Nashville MTA Board Meeting

WeGo Central
400 Dr. Martin L. King Jr. Blvd. | Nashville, TN  37219

September 26, 2019 | 1:30 p.m.

Board Members:  
Gail Carr Williams, Chair  
Janet Miller, Vice Chair  
Glenn Farner  
Hannah Paramore Breen  
Walter Searcy

1. Call to Order
2. Approval of August 22, 2019 Minutes
3. Public Comments*
4. Operations & Finance Committee – Walter Searcy, Chair  
   – Resolution for FY2020 Annual Grant Applications M-A-19-026 Pg. 9
5. New Initiatives & Community Engagement Committee – Janet Miller, Chair  
   – Title VI Program Update M-A-19-027 Pg. 13
6. Chair’s Report
7. Chief Executive Officer's Report
8. Other Business
9. Adjourn

* Please keep all public comments to the Board within three minutes. Thank you *
NASHVILLE METROPOLITAN TRANSIT AUTHORITY
Board of Directors Meeting
August 22, 2019

I. **Call to Order:** The regular meeting of the Nashville Metropolitan Transit Authority (Nashville MTA) Board of Directors was held at WeGo Central, located at 400 Dr. Martin L. King Jr. Blvd., Nashville, TN 37219 on Thursday, July 25, 2019.

**Present:** Gail Carr Williams, Chair; Janet Miller, Vice Chair; Member; Glenn Farner, Member; Walter Searcy, Member; Secretary Margaret Behm; and Chief Executive Officer Stephen G. Bland.

**Absent:** Hannah Paramore Breen, Member

A quorum was established, and Chair Williams called the meeting to order at 2:41 p.m.

II. **Approval of Minutes:** Minutes of the June 27, 2019 and July 25, 2019 were approved.

III. **Public Comments:** Chair Williams opened the floor for public comments. The public was reminded that comments were limited to three minutes.

**Darius Knight**
Mr. Knight reported the following:
- He stated that we need to make sure that when we look at the data that we understand that the mobile payment data is only pulling from customers that have the NFC chip, and if the other customers don’t have the NFC chip, it’s not going to work.
- He stated that he’s been riding different bus routes to see what it is that the bus drivers deal with on a regular basis. He’s noticed that the same previously reported issues have not been addressed. He stated that the bus drivers and the customers are all frustrated because they keep reporting issues and nothing happens. He asked, what was the purpose of rebranding if we were going to continue to do the same thing.
- He asked WeGo Public Transit to take a look at our maintenance plan. He asked how we were going to do a better bus next year, much less the service changes at the end of September if our buses are not working correctly.
- We need to be honest and transparent about the real issues. If we continue to ask the drivers to report maintenance issues and nothing changes, we’re going to continue to have driver shortage.
- In the future, he would like for us to notify the customers well in advance of possible service reductions.
- He reported that several buses are operating without air or poor air conditioning.

**Jessica Dauphin**
Ms. Dauphin reported the following:
- She stated that she was present to represent Transit Alliance, which supports the work of WeGo Public Transit and they hope to see it flourish.
- Transit Citizenship Leadership Academy fall class is fast approaching and they are looking for community members to join the TCLA.
Sheila Hanson
Ms. Hanson reported the following:
- She is allergic to smoke and has an issue with bus drivers smoking in the doorway of the buses. She asked if we could bring it to the bus drivers’ attention that there is a certain distance that must be adhered to.
- She stated that the bus stop just past Harding needs a little help and the Haywood Lane is not ADA accessible.
- She stated that the Nolensville Dollar General stop is not on level ground, but there is another stop 50 ft. away that could be used in place of that bus stop.
- The Hickory Plaza and Old Hickory Blvd bus stop behind Kroger has been knocked down needs to be reinstalled.
- She would like for bus drivers to announce bus stops for every stop.

John Bull
Mr. Bull reported the following:
- He’s glad to see the Access on Demand (AOD) usage has adjusted over 8%.
- He’ll be happy when the interstate construction will be complete.
- He’s glad to hear that the bus safety numbers are up on the report.
- He’s had issues with getting to the bus stop at Nolensville and Wallace – the pedestrian buttons and signals aren’t working.
- He asked if the customers could have a summary statement on the new fare system, it might be an enhancement and incentive for them to register.

Glen Allen Graham
Mr. Graham reported the following:
- The new bus shelters along the BRT routes have hitching posts, but don’t have seating in them, why?
- The best kept secret in TN is about the bus route changes and what date all of this is going to happen.

Julie Timm
Ms. Timm reported the following:
- She stated that she moved here three years ago from the state of Virginia and immediately fell in love with Nashville and is sad to be leaving. The energy and vibrancy of this community and this town is irreplaceable. The changes that this company has made have been remarkable, and a lot of the changes are due to the leadership of this board and Steve Bland.
- She expressed her gratitude and her honor to have been a part of these changes over the past three years. She said that she hopes that the public is aware of how much the leadership listens to what is said at the board meetings. The board, the leadership team and staff lives and breathes this agency, and the community and the benefits to them.
- She expressed how proud she was to have worked with the staff and how amazing and inspirational they have been in making the changes.

There were no other public comments to come before the board.

IV. Operations & Finance Committee Report: Committee Chair Searcy reported the following:
a. **Body-on-Chasis Vehicle Replacement Purchase (M-A-19-024):** In September 2017, the Board approved the Nashville Metropolitan Transit Authority (Nashville MTA) to enter into a three-year contract with two one-year options for the purchase of up to 135 Champion Body-on-Chassis Vehicles under the procurement contract labeled #2015561. Concurrent with Nashville MTA’s efforts to operate within our fleet replacement plan, staff requests approval to order 19 replacement vehicles under the aforementioned Central States Bus Sales contract.

During the procurement evaluation process, several end-user departments (including Maintenance, Information Technology, Parts, Operations, Safety, and WeGo Access) re-evaluated the internal configuration of these vehicles to ensure optimal operating ease and safety for both operator and customers. Such items included, but were not limited to, revised seating arrangements, configuration of wheelchair restraints, and Trapeze software hardware and cabinetry install configuration. Due to these proposed adjustments, Nashville MTA will order one pilot bus to be produced and tested in-service for 30 days, in advance of order and assembly of the remaining 18 vans with Central States.

The Operations & Finance Committee recommended the Board to provide the Chief Executive Officer authority to approve the purchase of 19 replacement buses from Central States Bus Sales. The total value of this purchase is not to exceed $2,933,850 ($149,150 per van, in addition to spare replacement parts inventory costed at $100,000). The cost per vehicle includes all ancillary equipment such as on-board Wi-Fi technology, cameras, and full Trapeze software installation.

Funding sources to support this purchase will be comprised of $2,309,396 in FY2017 Metro Nashville Capital Spending Plan funds, $69,384 in State match dollars and $555,070 in Federal Section 5339 Bus and Bus Facilities funds.

There was no further discussion. The vote of approval was unanimous.

V. **New Initiatives and Community Engagement Committee Report:** Janet Miller, Vice Chair reported the following:

Vice Chair Miller acknowledged and thanked Dan Freudberg for his presentation update on the Fare Technology Project. She stated and CEO Bland confirmed that it should be ready to roll out by the end of 2020.

a. **FY2020 Proposed Operating Budget (M-A-19-025):** In the June 2019 Committee and Board meetings, a continuation budget was adopted to maintain the authorized spending levels at the FY2018-19 level until the Board could finalize service cuts and fare increases adopted to offset an $8.7 million budget deficit. The attached budget has incorporated the impact of the approved service cuts and fare increase along with an increase in additional federal capital reimbursement to balance the FY2020 proposed budget.

The overall proposed operating budget as compared to last year is projected to increase approximately $820,000, or less than 1%, to $85.1 million in FY 2020 from $84.3 million in the FY 2019 budget. This small increase net of the service cuts is largely reflective of inflationary increases in expenses along with several larger increases related to a 21.1% increase in fuel costs related to our fuel hedging contracts and health related expenses increasing approximately 9.0% as a result of our current health trends and actuarial analysis. We also had wage step increases related to our union contract and a 2.75% contractual wage increase resulting from our new collective bargaining agreement.
The following summary highlights the increases and decreases in revenues for this proposed budget compared to FY 2019:

<table>
<thead>
<tr>
<th>Description</th>
<th>Amount</th>
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<tbody>
<tr>
<td>Decrease in Fare &amp; Contract Revenue, net</td>
<td>($484,800)</td>
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<tr>
<td>Increase in Non-Transportation Revenue</td>
<td>$15,800</td>
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<tr>
<td>Increase in State Operating Revenue</td>
<td>$73,600</td>
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<tr>
<td>Decrease in CMAQ and JARC</td>
<td>($1,728,400)</td>
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<tr>
<td>Additional Federal Reimbursements</td>
<td>$2,944,400</td>
</tr>
<tr>
<td>Total Revenue Increase</td>
<td>$820,600.00</td>
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- Over the last year, we have seen a decrease of approximately $1.2 million in budgeted passenger fares, primarily as a result of a trend we are seeing from passengers utilizing more free transfers and an increase in the free homelessness program. Additionally, we have increased free circuit ridership related to folding in the former Route 29 Jefferson into the Blue Circuit route. We expect this trend to continue as rider habits change to maximize their benefits of WeGo’s fare structure implemented during FY2018. The decrease in fare revenue is partially offset by an approved fare increase, as well as some new contract revenue. The fare increase raises the one-ride fare from $1.70 to $2.00 which became effective August 2, 2019. All other fare media will be adjusted relative to the one-ride fare. The fare increase is expected to generate approximately $580,000 in net fare revenue. Contract revenues are also increasing as the result of additional service being paid for by the Regional Transportation Authority of Middle Tennessee (RTA) related to retaining a portion of the Music City Circuit route between Riverfront Station and WeGo Central that will be cancelled effective September 29, 2019 as a part of MTA’s approved service cuts.

- Other Non-Transportation Revenues are increasing primarily as the result of a contractual increase in our parking contract for WeGo Central that is managed by Premier Parking. These increases are partially off-

- Set by a decrease in budgeted advertising revenue as a result of a decision to no longer allow fully wrapped buses in our advertising program for safety reasons.

- The increase in State operating revenues is based upon a confirmed award amount from the Tennessee Department of Transportation (TDOT) for FY2020.

- The decrease in Congestion Mitigation Air Quality (CMAQ) and Job Access Reverse Commute (JARC) is primarily due to TDOT electing not to award any CMAQ to MTA in the latest round of three-year CMAQ operating funds. We have historically been receiving this funding since 2012 to support bus service operations along West End Avenue (Routes 3 & 5) which was expanded in 2012. JARC funding is awarded annually by the Metropolitan Planning Organization. However, MTA is not guaranteed to receive any additional JARC awards for FY2020. JARC funding is used to support some services along the 10 Charlotte Pike, the 77 Thompson Lane Connector, and the 43 Hickory Hills.

- The anticipated increase in federal operating reimbursements is needed to offset decreases in other revenue sources. The increase is based upon an estimate of preventive maintenance and paratransit operating expenses eligible for reimbursement. Federal capital grant dollars are eligible to be converted into
operating revenue dollars to reimburse preventive maintenance expenses. We have additional expenses eligible to be reimbursed through our capital grant funding. The balance of the remaining federal 5307 capital formula funds after the operating reimbursement will be utilized for capital purposes. Use of funds for this purpose will reduce the amount of funding available for capital projects.

The following summary highlights the increases and decreases in expenses for this proposed budget compared to FY 2019:

- Labor and fringe related costs are decreasing as a result of the service cuts being implemented September 30, 2019. The service cut represents approximately 42,000 hours of service in FY20 and 57,000 hours on an annual basis. This will result in a reduction of approximately 27 driver positions and approximately six in maintenance, which would be accomplished through not filling current open positions. These decreases are partially offset by wage step increases for drivers as well as a 2.75% wage increase included in our current union contract, as well as some increases in budgeted overtime hours needed to cover service due to continued driver shortages. While the reduction in driver positions related to the service cuts improves the shortage issue, it does not completely solve the ongoing issue.

- The decreases in other fringe benefits, FICA, and pension expenses relate to the service reductions.

- The decrease in workers' comp is primarily due to the service reductions, as well as actuarial calculations reflecting improved experience from a decrease in the number of and severity of workers' comp claims over the last year.

- An increase in health care coverage is anticipated due to increased medical claim costs, administrative costs, and actuarial results. The increase was partially offset by the reduction in employees related to the service reductions.

- Increases in fuel costs are the result of new diesel and gasoline fuel hedging contracts along with anticipated increases in the open market costs for fuel. We hedge approximately 80% of our diesel and 75% of our gasoline consumption. Diesel contract prices are increasing from an average of $1.82 per gallon this year to a new contractual diesel hedge price in FY2020 of $2.22 per gallon. Unleaded fuel hedge prices are also increasing from an average of $1.70 this year to an average contracted price in FY2020 of $1.98 per gallon. This increase is slightly offset by decreased consumption of fuel due to improved fuel economy in our new replacement buses and paratransit vans received during FY2019 and the service reductions.

- The increase in security services relates to more focus being put on our security presence at WeGo Central, our main transfer facility, which had seen an uptick in security incidents over the past two years, and the need for additional coverage during the school year as students transferred at the facility. There was also an increase in our contractual rates contained in our contract with Allied Universal who supplies our unarmed security services.

- The increase in Taxi Overflow and Access on Demand Services is primarily due to an increase in our taxi overflow services and projected increases in our Access on Demand services. Also included is a 2% inflationary increase related to existing third-party provider contracts.

- The increase in Other Services is primarily due to entering into a new contract to maintain all camera equipment on our buses and paratransit vans, creating an
increase of approximately $189,000. It also includes inflationary increases to software maintenance contracts amounting to approximately $131,000. These systems reflect new technologies being brought online to enhance customer experience, such as real-time information, on-board Wi-Fi, etc.

- The decrease in parts maintenance relates to WeGo receiving 31 new buses and 19 paratransit vans during FY19 and receiving additional new buses and vans during FY20. The service reductions also contributed to the anticipated decrease in overall maintenance expense.
- The increase in utilities is primarily due to higher than anticipated natural gas usage in FY19 compared to what was budgeted and an increase in telecommunications expenses due to having a full year of Wi-Fi on our fleet compared to a partial year in FY19.
- The increase in property and liability insurance is directly related to our revenue fleet, including new buses and paratransit vehicles. Property damage premiums are directly proportional to total asset values of our revenue fleet.

The NICE Committee is requesting that the Board adopts the FY2020 budget as presented here.

There was no further discussion. The vote of approval was unanimous.

In closing, Vice Chair Miller acknowledged and congratulated Board Secretary Margaret Behm, Jenny Nelson and Julie Moseley for recently being featured in the Tennessean. The article spotlighted the efforts that these women undertook in their careers to break through the glass ceiling and create opportunities for other women. These three ladies led a crusade for a women’s room at the Nashville Public Library to commemorate and memorialize the ratification of the right for women to vote. Vice Chair Miller congratulated them again and stated that she was proud of their hard work.

VI. **Chair’s Report:** Chair Williams began her comments by saying that it had been our honor to have Chief Development Officer Julie Timm serve with us; her work has been exemplary, and there will be so many lasting impressions that speak to the work that she’s done here. She said that she was appreciative of the gifts that Julie Timm has shared with us. She admonished Ms. Timm to go forth and represent Nashville and WeGo Public Transit in meaningful ways. She also stated that it has been an honor to watch two of our own professional women to leave us to accept CEO positions in other states. It’s a testament of CEO Bland’s leadership in mentoring women into higher positions and his courage to go out to hire women in an industry that does not always do so intentionally as he has done. She congratulated both India Birdsong and Julie Timm and wished them the absolute best.

In closing, she thanked everybody for their hard work on the budget. She stated, it was a challenge for us to get to this point and she knows the challenges that it’s going to be for our ridership and community. The budget reflects the reality of what we were dealt with and our care and commitment to Nashville, the citizens and our ridership; and we look for a different conversation next year.

VII. **CEO’s Report:** CEO Bland reported the following to the Board:

- CEO Bland called everyone’s attention to pages 11 and 12 in the Operations and Finance Committee packet, which lists significant upcoming procurements. He stated that we’ll include this information in each month’s packet and would ask that
everyone take a look and let us know if they are aware of any supplies of the particular goods and services that we should reach out to.

- With respect to our senior staff, the ranks continue to thin. Last month, we wished India Birdsong well as she left Nashville to assume the role of CEO for the transit agency in Cleveland. Just yesterday, Julie Timm was announced as the new CEO for the Greater Richmond Transit Company in Virginia. He stated that Julie will leave us in early September and asked if everyone would join him in wishing her well. With respect to these vacancies, we received over 50 applications for the COO role and just yesterday extended an offer to an outstanding candidate. In terms of Julie’s position, the wound is still too fresh and CEO Bland be meeting with her staff over the next couple weeks to determine a direction for this position.

- This week, we have a consultant in Nashville to help us develop our Safety Management Systems Plan, or SMS Plan. The SMS Plan requirements come out of a new regulation from the FTA that intends to have transit safety mirror more of the practices you see in the aviation industry in terms of predictive analysis and risk mitigation. We are due to complete the plan by next summer.

- Staff met with representatives of Music City Riders United to discuss means of improving compliance with stop announcement policies. We will be advancing both retraining for Operators on their obligations to call out stops and examining technical solutions with our existing automatic annunciator systems.

- The Planning staff continues to develop various Better Bus spending scenarios service alternatives. We anticipate these scenarios to be finalized for review in late September to early October.

- The Murfreesboro Pike Project continues. All work is substantially complete, with the exception of several remaining software glitches that are precluding proper communication between transit and signal systems. The vendor continues to work to correct these deficiencies.

- Fare changes were implemented on August 2 in a relatively smooth fashion. The attention has now shifted to the September 29 service reductions, as outreach efforts will begin in earnest just after Labor Day.

- RTA Items
  - We are in the process of rehabilitating the 4 locomotives on the WeGo Star. The first of these has been completed and is on its way back to Nashville as we speak. Once it is tested in revenue service, the second locomotive will be sent out. We anticipate this project to extend through next year.
  - Yesterday, CEO Bland and Sumner County Mayor Anthony Holt attended a hearing before a Subcommittee of the Government Operations Committee of the General Assembly to review the RTA’s Sunset Audit report from the Office of State Comptroller. As an outcome of this process, the committee is recommending that the RTA Authorizing legislation be extended for 4 years. This will come before the General Assembly during the next session.
  - We continue to partner with the Metropolitan Planning Organization on a South Corridor Study to examine transit options between Maury, Williamson and Davidson Counties. The consultant has completed initial public outreach and screening and is conducting second round public outreach over the next 2 weeks.
We are working with HDR Engineers on a feasibility study for potential upgrades to the WeGo Star that could accomplish objectives such as additional trips, speed improvements and line extensions. HDR has produced a draft report that we are currently reviewing with RJ Corman and Transportation Solutions Group, the operator of the Star.

At the request of Mayor Pitts of Clarksville, CEO Bland is participating on the search committee for the City's next Transit Director. Interviews will conducted with 6 candidates next week.

**VIII. Other Business:**

Walter Searcy acknowledged that Mr. Clift from the Nashville Urban League was present at the meeting.

**IX. Adjournment:** The meeting was adjourned at 3:15 p.m.
Nashville Metropolitan Transit Authority
of Nashville & Davidson County, Tennessee

Board Action Item

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<tr>
<th>Item Number:</th>
<th>M-A-19-026</th>
<th>Meeting Date:</th>
<th>09/26/19</th>
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<tr>
<td>Item Title:</td>
<td>Resolution for FY2020 Annual Grant Applications</td>
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**BACKGROUND:**

The Nashville Metropolitan Transit Authority (Nashville MTA) has the authority to receive federal, state, and local financial assistance for transportation projects.

In order for Nashville MTA to apply and receive federal funds, Nashville MTA must comply with Federal Certifications and Assurances and annually submit compliance in accordance to these terms.

The Federal Transit Administration (FTA) formula funding sources are as follows:

*5307 Urbanized Area Formula Funds*
When the apportionment is made available, Nashville MTA is eligible to use 5307 Urbanized Area Formula Funds, along with the 10% State and 10% Local match. The FY2019 apportionment for the region, combined with the State and Local match, is $29,345,861 (total).

*5339 Bus and Bus Facilities Formula Funds*
Nashville MTA is eligible to use Bus and Bus Facilities Formula Funds. The FY2019 apportionment for the Nashville Urbanized Area, combined with State and Local match, is $2,014,153 (80% Federal/10% State/10% Local).

*5310 Enhanced Mobility of Seniors an Individuals with Disabilities Program (EMSID) Funds*
Nashville MTA is eligible to receive EMSID funds for projects that will enhance mobility for seniors and persons with disabilities beyond traditional services that are part of a locally developed and coordinated public transit human services transportation plan. At least 55% of the program funds must be used on capital projects and requires a 20% State/Local match; operating assistance requires a 50% State/Local match. The FY2019 Federal apportionment is $789,594 (Federal amount).

The Tennessee Department of Transportation (TDOT) funding sources are as follows:

*Operating Assistance*
Nashville MTA is eligible for State operating assistance from TDOT. The amount for FY2020 is $4,977,900.

*Match Assistance*
Nashville MTA can request a 10% match from TDOT for all federally executed awards for formula funding of capital or planning projects.

*IMPROVE Act Assistance*
Nashville MTA can request up to $3 million (requires a 25% match) for capital projects that support public transportation services.
RECOMMENDATION:

The attached resolution comprises the annual submittal of Certifications and Assurances for FTA funds and authorization to submit applications for grants with the FTA, TDOT, and other grant funding entities.

The Operations & Finance Committee recommends the Board:

- Adopt the attached resolution;
- Authorize the application for 5307, 5339, and 5310 funding and State/local match;
- Authorize the submittal of the application for State Operating Assistance; and,
- Authorize the submittal of applications and execution of contracts for any other federal, state, or local grant funding that may become available during FY2020 for the benefit of the Nashville MTA.

APPROVED:

______________________________  __________________________
Board Secretary              Date

September 26, 2019
RESOLUTION #20-01

A RESOLUTION AUTHORIZING THE FILING OF APPLICATIONS WITH THE FEDERAL TRANSIT ADMINISTRATION AND THE TENNESSEE DEPARTMENT OF TRANSPORTATION FOR FINANCIAL ASSISTANCE

WHEREAS, the Metropolitan Transit Authority of Nashville and Davidson County is filing applications for funds with the Federal Transit Administration, the Tennessee Department of Transportation, and other grant contracting entities; and,

WHEREAS, the Federal Transit Administration is authorized to make grants for mass transportation projects under the Urban Mass Transportation Act of 1964, as amended; and,

WHEREAS, it is required by the United States Department Transportation that in conjunction with the filing of these applications that the applicant agree to comply with all Federal legislation, regulations, and guidance pertaining to the requested financial assistance; and,

WHEREAS, that since 1995, the Federal Transit Administration has consolidated Annual Certifications and Assurances and requires applicants to annually submit to compliance with said Certifications and Assurances;

NOW, THEREFORE, BE IT RESOLVED BY THE METROPOLITAN TRANSIT AUTHORITY OF NASHVILLE AND DAVIDSON COUNTY

SECTION 1: That the Chief Executive Officer of the Metropolitan Transit Authority is authorized to execute and file applications on behalf of the Metropolitan Transit Authority of the Metropolitan Government of Nashville and Davidson County with the Federal Transit Administration, the Tennessee Department of Transportation, and other grant contracting entities to aid in the financial assistance of capital projects and operations.

SECTION 2: That the Chief Executive Officer of the Metropolitan Transit Authority is authorized to execute and file with such applications an assurance or any other document required by the Federal Transit Administration, the Tennessee Department of Transportation, and other grant contracting entities effectuating the purposes of these grants.

SECTION 3: That the Chief Executive Officer of the Metropolitan Transit Authority is authorized to furnish such additional information as the Federal Transit Administration, the Tennessee Department of Transportation, and other grant contracting entities may require in connection with the applications or the projects.

SECTION 4: That the Chief Executive Officer of the Metropolitan Transit Authority is authorized to execute an agreement on behalf of the Metropolitan Transit Authority of Nashville and Davidson County with the Federal Transit Administration, the Tennessee Department of Transportation, and other grant contracting entities to effectuate the purposes of these grants.
Department of Transportation, and other grant contracting entities to aid in funding of Metropolitan Transit Authority projects.

**ATTEST:**

___________________________  _________________________
Margaret Behm             Stephen G. Bland
Secretary                Chief Executive Officer

___________________________  _________________________
Date                       Date
BACKGROUND:

Title VI of the Civil Rights Act of 1964 states that "No Person in the United States shall, on the ground of race, color, or national origin, be excluded from participation in, be denied the benefits of, or be subjected to discrimination under any program or activity receiving Federal financial assistance". The Federal Transit Administration (FTA) requires all recipients of federal funding to adopt and submit an agency Title VI Program every three years. The Nashville Metropolitan Transit Authority (Nashville MTA) Board approved the current Nashville MTA Title VI Program in September 2016 and submitted the Program to the FTA in October 2016. The updated Title VI Program is required to be submitted to FTA in October 2019 upon approval by the recipient’s board of directors, appropriate governing entity, or official(s) responsible for policy decisions.

The MTA Title VI Program establishes specific system-wide service standards and policies as well as a Major Service Change Policy, a Disparate Impact Policy, Disproportionate Burden Policy, policies for oversight of sub-recipients, and a Public Participation Plan (PPP). The PPP describes Nashville MTA’s plans and strategies to engage minority and Limited English Proficiency (LEP) populations in its planning and programing activities. The PPP also details what shall be placed in Nashville MTA’s notices to the public as well as the methods by which we communicate with the public. Additionally, the PPP defines what constitutes a Major Service Change (this includes changes to fares) and includes a description and explanation of how comments are considered through the service planning process for all proposed service changes. The final document can be viewed at https://nashvillemta.org/PDF/MTA_Title_VI_2019.pdf.

The FTA submitted comments on the 2016 Title VI Program to Nashville MTA that were addressed in full when completing the 2019 update.

The Draft Program was released for a 30-day public review and comment period beginning on August 1, 2019 and ending on September 1, 2019. The public was given the opportunity to provide comment via phone, email, and at two public hearings held at WeGo Central. Public notice was provided on the Nashville MTA website; in a media advisory; on social media; and in three local newspapers, including one Spanish language publication. The document was made available online and hard copies were made available at the public hearings. The following is a summary of comments and general discussion during the public comment period:

Public Comment Summary

- Communication Strategies: A request was made to rank the listed strategies and to add an additional category to include engagement and outreach at WeGo Central. **In response to this comment, "Outreach at WeGo Central" has been added to the bulleted list on page 11 of the document.**

- Major Service and Fare Change Policy: Questions were posed as to if a 25% change or elimination of service is a reasonable threshold to initiate a Title VI analysis, if other thresholds could include percentage of riders impacted, and what the 25% change refers to. **In response to these questions, we have included “daily revenue miles for a specific route” to the explanation of what 25% represents in the Major Service and Fare Changes section and an explanatory footnote stating**
the following: “Revenue miles may be impacted by frequency, span, and route alignment; all of which are considered when establishing the total percentage change in service.” It should be noted that the establishment of a new route or elimination of any existing route are also considered a major service change and requires a Title VI analysis.

Additionally, the following language has been added to this section: “Beyond the minimum requirements of conducting a Title VI analysis when a service change meets the 25% of daily revenue miles threshold, Nashville MTA takes into consideration any negative impacts on minority and low-income groups during all phases of planning, design, and implementation of minor construction events, minor service changes, and community outreach events. A particular threshold does not exist to initiate a code of conduct, but rather Nashville MTA remains cognizant to its actions and the impacts of those actions on the region’s most vulnerable or underrepresented populations, including, but not limited to, minorities and low-income.”

General areas of discussion:

- **What does “equity among communities” refer to in regards to amenity placement procedures?**
  - When distributing shelters, benches, or any other amenities, decisions are based on several factors such as ridership, ease of installation, and geographic distribution among other factors. By saying this is done equitably among communities refers to the fact that just because a disenfranchised population in one part of the Nashville MTA service area contains ample shelters or amenities, does not disregard the need for shelters in other disenfranchised communities in the area.

- **Are there employment centers of fewer than 1,000 employees that would be candidates for transit access?**
  - Upon review of the internal document *Transit Design Guidelines*, the 1,000 threshold has been removed from the language to state broadly “major employment centers.”

- **What is the definition of “traditionally underserved”?**
  - For the purposes of Title VI and Environmental Justice, traditionally underserved populations include racial and ethnic minorities, those with LEP, and low-income individuals. However, Nashville MTA does not exclusively focus on these populations, but rather on the holistic list of those that fall under the general definition of “traditionally underserved” that also includes youth, elderly populations, and people with disabilities.

- **Public engagement strategies should focus more on ridership demographics as opposed to service area demographics. Encourage the use of one-on-one personal strategies to go where the riders are as opposed to making them come to WeGo.**
  - It was acknowledged that with limited resources, this type of engagement is more difficult to achieve. WeGo staff is currently participating in this type of targeted and direct public engagement as part of a suite of public engagement strategies currently in use. Additional resources may be required to expand this strategy further. As a continuing effort in the WeGo rebranding process and communications strategies, RTA and Nashville MTA are currently working towards a revised PPP. This tactic has been added to the strategies to consider as we update the PPP and will be added to the Title VI Program once finalized.

- **This document should be an opportunity to highlight the agency’s achievements in equitable practice.**
  - In response to this suggestion, a chart has been added to the document to show shelter distribution in minority census tracts versus non-minority census tracts. The document also includes language that describes the WeGo rebranding process to emphasize the importance of inclusivity as a public transit service provider. Another example of how Nashville MTA is successful in aspiring for inclusivity is displayed through public outreach strategies that go beyond what is required by the FTA in order to fully engage with the community.
RECOMMENDATION:

Upon review and revision of the Title VI Program, the New Initiatives and Community Engagement recommend that the Nashville MTA Board approve the 2019 update to the Nashville MTA Title VI Program to be submitted to the FTA in October.

APPROVED:

______________________________________  ________________________________
Board Secretary  Date

September 26, 2019