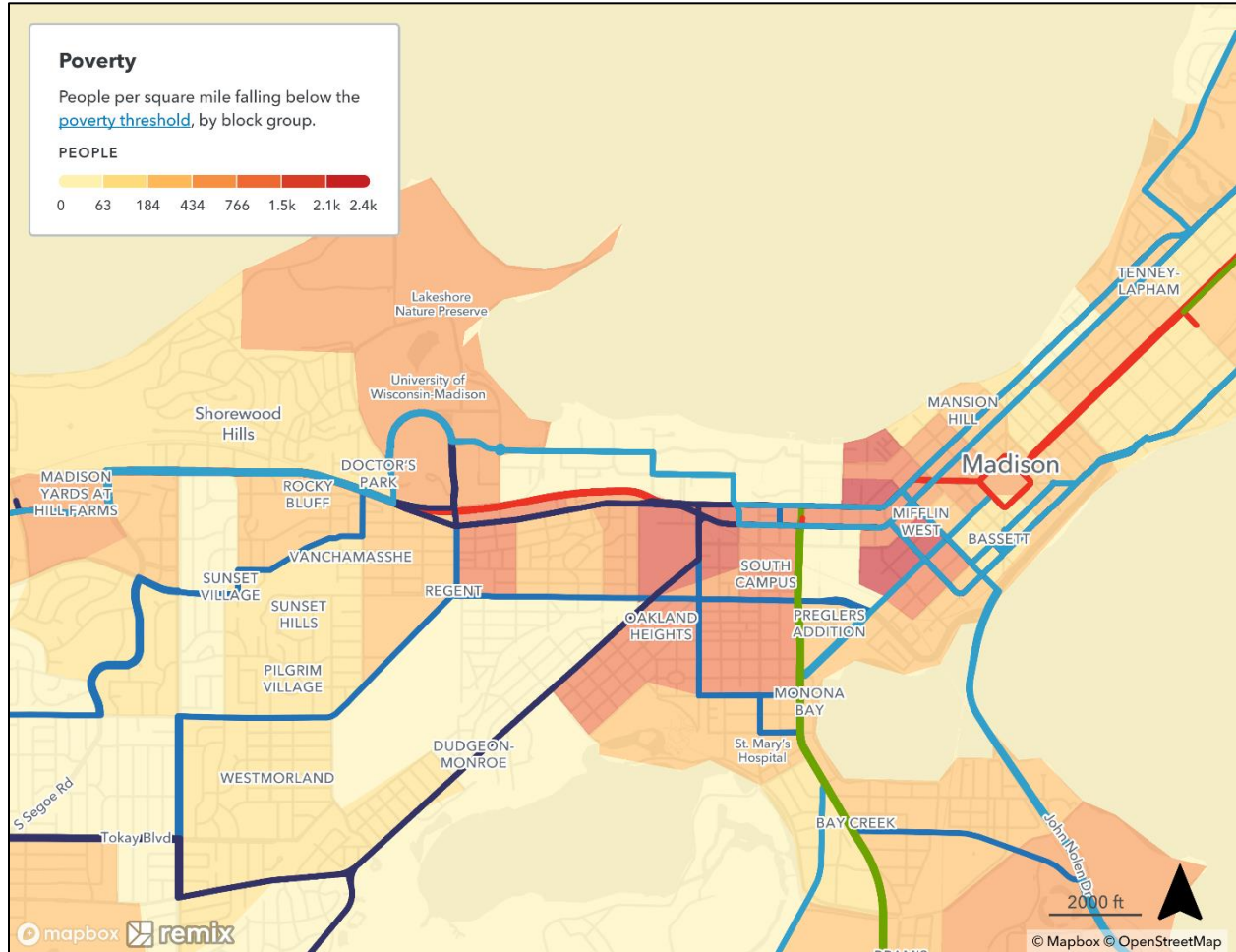


Figure 13 - Proportion of Low-Income Population (Service Change Overlay)



5.2.2 – Disparate Impact Analysis

Approximately 325 million (24.6%) of the 1.3 billion people-trips added since June 2023 are considered minority people-trips (Table 2). Within Metro's service area, this demographic accounts for 26.2% of the population, as detailed in Figures 14-17. Evidence of a potential Disparate Impact is found if there are adverse effects imposed by the service change, and the difference in people-trips for minority populations and the area average for minority populations is greater than 2%. The increase in low-income people-trips is 1.63 percentage points lower than the area average, indicating that the proportion of benefits that accrue to minority populations from these service additions is slightly less than the area average. However, this is within Metro's policy threshold of 2%, and is therefore not considered evidence of a potential Disparate Impact.

Table 2 – Disparate Impact Analysis

Change in People Trips	Low-Income People Trips	Percent of Total	Area Average	Delta	Disparate Impact
1,322,732,990	325,016,925	24.6%	26.2%	-1.63%	No

Figure 14 – Proportion of Minority Populations (Metro Service Area)

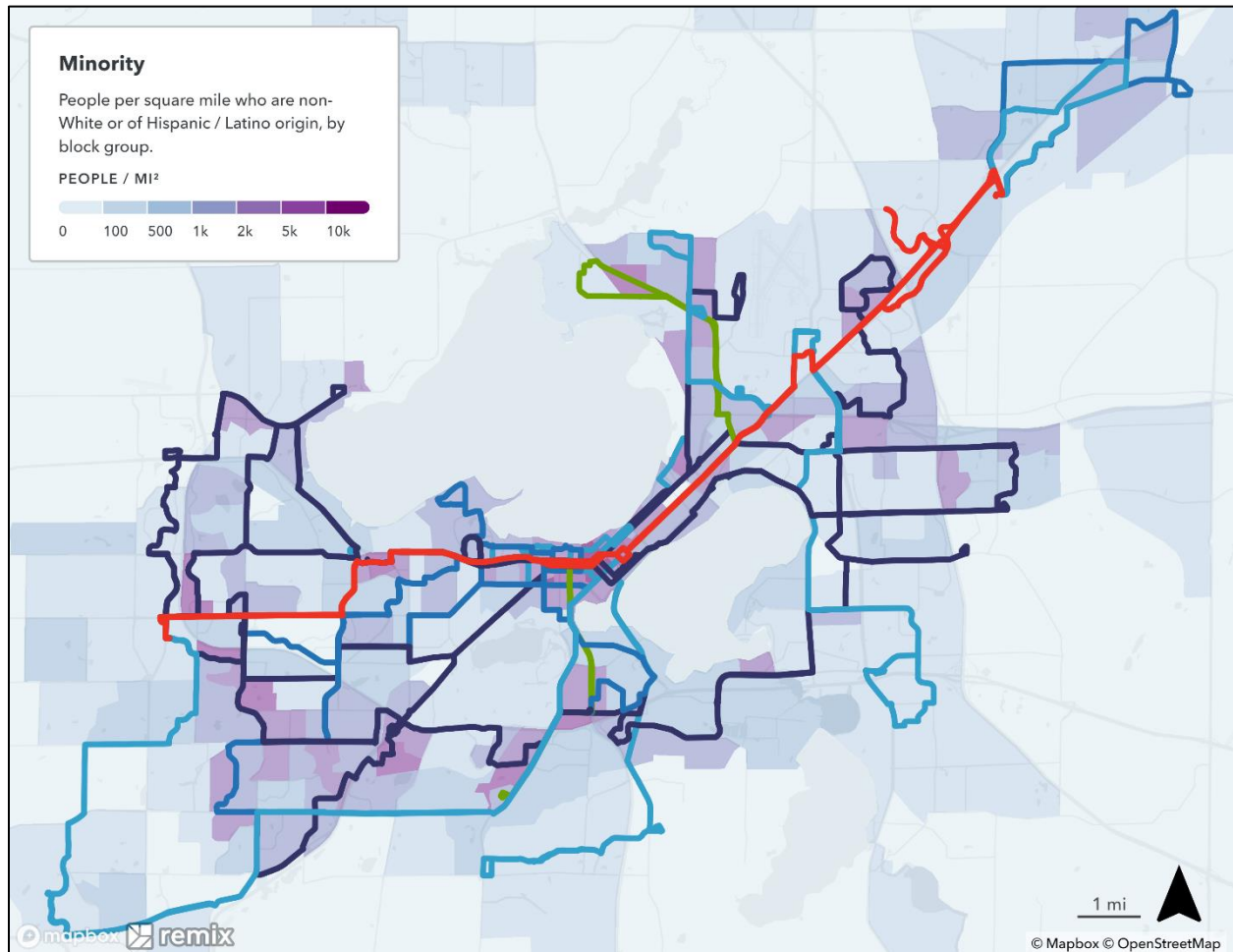


Figure 15 – Proportion of Minority Populations (Service Change Overlay)

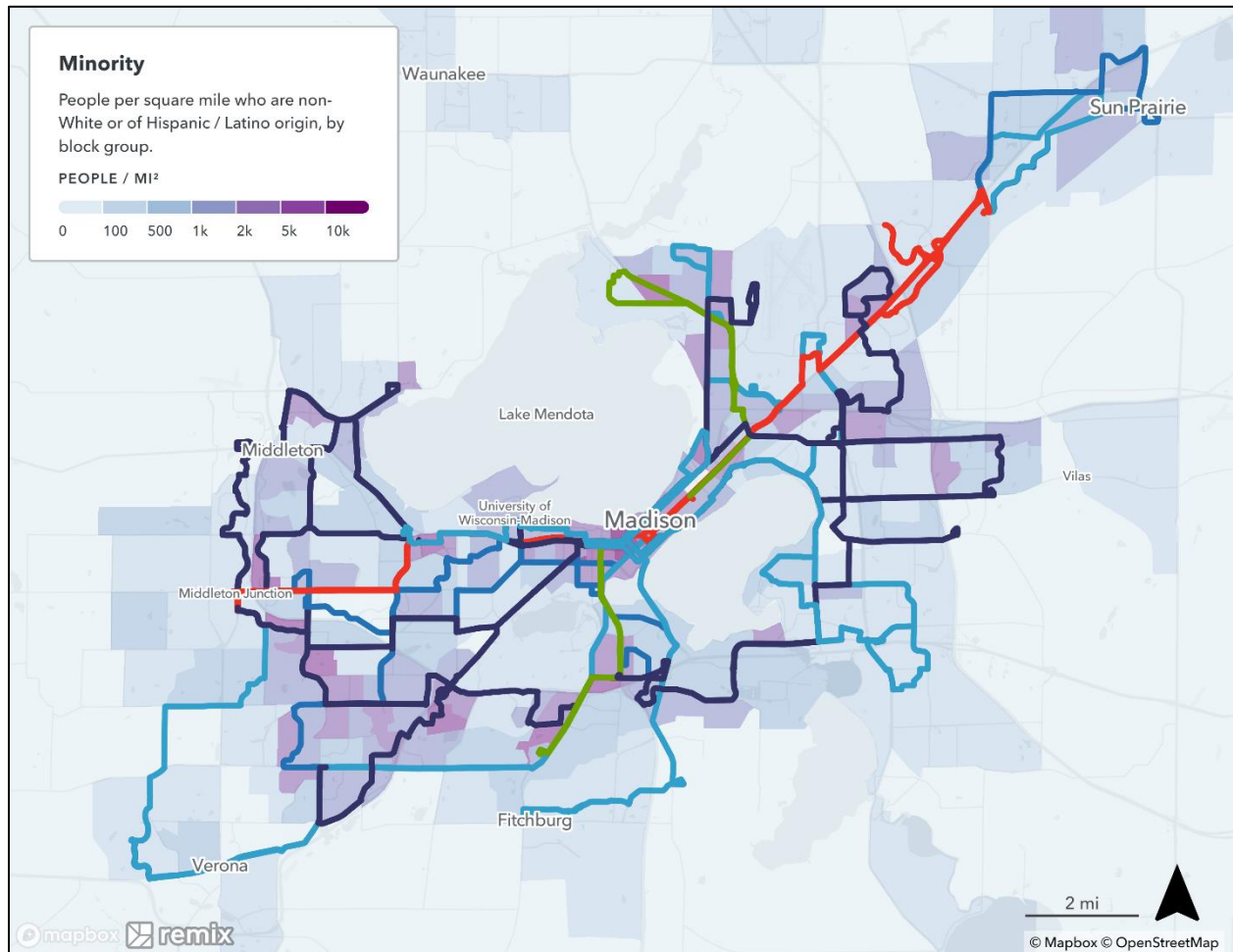


Figure 16 – Proportion of Minority Populations (Downtown Madison)

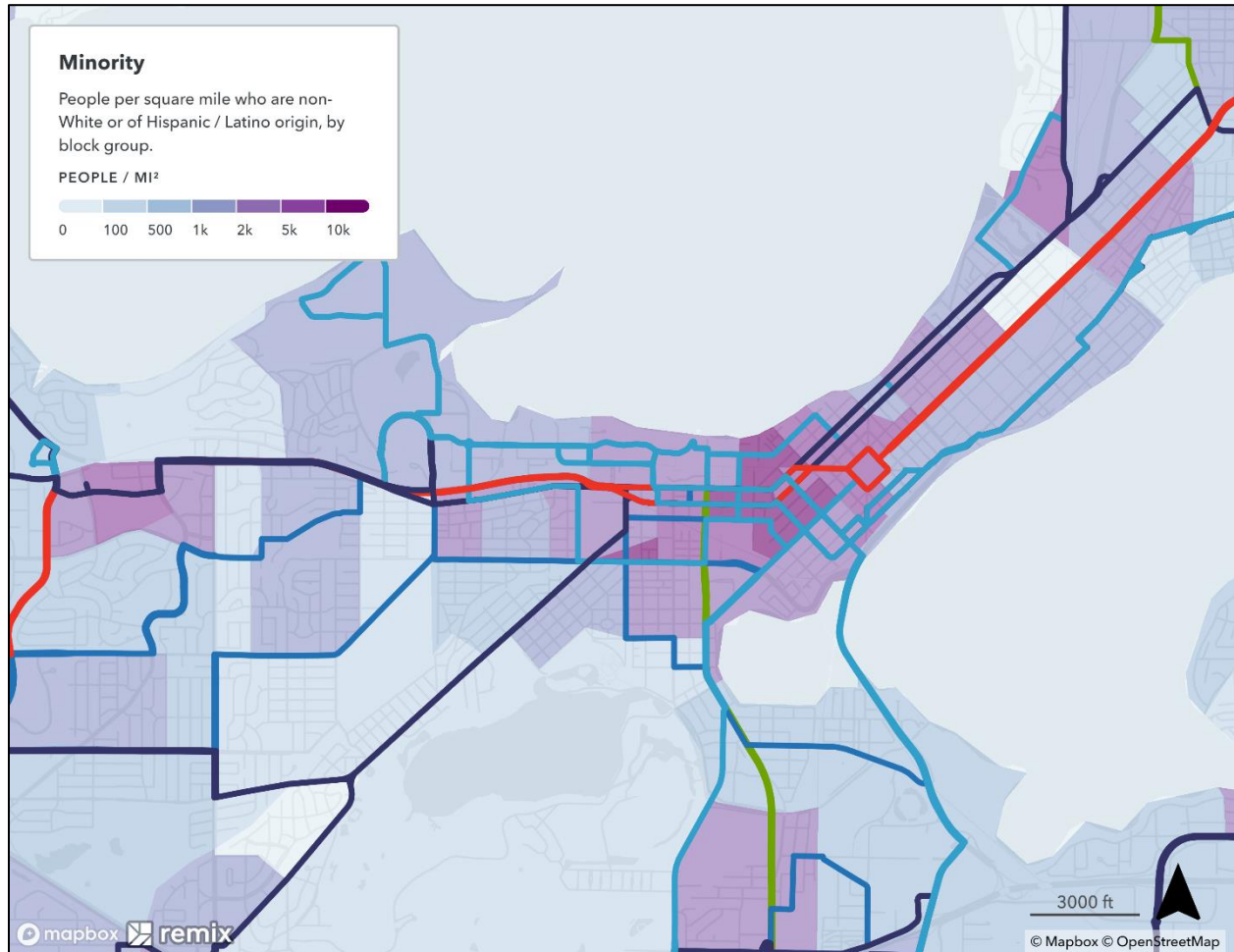
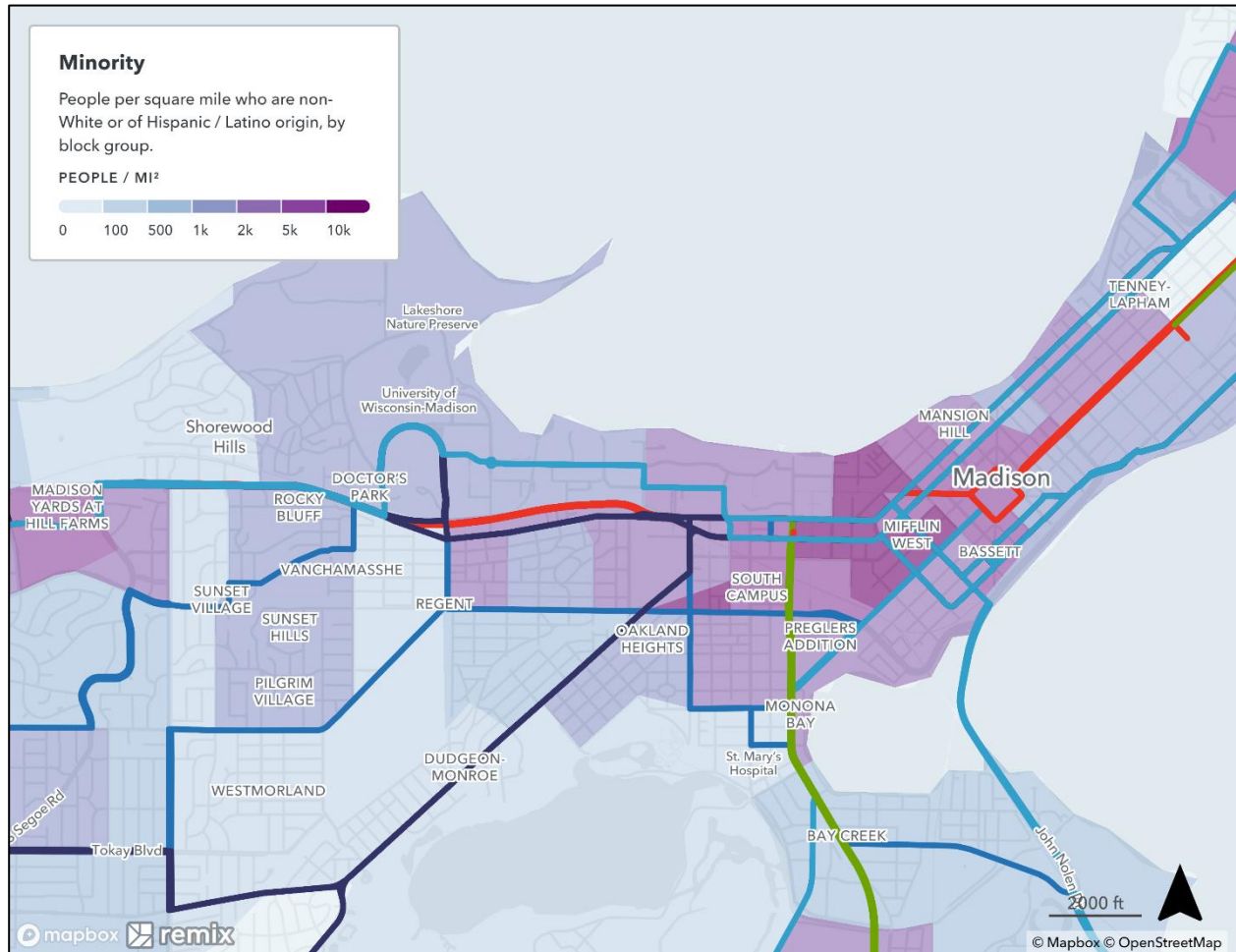


Figure 17 - Proportion of Minority Populations (Service Change Overlay)





Equity Analysis of Proposed Fare Changes

March 2024

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1 - Background

In 2021, Metro Transit staff began to evaluate alternatives to its current fare systems with the goals of integrating with Bus Rapid Transit, enhancing customer convenience, and reducing administrative costs. Staff recommended the implementation of a new account-based fare system that utilizes smartcards and fare capping with limited proof-of-payment kiosks located at Bus Rapid Transit stations. Throughout the fare study process, Metro staff received public feedback noting the importance of maintaining an option for cash fares, which was included in following policy principles recommended by Metro and approved by the Transportation Planning and Policy Board (TPPB):

- 1. Implementation of an account-based smartcard fare system**
 - New fare system implemented on all routes (BRT & Local Routes)
 - Allow customers to “pay-as-they-go” by adding monetary value to their smart card
 - All-door boarding with fare validation at each door
 - Accept payments via mobile phone or other third party media
- 2. Implementation of a new fare tariff with fare capping**
 - Reduced fare program for seniors, youth, and people with disabilities
 - Continuation of cash fare option
 - Replace paper transfers with timed transfer window
- 3. Incorporation of multiple methods for obtaining smartcard and loading account**
 - Contract with retailers to enable reloading accounts with cash
 - Equip Bus Rapid Transit stations with kiosks that dispense smartcards and accept cash

Following the approval of this policy direction by the TPPB, Metro staff initiated the procurement process for an account-based fare vendor. Masabi, LLC was selected as the vendor for the fare system transition and Metro staff were authorized to enter a contract with Masabi in September 2022. In January 2024 Metro staff presented the Transportation Commission with a draft of the proposed changes to the fare structure, including the implementation of fare capping. Metro Transit is conducting this Fare Equity Analysis in accordance with FTA Circular 4702.1B to determine whether the proposed fare changes result in a Disparate Impact to minority populations or places a Disproportionate Burden on low-income populations.

Table 1 – Metro Fare Restructuring Policy Timeline

May 3rd, 2021	Transit Fare Study Introduced to the TPPB
June 28th, 2021	Transit Fare Options Analysis Presented to TPPB
July 21st, 2021	Public Information Meeting Held
August 2nd, 2021	Public Hearing Held
August 16th, 2021	Fare Collection Policy Direction Passed by TPPB
September 9th, 2022	City of Madison Common Council Authorizes Metro General Manager to Enter Contract with Masabi LLC
January 31st, 2024	Metro Presents Draft Fare Capping Policy to the Transportation Commission
March 13 th , 2024	Public hearing on proposed fare tariff and fare equity analysis

2 – Title VI Regulatory Requirements

Section 601 of Title VI of the Civil Rights Act of 1964 states:

“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 subject to discrimination under any program or activity receiving federal financial assistance.”

The Federal Transit Administration (FTA) is one of ten operating agencies within the United States Department of Transportation, and provides financial assistance to develop, operate, and maintain transit systems across the country. The FTA requires all recipients of financial assistance to comply with Title VI and has established regulatory guidance in FTA Circular 4702.1B. As a recipient of financial assistance from the FTA, Metro Transit is required to comply with all regulations contained in Circular 4702.1B.

2.1 – Requirement to Conduct Fare Equity Analysis

Chapter IV of FTA Circular 4702.1B establishes requirements and guidelines specific to fixed route transit providers. The requirements in this chapter are scaled based on the size of the transit provider. Transit providers that operate 50 or more fixed route vehicles in peak service, or that operate within an urbanized area with a population greater than 200,000 are required to conduct a fare equity analysis for all proposed fare changes with the following exceptions:¹

- “Spare the air days” or other instances when a local municipality or transit agency has declared that all passengers ride free.
- Temporary fare reductions that are mitigating measures for other actions.
- Promotional fare reductions that are less than 6 months in duration.

As a transit provider that operates in an urbanized area with a population greater than 200,000 and has more than 50 buses operational during peak service, Metro Transit is required to conduct a fare equity analysis for any fare changes. Fare equity analyses utilize ridership demographic data to determine whether proposed fare changes are likely to result in a Disparate Impact on minority populations or Disproportionate Burden on low-income populations. Disparate Impacts and Disproportionate Burdens are defined by the FTA as the following:²

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

¹ FTA Circular 4702.1B Chapter IV-19.

² FTA Circular 4702.1B Chapter I-2.

Disproportionate Burden: A Disproportionate Burden refers to a neutral policy or practice that disproportionately affects low-income populations more than non-low-income populations.

Furthermore, the FTA requires that transit providers establish policy thresholds to determine whether a potential Disparate Impact or Disproportionate Burden has occurred (see section 2.2). If a potential Disparate Impact or Disproportionate Burden is identified, then the transit provider is required to assess alternatives to “avoid, minimize, or mitigate” the potential impact. A transit provider may implement a proposed fare change that results in a Disparate Impact or Disproportionate Burden only if the following conditions are met:³

- The transit provider has a substantial legitimate justification for the proposed fare change, and
- The transit provider can show that there are no alternatives that would have a less disparate impact on minority riders but would still accomplish the transit provider’s legitimate program goals.

2.2 – Disparate Impact & Disproportionate Burden Policies

FTA Circular 4702.1B requires transit providers to establish Disparate Impact and Disproportionate Burden policies that establish thresholds to determine whether the adverse effects of a proposed service or fare change are excessively borne by minority or low-income populations. Metro Transit’s Disparate Impact and Disproportionate Burden policy thresholds were approved by the City of Madison Transportation Commission on September 13th, 2023 as part of its Title VI program update. No changes were made to Metro Transit’s policy thresholds since its previously adopted Title VI program in 2019. Metro Transit’s Disparate Impact Policy states the following:⁴

“The Disparate Impact threshold is described as follows for Metro Transit: Should the burden of any major service change require a minority population/ridership (33% threshold) to bear adverse effects greater or less than 2% than those borne by the non-minority population/ridership, that impact will be considered a disparate impact.”

3 - Current Fare Structure

Metro Transit’s current fare structure is enumerated in its Fare Tariff, which was last updated in 2016 (see Appendix A). In general, Metro utilizes a traditional farebox system that is designed to accept cash and a variety of pre-purchased passes (see Table 2). Fare and pass costs are segmented into Adult, Youth, and Senior/Disabled categories with each category having different rates. Additionally, Metro contracts with multiple organizations to offer unlimited ride passes.

³ FTA Circular 4702.1B Chapter IV-20

⁴ While this policy doesn’t explicitly reference disproportionate burden, Metro Transit applies the same 2% standard to its disproportionate burden analysis.

Table 2 - Metro Transit's Current Fare Structure

Adult Fares	
Cash Fare	\$ 2.00
One-Day Pass	\$ 5.00
10-Ride Card	\$ 17.25
31-Day Pass	\$ 65.00
Low-Income 31-Day Pass	\$ 28.00
Youth Fares	
Youth Cash Fare	\$ 1.25
Youth 10-Ride Card	\$ 11.25
EZ Rider Pass (Semester Pass)	\$ 165.00
EZ Rider Pass (School Year)	\$ 315.00
Summer Youth Pass	\$ 35.00
Day Tripper (Group Field Trip Pass)	\$ 52.00
Senior/Disabled Fares	
Senior Cash Fare	\$ 1.00
Senior 31-Day Pass	\$ 32.50
10-Ride Card	\$ 10.00
Unlimited Ride Passes & Commute Cards	
Unlimited Ride Pass	\$ 1.35
Commute Card	\$ 1.40
Specialized Commute Card	\$ 1.00

4 - Proposed Fare Structure & Fare Capping Policy

In 2021, Metro Transit staff began to evaluate alternatives to its current fare system with the goals of integrating with Bus Rapid Transit, enhancing customer convenience while reducing administrative costs. Following a detailed study of various fare system types and a public engagement process, the City of Madison Transportation Planning and Policy Board approved Metro Transit's proposed policy direction for future fare collection. This policy direction was based on the following principles:

- 1. Implementation of an account-based smartcard fare system**
 - New fare system implemented on all routes (BRT & Local Routes)
 - Allow customers to "pay-as-they-go" by adding monetary value to their smart card
 - All-door boarding with fare validation at each door
 - Accept payments via mobile phone or other third party media
- 2. Implementation of a new fare tariff with fare capping**
 - Reduced fare program for seniors, youth, and people with disabilities
 - Continuation of cash fare option
 - Replace paper transfers with timed transfer window
- 3. Incorporation of multiple methods for obtaining smartcard and loading account**

- Contract with retailers to enable reloading accounts with cash
- Equip Bus Rapid Transit stations with kiosks that dispense smartcards and accept cash

In accordance with these principles, Metro Transit staff are proposing a revised fare tariff to implement fare capping. Metro Transit strove to keep these changes cost-neutral to customers, resulting in a revised fare tariff with no fare increases. In general, Metro Transit's revised fare tariff is divided into five main categories: (1) Adult Fares, (2) Half-Price Fares, (3) School Program Fares, (4) Transitional Fares, (5) Paratransit Fares. While Metro Transit intends to continue its contracted fare media, these fares were not included in the tariff as they are subject to individual partner agreements.

4.1 - Adult Fares

Metro Transit's proposed Adult fare structure represents a transition from pre-paid passes and cash fares to a stored value, account-based system, with fares capped at daily, weekly, and monthly intervals. Customers will have a single smart card that is linked to a personal account where they can add value to their smartcard. Stored value can be added at the Metro Transit headquarters, at BRT fare kiosks, or at any one of Metro Transit's retail partners. The proposed adult fare rates correspond to Metro Transit's current fare structure for pre-paid passes of the same type. While customers who use cash will not have access to the benefits of fare capping or free transfers, all customers are able to load their smartcard with cash at any of the previously mentioned outlets.

Table 3 - Proposed Standard Fare Structure

Fare Type	Price
Cash	\$2.00
Single Ride	\$2.00
Daily Fare Cap	\$5.00
Weekly Fare Cap	\$16.25
Monthly Fare Cap	\$65.00

4.2 – Half-Price Fares

In addition to the standard adult fares, Metro Transit is proposing a half-priced fare structure for eligible youth, senior, disabled, and low-income riders. This fare structure approximately matches Metro's current reduced-price fares. However, there are several notable differences. First, single ride and cash fares will decrease from \$1.25 to \$1.00 for eligible youth customers. Additionally, the monthly fare cap of \$28.00 for eligible Senior riders represent a \$4.50 decrease from the current cost of \$32.50 for a senior 31-day pass. The half-price fares follow the same stored value, account-based, fare collection system described above for standard adult fares. For more information on eligibility requirements see Appendix B.

Table 4 - Proposed Half-Price Fare Structure

Fare Type	Price
Cash	\$1.00
Single Ride	\$1.00
Daily Fare Cap	\$2.50
Weekly Fare Cap	\$7.00
Monthly Fare Cap	\$28.00

4.3 – School Program Fares

Metro Transit has a long history of partnership with the Madison Metropolitan School District and has historically provided several student pass types. Metro is proposing no changes to its semester, school year, and summer pass programs for MMSD students. The “Day Tripper” pass, which was intended as a group pass for field trips, is being discontinued due to low usage rates.

Table 5 - Proposed School Program Fare Structure

Fare Type	Price
Youth Pass (Semester)	\$165.00
Youth Pass (School Year)	\$315.00
Summer Youth Pass	\$35.00

4.4 – Transitional Fare Products

Metro Transit is proposing the continuation of several types of legacy fare media as customers transition to proposed account-based smartcard fare collection system. The legacy fare media that will remain during Metro’s fare system transition are listed below in Table 6. and are intended to be in effect until the end of 2025.

Table 6 - Proposed Transitional Fare Media

Fare Type	Price
31-Day Pass (Adult)	\$65
31-Day Pass (Senior/Disabled)	\$28
10-Ride Card (Adult)	\$17.25
10-Ride Card (Half-Price)	\$10.00

4.5 – Paratransit Fares

While paratransit users will be able to take advantage of the new smartcard system, Metro is not proposing any changes to the paratransit fare structure.

Table 7 - Proposed Paratransit Fares

Fare Type	Price
Single Ride	\$3.25
Convenience Tickets	\$19.50
Agency Fare	Previous year’s audited cost per ride adjusted to reflect current year variables in service expenses.

5 – Fare Equity Analysis

FTA Circular 4702.1B requires transit providers to analyze ridership data in order to determine whether a potential Disparate Impact or Disproportionate Burden is likely to occur as a result of the provider's proposed fare changes. Specifically, Circular 4702.1B states that transit provider shall conduct the analysis in the following manner:⁵

1. Determine the number and percent of users of each fare media being changed;
2. Review fares before the change and after the change;
3. Compare the differences for each particular fare media between minority users and overall users; and
4. Compare the differences for each particular fare media between low-income users and overall users.

Per Metro Transit's Disparate Impact and Disproportionate Burden Policy and FTA Circular 4702.1B guidance, if the adverse effects of a proposed fare change for a particular fare media are greater than 2% for minority or low-income populations, then there is evidence of a potential Disparate Impact or Disproportionate Burden.

5.1 – Methodology

For the purposes of this analysis, Metro Transit determined that on-board survey data was the most appropriate data source as it contains the demographic data necessary to perform the type of quantitative analysis described above. The most recent on-board survey conducted by Metro Transit was in 2015. While this dataset is nearly a decade old, it is the only available source of demographic data by fare type for this analysis as the FTA does not allow for the use of Census data in fare equity analyses. Metro Transit staff performed the following steps in performing this analysis in accordance with the guidance found in FTA Circular 4702.1B:

1. Determine the number and percent of users of each fare media being changed

The 2015 on-board survey data was parsed and cross-tabulations were created for race/fare-type and income/fare type data. While the 2015 on-board survey was comprehensive and yielded approximately 6,000 survey responses, the dataset is limited in several ways. Most notably, not every type of fare media Metro offers had demographic data collected in the survey. This limited the analysis to the following fare types that were included in the survey:

- Cash
- Unlimited Ride Pass (Commute Card/Specialized Commute Card)
- 10-Ride Card
- 31-Day Pass
- 31-Day Pass (low-income)
- EZ Rider Youth Pass (Semester/ School Year/ or Summer)

⁵ FTA Circular 4702.1B Chapter IV-19

Additionally, the 2015 on-board survey allowed respondents to either omit an answer for these questions or respond with the answer of “other” if no category applied to them. For the purposes of this analysis, all responses coded as “no answer” or “other” were removed from the dataset.

2. Review fares before and after the change

Metro Transit’s proposed fare media changes represent a significant shift from its current paper fare media. While price increases and/or decreases are minimal, some legacy fare media categories, such as senior and youth fares, are consolidated into a single half-priced fare category. Table 8 outlines how Metro Transit’s proposed fare media correlate to its legacy fare media. The absolute and percentage change in fares are also presented.

Table 8 - Legacy and Proposed Fare Media Comparison

Adult Fares					
Legacy Fare Media	Current Fare	Proposed Fare Media	Proposed Fare	Absolute Change	Percent Change
Cash Fare	\$2.00	Single Ride (Cash/Smartcard)	\$2.00	\$0.00	0%
One-Day Pass	\$5.00	One-Day Fare Cap	\$5.00	\$0.00	0%
-	-	Weekly Fare Cap	\$16.25	-	-
31-Day Pass	\$65.00	Monthly Fare Cap	\$65.00	\$0.00	0%
10-Ride Card	\$17.25	10-Ride Pass	\$17.25	\$0.00	0%
2-Hour Transfer	\$0.00	2-Hour Transfer	\$0.00	\$0.00	0%
Low-Income Fares*					
-	-	Half Price Single Ride	\$1.00	-	-
-	-	Half-Price Daily Fare Cap	\$2.50	-	-
-	-	Half-Price Weekly Fare Cap	\$7.00	-	-
Low-Income 31-Day Pass	\$28.00	Half-Price Monthly Fare Cap	\$28.00	\$0.00	0%
Youth Fares					
Youth Cash Fare	\$1.25	Half-Price Single Ride	\$1.00	-\$0.25	-20%
Youth 10-Ride Card	\$11.25	Half-Price 10-Ride Pass	\$10.00	-\$1.25	-11%
EZ Rider Pass (Semester Pass)	\$165.00	Youth Pass (Semester)	\$165.00	\$0.00	0%
EZ Rider Pass (School Year)	\$315.00	Youth Pass (School Year)	\$315.00	\$0.00	0%
Summer Youth Pass	\$35.00	Summer Youth Pass	\$35.00	\$0.00	0%
Day Tripper (Group Field Trip Pass)	\$52.00	Eliminated		-	-

Senior/Disabled Fares					
Senior Cash Fare	\$1.00	Half-Price Single Ride	\$1.00	\$0.00	0%
Senior 31-Day Pass	\$32.50	Half-Price Monthly Fare Cap	\$28.00	-\$4.50	-14%
10-Ride Card	\$10.00	10-Ride Pass	\$10.00	\$0.00	0%
Unlimited Ride Passes & Commute Cards					
Unlimited Ride Pass	\$1.35	Contracted fare media - no changes at this time.			
Commute Card	\$1.40				
Specialized Commute Card	\$1.00				
Transfers					
Transfer	Free for 2 Hours		Transfer		Free for 2 Hours (no cash transfers)

* Eligibility for Low-Income Fares based on 150% of the US Department of Health and Human Services poverty guidelines.

3. Compare the differences for each particular fare media between minority users and overall users

Metro Transit staff analyzed the usage rates for each type of fare media and compared the usage rate of minority populations to the system-wide population. As mentioned above, this analysis was limited by the fare media types included in the 2015 on-board survey. The results of this analysis, located in Table 9, show that three types of fare media exceed Metro Transit's 2% threshold for determining a potential Disparate Impact (discussed below). However, since the proposed changes to these fare media types do not impose adverse effects on minority populations, they do not constitute evidence of a potential Disparate Impact.

Unlimited/Commute Card Pass

The "pass" option includes Metro's unlimited ride pass, commute card pass, and specialized commute card pass. Metro Transit contracts with partners in the community to provide these passes to their employees/members. Partners are charged per ride based on the rate listed in Table 9. The proportion of minority riders that utilize Metro's "pass" option is 7% less than the system-wide usage of the "pass" option. Since no changes are proposed to the unlimited ride pass/ commute card pricing, and minority riders utilize this fare media less than the system average, there are no adverse effects imposed. Therefore, based on this assessment, there is no evidence of a potential Disparate Impact.

10-Ride Pass

Metro Transit's proposed fare changes will create a transitional period for its 10-Ride Pass, which is expected to be eliminated by the end of 2025. While the eventual elimination of this fare media type will impose adverse effects, it is not expected to cause a Disparate Impact since this fare media type is not used by minority populations at rate greater than 2% of the system-wide usage (see Table 9).

EZ Rider Pass

The “EZ Rider” pass is a fare media type offered to MMSD students. This fare media is being renamed as “Youth Pass” for MMSD students. The proportion of minority riders that utilize this pass is 4% greater than the proportion of system-wide riders. Since this is above Metro Transit’s 2% Disparate Impact threshold, it can be considered evidence of a potential Disparate Impact if adverse effects are imposed. However, since the pricing for the youth fares is not changing, there are no adverse effects imposed by the proposed fare change. Therefore, this should not be considered evidence of a potential Disparate Impact.

Table 9 - Disparate Impact Quantitative Analysis

Fare Type	Absolute Value		Percent		Delta (Minority-System Wide)
	Minority	System-Wide	Minority	System-Wide	
Cash	180	494	11%	9%	2%
Pass (Unlimited Ride/Commute Card)	947	3,751	60%	67%	-7%
10-Ride	84	438	5%	8%	-3%
31-Day	200	640	13%	11%	2%
31-Day Low Income	72	178	5%	3%	2%
EZ Rider	98	135	6%	2%	4%
Total	1,581	5,636	100%	100%	-

4. Compare the differences for each particular fare media between low-income users and overall users.

Metro Transit staff analyzed the usage rates for each type of fare media and compared the usage rate of minority populations to the system-wide population. As mentioned above, this analysis was limited by the fare media included in the 2015 on-board survey. The results of this analysis, located in Table 10, show that one type of fare media (10-Ride Pass) exceeds Metro Transit’s 2% threshold for determining a potential Disproportionate Burden (discussed below). However, since the proposed changes to this fare media type do not impose adverse effects on low-income populations, they do not constitute evidence of a potential Disproportionate Burden.

10-Ride Pass

Metro Transit’s proposed fare changes will create a transitional period for its 10-Ride Pass, which is expected to be eliminated by the end of 2025. While the eventual elimination of this fare media type will impose adverse effects, there is not evidence of a potential Disproportionate Burden since the proportion of low-income riders who use this type of fare media is more than 2% greater than the system-wide proportion of riders who use this type of fare media (see Table 10).

Table 10 - Disproportionate Burden Quantitative Analysis

Fare type	Absolute Value		Percent Value		Delta (Low Income-System Wide)
	Low-Income	System-Wide	Low-Income	System-Wide	
Cash	240	494	11%	9%	2%
Pass	1,518	3,751	67%	67%	1%
10-Ride	103	438	5%	8%	-3%
31-Day	230	640	10%	11%	-1%
31-Day Low Income	111	178	5%	3%	2%
EZ Rider	50	135	2%	2%	0%
Total	2,252	5,636	100%	100%	-

5.2 – Transfer Analysis

Metro Transit also analyzed the equity impacts of its proposed transfer policy, which will maintain free 2-hour transfers for smartcard users while eliminating paper transfers for cash users. Metro again utilized its 2015 on-board survey data to determine if the proposed transfer policy would result in a potential Disparate Impact or Disproportionate Burden. Staff queried the dataset to find all responses that showed a customer both paid in cash and had at least one transfer in their trip. Since this analysis only considered the impacted fare media (cash), the proportion of minority and low-income respondents in this dataset was compared to the proportion of non-minority/non-low-income respondents instead of to the system-wide proportion.

The results of this analysis are in Tables 11 & 12 and show that there is no evidence of a potential Disparate Impact since the difference in the proportion of minority and non-minority populations who use cash transfers was 0%, which is below Metro Transit's 2% Disparate Impact threshold. However, Metro Transit staff did find that there is evidence of a potential Disproportionate Burden as the difference in the proportion of low-income and non-low-income populations was greater than Metro Transit's 2% threshold. As such, Metro Transit staff will take steps to "avoid, minimize, or mitigate impacts where practicable".⁶ A description of these efforts can be found in Section 6 – Mitigation Measures.

Table 11 - Minority Population Cash Transfer Analysis

Category	Absolute Value	Percent
Minority	122	50%
Non-Minority	123	50%
Delta	1	0%
Total	245	100%

⁶ FTA Circular 4702.1B Chapter IV-21

Table 12 - Low-Income Cash Transfer Analysis

Category	Absolute Value	Percent
Low-Income	131	64%
Non-Low-Income	75	36%
Delta	56	27%
<i>Total</i>	<i>206</i>	<i>100%</i>

5.3 – Results of Fare Equity Analysis

Metro Transit is proposing an overhaul of its fare collection system that will transition customers from pre-paid passes and cash fares to a stored value, account-based system, with fares capped at daily, weekly, and monthly intervals. This transition will impose minimal changes to fare pricing and no fare increases (see Table 8). Metro Transit staff analyzed the potential impacts of its proposed fare changes in accordance with FTA Circular 4702.1B. While there are several fare media types that exceed Metro Transit's 2% threshold for identifying potential Disparate Impacts or Disproportionate Burdens, the proposed changes either do not impose adverse effects or the effects are expected to be borne at a greater rate system wide. The lone exception is the elimination of cash transfers, which was identified as having the potential to cause a Disproportionate Burden if implemented without mitigation measures. As such, Metro Transit staff are proposing multiple mitigation measures that can be found in Section 6.

6 – Mitigation Measures

Metro Transit's proposed fare system includes multiple measures to address the potential Disproportionate Burden identified in the transfer analysis and ease the transition to the new fare system. These measures include the expansion of Metro's low-income fare option, implementing limited fare kiosks at BRT platforms, expanding Metro's retail network partnerships, and providing a promotional period where smart cards are free. The following sections describe each of these measures in greater detail.

6.1 – Free Smartcard Promotional

As part of the transition process, Metro Transit plans on having a promotional period where they will offer customers free smartcards through 2024. This removes the primary barrier for low-income customers to access the benefits of Metro's half-priced fare program, fare capping, and free 2-hour transfer window. Once a customer has their smartcard, they will be able to load it with value through an online account or with cash at any Metro fare kiosk or retail partner. Removing the barrier of obtaining a smart card significantly mitigates the impact of eliminating cash transfers for low-income individuals.

6.2 – Expanded Low-Income Fare Program

Metro Transit's current low-income fare program only applies to its 31-day pass. Furthermore, Metro purchases a limited number of these passes annually and operates the program on a first-come, first-served basis. The proposed fare tariff establishes a half-priced fare program for low-income individuals, seniors, and youth. Fare capping is also extended to the half-priced fare program. Eligible customers will have their fares capped at the same daily, weekly, and

monthly intervals, but at a half-priced rate. This ensures that all eligible customers always receive a reduced fare.

6.3 – Fare Kiosks at BRT Stations

As part of Metro Transit's BRT project, off-board fare payment kiosks will be installed at select BRT stations. Customers will be able to either purchase a single ride ticket or load their smartcard with stored value at the kiosk. Smartcards can be loaded with cash at these kiosks, allowing low-income customers who would otherwise pay in cash to receive the benefits half-priced fares, fare capping, and the free 2-hour transfer window.

6.4 – Expanded Retail Network

Metro Transit currently has a network of retail partners that sell its fare media at their outlets. These outlets are dispersed throughout Metro's service area, allowing customers to purchase fare media without having to travel to the Metro Headquarters. When customers transition to smartcards, they will be able to load their cards with stored value in cash at any of these retail outlets. In anticipation of this transition, Metro has worked to expand its retail network to include 66 partners and continues to explore options to expand its network further. Combined with the fare kiosks at BRT stations, this further mitigates the impact of eliminating cash transfers by providing cash users an expansive network that they can use to add stored value to their smartcard, thereby allowing low-income customers who would otherwise pay in cash to receive the benefits of half-price fares, fare capping, and the free 2-hour transfer window.

Appendix A – Current Metro Fare Tariff

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METRO TRANSIT FARE TARIFF



UPDATED:
August 28, 2016

SERVICE CATEGORY: Metro Fixed Route Service

ADULT FARES (18-64):

Cash Fare	\$2.00
10-Ride Card	\$17.25 for 10 rides
31-Day Pass	\$65.00
Low Income 31-Day Pass	\$28.00
One Day Pass	\$5.00
Transfer Fee	Free

NOTES:

1. The 31-Day Pass will entitle the person to whom it is issued an unlimited number of rides during the 31-day period for after initial activation.
2. To receive low income pass, customers must fill out and sign a self-declaration form that income is at/below 150% of poverty level. Only 300 available for sale at 3 outlets per month.
3. The One Day Pass allows unlimited rides on any calendar day.
4. All transfers are valid for two (2) hours from the time of boarding.
5. On Saturdays, Sundays, and holidays, up to two (2) adults and four (4) children may ride for one cash fare of \$6.00 for an unlimited number of trips on that day.

YOUTH FARES (5-17):

Cash Fare	\$1.25
10-ride Card	\$11.25 for 10 rides
EZ Rider Pass (semester)	\$165.00
EZ Rider Pass (school year)	\$315.00
EZ Rider Limited Pass	No charge. Valid during MMSD school hours. Issued in lieu of EZ Rider Pass in case of ride behavior violation.
Summer Youth Pass	\$35.00
Day Tripper (Group) Pass	\$52.00
Transfer Fee	Free

NOTES:

1. All children under the age of 5, when accompanied by an adult, ride free.
2. In order to be eligible to ride for the youth fare, a valid and current middle or high school identification card must be presented. Elementary school students are exempt from the identification requirement. Those high school students over the age of 17, enrolled in school, and possessing a valid and current identification card may ride for the youth fare. If identification is not presented, the adult fare applies.
3. The EZ-Rider Pass will be good during all days and hours of Metro operation during a Madison Metropolitan School District semester (including Saturdays, Sundays, holidays, and weekday non-school days). Passes are available only at Metro Transit, Metro-by-Mail, on the web at mymetrobus.com and at MMSD schools.
4. The Summer Youth Pass is good on all days from the end of a Madison Metropolitan School District year in June until the start of a Madison Metropolitan School District year in August.
5. The Day Tripper Pass is good for a round trip to accommodate a class up to approximately 30 students. This pass requires at least a 5-day advance notice and a chaperone to student ratio of 1:10 and is sold only at Metro Transit.
6. All transfers are valid for two hours from the time of boarding.

SENIOR (65+)/DISABLED FARES:

31-Day Pass	\$32.50
Cash Fare	\$1.00
10-Ride Card	\$10.00 for 10 rides
Transfer Fee	Free

NOTES:

1. In order to be eligible to ride for the senior and disabled fare, valid identification must be presented. The Medicare card is an acceptable form of identification for seniors. Without identification, the adult fare applies.
2. All transfers are valid for two (2) hours from the time of boarding.

SERVICE CATEGORY: Paratransit Service**ALL PASSENGERS:**

Cash Fare	\$3.25
Convenience Tickets	\$19.50 for booklet of 6 tickets. Each ticket is equal to \$3.25 fare.
Transfer Fee	Free
Agency Fare ²	Previous year's audited cost per ride adjusted to reflect current year variables in service expenses.

NOTES:

1. Paratransit Convenience Tickets are sold Metro Transit, through Metro-by-Mail, on the web at mymetrobus.com and at a limited number of outlets.
2. An agency is defined as an organization that serves persons who qualify for human service or transportation-related programs or services due to disability, income, or advanced age consistent with President's Executive Order on Human Service Transportation Coordination (February 24, 2004).

SERVICE CATEGORY: Unlimited Ride Pass and Commute Card**ALL PASSENGERS:**

Unlimited Ride Pass	\$1.35
Commute Card	\$1.40
Specialized Commute Card	\$1.00

NOTES:

1. The Specialized Commute Card is for groups in which all participants meet the criteria of senior/disabled riders.
2. Paratransit rides taken with an Unlimited Ride Pass or Commute Card will be billed at the applicable ADA paratransit fare in the fare tariff on the date the ride is taken.

Appendix B – Proposed Metro Fare Tariff

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2024 GENERAL PRICING

FIXED ROUTE SERVICE

ADULT (18-64)

Single Ride	\$2.00
One Day Cap	\$5.00
Weekly Cap	\$16.25
Monthly Cap	\$65.00
Transfers	Free

Notes:

1. Rider taps fare card every time they ride. When rider reaches fare cap price, rides are free for rest of the day, week or month.
2. Transfers are valid for two (2) hours from the time of boarding.

HALF-PRICE

Single Ride	\$1.00
One Day Cap	\$2.50
Weekly Cap	\$7.00
Monthly Cap	\$28.00
Transfers	Free

Notes:

1. Pricing applies to youth, seniors (65+), those with disabilities, and low-income riders.
2. All children 4 and under, when accompanied by an adult, ride free.
3. To be eligible for reduced fare, an eligibility form must be submitted to Metro Transit with valid identification. Middle and high school ID's, Medicare Cards, and Quest cards are acceptable forms of identification. Low-income guidelines are included in the appendix of this document.
4. Rider taps fare card every time they ride. When rider reaches fare cap price, rides are free for rest of the day, week or month.
5. All transfers are valid for two (2) hours from the time of boarding.



SCHOOL PROGRAM PRICING

Youth Pass (semester)	\$165.00
Youth Pass (school year)	\$315.00
Summer Youth Pass	\$35.00

Notes:

1. To be eligible for the youth fare, a valid middle or high school ID must be presented upon request. Elementary school students are exempt from the ID requirement. High school students over 17, enrolled in school, and possessing a valid ID may ride using the youth pass.
2. Passes are available at Metro Transit, through the mail at mymetrobus.com, or at MMSD schools.

TRANSITION PRODUCTS

To transition riders, social service agencies, and schools to new fare programs, these options will be available for a limited time. Products will be phased out by the end of 2025.

31-Day Pass - Adult	\$65
31-Day Pass - Senior/Disabled	\$28
10-Ride Card - Adult	\$17.25
10-ride Card - Youth	\$10.00

PARATRANSIT

Single Ride	\$3.25
Convenience Tickets	\$19.50 for booklet of 6 tickets.
Agency Fare	Previous year's audited cost per ride adjusted to reflect current year service expenses.

Notes:

1. New account-based system for single ride paratransit fares is expected to be available in 2025.
2. Paratransit Convenience Tickets can be purchased at Metro Transit, through the mail at mymetrobus.com, or at a limited number of outlets.
3. An agency is defined as an organization that serves persons who qualify for human service or transportation-related programs or services due to disability, income, or advanced age consistent with President's Executive Order on Human Service Transportation Coordination (February 24, 2004).

UNLIMITED RIDE PASS PROGRAMS - There will not be any changes to any unlimited ride pass programs, which have contracted fare rates.

FUTURE FARE PROGRAMS - May be introduced at a later date.

APPENDIX

LOW-INCOME CRITERIA

The U.S. Department of Health and Human Services publishes a yearly poverty guideline. Metro uses 150% of the poverty guideline to determine eligibility for its low-income half-price fare.

The 2024 guideline is listed below.

US Department of Health and Human Services 2024 Poverty Guidelines

Persons in family/household	Poverty guideline	150%
1	\$15,060	\$22,590
2	\$20,440	\$30,660
3	\$25,820	\$38,730
4	\$31,200	\$46,800
5	\$36,580	\$54,870
6	\$41,960	\$62,940
7	\$47,340	\$71,010
8	\$52,720	\$79,080

Appendix C – Public Comments Received

(TBD following March 13th Meeting)



City of Madison

City of Madison
Madison, WI 53703
www.cityofmadison.com

Meeting Minutes - Approved TRANSPORTATION COMMISSION

*Consider: Who benefits? Who is burdened?
Who does not have a voice at the table?
How can policymakers mitigate unintended consequences?*

Wednesday, March 13, 2024

5:00 PM

Virtual

CALL TO ORDER / ROLL CALL

The meeting was called to order at 5:00 p.m. Harrington-McKinney arrived at 5:04 p.m.

Present: 10 - MGR Govindarajan; Dina Nina Martinez-Rutherford; Barbara Harrington-McKinney; Ann E. Kovich; Robbie Webber; Denise N. Jess; Darrin S. Wasniewski; Christopher T. McCahill; Harald Kliems and William F. Bremer

Absent: 2 - Juliana R. Bennett and Nicki Vander Meulen

Excused: 1 - Jose Miguel (Pepe) Barros Hoffens

APPROVAL OF MINUTES

Kliems moved to approve the minutes of the February 28 meeting, seconded by Wasniewski, with Bremer abstaining. The motion passed by voice vote/other.

PUBLIC COMMENT

1. [82406](#) Public Comment for Items not on the Agenda for the March 13, 2024 Meeting

George Mayer, Jenny Iskandar and Susan Bruegman registered to speak on the Sauk Creek Greenway and the bike path through there.

DISCLOSURES AND RECUSALS

None

CONSENT AGENDA

Wasniewski moved to approve ITEM 2, seconded by Martinez-Rutherford. The motion passed by voice vote/other.

ITEMS TO BE CONSIDERED

- 2.* [82285](#) Authorizing the Mayor and the City Clerk to enter into a 2-year competitively selected service with Star Protection and Patrol, LLC for unarmed security services at Parking Division facilities.

Wasniewski moved to Return to Lead with the Recommendation for Common Council to Adopt, seconded by Martinez-Rutherford. The motion passed by voice vote/other.

3. [82407](#)

2023 Year-end Traffic Safety Report

Lt. Hannah with MPD provided verbal reports and, along with Director of Traffic Engineering Yang Tao, was available for questions. Alder Figueroa Cole made comments.

4. [82408](#)

Public hearing at 6:00 pm regarding Metro Transit's Fare Tariff Updates, followed by discussion, deliberation and vote

Chief Development Officer Mick Rusch with Metro provided verbal reports and, along with Metro General Manager Justin Stuehrenberg, Sean Hedgpeth and Jessie Stammer, was available for questions. Alder Figueroa Cole made comments.

Registrants as follows: Support, wish to speak; Jordan Rouse, E Washington Ave; Josh Olson, Raymond Rd

Support, does not wish to speak; Kurtis Veith, Bear Claw Way; Richard Burke, Charon Ln; Cecilia Orth, South St; Michael Verban, N Midvale Blvd; Stephen Grechis, S Whitney Way; Nathan Germain, S Brooks St; Eric Webb, Erin St; Austin Griesbach, W Washington Ave

Kliems moved to Approve Metro proposed fare tariff structure to implement account-based ticketing, fare-capping, and half-fare program, seconded by Webber. The motion passed by voice vote/other.

5. [52830](#)

Members of the Transportation Commission who are also members of other transportation-related Boards, Committees or Commissions provide relevant updates from those Boards, Committees or Commissions.

McCahill updates on PC:

-Item related to Complete Green Streets, there is an urban design district for the capital east E Wash stretch that called for a 10 ft terrace, and the PC agreed to eliminate that requirement so that CGS could be the main standard applied there and Engineering wouldn't have conflicting standards. But they did say they were entrusting it to Engineering and TC to ensure there would be tree coverage and properly designed terrace, and looking to TC to improve and uphold CGS and all that entails.

6. [60440](#)

General announcements by the Chair (for information only; not for discussion)

Kovich provided verbal updates on an email invitation to the PC work session tomorrow at 5:00 pm because of ITEM 2, overview and discussion with MFD regarding Fire access equivalencies, more detail and a continued conversation with what we discussed at our 1/31 TC meeting.

7. [60439](#)

Commission member suggestions for items on future agenda (for information only; not for discussion)

Kovich mentioned some of the upcoming TC items. Kliems suggested an item regarding budget.

ADJOURNMENT

Kliems moved to adjourn, seconded by Webber. The meeting adjourned at 6:46 p.m.

Appendix H - Service Monitoring Data Sources & Methods

Service Monitoring Data Sources and Methods

Service Monitoring Category	Data Source(s)	Methods
Route Classification	Minority Populations: ACS 5-Year Estimates Table B03002	Percentage of population within 3/4 miles of fixed-route service.
	Low-Income: ACS 5-Year Estimates Table C17002	Percentage of population within 3/4 miles of fixed-route service.
Vehicle Load	Clever Insights by Clever Devices	Percentage of trips where the load exceeded the load standard during the trip. Percentage point differential used to identify potential disproportionate burden or disparate impact.
Route Frequency	Trapeze FX	Typical frequency by service period unless otherwise noted. Disproportionate burden and disparate impact identified if route is classified as minority or low-income, but does not meet the frequency standard for its route category.
On-Time Performance	Clever Reports by Clever Devices	Reflects the sum of the following formula for each route within a given date range: <i>(OT Timepoint Count / Total Timepoint Count)</i> . Timepoint considered on-time (OT) if it departed its timepoint within 1 minute early and 5 minutes late. Percentage point differential used to identify potential disproportionate burden or disparate impact.
Service Span	Trapeze FX	Last trip end time - first trip start time. Averaged for routes in the route classification. Peak only routes truncated based on hours in operation. Percentage point differential used to identify potential disproportionate burden or disparate impact.

* Unless otherwise noted, all data in the Service Monitoring Report are generated based on August service levels of the final year in the reporting period.

Appendix I – Results of 2024 On-Board Survey

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GREATER MADISON
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July 2025

Greater Madison Metropolitan Planning Organization

Metro Transit Onboard Survey

Greater Madison Metropolitan Planning Organization

Policy Board

Doug Wood, Chair
Clement Abongwa
Richelle Andrae
Cassandra Benedict
Liz Callin

Phil Caravello
John Duncan
Michelle Ellias
Derek Field
Steve Flottmeyer

MGR Govindarajan
Barbara Harrington-McKinney
Bill Jetzer
Adrienne Nienow
Chris Petykowski
Kristi Williams

Staff

Alexandra Andros
Planning Manager

Bill Holloway
Transportation Planner

Kayla Haas
Communications Specialist

Dan Seidensticker
GIS Specialist

Ben Lyman
Transportation Planner

Prasad Packirisamy
Transportation Planner

Zia Brucaya
Transportation Planner

David Kanning
Transportation Planner

Sherry BonDurant
Administrative Clerk



U.S. Department
of Transportation
**Federal Transit
Administration**



U.S. Department
of Transportation
**Federal Highway
Administration**



GREATER MADISON
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CONNECTING PEOPLE, PLACES & OPPORTUNITIES

The preparation of this report has been financed in part through grants from the Federal Highway Administration and Federal Transit Administration, U.S. Department of Transportation, under the Metropolitan Planning Program, Section 104(f) of Title 23, U.S. Code, and by the Wisconsin Department of Transportation (WisDOT).

The contents of this report do not necessarily reflect the official views or policy of the U.S. Department of Transportation or WisDOT.

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GREATER MADISON
METROPOLITAN
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Summary

The 2024 Madison Metro Transit (Metro) On-Board Survey was conducted to collect information for Metro's service planning, including required review of proposed service changes under Title VI, and for use in the Greater Madison MPO's Regional Travel Demand Model. This report includes findings from the survey that are relevant to service planning, both supporting Title VI review of proposed service changes and providing a deeper understanding of how the Metro Transit system is used and experienced by riders.

Key findings of the survey include:

1. The 2023 Transit Network Redesign was successful in reducing the number of transfers required for riders to complete trips, with a disproportionately beneficial impact on reducing the number of transfers required for Black/African American riders to complete their trips. In 2015, 49%¹ of Black/African American riders needed to transfer to complete their trips, and only 15% of White riders needed to transfer. While Black/African American riders still transfer at much higher rates (33%) than most other racial groups or the system average (13%), the Transit Network Redesign does appear to have reduced the need for Black/African American riders to transfer to complete their trips. (See Figure 30)
2. The Transit Network Redesign was successful in reducing the number of transfers required for trips made by Low-Income (\$0–\$34,999) households, of whom 34% transferred in 2015 compared to only 17% of Mid- and High-Income (\$35,000+) households. Following the Transit Network Redesign, transfer rates for these income brackets were reduced to 13% for Low-Income households and to 14% for Mid- and High-Income households. (See Figure 38)
3. People who experience disabilities or mobility impairments have been the most negatively affected by the 2023 Transit Network Redesign, which resulted in greater distances between routes, and the launch of the East-West Bus Rapid Transit Rapid Route A, which resulted in greater distances between stops. (See Figure 104)

¹ Due to the small sample sizes of some populations or other responses, margins of error are expected to be large. Providing percentages to two or even one decimal place would provide an illusion that those decimals are significant. Accordingly, in this report, percentages are given in whole numbers with no decimal places, except where the value is less than 1%, in which case the smallest number of decimals required to provide a meaningful data point are provided.

Introduction

From the Cambridge Systematics Approach, Findings, and Analysis Final Report:

The 2024 Metro transit on-board survey aims to understand the travel patterns and rider characteristics of transit riders in the Madison area. Through the administration of an onboard survey for bus passengers and the subsequent analysis of the data, the study will provide crucial travel and ridership information that can support a variety of short-term and long-term planning studies.

The survey was administered in Spring 2024 by a team led by Cambridge Systematics (CS), with Canete Medina Consulting Group, Inc. (CM), and LOCUS Inc. CM led the data collection efforts on the field, with CS and LOCUS Inc. assisting in the survey design, sampling plans and strategies, and summarization of the survey data. The project was managed by the Greater Madison Metropolitan Planning Organization (MPO) with support from Madison's Metro Transit (Metro).

The 2024 on-board survey for Metro has the following objectives:

- Collect ridership demographics and travel patterns to support short-term service planning and Title VI analysis (including understanding transportation/mobility security).
- Understand the impacts of the recent bus network redesign on the usage and travel patterns for transit riders (including transfer behavior) and establish a baseline assessment ahead of the upcoming deployment of the Phase 1 (East-West Corridor) of the bus rapid transit (BRT) line.
- Support longer-term regional transit planning and travel demand forecasting efforts, including ridership forecasting for the upcoming BRT projects.

The Cambridge Systematics Final Report provides a first-round review and tabulation of survey responses, including limited cross-tabulation of responses:

- Race and Annual Household Income

- Annual Household Income and Number of Vehicles in Household
- Household Size and Number of Employed Workers in Household
- Household Size and Number of Vehicles in Household

Although basic charts showing demographic responses alone are included in the Cambridge Systematics Final Report, they are also provided in this report for convenience. This report expands the number of cross-tabulated fields from the mainline route survey (long form) to provide a more nuanced view of Metro's ridership profile, and provides insight into the relationship between race and ethnicity, income, disability, gender, age, English proficiency, language spoken at home, transportation security, and metrics such as trip length, mode of getting to and from bus stops, route(s) ridden, number of transfers, and more. Although not exhaustive, with 32 relevant questions, there are over 500 combinations in which responses could be cross-tabulated – this report provides nearly 100 charts describing important relationships between these factors.

The UW-Madison route (short form) survey was conducted on Routes 80, 81, 82, and 84. This survey instrument was shorter than the mainline (long form) survey since trips on these routes are much shorter than those on mainline routes and riders have less time to complete the survey on the bus. UW-Madison Transportation Services provided questions that they deemed important to have responses to, and most questions about the trip were omitted from the short form survey. Accordingly, there are many fewer possible cross-tabulations that can be performed with these responses. As very few survey responses were received on Routes 81 and 82 (11 total), responses from those routes are not included in this report. Nevertheless, six additional charts are provided to explore how these routes are being used.

It is important to note that in cross-tabulating responses, the number of surveys available to be compared varies with every combination of questions. For example, if out of 3,040 completed surveys, 2,800 riders

responded to question A and 2,700 riders responded to question B, it might be that only 2,600 riders answered BOTH questions A and B. This also results in situations where the average overall response to a question might be higher or lower than all of the cross-tabulated responses, as when a disproportionate percentage of people who declined to answer the Race question have a higher transfer rate than those who did answer that question; the overall average is skewed by those who did not answer the Race question and is higher than the transfer rate for any individual race or ethnicity.

Survey Details

The On-Board Survey was conducted in two phases: a pre-test on March 6, 2024, of Routes A, B, D, and 80, and the main survey in April 2024 of all regular routes.² Surveys were distributed on buses by employees of one of the project consultants. Paper surveys could be completed and returned to the surveyor on the bus, mailed in, or completed online using a unique identifier printed at the top of each paper survey. Paper surveys were available in English and Spanish, and online surveys were available in English, Spanish, Hmong, Chinese, and Korean. Translation services could be requested if surveys were desired in other languages, and surveyors carried translation information cards to assist riders with accessing surveys in their desired language. A total of 3,044³ main-line route surveys were completed, 3,023 in English and 21 in Spanish, as shown in Figure 1. English-language surveys were pre-assigned to routes on which they were distributed; Spanish-language surveys

were not pre-assigned to routes, so these appear in charts in Route “NA”. No surveys were completed in any language other than English or Spanish. An additional 1,024 English short form surveys were completed for the UW-Madison routes.

As with past on-board surveys conducted for Madison Metro Transit, surveys were distributed by drivers on paratransit routes instead of by surveyors. Surveys could be returned through the driver or mailed in. Only 11 of these surveys were completed and returned, a small enough sample that these results are unlikely to be representative of the larger paratransit-riding population; accordingly, these results are not presented in this report. For future on-board surveys, it will be important to re-evaluate how paratransit surveys are distributed and collected and to make any needed changes to improve survey response rates.

Figure 1: Long-Form Survey Language by Survey Type

	Paper Surveys	Online	Mail-ins (including pre-test)	Pre-test Paper	Pre-test Online	Grand Total
English	1,820	1,009	111	61	22	3,203
Spanish	17	4	-	-	-	21

Spanish-language surveys were not assigned to routes before being distributed in the field, so in charts showing responses by scheduled route, Spanish-language responses are in the “NA” route category. This results in sub-optimal data hygiene; however, with only 21 Spanish surveys out of a total of 3,044, it does not introduce statistically significant bias in the overall data set. Nevertheless, this unanticipated shortfall in data quality has been noted and will be addressed in the design of future on-board surveys.

² Supplemental School routes (600 series) were not surveyed.
³ The Cambridge Systematics Final Report states that a total of 3,045 surveys were completed for main-line routes (excluding UW-Madison Routes 80, 81, 82, and 84); however, there are 3,044 surveys in the final data set provided by Cambridge Systematics and Canete-Medina Consulting Group, so this report uses the total of 3,044 surveys.

Data Hygiene

In addition to providing an in-depth analysis of rider demographics and trip characteristics from all completed surveys, for relevant questions, this report uses a data set that has been carefully reviewed and cleaned to ensure accuracy. Analyses using this cleaned data set include those considering the number of transfers made in a trip as well as all of those related to specific trip origin⁴, bus boarding⁵, bus alighting⁶, and destination⁷ points (OBAD). Primarily, these data points are used in the development of the Regional Travel Model and are not considered in this report.

Manual review of every submitted survey was required to identify many of these points, such as when a rider indicated that they got on the bus at “Kwik Trip” but did not provide more information. During review, MPO staff considered information about the trip origin and the bus route the survey was completed on and tried to determine at which Kwik Trip-adjacent bus stop the rider boarded the bus. This review also allowed MPO staff to interpret misspelled place and street names, or to use other available information to identify OBAD points that the rider themselves wasn’t sure of or misidentified.⁸ All reported stops were geocoded to latitude/longitude coordinates to eliminate this variability. For trips where OBAD points were undeterminable, responses are not included in the data that feeds into the Regional Travel Model.

When reviewing and correcting the number of transfers made for a given trip, MPO staff considered if transfers were really required for the trip, or if the rider misinterpreted the question and provided, for example, the total

number of buses they would ride for a round-trip journey. Other riders counted interlined buses as transfers, such as when they boarded a route G bus, which turned into an H bus before they disembarked. And finally, some riders simply misreported the number of transfers their trip could reasonably require, such as riders who boarded route A, F, or R on Sheboygan Ave. and disembarked on W. Johnson St., and who reported that they would transfer one or more times for this trip. This simply does not make any sense, as all three of these routes follow the same alignment between Sheboygan Ave. and W. Johnson St., and no transfer could logically be required.

The survey was designed to collect representative responses by time of day and by route group. Routes were grouped due to low ridership on some routes and the difficulty of obtaining enough responses from riders on those routes to constitute a statistically representative sample. Although this approach is reasonable when setting targets for survey responses, combining the responses from those grouped routes introduces the opportunity for muddying the data related to each route. For example, Routes A, S, and W were grouped together due to very low ridership on the infrequent (30–60-minute headways) Routes S and W, and the very high ridership on the frequent (15–30-minute headways) Route A. Although this makes sense from a response rate target perspective, rider experiences and trip types will be very different between Route A and Routes S and W, so combining responses from these routes will introduce confusion about how those routes are used and the experiences of their riders. Unfortu-

4 The beginning of the trip, such as starting at home, a place of employment, or school.

5 The bus stop where the rider got on the bus being surveyed; not necessarily the stop where the rider got on the first bus of the trip if a transfer was required.

6 The bus stop where the rider will get off the bus being surveyed; not necessarily the stop where the rider will get off the final bus of the trip if a transfer is required. Also referred to as the stop where the rider disembarked.

7 The end of the trip, such as arriving at home, a place of employment, or school.

8 A frequently encountered example of this is the University Ave. and N. Frances St. bus stop (Stop ID 0626). This is a complex location where the bus stop is halfway between N. Frances St. and N. Bassett St., and is located on the corner where W. Gorham St. turns into University Ave. To add to the confusion, W. Gilman St. intersects University Ave. at the same intersection as N. Frances St. at a 45-degree angle between N. Frances St. and University Ave. As such, riders often mis-identified this stop as being at N. Bassett St. and W. Gorham St., W. Gilman St. and University Ave., or similar understandable errors in identifying the stop name.

nately, this means that due to very small sample sizes (four, one, and four, respectively), Routes P, S, and W are not included in charts showing responses by route. In the short-form UW-Madison survey conducted on routes 80, 81, 82, and 84, routes 81 and 82 had seven and four surveys completed, respectively. As with Routes P, S, and W, Routes 81 and 82 are excluded from this report due to a small sample size.

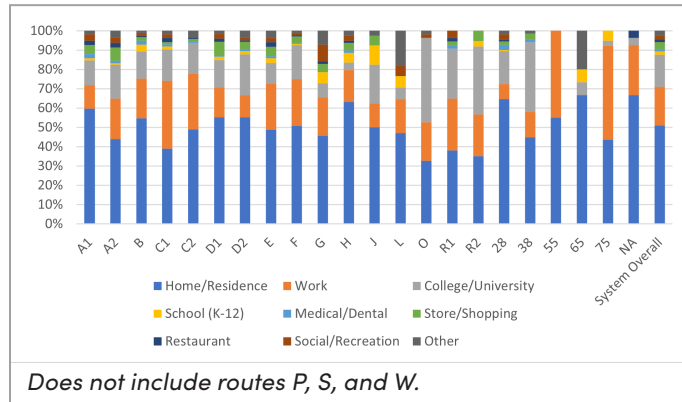
One racial group had such a small response rate that it is not included in most charts showing cross-tabulations by Race: Only five respondents identified themselves as Native Hawaiian/Pacific Islander (0.0016% of responses). This is such a small sample size that reporting these responses would provide a skewed perspective that is unlikely to be representative of this population overall. To further weaken the statistical relevance of responses from riders of this racial group, one or more of these respondents declined to answer many other questions in the survey, resulting in a sample size of only three or four individuals for many cross-tabulations. That said, the population of this racial group in the Metro service area is very small (227 – 0.04% – in the MPO Planning Area⁹, and 157 – 0.06% – in the City of Madison¹⁰) so it is important to note that although this population is under-represented in survey responses, it is simply a very small population and therefore difficult to obtain a statistically significant response rate from.

⁹2013 Planning Area boundary, 2020 Census

¹⁰ 2020 US Census

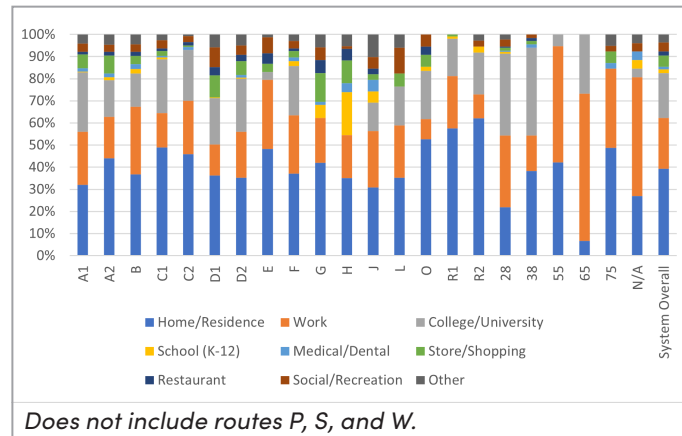
Trip Details

Figure 2: Trip Origins by Route



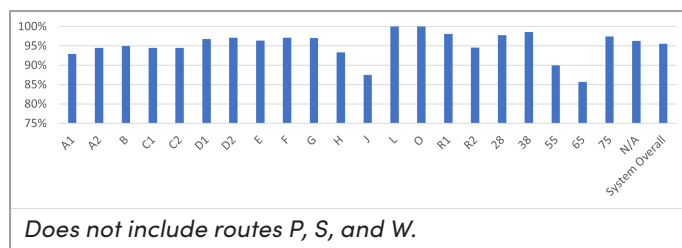
Out of 3,024 survey respondents, approximately half (51%) began their trip from home, 20% from the work-place, and 17% from a college or university. Other trip origins accounted for less significant shares.

Figure 3: Trip Destinations by Route



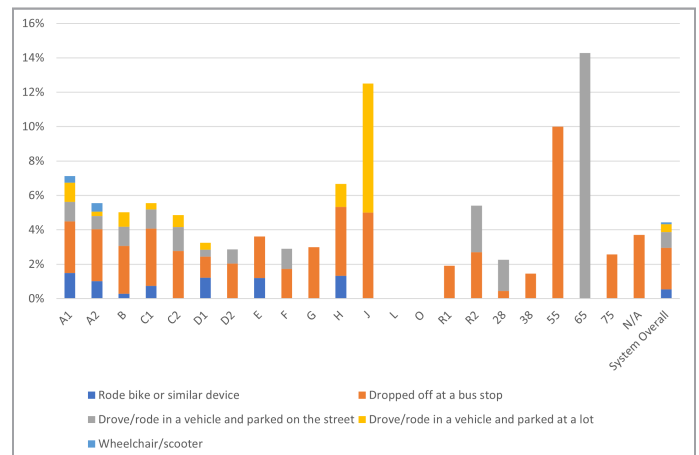
Out of 2,974 survey respondents, 39% reported their destination was home, 23% for work, and 20% for college or university. The remaining trip purposes made up a minor share.

Figure 4: Percentage of Riders Walking to Bus Stop by Route



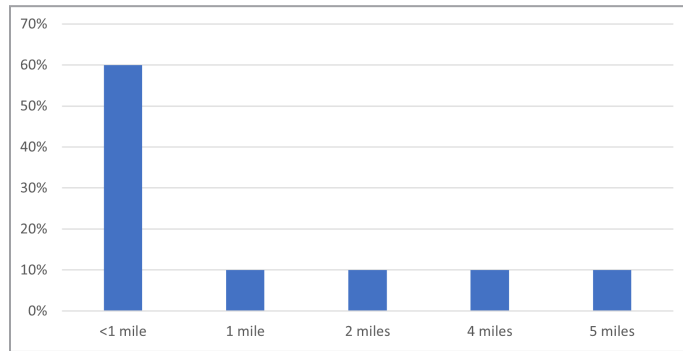
- Out of 2,976 respondents, a large majority, at 96%, walked to access the bus stop.
- All riders on Routes L and O walked to the bus stop.
- All routes had more than 90% of riders walking to the bus stop, except Route J at 88% and Route 65 at 86%.

Figure 5: Non-Walking Access Mode by Route



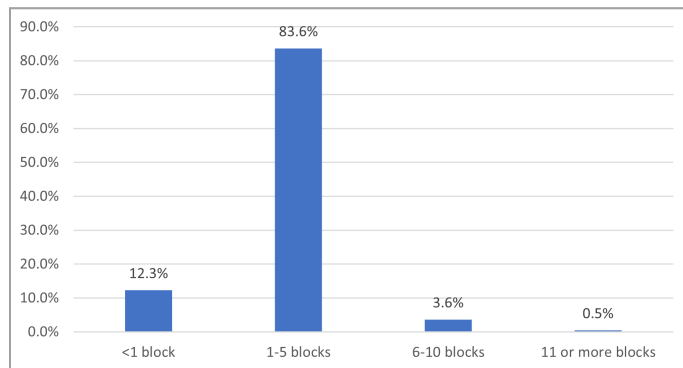
- Route A1 had the highest share of travelers riding a bike to access the bus stop at 2%. However, only a few routes had riders using bikes for access.
- Route 55 had the highest share of riders being dropped off at the bus stop at 10%, followed by Route J at 5%.
- Route 65 had the highest share of riders accessing the bus stop by driving or riding in a vehicle parked on the street at 14%.
- Route J had the highest share of riders accessing the bus stop by driving or riding in a vehicle parked in a lot at 8%.
- Routes A2 (0.5%) and A1 (0.4%) were the only routes with riders reporting that they accessed the bus stop using a wheelchair or scooter.

Figure 6: Distance Biked to Bus Stop



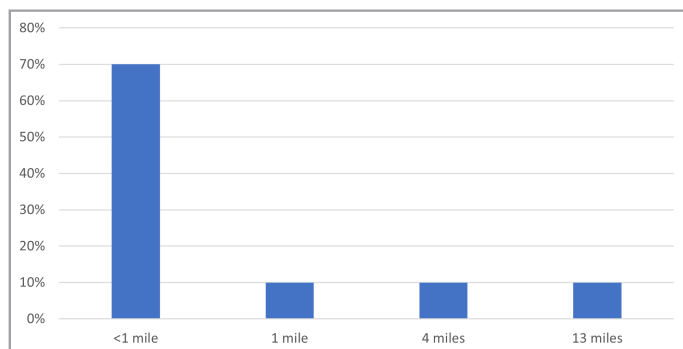
- Only ten respondents indicated that they had ridden a bike to the bus stop, 0.3% of responses.
- Among riders who rode a bike or used a similar device, 60% traveled less than one mile to access the bus stop.

Figure 7: Distance Walked to Bus Stop



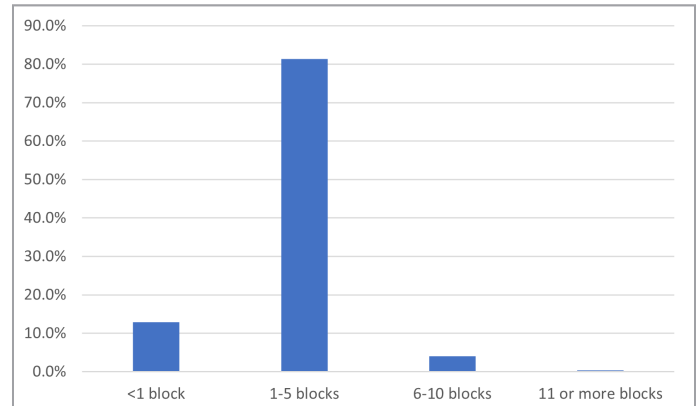
- The vast majority of riders (84%) walked or wheelchaired between one and five blocks to access the bus stop.
- 12% of riders accessed the bus stop from less than one block away.
- 4% traveled between six and 10 blocks, and very few riders traveled 11 or more blocks, although some riders reported walking multiple miles to access the bus system.

Figure 8: Distance Biked from Bus Stop to Destination



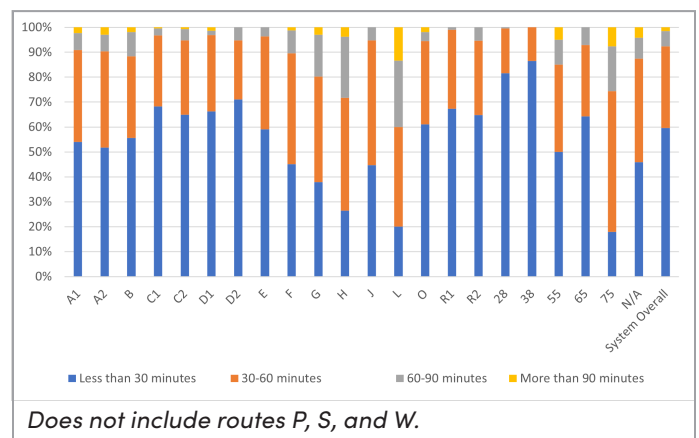
- Only ten respondents indicated that they had ridden a bike to the bus stop, 0.3% of responses.
- 70% of riders who rode a bike or used a similar device traveled less than one mile from the alighting bus stop to their destination.

Figure 9: Distance Walked to Destination



- 81% of riders walked or used a wheelchair to travel between one and five blocks from the alighting bus stop to their destination.
- 13% of riders traveled less than one block.
- 4% of riders traveled between 6 and 10 blocks.
- A very small share of riders traveled more than 11 blocks, although one respondent stated that they had walked 71 blocks to the bus, and another had walked 3 miles.

Figure 10: Trip Duration by Route

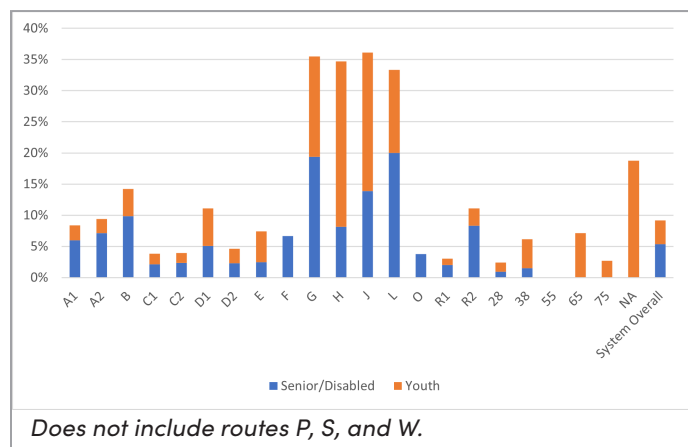


Trip duration includes time spent walking, waiting for the bus, riding the bus, any transfers, and walking to the final destination.

- Out of 2,794 respondents, 60% of riders took less than 30 minutes to travel from origin to destination.
- 33% took 30 to 60 minutes, 6% took 60 to 90 minutes, and 2% took more than 90 minutes.

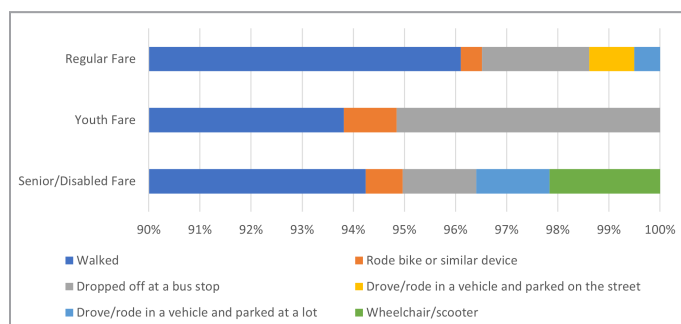
- Likely due to short route lengths (less than one hour end-to-end), nearly all riders on Routes R2 (95%) and 28 (96%) and all riders on Routes R1 and 38 (100%) completed their trips within 60 minutes. This also indicates that trip origins and destinations for these riders are served well, as they do not need to walk long distances or transfer to other routes to complete their trips.
- Route L had the highest share of trips exceeding 60 minutes, at 40%.

Figure 11: Discounted Fares by Route



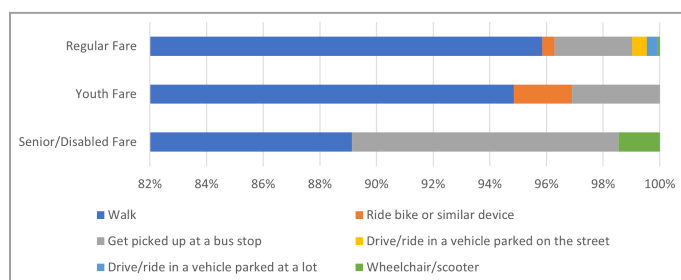
- Out of 2,638 respondents, 5% accessed the discounted fare for seniors or people with disabilities, while 4% accessed the youth discounted fare.
- Route L had the highest share of riders using a Senior/Disabled discounted fare at 20%, followed by Route G at 19%.
- Route H had the highest share of youth discounted fare users at 27%, followed by Route J at 22%.
- Although Route O had no riders using the Youth discounted fare during the April survey, this route serves the Goodman Pool, a popular destination for youth and families, which does not open until June of each year. It is likely that the use of Youth discounted fares would have been much higher if the survey had been conducted during summer months.
- When combining both categories, Route J had the highest overall share of discounted fare users at 36%.
- Routes G, H, and L also had high shares of combined discounted fare use, each exceeding 33%.

Figure 12: Access Mode by Fare Type



- Walking is the most common way for all riders to reach bus stops, with over 93% of all riders accessing the bus by walking.
- 5% of riders using Youth discounted fares were dropped off at the bus stop, the highest among all fare types, indicating greater dependence on others for this part of the trip.

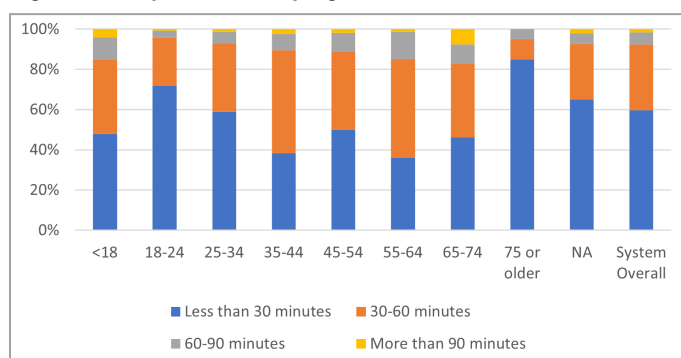
Figure 13: Egress Mode by Fare Type



- 89% of riders using a Senior/Disabled discounted fare walked from the bus stop to their destination, the smallest proportion of those walking to their destination of any fare group.
- 9% of riders using a Senior/Disabled discounted fare were picked up at the bus stop—the highest among all fare types—showing greater reliance on someone else for this part of the trip.

Trip Details by Demographics

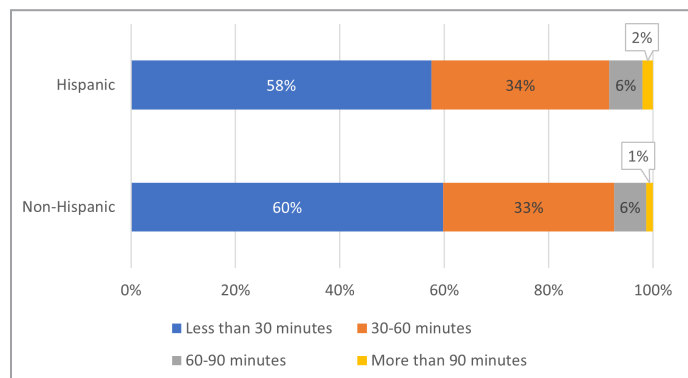
Figure 14: Trip Duration by Age



Trip duration includes time spent walking, waiting for the bus, riding the bus, any transfers, and walking to the final destination.

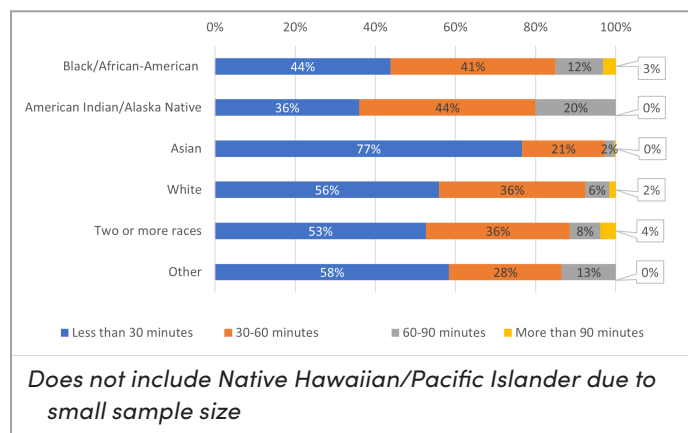
- Riders aged 75 or older had the highest share of trips under 30 minutes at 85%.
- Riders aged 55 to 64 had the highest share of trips between 60 and 90 minutes, at 14%.
- Riders aged 65 to 74 had the highest share of trips over 90 minutes, at 8%.

Figure 15: Trip Duration by Ethnicity



- Out of 2,593 respondents, 346 riders identified as Hispanic, representing 13% of the total.
- A lower share of Hispanic riders, at 58%, took less than 30 minutes to travel, compared to 60% of non-Hispanic riders.
- A higher share of Hispanic riders, at 2%, took more than 90 minutes to travel, compared to 1% of non-Hispanic riders.
- Between the two groups, the variation across different travel time categories is minimal.

Figure 16: Trip Duration by Race

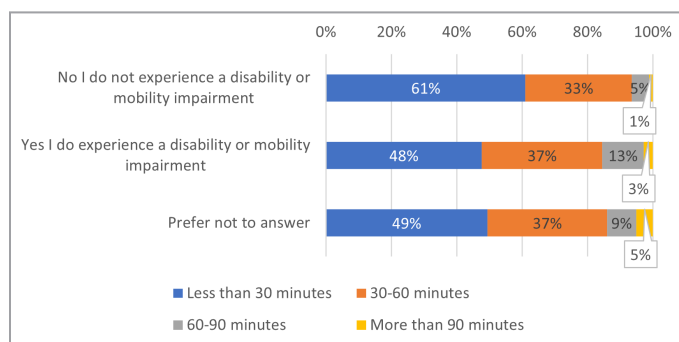


- A greater share of American Indian/Alaska Native and Black/African American riders have trips over 30

minutes in length than do any other races, as well as having the largest percentage of riders taking over 60 minutes to complete their trips.

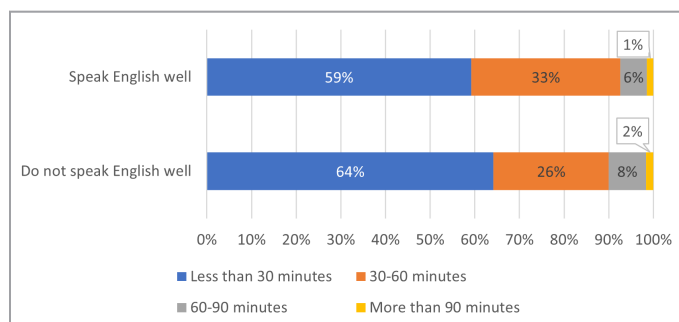
- Asian riders typically enjoy the shortest overall trip length, with over 97% of these riders completing their trips within 60 minutes.

Figure 17: Trip Duration by Disability or Mobility Impairment



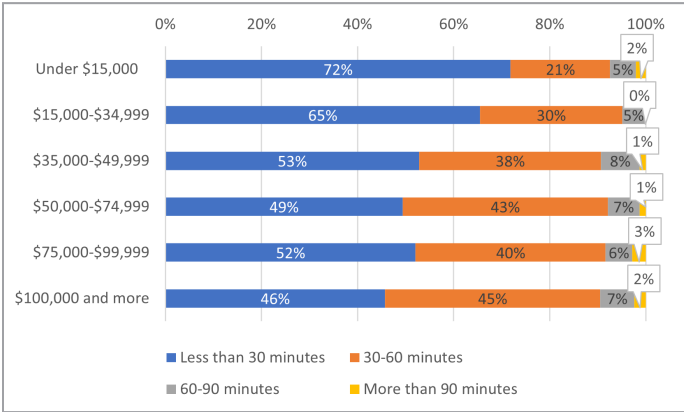
Riders who experience a disability or mobility impairment are more likely to take longer to complete their trips than those who do not experience a disability or mobility impairment, with 52% of their trips requiring longer than 30 minutes to complete, compared to 39% of trips made by those who do not experience disabilities or mobility impairments.

Figure 18: Trip Duration by English Proficiency



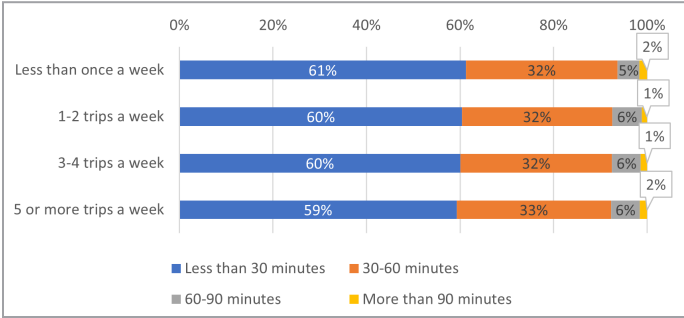
- Riders who do not speak English well had a higher share of trips under 30 minutes at 64%, compared to 59% among those who speak English well.
- They also had a higher share of trips lasting more than an hour at 10%, compared to 8% among riders who speak English well.

Figure 19: Trip Duration by Household Income



- Riders from households earning under \$15,000 had the highest share of trips under 30 minutes, and approximately 93% of trips by this group were under 60 minutes.
- Riders from households earning \$100,000 or more had the highest overall share of long trips (60 minutes or longer) at 10%.

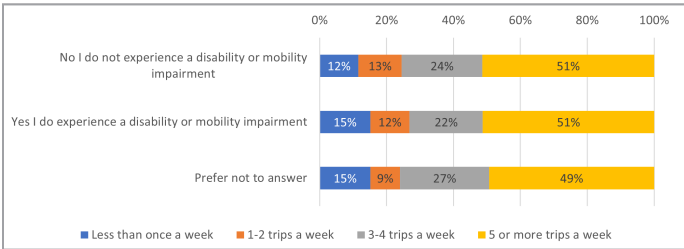
Figure 20: Trip Duration by Number of Trips per Week



Riders were asked how many times they make “this trip” per week; this is intended to be a one-way trip, a common transit metric (unlinked passenger trip).

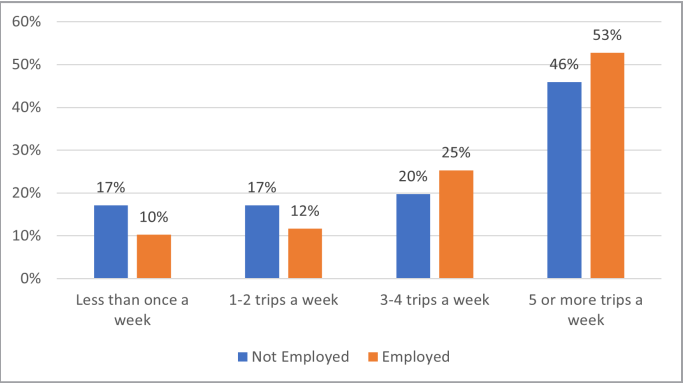
Trip length does not appear to be related to the number of transit trips riders take each week. About 60% of Metro Transit users’ trips are less than 30 minutes, regardless of how frequently they ride.

Figure 21: Disability or Mobility Impairment by Trips per Week



Whether riders had a disability or mobility impairment did not appear to make a difference in how often they traveled by bus. About half of the riders in all three groups made five or more trips per week.

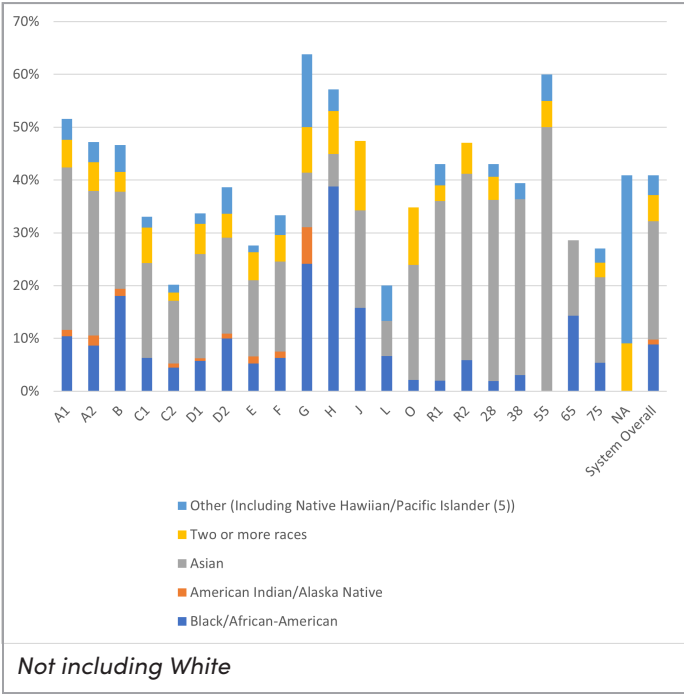
Figure 22: Employment Status by Trip Frequency



Employed people tend to ride the bus at a somewhat higher frequency than those who are not employed, with more than 50% riding at least five times per week and more than 78% riding three or more times per week.

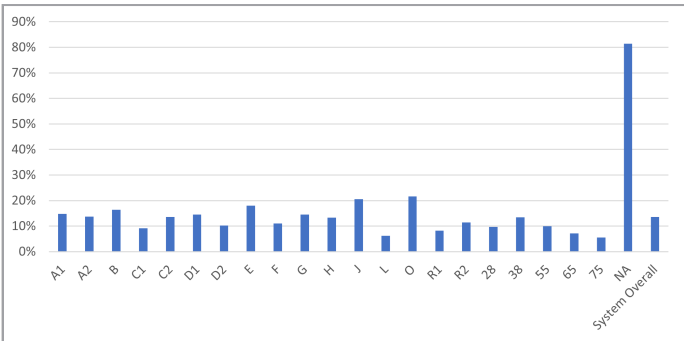
Route Profiles

Figure 23: Route by Race



- Route H had the highest share of Black riders, at 39%, followed by Route G at 24%.
- Asian riders accounted for more than 30% of ridership on Routes A1, R1, R2, 28, 38, and 55.
- “Other” races made up nearly 32% of riders on unknown routes, which are primarily from Spanish-language surveys.
- Routes with minority (non-White) ridership above the system average include Routes A1, A2, B, G, H, J, R1, R2, 28, and 55.

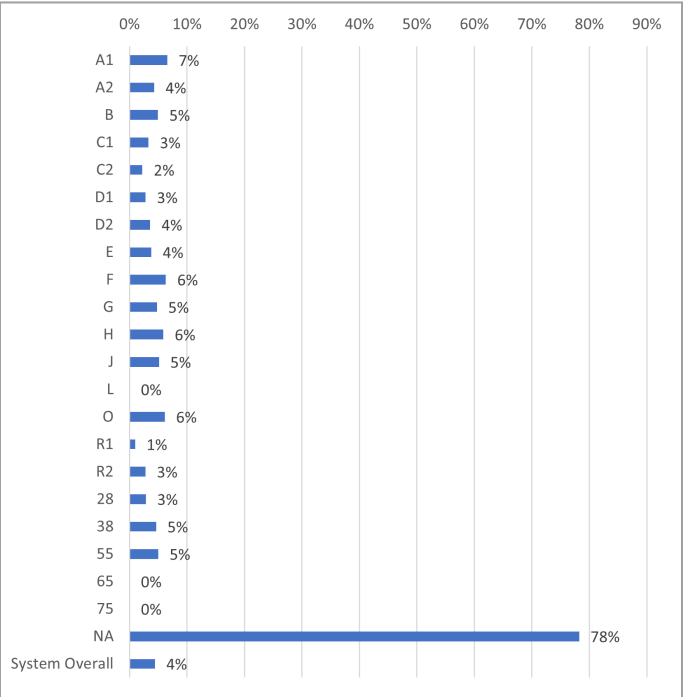
Figure 24: Route by Hispanic Ethnicity



- The overall share of riders identifying as White and of Hispanic, Latino, or Spanish origin is 14%.

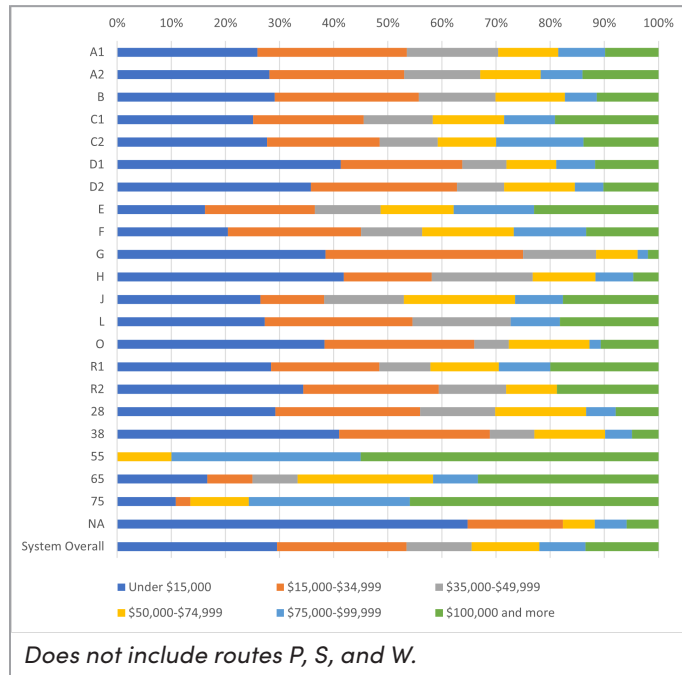
- Route O had the highest share at 22%.
- Route 75 had the lowest share of riders from this group, at 6%.
- As mentioned above, Spanish-language surveys were not assigned to routes before being distributed, which resulted in over 80% of surveys without assigned routes being completed by people of Hispanic ethnicity.

Figure 25: Limited English Language Proficiency, by Route



- The overall share of riders who either do not speak English or do not speak it well was 4%.
- Route A had the highest share at 6.6%, followed by Routes F and O.
- No riders on Routes L, 65, and 75 reported being able to speak English less than well.
- As no Spanish-language surveys were assigned to a route before being distributed, nearly 80% of surveys for unknown (NA) routes indicate that the respondent does not speak English well.

Figure 26: Household Income by Route

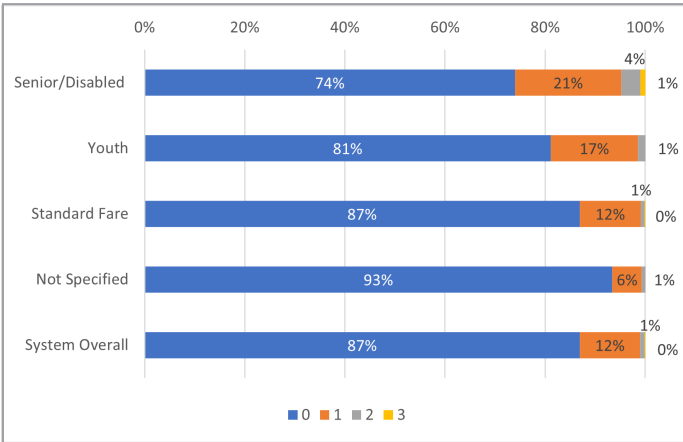


- Riders from households earning under \$15,000 made up the highest share system-wide, at 30%, followed by those earning between \$15,000 and \$34,999, at 24%.
- 53% of all riders came from households earning under \$35,000.
- More than 40% of riders on Route D1 and 38% on Route H have household incomes of under \$15,000.
- Routes with above-average numbers of riders with household incomes below \$35,000 include A1, A2, B, D1, D2, G, H, L, O, R2, 28, and 38.
- Riders of Routes 55 and 75, which serve the Epic campus in Verona, have the highest household incomes of any routes, with 100% of surveyed riders of Route 55 and 87% of Route 75 riders having household incomes \$50,000 or more.

Transfers

Three respondents would transfer three or more times to complete their trip; these are such a small percentage of any category that they rarely appear in the following charts.

Figure 27: Number of Transfers by Fare Type



- Riders paying Senior or Disabled reduced fares transfer more than other riders, with 26% of these riders requiring one or more transfers to complete their trip.
- Riders paying Youth reduced fares transfer more than riders paying standard fares, with 19% of Youth riders requiring one or more transfers.

Figure 28: Number of Transfers by Ethnicity

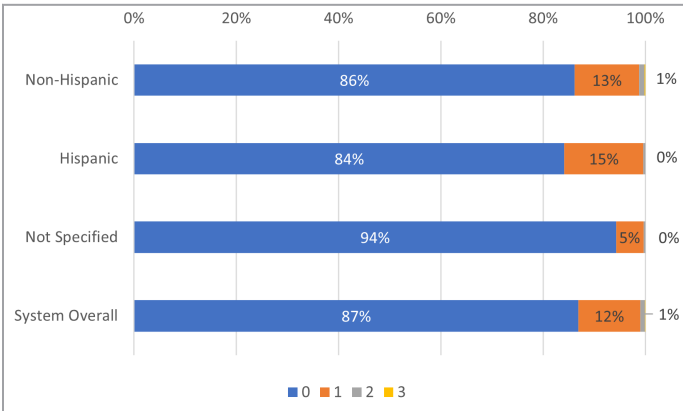
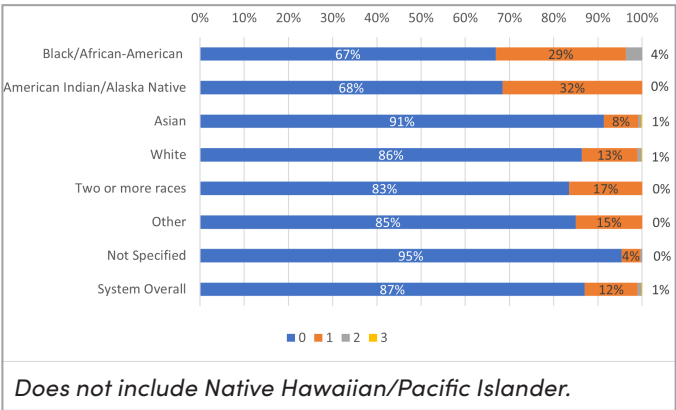
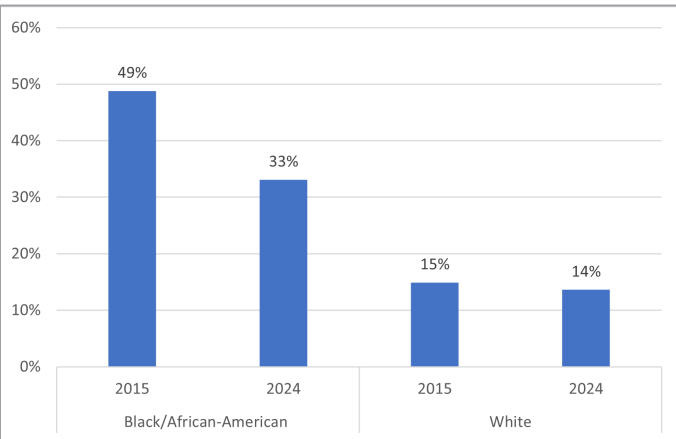


Figure 29: Number of Transfers by Race



- Fewer Asian riders require transfers (8%) than any other racial group.
- Black/African American (33%) and American Indian/Alaska Natives (32%) transfer at much higher rates than other racial groups or the system average (13%).

Figure 30: Riders Making One or More Transfers by Race, 2015-2024



Reducing the number of transfers needed to complete common trips was a primary goal of the Transit Network Redesign, especially reducing the number of transfers required for trips completed by Black/African American riders, nearly half of whom reported that their trip required a transfer in the 2015 On-Board Survey. Only 15% of white riders’ trips required a transfer in that survey.

While Black/African American riders still transfer at much higher rates than most other racial groups, the Transit Network Redesign appears to have substantially

reduced the need for Black/African American riders to transfer to complete their trips.

Figure 31: Number of Transfers by Age

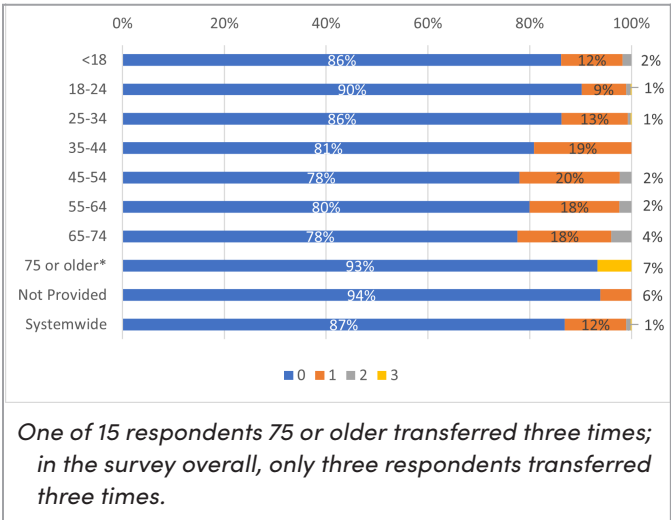
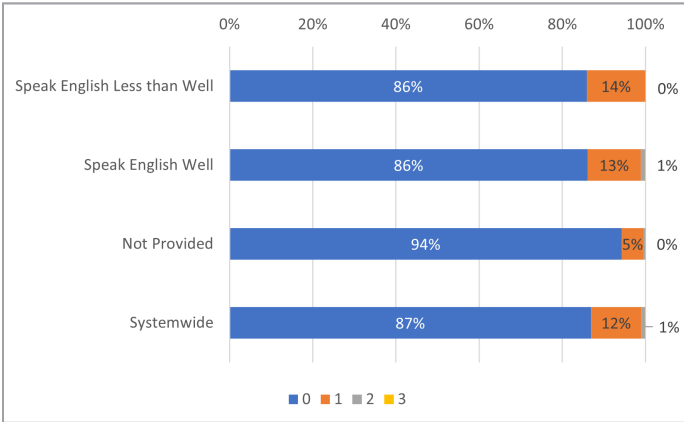
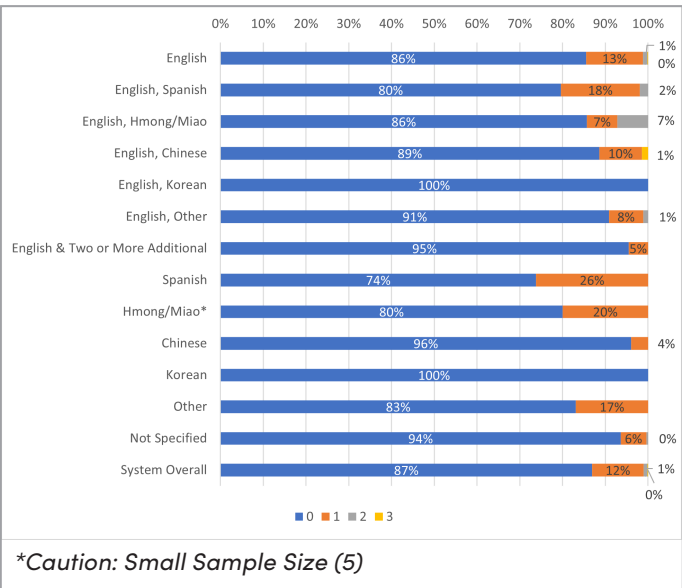


Figure 32: Number of Transfers by English Proficiency



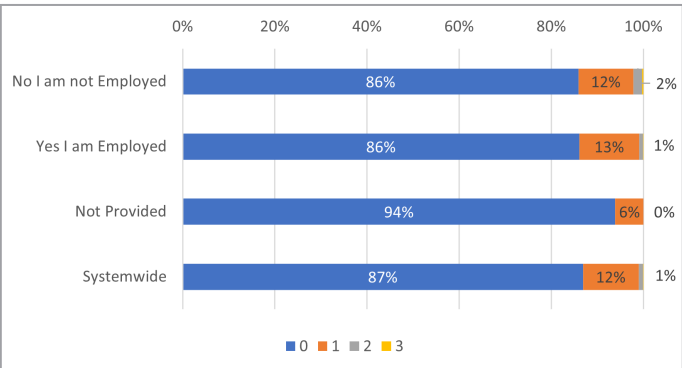
- Riders who indicated that they speak English less than well transfer at nearly identical rates as those who speak English well.
- No riders who speak English less than well require two transfers to complete their trips.

Figure 33: Number of Transfers by Language(s) Spoken at Home



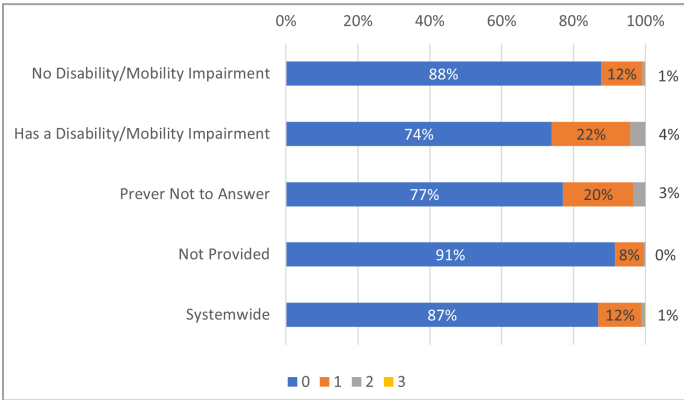
Riders who speak Spanish at home (26%) have the highest transfer rate, followed by those who speak both English and Spanish, and respondents who speak Hmong/Miao.

Figure 34: Number of Transfers by Employment Status?



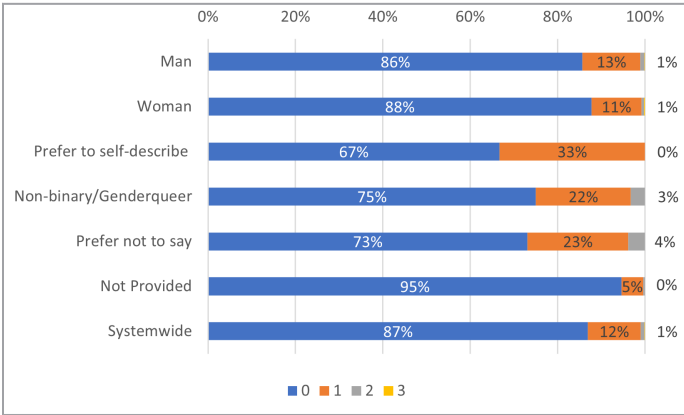
Employment does not appear to be a significant factor in the number of transfers riders must make to complete their trips.

Figure 35: Number of Transfers by Disability/Mobility Impairment



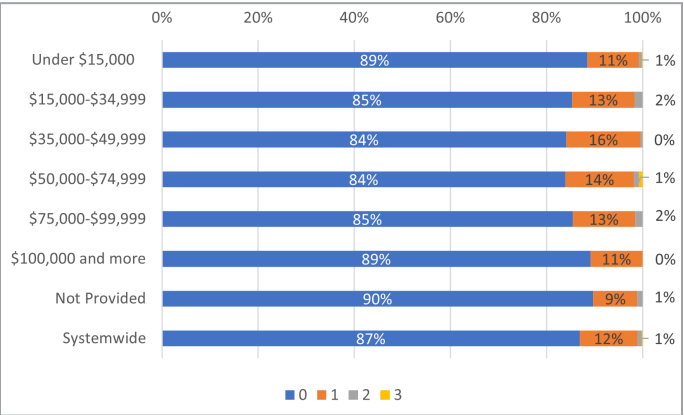
People who reported experiencing a disability or mobility impairment indicate that they require transfers to complete their trips at a much higher rate (26%) than those who do not experience a disability or mobility impairment (12%).

Figure 36: Number of Transfers by Gender



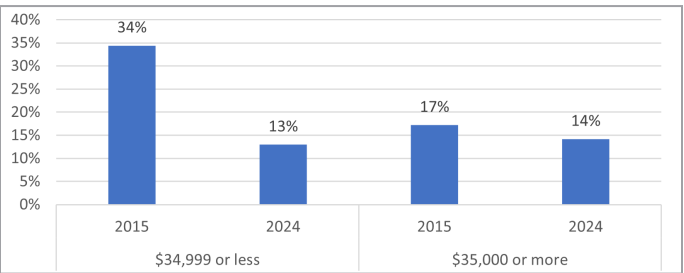
- Riders who selected a response other than Man or Woman were about twice as likely to transfer as other respondents.
- Men report transferring for 14% of trips, only slightly more frequently than the 12% reported by women.

Figure 37: Number of Transfers by Household Income



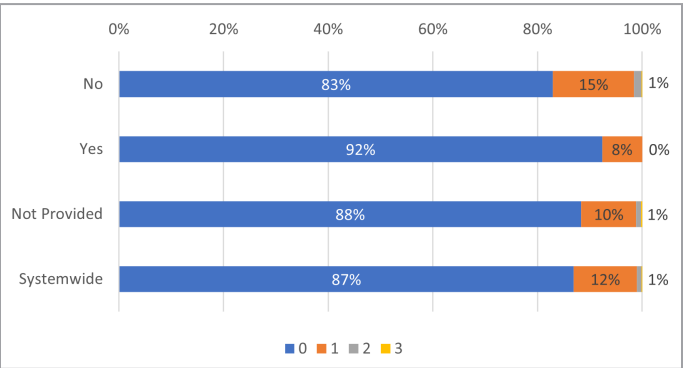
Household income appears to have only a minimal relationship with whether riders had to transfer.

Figure 38: Riders Making One or More Transfers by Household Income, 2015-2024



The Transit Network Redesign aimed to reduce the number of transfers required for trips made by Low-Income (\$0-\$34,999) households. Following the redesign, the percentage of these riders requiring a transfer fell by more than half, to just 13%.

Figure 39: Number of Transfers by Vehicle Availability



Riders without an available vehicle transfer to complete their trip at more than double the rate of riders with a vehicle – 17% compared to 8%.

Transportation Security Index

The Transportation Security Index (TSI) was developed by University of Michigan researchers as “a validated survey instrument composed of items that focus on the symptoms of transportation insecurity (for example, taking a long time to plan out everyday trips and re-scheduling appointments). By focusing on symptoms of transportation insecurity, the measure spares researchers from attempting the impossible task of cataloging every possible input — from bus schedules to gas prices — that influences transportation insecurity.”¹¹

Although the full TSI is a sixteen-question interview and therefore beyond the scope of what can be included in a survey such as the Metro On-Board Survey, Greater Madison MPO staff worked with TSI researchers to identify a subset of three questions that achieve nearly the same rigorous accuracy as the full 16-question survey. These three questions have also been used by other transit agencies and communities to identify transportation-insecure communities, allowing Madison’s responses to be compared to a growing number of other transit agencies’ TSI profiles.

Figure 40: Household Income by Frequency of Trips Skipped due to Transportation Problems in the last 30 Days

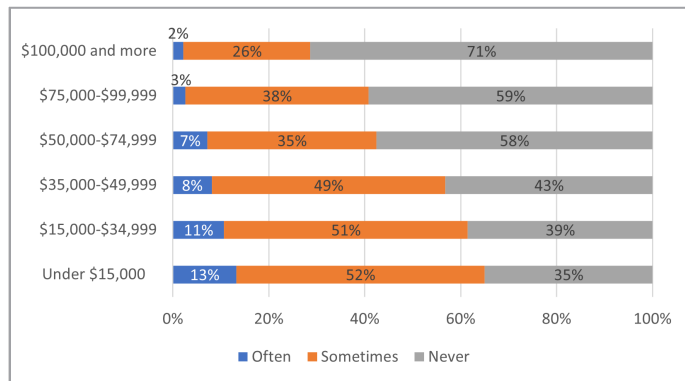


Figure 41: Household Income by Frequency of Not Able to Leave the House when Desired over the past 30 Days

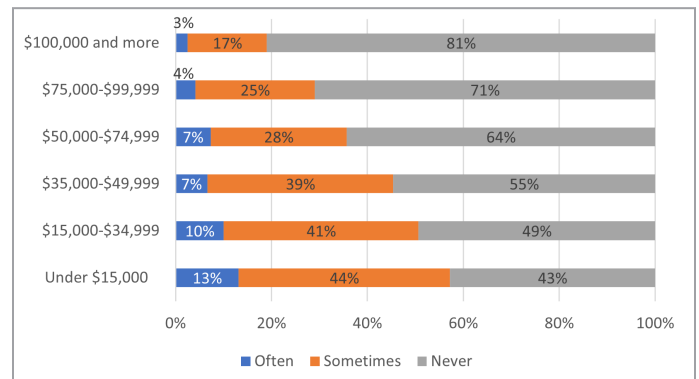
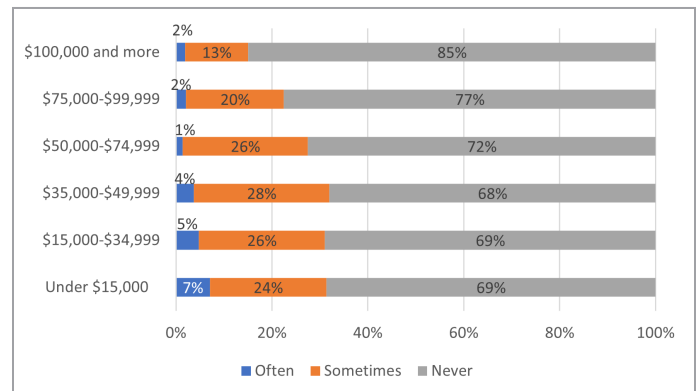
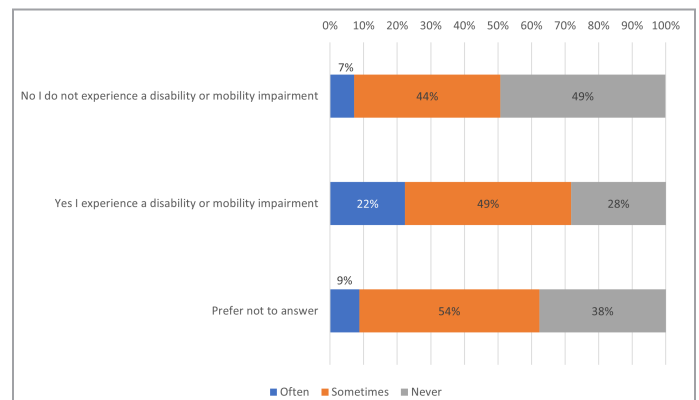


Figure 42: Household Income by Frequency of Transportation-Related Relationship Problems over the past 30 Days



Household Income clearly has a direct relationship to transportation security, with lower-earning households experiencing more transportation insecurity than higher-income households.

Figure 43: Disability by Frequency of Trips Skipped due to Transportation Problems in the last 30 Days



¹¹ <https://poverty.umich.edu/research-funding-opportunities/data-tools/the-transportation-security-index/>

Figure 44: Disability by Frequency of Not Able to Leave the House when Desired over the past 30 Days

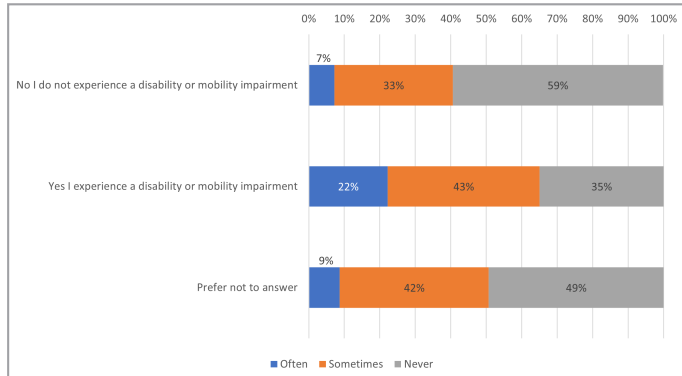
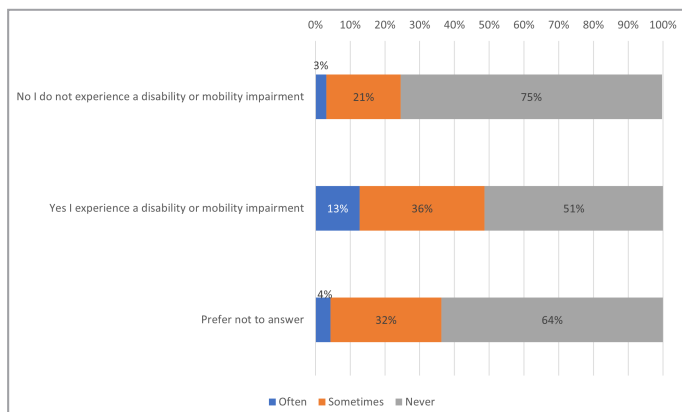


Figure 45: Disability by Frequency of Transportation-Related Relationship Problems over the past 30 Days



Experiencing a disability or mobility impairment clearly has a direct relationship to transportation insecurity, with people experiencing a disability or mobility impairment experiencing more transportation insecurity than people who do not experience a disability or mobility impairment.

Figure 46: Race/Ethnicity by Frequency of Trips Skipped due to Transportation Problems in the last 30 Days

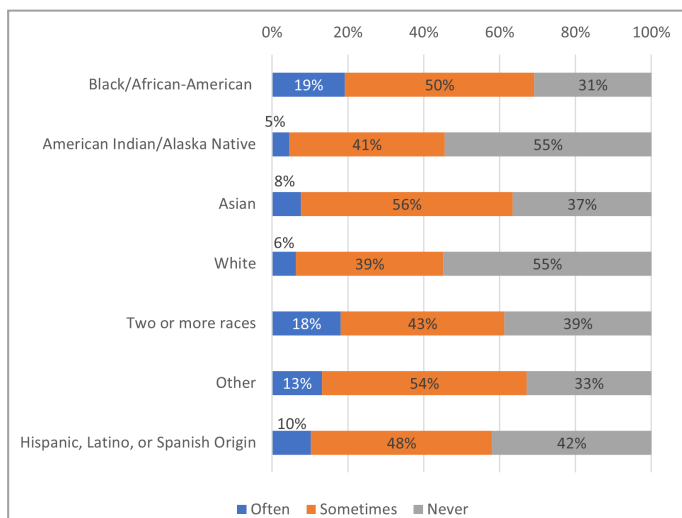


Figure 47: Race/Ethnicity by Frequency of Not Able to Leave the House when Desired over the past 30 Days

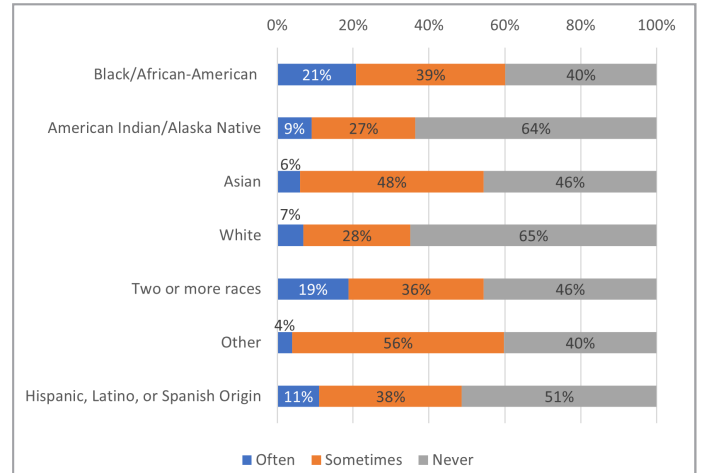
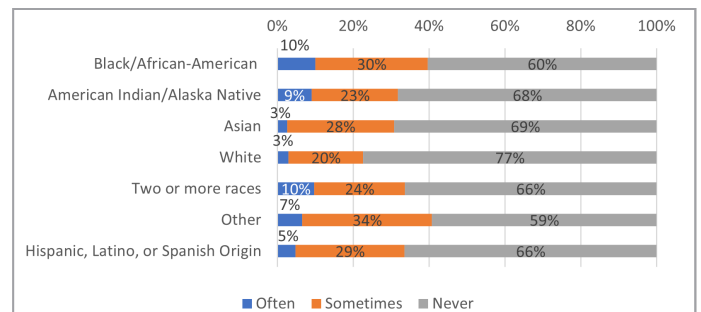


Figure 48: Race/Ethnicity by Frequency of Transportation-Related Relationship Problems over the past 30 Days



Riders who identify as Black/African American or Two or more races experience transportation insecurity at higher rates than other racial or ethnic groups.

Figure 49: Language Spoken at Home by Frequency of Trips Skipped due to Transportation Problems in the last 30 Days

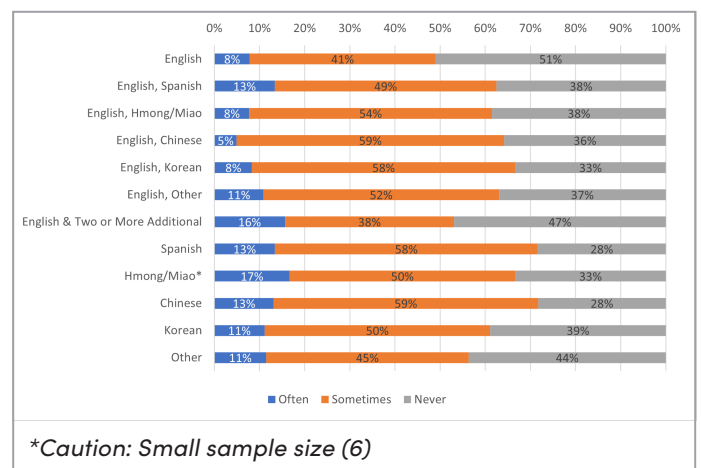


Figure 50: Language Spoken at Home by Frequency of Not Able to Leave the House when Desired over the past 30 Days

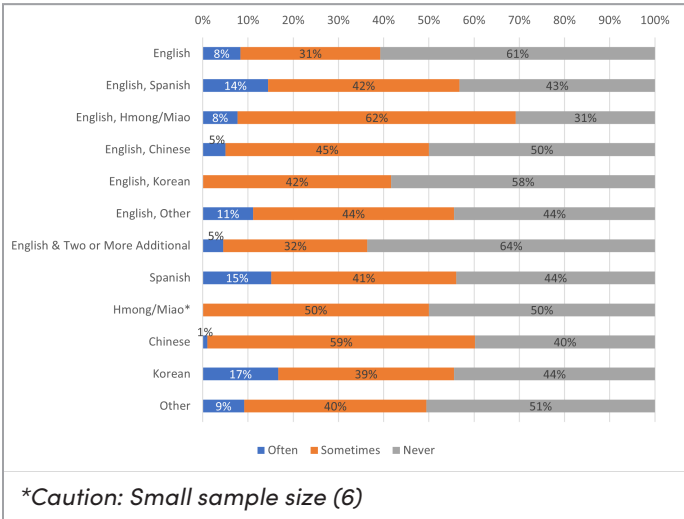


Figure 51: Language Spoken at Home by Frequency of Transportation-Related Relationship Problems over the past 30 Days

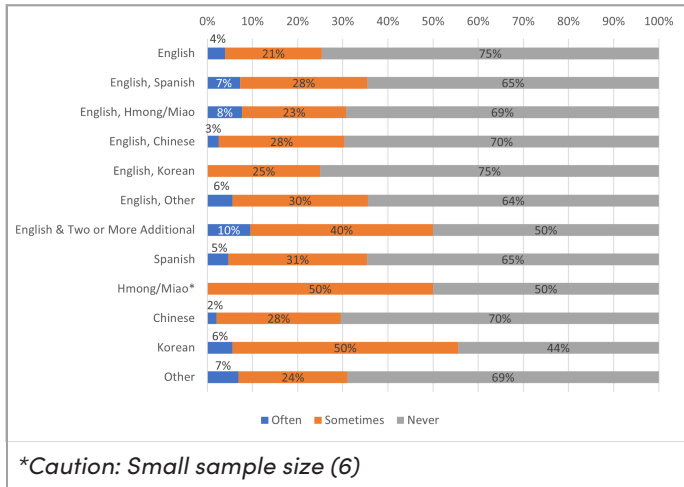


Figure 52: Other Language Spoken at Home by Frequency of Trips Skipped due to Transportation Problems in the last 30 Days

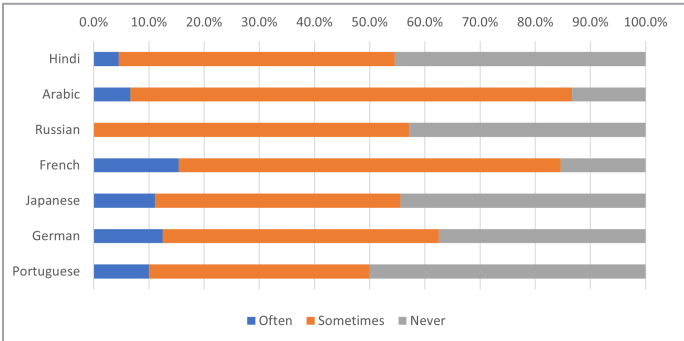


Figure 53: Other Language Spoken at Home by Frequency of Not Able to Leave the House when Desired over the past 30 Days

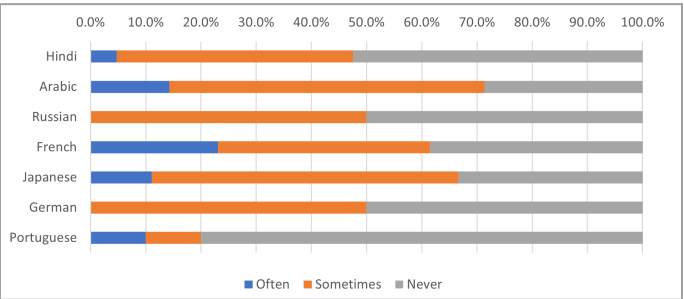


Figure 54: Other Language Spoken at Home by Frequency of Transportation-Related Relationship Problems over the past 30 Days

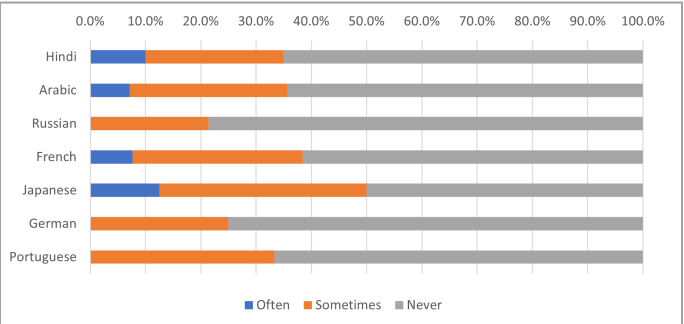


Figure 55: Gender by Frequency of Trips Skipped due to Transportation Problems in the last 30 Days

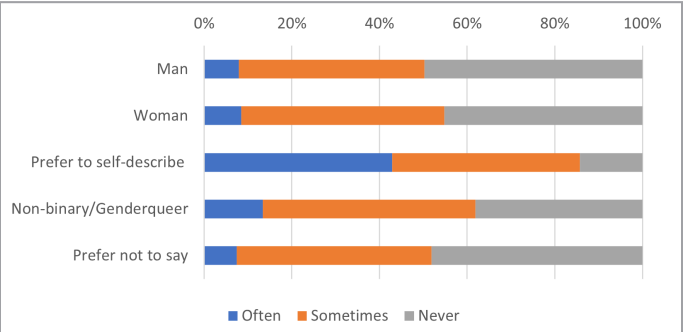


Figure 56: Gender by Frequency of Not Able to Leave the House when Desired over the past 30 Days

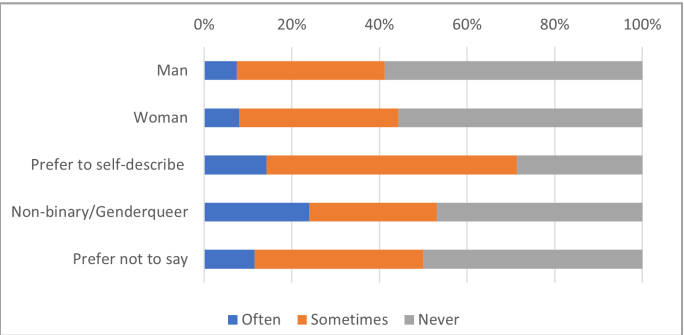


Figure 57: Gender by Frequency of Transportation-Related Relationship Problems over the past 30 Days

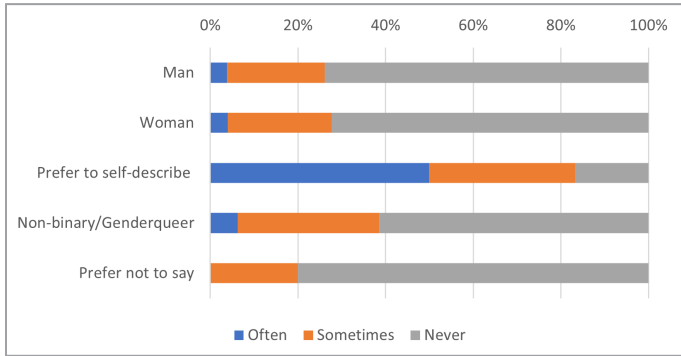


Figure 58: Age by Frequency of Trips Skipped due to Transportation Problems in the last 30 Days

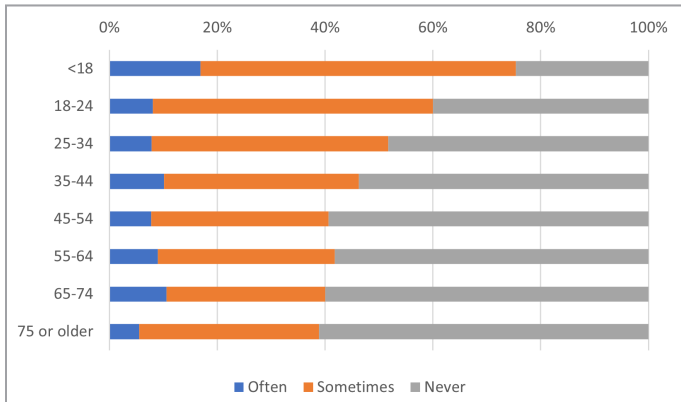


Figure 59: Age by Frequency of Not Able to Leave the House when Desired over the past 30 Days

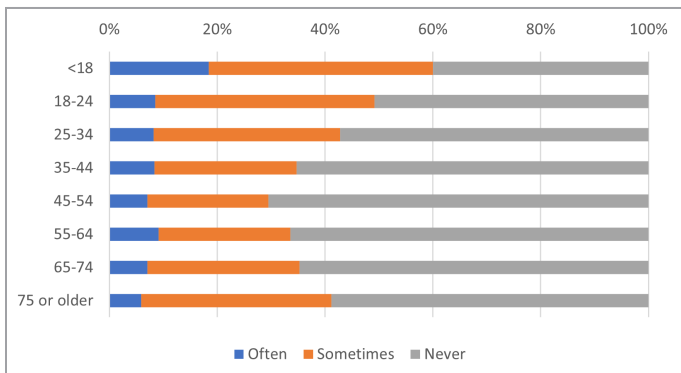


Figure 60: Age by Frequency of Transportation-Related Relationship Problems over the past 30 Days

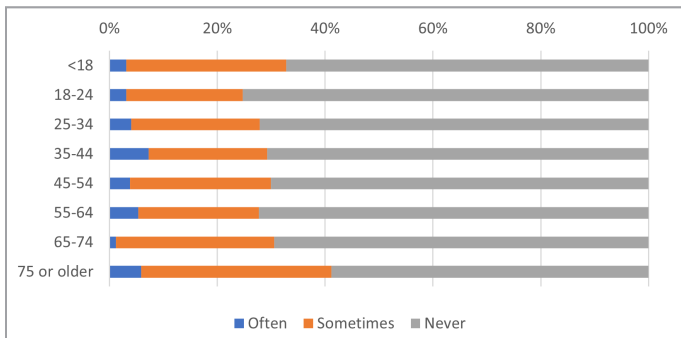


Figure 61: English Proficiency by Frequency of Trips Skipped due to Transportation Problems in the last 30 Days

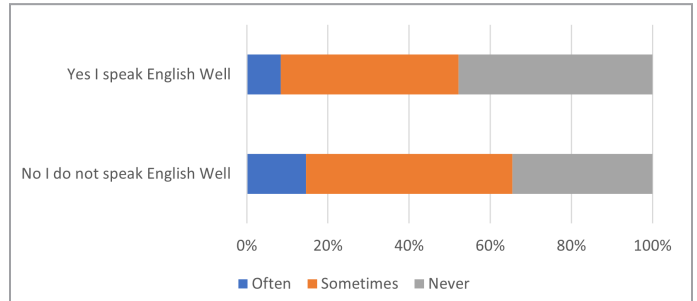


Figure 62: English Proficiency by Frequency of Not Able to Leave the House when Desired over the past 30 Days

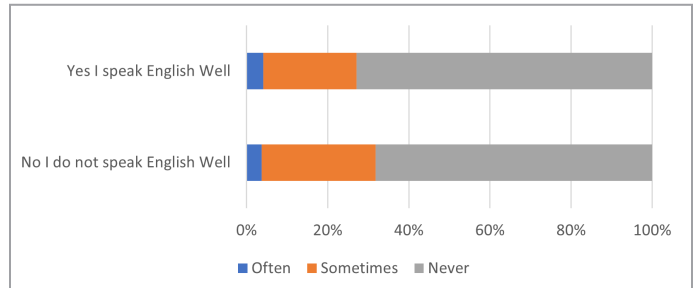


Figure 63: English Proficiency by Frequency of Transportation-Related Relationship Problems over the past 30 Days

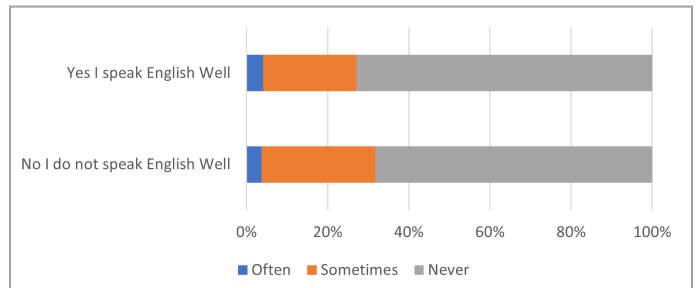
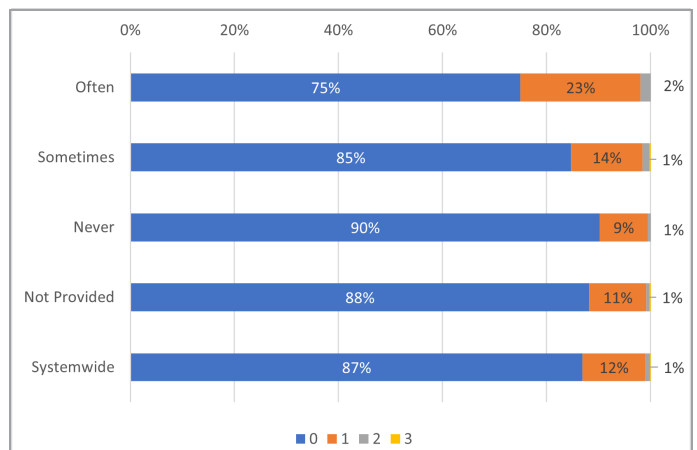


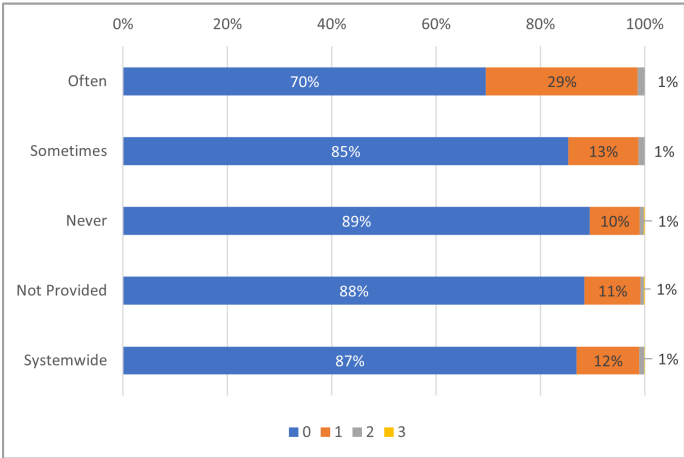
Figure 64: Transfers by Frequency of Trips Skipped due to Transportation Problems in the last 30 Days



Riders whose trips require one or more transfers are more likely to skip trips due to transportation problems. Riders who report that they "often" have to skip trips

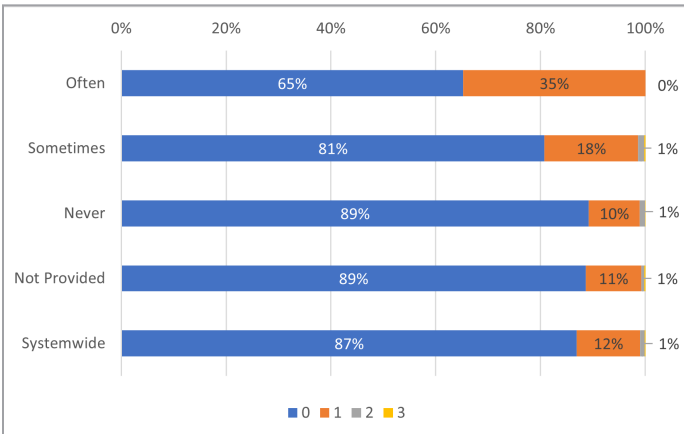
transfer on 25% of their trips, while riders who report that they “never” skip trips transfer on only 10% of their trips.

Figure 65: Transfers by Frequency of Not Able to Leave the House when Desired over the past 30 Days



Riders whose trips require one or more transfers are more likely to be unable to leave their homes when they want to due to transportation problems. Riders who report that they “often” have to stay home transfer for 30% of trips taken, while riders who report that they “never” have to stay home transfer for only 10% of trips.

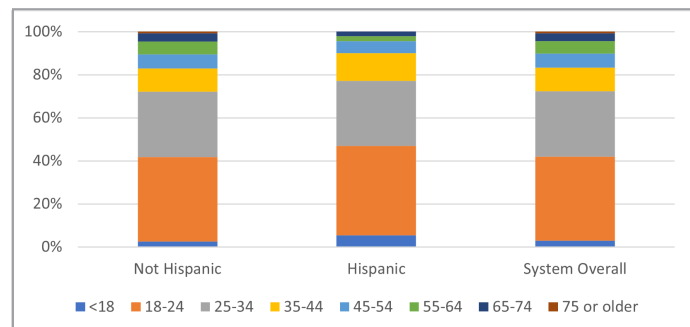
Figure 66: Transfers by Frequency of Transportation-Related Relationship Problems over the past 30 Days



Riders whose trips require transfers are more likely to report that their relationships have been affected due to transportation problems. Riders who report that they “often” have transportation issues affect their relationships transfer for 35% of trips taken, while riders who report that they “never” have transportation problems affect their relationships transfer for only 11% of trips.

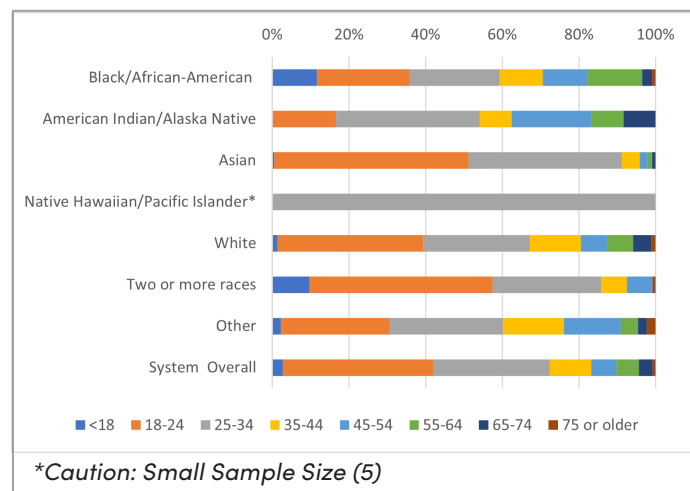
Demographic Profile

Figure 67: Respondent Age by Hispanic Ethnicity



Hispanic respondents were somewhat overrepresented among younger riders, particularly those under 18, and underrepresented among riders over 45 years old, relative to non-Hispanic respondents.

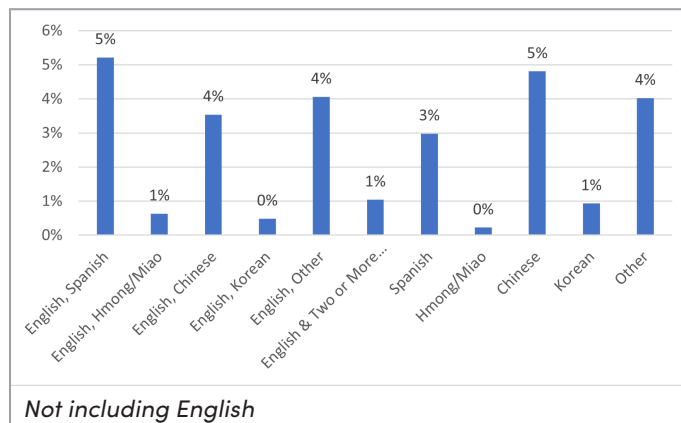
Figure 68: Respondent Age by Race



Riders aged 18 to 24 made up the largest share of almost all racial groups and the system overall, with the exceptions of American Indian/Alaska Natives, those who selected "other", and Native Hawaiian/Pacific Islanders.

- Riders aged 25–34 made up the second-largest share of almost all racial groups and the system overall, and the largest share of American Indian/Alaska Natives, those who selected "other", and Native Hawaiian/Pacific Islanders – all five respondents from this racial group are in this age group.

Figure 69: Language Spoken at Home



- Out of 2,683 respondents, 72% spoke only English at home.
- The next highest shares were riders who spoke both English and Spanish and those who spoke only Chinese, at 5%.

Figure 70: Other Languages Spoken at Home (10 or More Responses)

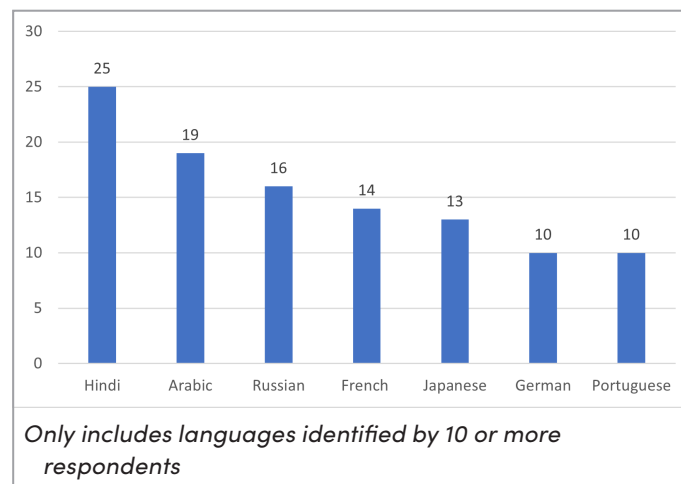


Figure 71: Do you work/have a job?

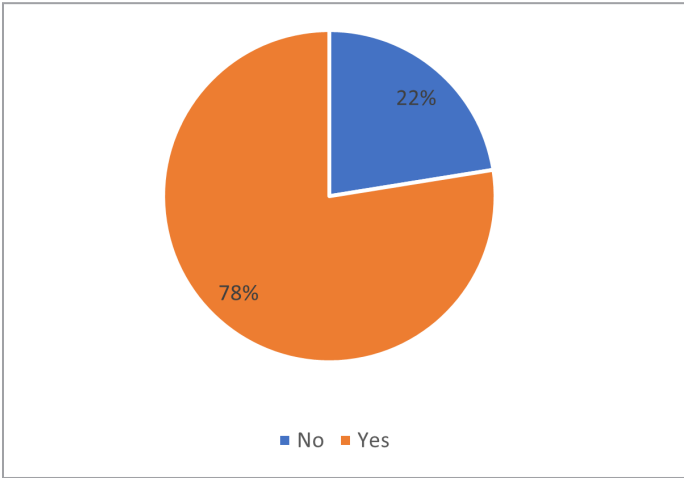


Figure 72: Do you experience a disability or mobility impairment?

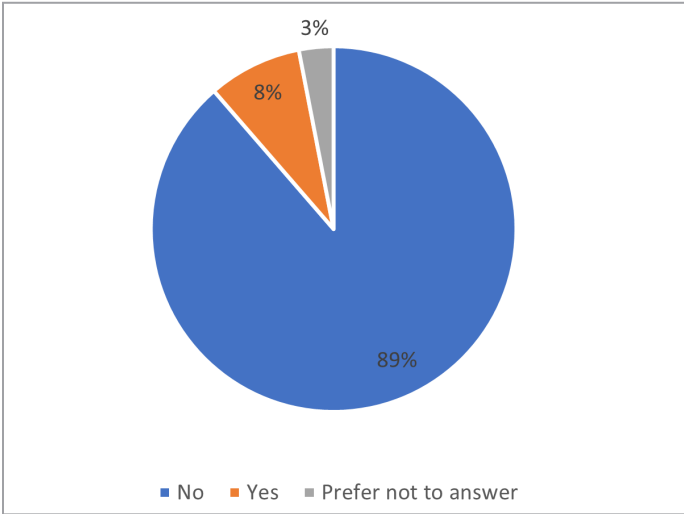


Figure 73: What is your gender?

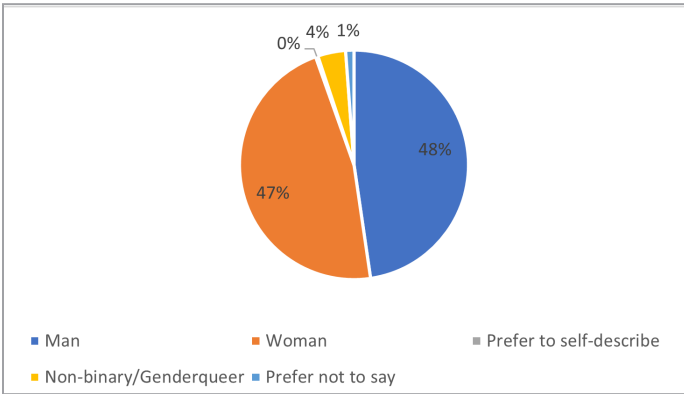


Figure 74: How much money did you and the people you live with make last year (before taxes)?

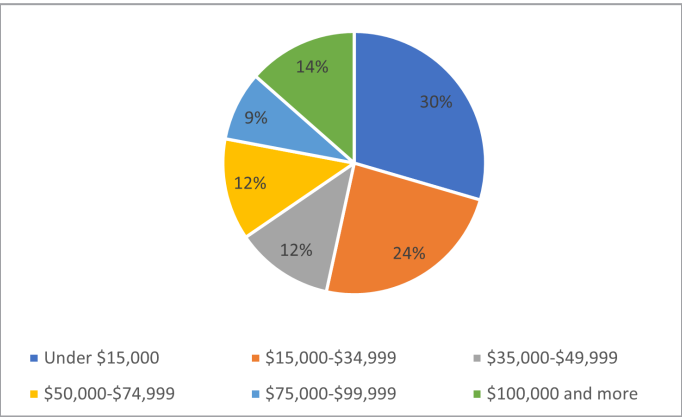


Figure 75: Do you have a valid driver's license?

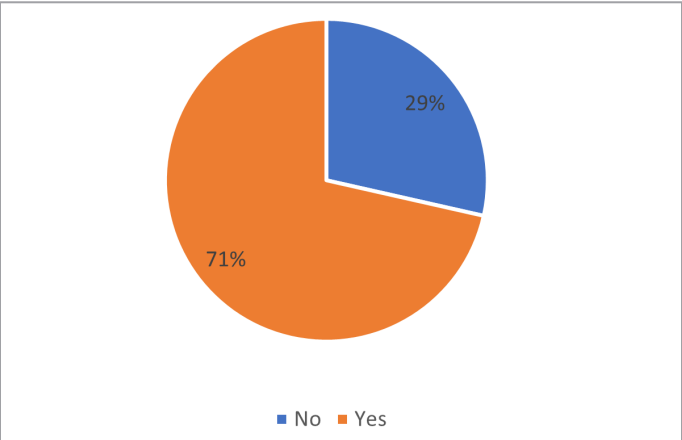


Figure 76: Are you a student?

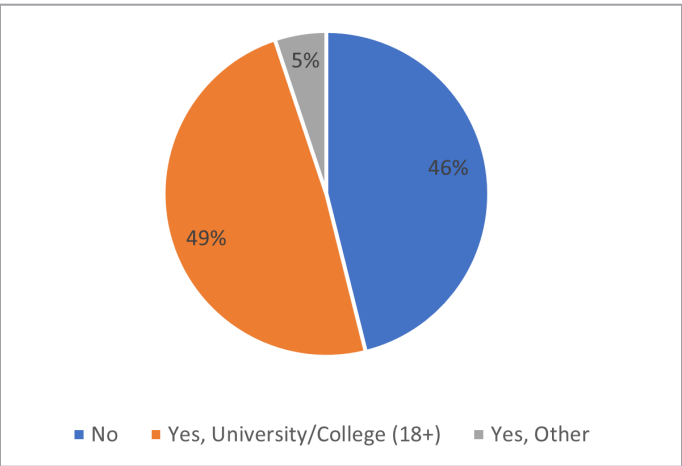
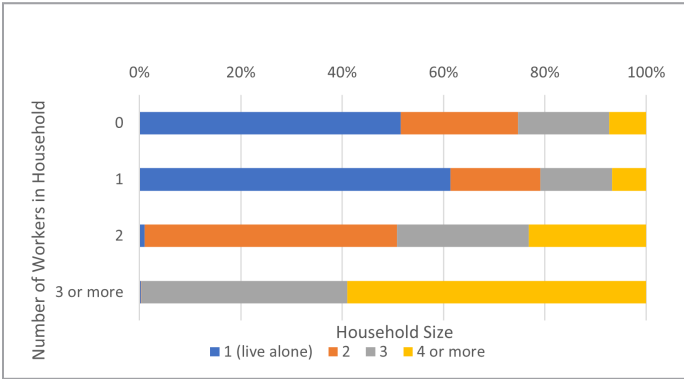


Figure 77: Household Size by Number of Workers



There are clearly errors in the responses to these questions, as households with one person living alone cannot have two or more workers in the household, and households with two people cannot have three or more workers in the household.

Figure 78: Household Size by Number of Vehicles Available

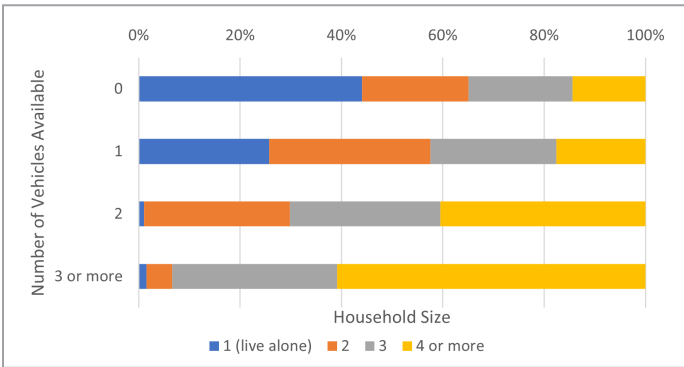


Figure 79: How long have you used Metro Transit?

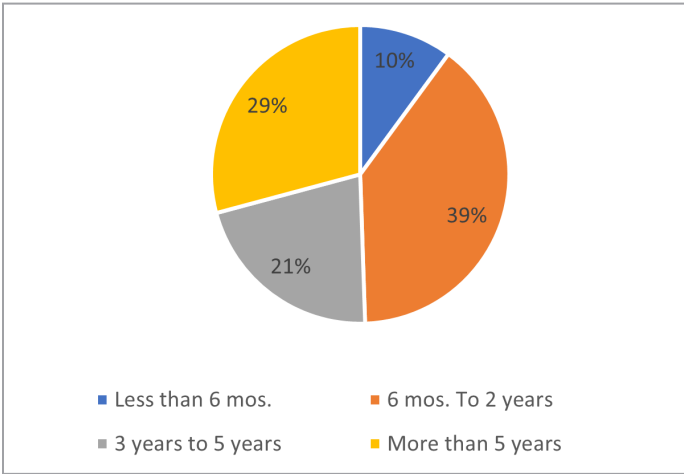
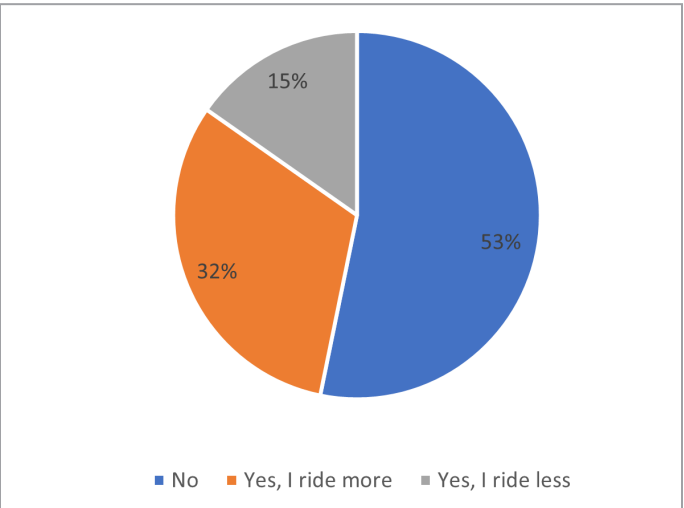


Figure 80: Has your use of Metro changed since routes were redesigned in 2023?



The majority (53%) of riders say their use of Metro has not changed following the Transit Network Redesign. The number of riders whose use has increased (32%) is more than double the number of riders whose use has decreased (15%).

Metro Service Ratings

Figure 81: Cleanliness of Buses

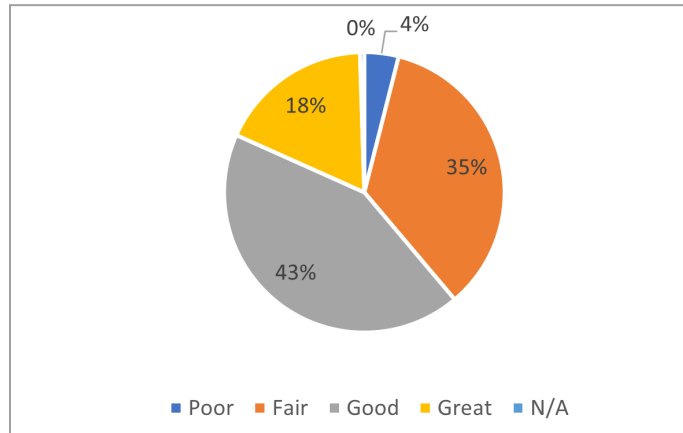
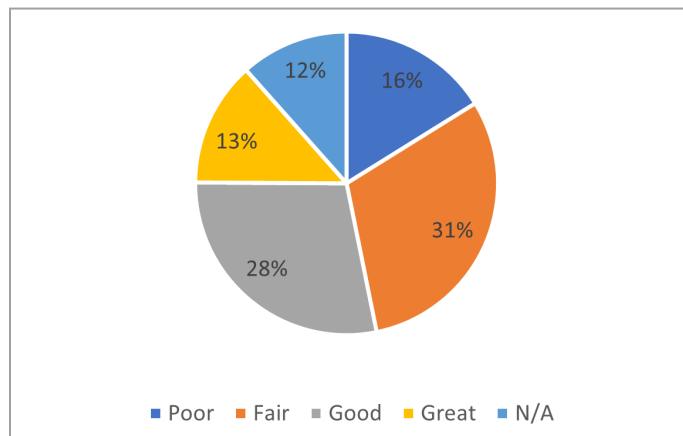
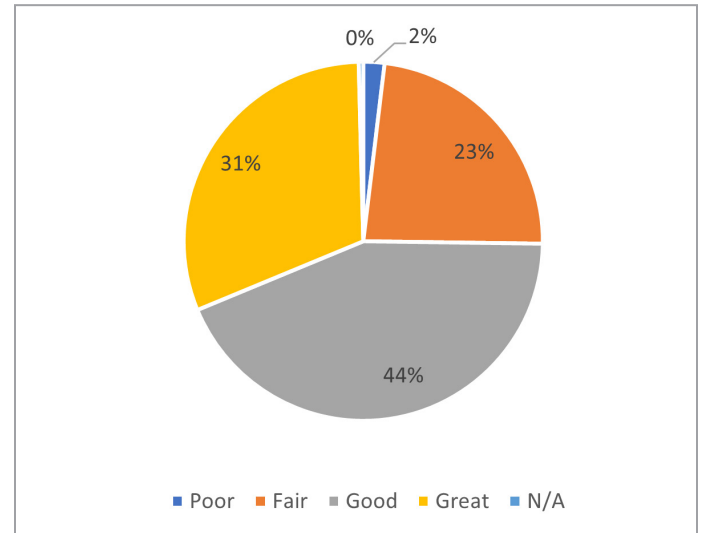


Figure 82: Changes to Routes in June 2023



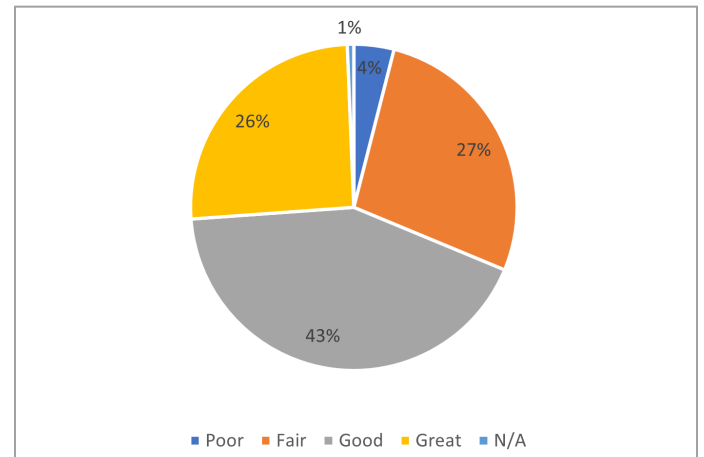
Marginally more riders responded that they think the Transit Network Redesign was “poor” (16%) than that it was “great” (13%); however, 59% think that it was “fair” or “good”.

Figure 83: Personal Safety while Riding



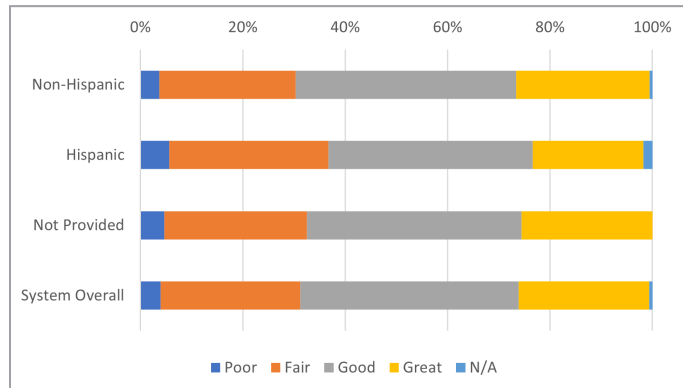
Less than 2% of respondents feel that personal safety while riding is “poor”, while nearly 75% feel that it is “good” or “great”.

Figure 84: Personal safety at bus stops



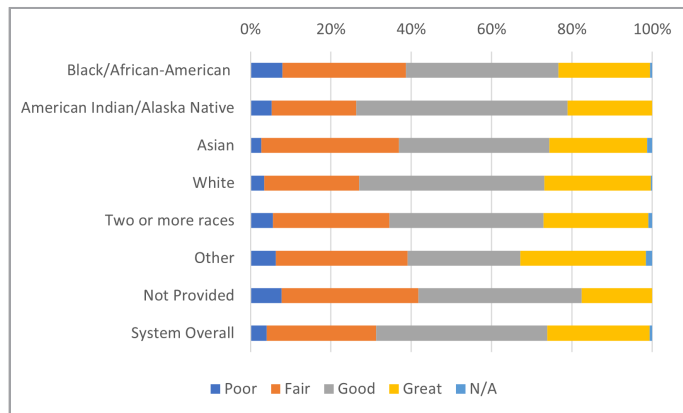
Just 4% of respondents feel that personal safety at bus stops is “poor”, while 68% report that it is “good” or “great”.

Figure 85: Personal Safety at Bus Stops by Hispanic Ethnicity



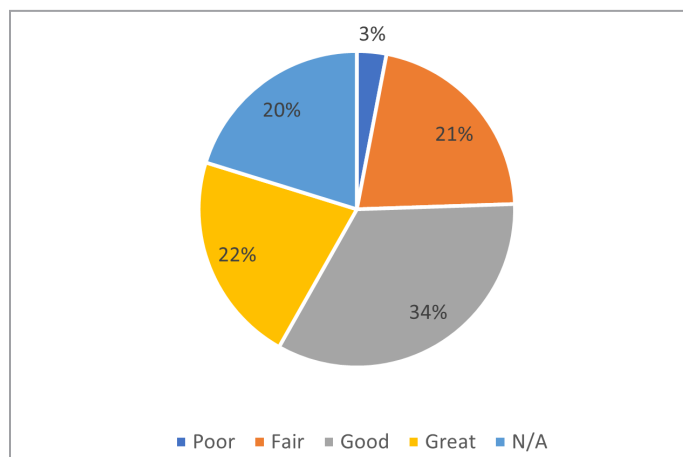
Hispanic riders report a higher perception of “poor” safety at bus stops (6%) than non-Hispanic riders (4%).

Figure 86: Personal Safety at Bus Stops by Race



Black/African American riders report the highest perception of “poor” safety at bus stops, at 8%.

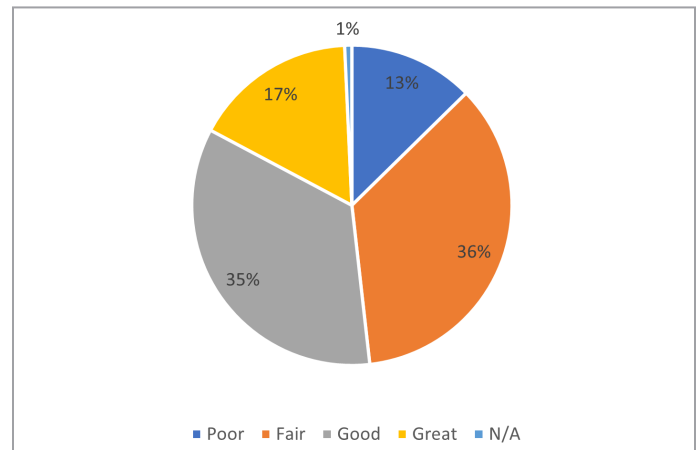
Figure 87: Personal Safety When Transferring



- 3% of respondents feel that personal safety while transferring is “poor”.

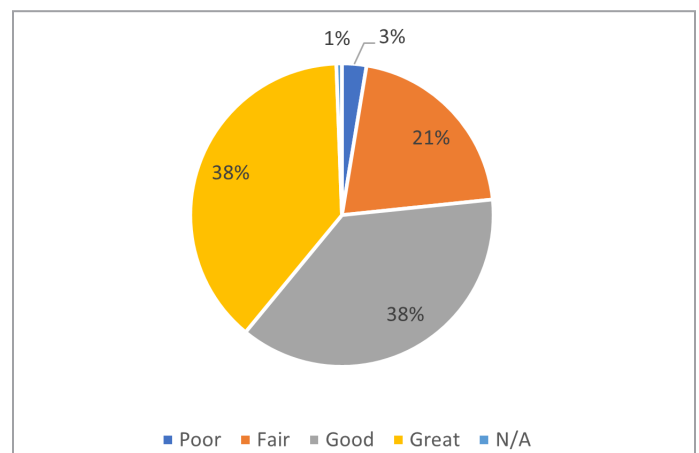
- Although safety at bus stops has previously been reported to be a concern for Asian riders,¹² this racial group and White riders reported the lowest perception of “poor” safety at bus stops, 3%.
- Racial groups that reported a combined “poor” and “fair” rating by more than the system average (31%) of respondents include Black/African American and Other (39%), Asian (37%), and Two or More races (35%).

Figure 88: Convenience of Routes



In an interesting conflict with riders’ responses regarding the Transit Network Redesign (Figure 82), more riders rated the convenience of routes as “great” (17%) than “poor” (13%).

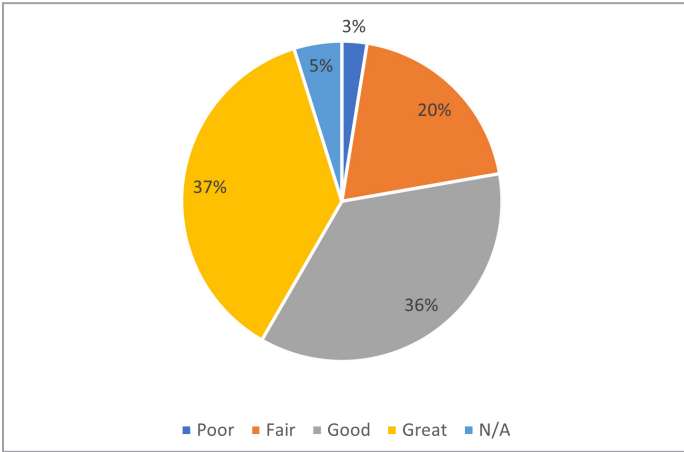
Figure 89: Driver Courtesy



Three percent of riders responded that driver courtesy is “poor”, while 38% reported that it is “great”.

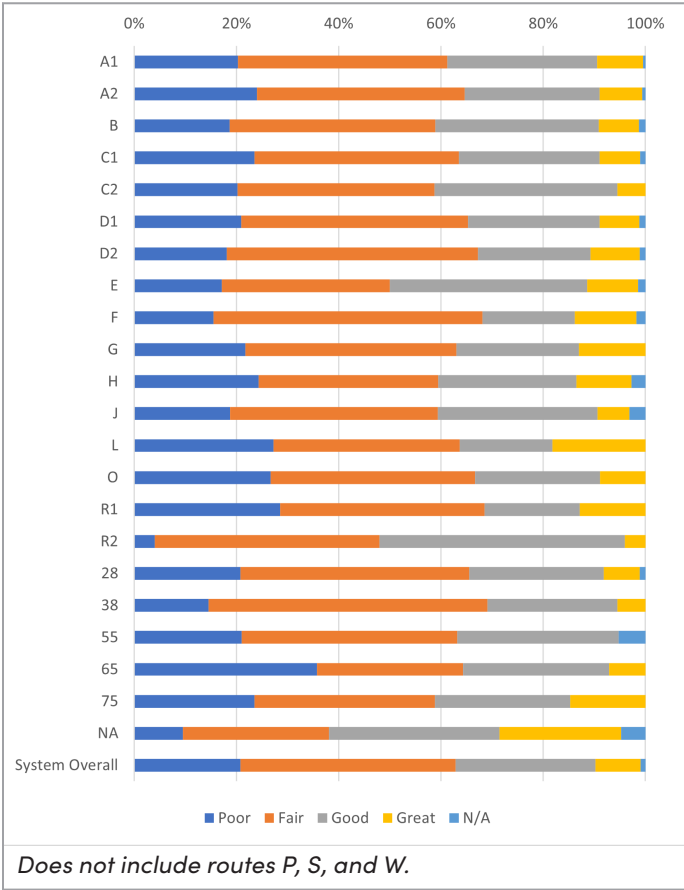
¹² Including from the Vera Court Neighborhood Association and Hmong focus groups held for the 2025 Transit Development Plan.

Figure 90: Driver Helpfulness



Three percent of riders responded that driver helpfulness is “poor”, while 37% reported that it is “great”.

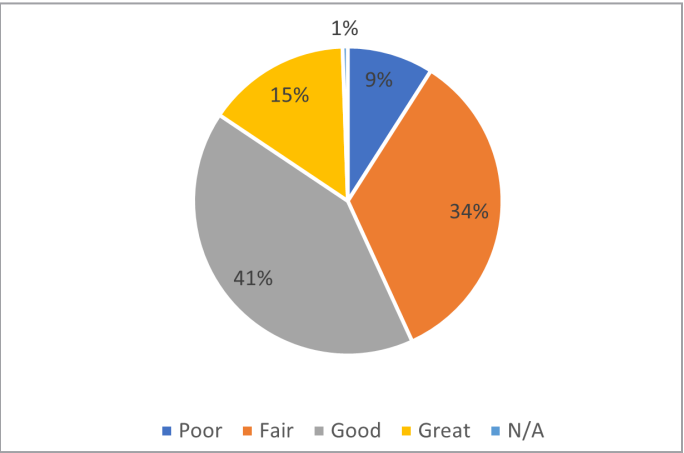
Figure 91: Wait Time for Buses by Route



Responses to this question are, in some ways, to be expected – relatively infrequent routes such as L, O, and R1 have higher-than-typical “poor” wait time ratings. Unexpectedly, Route L, with headways of over an hour, had the highest “great” wait time rating of any route, while frequent service routes such as A, B, C, and D

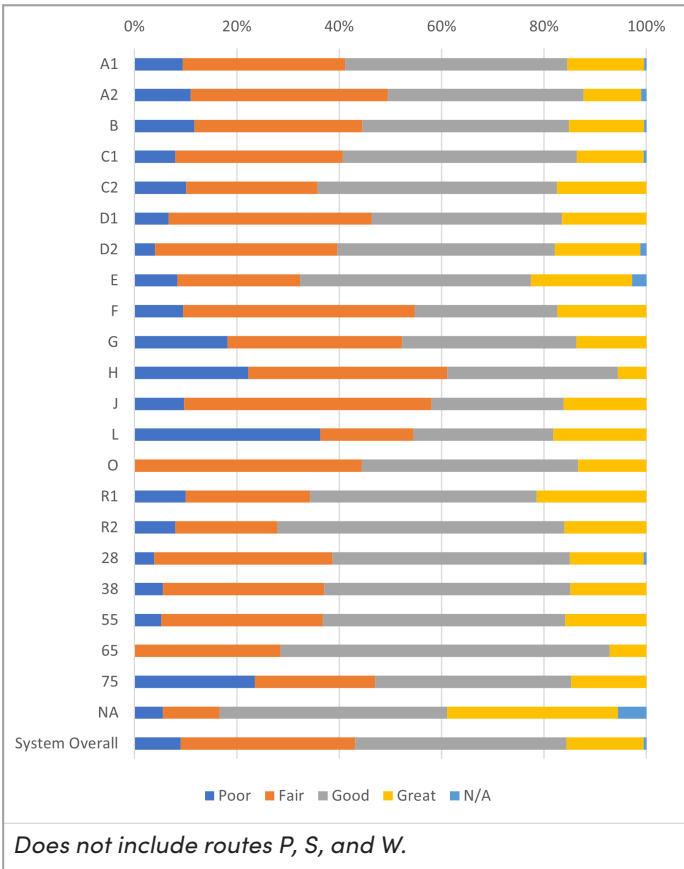
routes were rated very similarly to – or worse than – routes E, F, G, H, and J.

Figure 92: Travel Time on Buses



While 9% of riders reported that travel time on buses was “poor”, 56% reported that it was “good” or “great”.

Figure 93: Travel Time on Buses by Route



Route L, which takes just over an hour to run its entire length, has the poorest travel time rating, followed by Route 75, which takes just under an hour to run its course.

Figure 94: Maps, Schedules, and Information

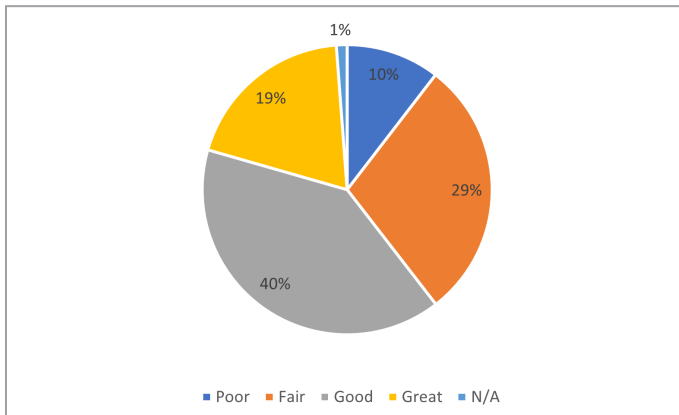
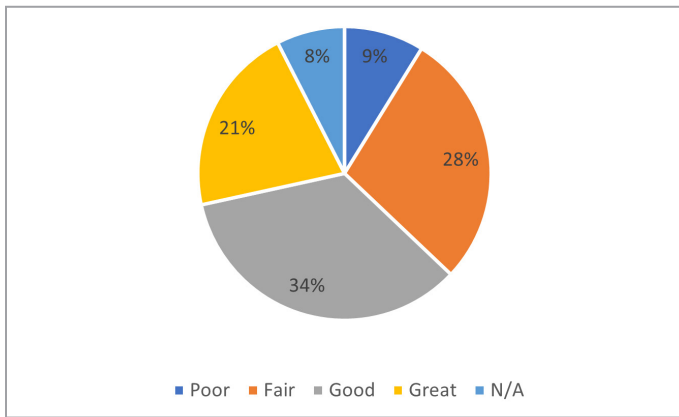
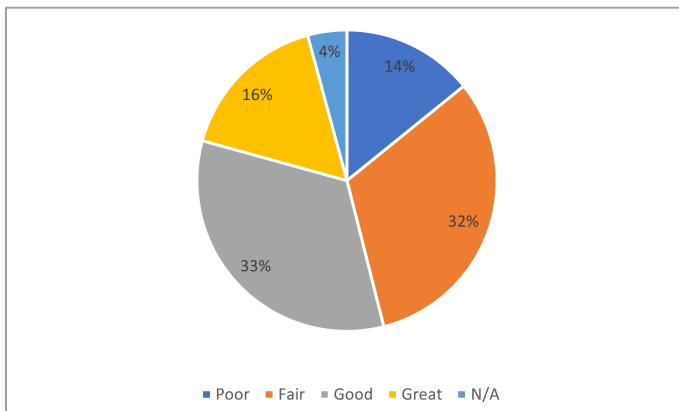


Figure 95: Online Trip Planning



While 9% of riders responded that online trip planning was “poor”, 21% reported that it was “great”. Since the survey was conducted, many bugs in Google’s online trip planning have been eliminated. Additionally, Metro has begun working with the Transit app, as well as offering its own real-time bus locator service using new technology.

Figure 96: Bus Tracking



Fourteen percent of riders responded that online bus tracking was “poor”, and 17% reported that it was “great”. Since the survey was conducted, Metro has begun working with the Transit app, as well as offering

its own real-time bus locator service using new technology.

Figure 97: Fare Cost

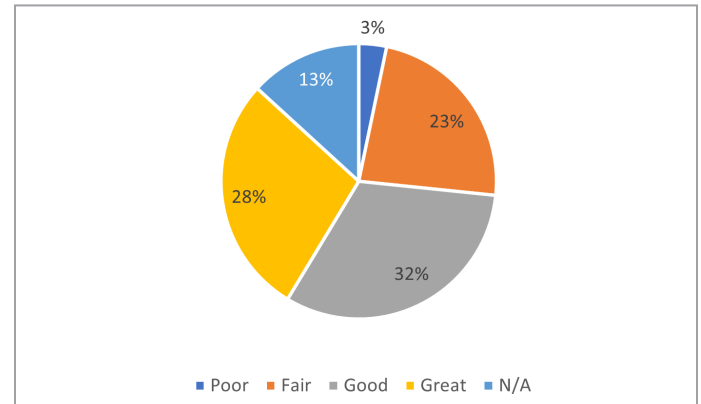
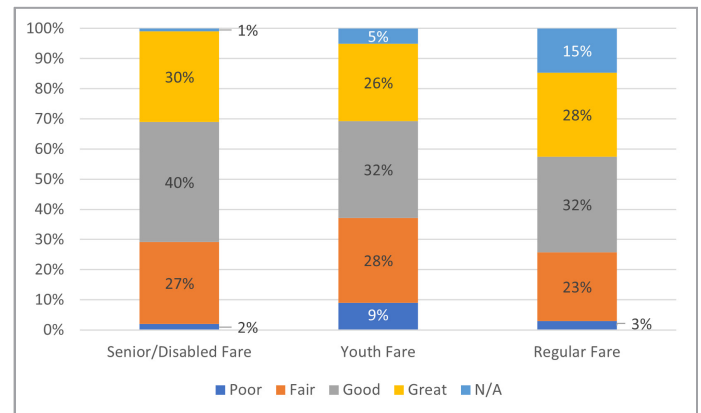


Figure 98. Fare Cost by Reduced Fare Use



- Riders who use Senior/Disabled reduced fares find their fares costs to be better (Fair, Good, or Great) than do those who use Youth reduced fares or those who pay regular fares, with only 2% of this population rating fare costs as “poor” and 30% rating fares as “great”.
- Youth reduced fare riders find their fares to be worse than those who pay Senior/Disabled reduced fares or those who pay regular fares, with 9% of this population rating fare costs as “poor” and 26% rating fares as “great”.

Figure 99: Overall Satisfaction

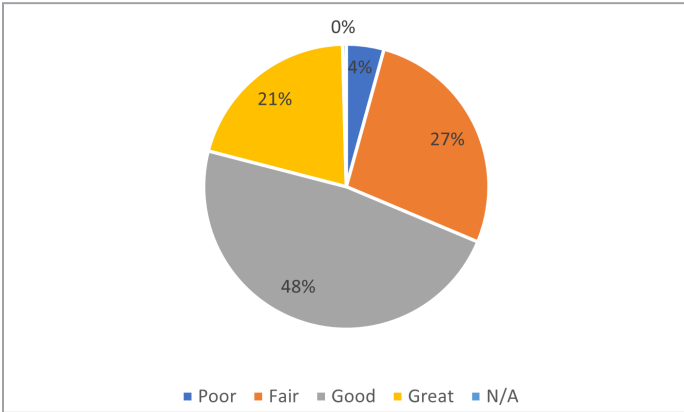
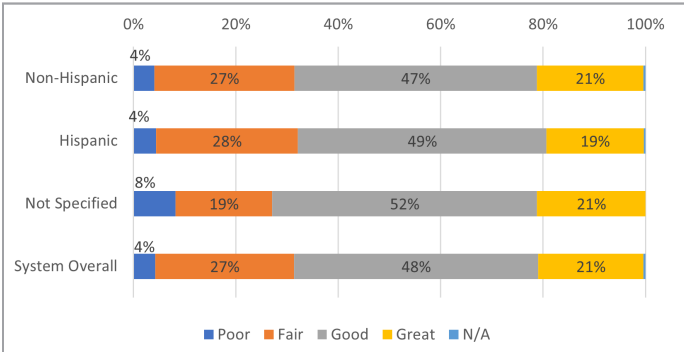
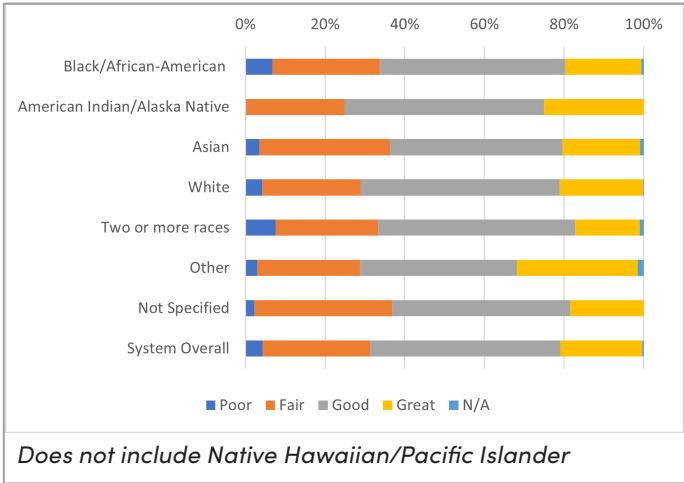


Figure 100: Overall Satisfaction by Hispanic Ethnicity



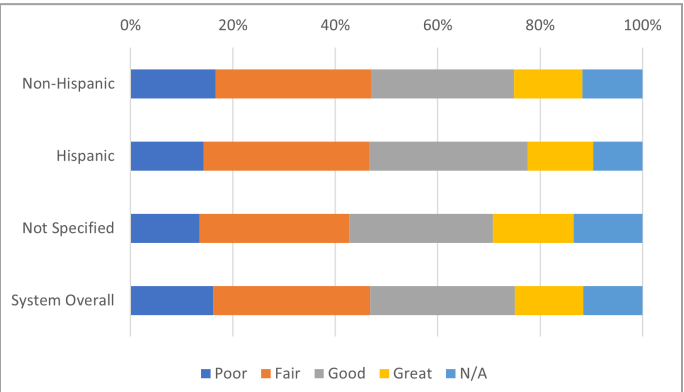
Hispanic and non-Hispanic riders report very similar overall satisfaction with the Metro system.

Figure 101: Overall Satisfaction by Race



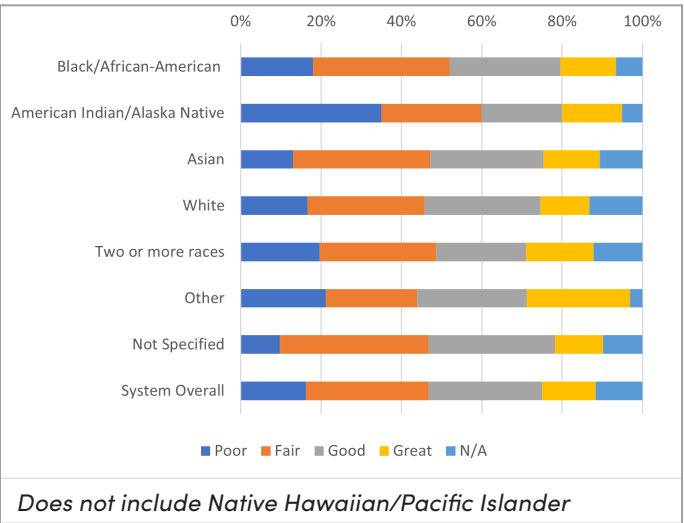
- Riders of Two or More Races have the lowest satisfaction with the Metro system (8%), followed by Black/ African American riders (7%).
- Riders who selected the “Other” race category have the highest satisfaction with the Metro system (30%), followed by American Indian/Alaska Natives (25%).
- The majority of all racial groups report an overall satisfaction of “good” or “great”.

Figure 102: Attitude towards June 2023 Route Changes by Hispanic Ethnicity



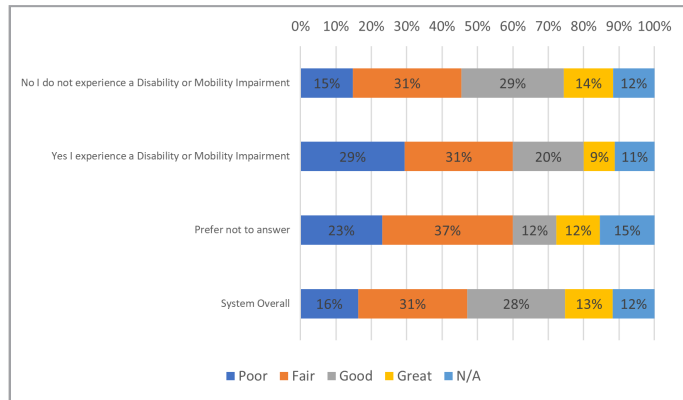
- Non-Hispanic riders (17%) are more likely than Hispanic riders (14%) to rate the route changes enacted in June 2023 as “poor”.
- More Hispanic riders rate the route changes as “good” or “great” (44%) than do non-Hispanic riders (41%).

Figure 103: Attitude towards June 2023 Route Changes by Race



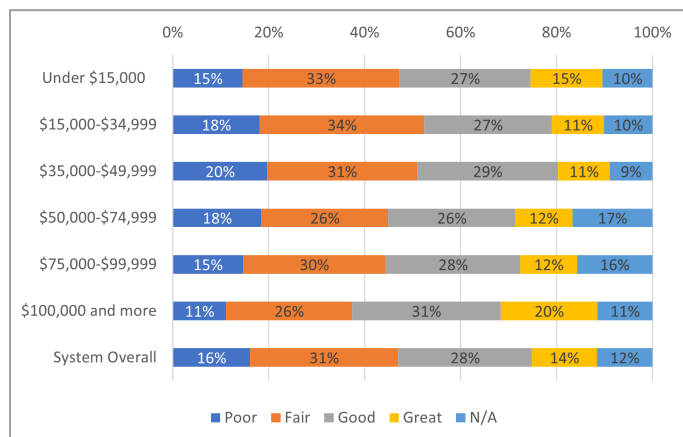
- American Indian/Alaska Native riders report the most dissatisfaction with the changes to routes that were enacted in 2023, with 35% rating these changes as “poor”, and 60% rating them as either “poor” or “fair”. Thirty-five percent of these riders rate the changes as “good” or “great”, the lowest of any racial group.
- Riders identifying as “other” races have the highest approval rating of the 2023 route changes, with 53% of these riders rating the changes as “good” or “great”.

Figure 104: Attitude towards June 2023 Route Changes by Disability/Mobility Impairment



- Nearly 30% of riders who experienced a disability or mobility impairment rated the system poorly after the June 2023 route changes, nearly double the percentage of riders who do not experience a disability or mobility impairment.
- Twenty-nine percent of riders who experience a disability or mobility impairment rate the changes as “good” or “great”, compared to 43% of those who do not experience a disability or mobility impairment.

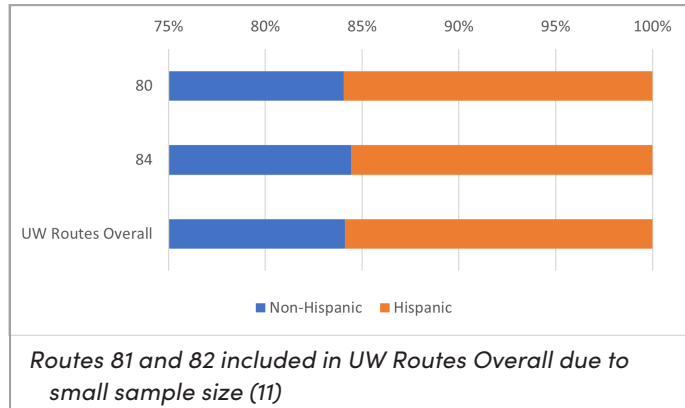
Figure 105: Attitude towards June 2023 Route Changes by Household Income



Forty-two percent of riders from the lowest-income group (\$15,000 and less) rate the route changes as “good” or “great”, slightly above the system-wide average of 41%. The lowest rating of “poor” is from the highest income bracket, with 11% of these riders giving the route changes a rating of “poor”. This bracket also had the highest overall approval ratings, with 51% of riders rating the changes as “good” or “great”.

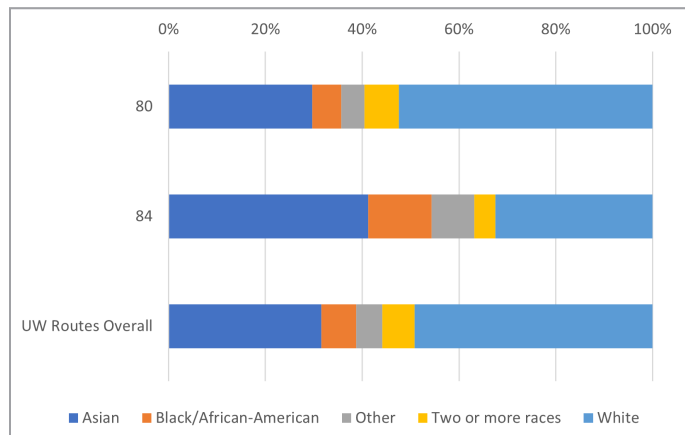
UW-Madison Routes (80 & 84)

Figure 106: Routes by Hispanic Ethnicity



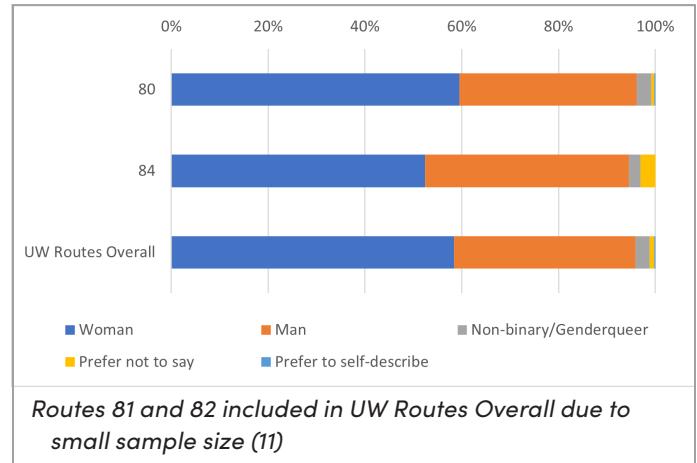
There is very little variability between Hispanic use of UW routes.

Figure 107: Routes by Race



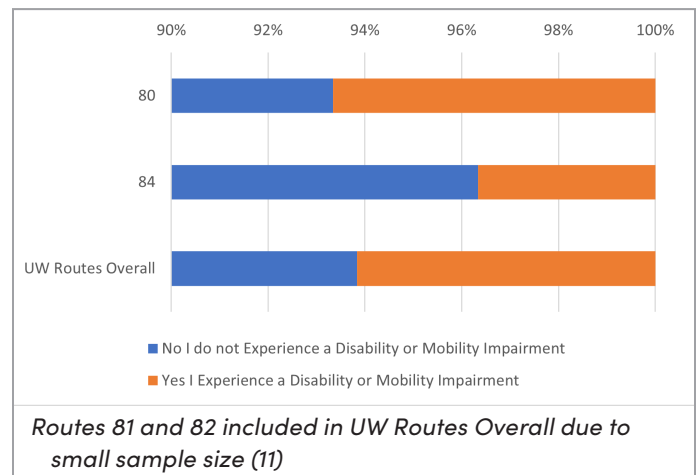
- Although White riders outnumber riders of other races on Route 80, Asians outnumber White riders (32%) on Route 84, with 41% of ridership.
- Black/African American riders only compose 6% of Route 80 ridership, but they compose 13% of Route 84 ridership.

Figure 108: Routes by Gender



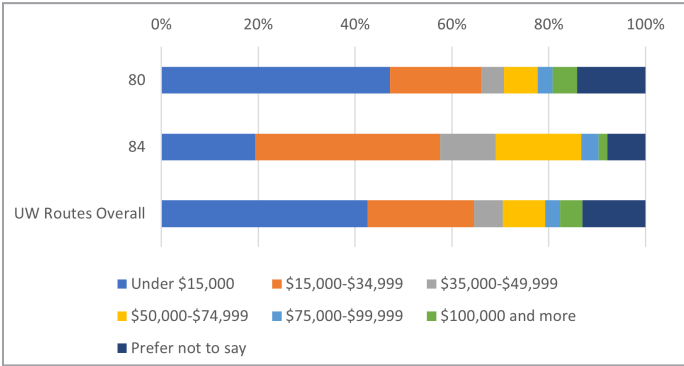
- Women outnumber Men on all UW Routes, comprising between 46% and 60% of total ridership.
- Non-binary/Genderqueer riders compose 2% of Route 84 ridership and 3% of Route 80 ridership.

Figure 109: Routes by Disability or Mobility Impairment



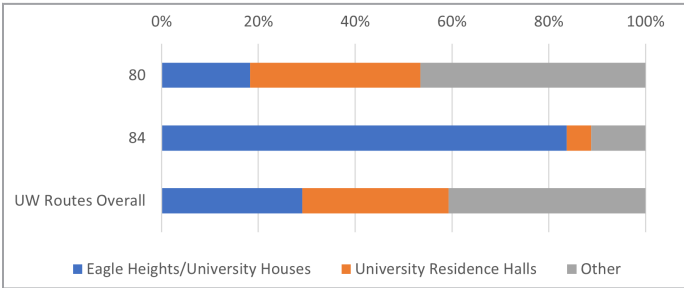
Riders experiencing a disability or a mobility impairment compose 4% of Route 84 ridership and 7% of Route 80 ridership.

Figure 110: Routes by Household Income



The majority of riders on all UW routes have a household income of under \$35,000.

Figure 111: Routes by Residence



- Eighty-four percent of riders on Route 84, which serves Eagle Heights, reside in Eagle Heights.
- Thirty-five percent of riders on Route 80 reside in University Residence Halls.



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