

CITY OF MAPLEWOOD

Title VI Program

Date filed with MoDOT Transit Section:

DATE

**Title VI Plan
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Attachments

- Attachment 1 – Agency Information
- Attachment 2 – Title VI Complaint Form

A. Title VI Assurances

City of Maplewood agrees to comply with all provisions prohibiting discrimination on the basis of race, color, or national origin of Title VI of the Civil Rights Act of 1964, as amended, 42 U.S.C. 200d *et seq.*, and with U.S. DOT regulations, "Nondiscrimination in Federally-Assisted Programs of the Department of Transportation – Effectuation of Title VI of the Civil Rights Act," 49 CFR part 21.

City of Maplewood assures that no person shall, as provided by Federal and State civil rights laws, be excluded from participation in, be denied the benefits of, or be subjected to discrimination under any program or activity. City of Maplewood further ensures every effort will be made to ensure non-discrimination in all programs and activities, whether those programs and activities are federally funded or not.

City of Maplewood meets the objectives of the FTA Master Agreement which governs all entities applying for FTA funding, including City of Maplewood and its third-party contractors by promoting actions that:

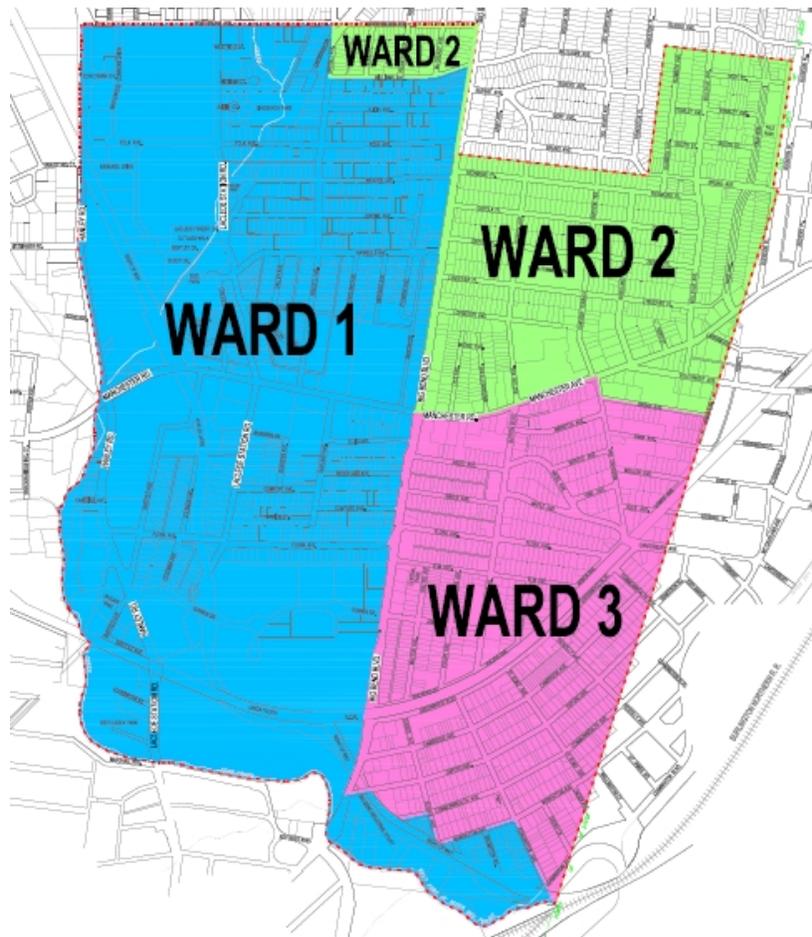
- A. Ensure that the level and quality of transportation service is provided without regard to race, color, or national origin.
- B. Identify and address, as appropriate, disproportionately high and adverse effects of programs and activities on minority populations and low-income populations.
- C. Promote the full and fair participation of all affected Title VI populations in transportation decision making.
- D. Prevent the denial, reduction, or delay in benefits related to programs and activities that benefit minority populations or low-income populations.
- E. Ensure meaningful access to programs and activities by persons with Limited English Proficiency (LEP).

B. Agency Information

The City of Maplewood is committed to providing cost-effective, courteous and responsive service to all citizens, and to take a leading role in fostering a community that is a desirable place to live, work and play.

In 1908, Maplewood incorporated and became its own municipality. Maplewood is governed by the city council which is made up of seven members. Six of whom shall be nominated and elected by the qualified voters of their respective wards and the seventh member is the mayor. Council members and the mayor are elected to serve staggered three-year terms.

General public transit services are not provided by the City of Maplewood and instead are provided by Metro Transit. Metro Transit is a completely separate agency independent of the City of Maplewood. The City of Maplewood has 1 vehicle that provides shuttle transportation to residents 60+ or disabled residents.



C. Notice to the Public

Notifying the Public of Rights under Title VI/ADA

City of Maplewood posts Title VI/ADA notices on our agency's website, in public areas of our agency and on our buses and/or paratransit vehicles.

City of Maplewood operates its programs and services without regard to race, color, or national origin, in accordance with Title VI of the Civil Rights Act of 1964.

City of Maplewood operates its programs and services without discrimination against individuals with disabilities, in accordance with the Americans with Disabilities Act of 1990.

For more information on the City of Maplewood's Title VI program, and the procedures to file a complaint, contact Tiffany Hyde, Assistant Public Works Director at [314-646-3640; t-hyde@cityofmaplewood.com; or visit our administrative office at City Hall, 7601 Manchester Road, Maplewood, MO 63143. For more information visit www.cityofmaplewood.com

If you believe you have been discriminated against on the basis of race, color, or national origin by the City of Maplewood, you may file a Title VI complaint by completing, signing, and submitting the agency's Title VI Complaint Form.

To obtain additional information about your rights under Title VI, contact: Tiffany Hyde at 314-646-3640.

How to file a Title VI/ADA complaint with the City of Maplewood:

1. To obtain a complaint form, please contact Tiffany Hyde, Title VI Coordinator, 7601 Manchester Road, Maplewood, MO 63143, phone 314-646-3640 Fax 314-646-3676 or email t-hyde@cityofmaplewood.com
2. In addition to the complaint process at City of Maplewood, complaints may be filed directly with the Federal Transit Administration, Office of Civil Rights, Region 7, 901 Locust Street-Suite 404, Kansas City, MO 64106. Phone number (816) 329-3920.
3. Complaints must be filed within 180 days following the date of the alleged discriminatory occurrence and should contain as much detailed information about the alleged discrimination as possible.
4. The form must be signed and dated, and include your contact information.

If information is needed in another language, contact Language Access Multicultural People at 314-842-0062.

D. Procedure for Filing a Title VI / ADA Complaint

Filing a Title VI / ADA Complaint

The complaint procedures apply to the beneficiaries of Maplewood's programs, activities, and services.

RIGHT TO FILE A COMPLAINT: Any person who believes they have been discriminated against on the basis of race, color, or national origin by the City of Maplewood may file a Title VI complaint by completing and submitting the agency's **Title VI / ADA Complaint Form**. Title VI / ADA Complaints must be received in writing within 180 days of the alleged discriminatory complaint.

HOW TO FILE A COMPLAINT: Information on how to file a Title VI / ADA complaint is posted on the city's website, and in public areas. You may download the City of Maplewood's Title VI / ADA Complaint Form at www.cityofmaplewood.com, or request a copy by writing to the City of Maplewood, 7601 Manchester Road, Maplewood, MO 63143. Information on how to file a Title VI / ADA complaint may also be obtained by calling Tiffany Hyde at 314-646-3640.

You may file a signed, dated complaint no more than 180 days from the date of the alleged incident. The complaint should include:

- Your name, address and telephone number.
- Specific, detailed information (how, why and when) about the alleged act of discrimination.
- Any other relevant information, including the names of any persons, if known, the city should contact for clarity of the allegations.

Please submit your complaint form to Tiffany Hyde, City of Maplewood, 7601 Manchester Road, Maplewood, MO 63143.

COMPLAINT ACCEPTANCE: City of Maplewood will process complaints that are complete. Once a completed Title VI / ADA Complaint Form is received, City of Maplewood will review it to determine if the City of Maplewood has jurisdiction. The complainant will receive an acknowledgement letter informing them whether or not the complaint will be investigated by the City of Maplewood.

INVESTIGATIONS: The City of Maplewood will generally complete an investigation within 90 days from receipt of a completed Title VI / ADA complaint form. If more information is needed to resolve the case, the City of Maplewood may contact the complainant. Unless a longer period is specified by the City of Maplewood, the complainant will have ten (10) days from the date of the letter to send the requested information to the Tiffany Hyde c/o City of Maplewood, investigator assigned to the case.

If the requested information is not received within that timeframe the case will be closed. Also, a case can be administratively closed if the complainant no longer wishes to pursue the case.

- 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 provides an explanation of the corrective action taken.

If the complainant disagrees with the City of Maplewood's determination, the complainant may request reconsideration by submitting the request in writing to the Title VI / ADA investigator within seven (7) days after the date of the letter of closure or letter of finding, stating with specificity the basis for the reconsideration. The City of Maplewood will notify the complainant of the decision either to accept or reject the request for reconsideration within ten (10) days. In cases where reconsideration is granted, the City of Maplewood will issue a determination letter to the complainant upon completion of the reconsideration review.

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

If information is needed in another language, contact Language Access Multicultural People, 8050 Watson Road, St. Louis, MO 63119 at 314-842-0062.

**E. Monitoring Title VI Complaints, Investigations, Lawsuits
and Documenting Evidence of Agency Staff Title VI Training**

Documenting Title VI Complaints/Investigations

All Title VI / ADA complaints will be entered and tracked in the City of Maplewood’s complaint log. Active investigations will be monitored for timely response on the part of all parties. The agency’s Title VI Coordinator shall maintain the log.

Agency Title VI Complaint Log

| Date complaint filed | Complainant | Basis of complaint R-C-NO | Summary of allegation | Pending status of complaint | Actions taken | Closure Letter (CL) | Letter of Finding (LOF) | Date of CL or LOF |
|----------------------|-------------|---------------------------|-----------------------|-----------------------------|---------------|---------------------|-------------------------|-------------------|
| | | | | | | | | |
| | | | | | | | | |
| | | | | | | | | |
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| | | | | | | | | |

Documenting Evidence of Agency Staff Title VI Training

Maplewood’s staff are given Title VI training, and agency can answer affirmatively to all the following questions:

1. Are new employees made aware of Title VI responsibilities pertaining to their specific duties?
2. Do new employees receive this information via employee orientation?
3. Is Title VI information provided to all employees and program applicants?
4. Is Title VI information prominently displayed in the agency and on any program materials distributed, as necessary?

F. Public Engagement Plan

Goal

The goal of the Public Engagement Plan is to have significant and ongoing public involvement, by all identified audiences, in the public participation process for major agency outreach efforts.

Objectives

- To understand the service area demographics and determine what non-English languages and other cultural barriers exist to public participation.
- To provide general notification of meetings and forums for public input, in a manner that is understandable to all populations in the area.
- To hold public meetings in locations that are accessible to all area stakeholders, including but not limited to minority and low-income members of the community.
- To provide methods for two-way communication and information and input from populations which are less likely to attend meetings.
- To convey the information in various formats to reach all key stakeholder groups.

Identification of Stakeholders

Stakeholders are those who are either directly or indirectly affected by an outreach effort, system or service plan or recommendations of that plan. Stakeholders include but are not limited to the following:

- City Council – the policy making body of the City. The role of the City Council is to direct the City Manager as to budget, finance and policy issues.
- Advisory Bodies – non-elected advisory bodies review current and proposed activities of the agency, and are encouraged to be active in the agency's public engagement process. Advisory bodies provide insight and feedback to the agency.
- Agency Transit riders and clients
- Minorities, low-income populations and/or limited English proficient persons
- Local jurisdictions and other government stakeholders
- Private businesses and organizations
- Employers
- Partner agencies

Elements of the Public Engagement Plan

It is necessary to establish a public participation plan that includes an outreach plan to engage minority and limited English proficient (LEP) populations.

Elements of the Public Engagement Plan include:

1. Public Notice

- a. Official notification of intent to provide opportunity for members of the general public to participate in public engagement plan development, including participation in open Board/council meetings, and advisory committees.

2. Public Engagement Process/Outreach Efforts:

- a. Public meetings
- b. Rider outreach
- c. Public hearings
- d. Services for the Disabled (Notices of opportunities for public involvement include contact information for people needing these or other special accommodations.)

Events such as public meetings and/or open houses are held at schools, churches, libraries and other non-profit locations easily accessible to public transit and compliant with the Americans with Disabilities Act.

3. Public Comment

- a. Formal public comment periods are used to solicit comments on major public involvement efforts around an agency service or system change.
- b. Comments are accepted through various means:
 - i. Dedicated email address.
 - ii. Website.
 - iii. Regular mail.
 - iv. Phone calls to City Hall 314-645-3600

4. Response to Public Input

All public comments are provided to the City Council prior to decision making. A publicly available summary report is compiled, including all individual comments.

Title VI Outreach Best Practices

City of Maplewood ensures all outreach strategies, communications and public involvement efforts comply with Title VI / ADA. City of Maplewood's Public Engagement Plan proactively initiates the public involvement process and makes concerted efforts to involve members of all social, economic, and ethnic groups in the public involvement process. Aligned with the above referenced communication tactics, the City of Maplewood provides the following:

- a. Title VI non-discrimination notice on agency's website.
- b. Services for Limited English Proficient persons. Upon advance notice, translators may be provided.

2022 – 2025 Title VI Program Public Engagement Process

City of Maplewood will conduct a Public Engagement Process for the 2022-2025 Title VI Program. This process includes a council meeting to seek input, provide education, and highlight key components of the Title VI Plan. Materials have been created to explain Title VI policies as well as provide education on how they relate to minority populations.

City of Maplewood will provide briefings to the City Council and will conduct a 30-day public comment period to provide opportunities for feedback on the 2022-2025 Title VI Program.

Comments are accepted during the public outreach period via:

- a. Email
- b. Mail
- c. Phone
- d. In person

Summary of 2018-2021 Public Outreach Efforts

| | |
|---------------------------|-------------------------------|
| Council Meetings | Parks & Recreation Commission |
| Plan & Zoning Commission | Library Board |
| Board of Adjustment | |
| Design & Review Board | |
| Sustainability Commission | |

G. Language Assistance Plan

City of Maplewood's Limited English Proficiency Plan

This limited English Proficiency (LEP) Plan has been prepared to address City of Maplewood's responsibilities as a recipient of federal financial assistance as they relate to the needs of individuals with limited language skills. The plan has been prepared in accordance with Title VI of the Civil Rights Act of 1964; Federal Transit Administration Circular 4702.1B, dated October 1, 2012, which states that the level and quality of transportation service is provided without regard to race, color, or national origin.

Executive order 13166, titled "Improving Access to Services for Persons with Limited English Proficiency," indicates that differing treatment based upon a person's inability to speak, read, write or understand English is a type of national origin discrimination. It directs each federal agency to publish guidance for its respective recipients clarifying their obligation to ensure that such discriminations do not take place. This order applies to all state and local agencies which receive federal funds.

Service Area Description: Within the boundaries of City of Maplewood.

City of Maplewood has developed this LEP Plan to help identify reasonable steps for providing language assistance to persons with limited English proficiency who wish to access services provided by City of Maplewood. As defined in Executive Order 13166, LEP persons are those who do not speak English as their primary language and have limited ability to read, speak, write or understand English. This plan outlines how to identify a person who may need language assistance, and the ways in which assistance may be provided.

In order to prepare this plan, The City of Maplewood undertook the **four-factor LEP analysis** which considers the following factors:

Four Factor Analysis

1. The number and proportion of LEP persons eligible to be served or likely to be encountered in the service area:

A significant majority of people in the City of Maplewood service area are proficient in the English language. Based on the 2019: ACS 5-Year Estimates Census data, 1.1% of the population five years of age and older speak English "less than very well" – a definition of limited English proficiency.

LEP Population in Maplewood's Service Area

| Population 5 years and over by language spoken at home and ability to speak English | Maplewood | | | Service Area Total | Percentage of Population 5 Years and Older |
|--|------------------|---|---|---------------------------|---|
| Population 5 Years and Over | 7,571 | 0 | 0 | 7,571 | 100.00% |
| Speak English "less than very well" | 0 | 0 | 0 | 0 | 0.00% |
| Spanish | 134 | 0 | 0 | 134 | 1.77% |
| Speak English "less than very well" | 32 | 0 | 0 | 32 | 0.42% |
| French, Haitian, or Cajun | 7 | 0 | 0 | 7 | 0.09% |
| Speak English "less than very well" | 0 | 0 | 0 | 0 | 0.06% |
| German | 5 | 0 | 0 | 5 | 0.07% |
| Speak English "less than very well" | 0 | 0 | 0 | 0 | 0.00% |
| Russian | 0 | 0 | 0 | 0 | 0.00% |
| Speak English "less than very well" | 0 | 0 | 0 | 0 | 0.00% |
| Indo-European | 39 | 0 | 0 | 39 | 0.52% |
| Speak English "less than very well" | 0 | 0 | 0 | 0 | 0.00% |
| Korean | 4 | 0 | 0 | 4 | 0.05% |
| Speak English "less than very well" | 0 | 0 | 0 | 0 | 0.00% |
| Chinese | 75 | 0 | 0 | 75 | 0.99% |
| Speak English "less than very well" | 19 | 0 | 0 | 19 | 0.25% |
| Vietnamese | 36 | 0 | 0 | 36 | 0.48% |
| Speak English "less than very well" | 17 | 0 | 0 | 17 | 0.22% |
| Tagalog | 12 | 0 | 0 | 12 | 0.16% |
| Speak English "less than very well" | 12 | 0 | 0 | 12 | 0.16% |

| | | | | | |
|-------------------------------------|----|---|---|----|-------|
| Asian & Pacific Island | 36 | 0 | 0 | 36 | 0.48% |
| Speak English "less than very well" | 0 | 0 | 0 | 0 | 0.00% |
| Arabic | 0 | 0 | 0 | 0 | 0.00% |
| Speak English "less than very well" | 0 | 0 | 0 | 0 | 0.00% |
| All Other | 42 | 0 | 0 | 42 | 0.55% |
| Speak English "less than very well" | 0 | 0 | 0 | 0 | 0.00% |

2. Frequency of Contact by LEP Persons with Maplewood's Services:

City of Maplewood staff reviewed the frequency with which office staff, dispatchers and drivers have, or could have, contact with LEP persons. To date, City of Maplewood has, on average, zero request per month for an interpreter.

| | |
|--|--|
| LEP Staff Survey Form | |
| The City of Maplewood is studying the language assistance needs of its riders so that we can better communicate with them if needed. | |
| 1. How often do you come into contact with passengers who do not speak English or have trouble understanding you when you speak English to them? | DAILY WEEKLY MONTHLY LESS THAN MONTHLY |
| 2. What languages do these passengers speak? | |
| 3. What languages (other than English) do you understand or speak? | |
| 4. Would you be willing to serve as a translator when needed? | |

| Frequency of Contact with LEP Persons | |
|--|---------------------------------------|
| Frequency | Language Spoken by LEP Persons |
| Daily | |
| Weekly | |
| Monthly | |
| Less frequently than monthly | |

3. The importance of programs, activities or services provided by City of Maplewood to LEP persons:

Outreach activities, summarized in City of Maplewood's Title VI Public Engagement Plan, include events such as public meetings at City Hall, schools, churches, libraries and other non-profit locations, and include specific outreach to LEP persons to gain understanding of the needs of the LEP population, and the manner (if at all) needs are addressed.

| |
|--|
| Outside Organization LEP Survey |
| Organization: _____ |
| <ol style="list-style-type: none">1. What language assistance needs are encountered?2. What languages are spoken by persons with language assistance needs?3. What language assistance efforts are you undertaking to assist persons with language assistance needs?4. When necessary, can we use these services? |

4. The resources available to City of Maplewood and overall cost to provide LEP assistance:

Strategies for Engaging Individuals with Limited English Proficiency include:

1. Language line. Upon advance notice, translators can be provided.
2. Written translations of vital documents (identified via safe harbor provision)
3. Website information.
4. To the extent feasible, assign bilingual staff for communication needs.

As applicable: Based on our demographic analysis (Factor 1) City of Maplewood has determined that no language group(s) within its service area meets Safe Harbor criteria requiring written translated "vital documents" by language group(s).

City of Maplewood will provide assistance and direction to LEP persons who request assistance.

Staff LEP Training

The following training will be provided to City of Maplewood staff:

1. Information on City of Maplewood's Title VI Procedures and LEP responsibilities.
2. Description of language assistance services offered to the public.
3. Use of Language Identification Flashcards.
4. Documentation of language assistance requests.

Monitoring and Updating the LEP Plan

The LEP Plan is a component of City of Maplewood's Title VI Plan requirement.

The City of Maplewood will update the LEP plan as required. At minimum, the plan will be reviewed and updated when it is clear that higher concentrations of LEP individuals are present in the Maplewood service area. Updates include the following:

1. How the needs of LEP persons have been addressed.
2. Determine the current LEP population in the service area.
3. Determine as to whether the need for, and/or extent of, translation services has changed.
4. Determine whether local language assistance programs have been effective and sufficient to meet the needs.
5. Determine whether City of Maplewood's financial resources are sufficient to fund language assistance resources as needed.
6. Determine whether City of Maplewood has fully complied with the goals of this LEP Plan.
7. Determine whether complaints have been received concerning City of Maplewood's failure to meet the needs of LEP individual.

H. Advisory Bodies

Table Depicting Membership of Committees, Councils, By Race

| Committee | Caucasian | Latino | African American | Asian American | Other | Total |
|---------------------|------------------|---------------|-------------------------|-----------------------|--------------|--------------|
| Board of Adjustment | 5 | | | | | 100% |
| City Council | 6 | | 1 | | | 100% |
| Design and Review | 5 | | | | | 100% |
| Park Board | 7 | | | | | 100% |
| Planning & Zoning | 7 | | | | | 100% |
| Sustainability | 6 | | 1 | | | 100% |

Description of efforts made to encourage minority participation on committees:

- We publish the need for members for the various Boards in the citywide newsletters
- We encourage the participants in our spring and fall citizen's academy to serve on the various Boards

I. Subrecipient Assistance

Subrecipient Assistance

OPTION A

The City of Maplewood does not have any subrecipients.

OPTION B

Primary recipients should provide subrecipients:

- Sample public notices, Title VI complaint procedures, and the recipient's Title VI complaint form.
- Sample procedures for tracking and investigating Title VI complaints filed with a subrecipient.
- Direction regarding obtaining demographic information of population served by subrecipients.
- Technical assistance.
- Reviews of Title VI Programs; follow-up as necessary.

J. Subrecipient Monitoring

Subrecipient Monitoring

OPTION A

The City of Maplewood does not have any subrecipients.

OPTION B

Primary recipients must monitor subrecipients.

- Non-compliant subrecipient means primary recipient is also non-compliant.

Primary recipients shall:

- Document process for ensuring all subrecipients are complying with the general and specific requirements.
- Collect and review subrecipients' Title VI Programs.
- At FTA's request, the primary recipient shall request that subrecipients who provide transportation services verify that their level and quality of service is equitably provided.

K. Equity Analysis of Facilities

OPTION A

The City of Maplewood has not constructed any storage facilities, maintenance facilities, or operations centers in the last three years.

Equity Analysis Guidance

Refer to FTA Title VI Circular 4702.1B Chapter III, section 13.

Demographic data and mapping

Guidance may be obtained from either a Regional Planning Commission or Metropolitan Planning Organization.

L. System-Wide Service Standards and Policies*

NOT APPLICABLE

**applies to all fixed route providers (including those that do not meet volume threshold)*

**Template for System-Wide Service Standards (1. 2. 3. 4.)
is presented in detail
in FTA Circular 4702.1B Appendix G.**

**Template for System-Wide Service Policies (1. 2.)
is presented in detail
in FTA Circular 4702.1b Appendix H.**

NOTE: Template for **Major Service Change and Impact Policies**
is located at O. Service and Fare Equity Analysis.

M. Requirement to Collect and Report Demographic Data*

NOT APPLICABLE

**applies to providers that operate 50 or more fixed route transit vehicles in peak service;
and 200,000+ population.*

**Template for Demographic Profile and Travel Patterns
is presented in detail
in FTA Circular 4702.1B Appendix I.**

N. Requirement to Monitor Transit Service*

NOT APPLICABLE

****applies to providers that operate 50 or more fixed route transit vehicles in peak service;
and 200,000+ population.***

**Template for Demographic Profile and Travel Patterns
is presented in detail
in FTA Circular 4702.1B Appendix J.**

O. Service and Fare Equity Analysis*

NOT APPLICABLE

****applies to providers that operate 50 or more fixed route transit vehicles in peak service; and 200,000+ population.***

Major Service Change and Impact Policies

The Board of Directors of _____ has established formal hearing procedures for the adoption of major changes in transit routes.

A major change in route includes the addition or elimination of a route within _____'s transit system, **increasing or decreasing the number of service hours operated on a route by 25% or more, or routing changes that alter 25% or more of a route's path.** Minor changes to an existing route shall not constitute a "major change in route".

A service change that is deemed a "Major Service Change" based on the description above would require a Title VI analysis.

Service changes that are deemed as a "Major Service Change" will also be required to have disparate impact analysis and disproportionate burden analysis done.

The _____ Title VI Program includes disparate impact and disproportionate burden policies.

_____’s Disparate Impact and Disproportionate Burden Policy

Adverse Effects: Major Service Change proposals and all fare change proposals shall be analyzed to measure and compare the level of adverse effect (loss) or benefit (gain) between minority and non-minority populations and between low-income and non-low-income populations as determined by demographic analysis of proposed changes and U.S. Census data and transit rider data.

What is Fair?: [EXAMPLE] Determination of adverse impact is based on the federal standard described in Uniform Guidelines published by the Equal Employment Opportunity Commission (EEOC) known as the "four-fifths" rule. This standard requires benefits to accrue to protected populations at a rate at least four fifths (4/5) (or eighty percent) of the rate of unprotected populations. Likewise, adverse effects must be borne by unprotected populations at a rate at least four fifths (4/5) (or eighty percent) of the rate for protected populations.

Stated another way, the maximum acceptable difference (positive or negative) in level of benefit between protected and unprotected populations is [20%]. For changes in transit service or transit fare rates, this standard applies as follows for minority and low-income populations.

Disparate impact on minority populations: If the impact of a major service change proposal or any fare change proposal requires a minority population to receive benefits [twenty percent (20%)] less or to bear adverse effects [twenty percent (20%)] more than those benefits or

adverse effects received or borne by the non-minority population, that impact will be considered a disparate impact.

Disproportionate burden on low income populations: If the impact of a major service change proposal or any fare change proposal requires a low-income population to receive benefits [twenty percent (20%)] less or to bear adverse effects [twenty percent (20%)] more than those benefits or adverse effects received or borne by the non-low-income population, that impact will be considered a disparate impact.

**Template for Service and Fare Equity Analysis
is presented in detail
in FTA Circular 4702.1B Appendix K.**

Adopted by City of Maplewood

Effective January 2022

Michael Reese, City Manager

Date