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Title VI Program

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Date

This TEMPLATE is provided by the Missouri Department of Transportation (MoDOT) Transit Section, as a resource for producing the triennial Title VI Program document for Federal Transit Administration recipients and subrecipients. FTA Circular 4702.1B, dated October 1, 2012, *“Title VI Requirement and Guidelines for Federal Transit Administration Recipients”* was the primary source of material for this template. Use of this template does not override each agency’s responsibility to interpret the requirements as expressed in FTA Circular 4702.1B, or as amended in the future.

This template is available online under Presentations – Title VI Presentation Template at the following link:

<http://www.modot.org/othertransportation/transit/transitapplicationsreportsprograms.htm>

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A. Title VI Assurances

Tri-County Mental Health Services, Inc. (TCMHS) 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.

TCMHS 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. TCMHS 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.

TCMHS meets the objectives of the FTA Master Agreement which governs all entities applying for FTA funding, including TCMHS 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).

Signed: _____

Title: _____

Date: _____

B. Agency Information

1. Mission of TCMHS:

To provide prevention and recovery-oriented mental health and substance use services which are quality assured and person-centered, with increased attention to the "whole person".

2. History (including year started)

Tri-County Mental Health Services began in 1990, to provide safety-net services to Clay, Platte and Ray Counties in Missouri in the areas of mental health and behavioral health, and substance use disorders. As the Northland region has grown, so has Tri-County. To serve a diverse clientele in urban, suburban and rural settings, Tri-County has developed a unique provider network allowing the agency to deliver convenient, cost-effective services to over 8,000 people each year.

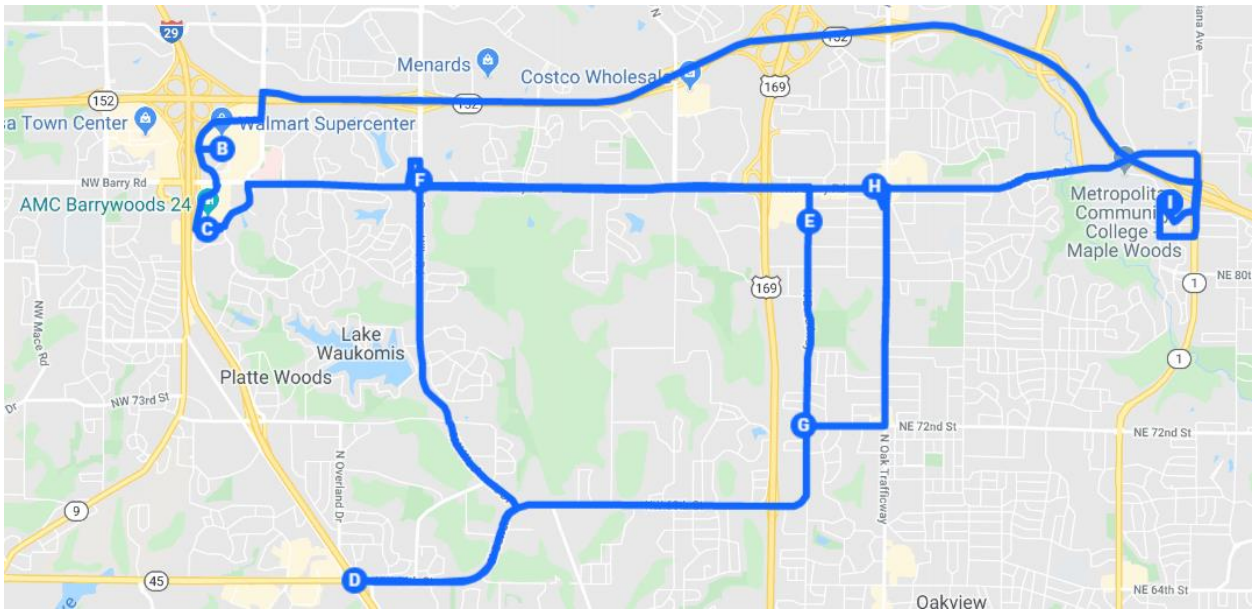
3. Regional Profile (regional population; growth projection)

Tri-County Mental Health Services, Inc., ("TCMHS") serves Clay, Platte and Ray counties in Missouri. This service area includes a wide variety of environments, including industrial areas, agricultural areas, high-income residential neighborhoods and subsidized housing units for the impoverished. Most of the consumers who participate in the TCMHS PSR program come from Platte and Clay counties, Missouri. On the official Missouri State website, Clay County is projected to have one of the largest numeric increases in population in the next 10 years. Both Platte County and Clay County are listed in the top 10 counties in Missouri for population growth, with Platte County's total population at 106,718, and Clay County's total population at 253,335. The TCMHS PSR program may also serve consumers from the Ray County area. Ray County is a rural area with a population of 23,158.

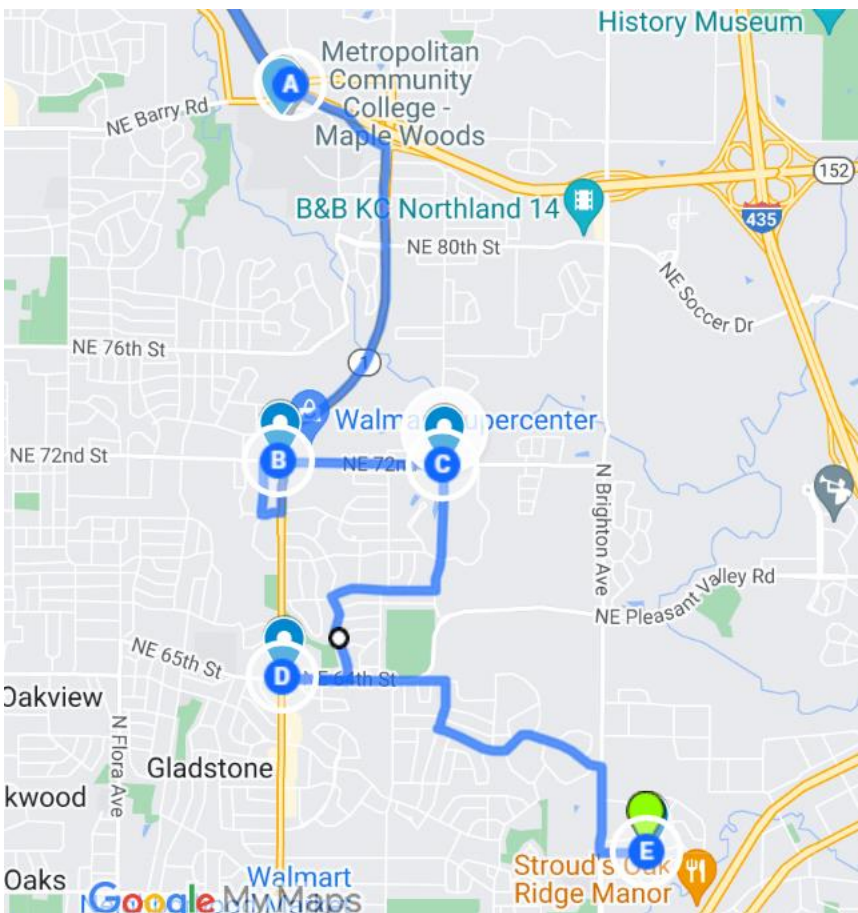
4. Population served (in relation to regional population)

TCMHS serves those who need safety net behavioral health and substance use services. More specifically, the vehicles obtained through the Department of Transportation's 5310 program are used to help consumers access our Psycho-Social Rehabilitation (PSR) program, through which TCMHS offers education and recreational group activities for adults living with mental health disorders. The goal of the programs is to assist members in living satisfying lives as independently as possible.

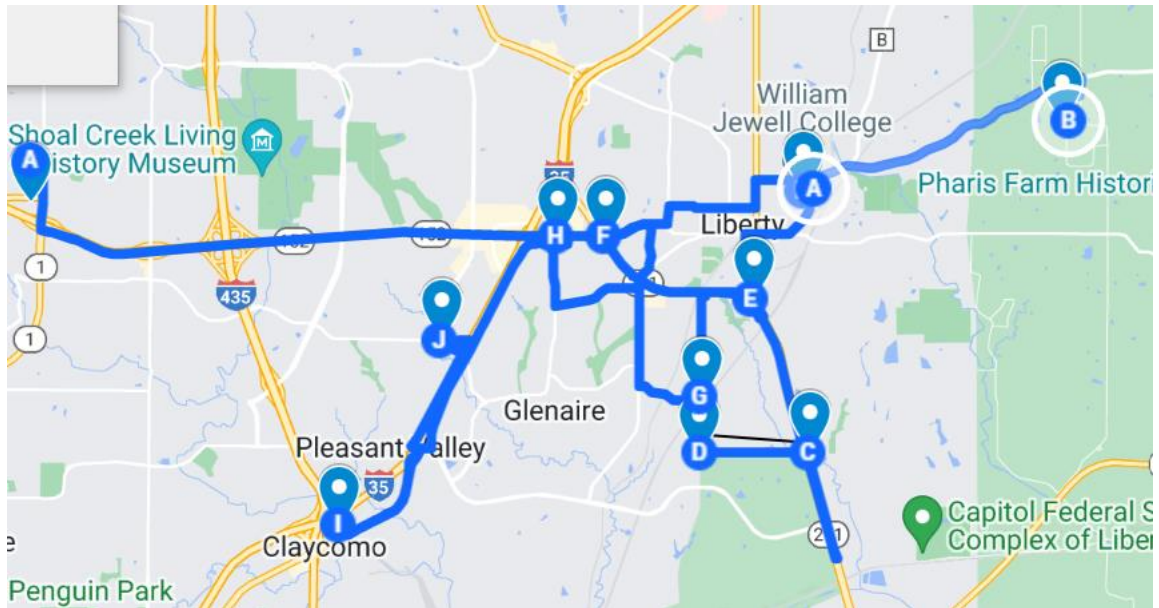
5. Service area (include map, with any routes utilized)



Kansas City Route



Gladstone Route



Liberty Routes

6. Governing body make-up (include terms of office)

TCMHS is governed by a volunteer Board of Directors, made up of 14 community members from diverse backgrounds and experiences in our three-county service area. Each Board member is eligible to serve two three-year terms. The Board is self-sustaining, in that it recruits and appoints its members to replace those who depart at the end of their eligibility or for other reasons.

C. Notice to the Public

Notifying the Public of Rights under Title VI

TCMHS posts Title VI notices on our agency's website, in public areas of our agency, in our board room, and on our buses and/or paratransit vehicles.

TCMHS 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.

For more information on the TCMHS's Title VI program, and the procedures to file a complaint, contact the Compliance Officer at 816-468-0400; or visit our administrative office at 3100 NE 83rd St., Suite 1001, Kansas City, MO 64119. For more information visit www.tri-countymhs.org.

If you believe you have been discriminated against on the basis of race, color, or national origin by TCMHS, 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: Compliance Office at TCMHS, 3100 NE 83rd ST., Suite 1001, Kansas City, MO 64119.

How to file a Title VI/ADA complaint with TCMHS.:

1. Information on how to file a Title VI complaint is posted on the TCMHS website, and in public areas of the agency. Complainants may print the Title VI complaint form at www.tri-countymhs.org, or request a copy by writing to TCMHS.
2. In addition to the complaint process at TCMHS, complaints may be filed directly with the Federal Transit Administration, Office of Civil Rights, East Building, 5th Floor – TCR 1200 New Jersey Ave., SE Washington, DC 20590.
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 the Compliance Officer at 3100 NE 83rd St., Suite 1001, Kansas City, MO 64119, or at 816-468-0400.

D. Procedure for Filing a Title VI Complaint

Filing a Title VI Complaint

The complaint procedures apply to the beneficiaries of TCMHS'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 TCMHS. may file a Title VI complaint by completing and submitting the agency's **Title VI Complaint Form**. Title VI 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 complaint is posted on our agency's website, and in public areas of our agency.

You may download the TCMHS Title VI Complaint Form at www.tri-countymhs.org, or request a copy by writing to TCMHS . Information on how to file a Title VI complaint may also be obtained by calling the Compliance Officer at 816-468-0400.

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 agency should contact for clarity of the allegations.

Please submit your complaint form to Compliance Officer, TCMHS, 3100 NE 83rd St., Suite 1001, Kansas City, MO 64119.

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

INVESTIGATIONS: TCMHS will generally complete an investigation within 90 days from receipt of a completed complaint form. If more information is needed to resolve the case, TCMHS may contact the complainant. Unless a longer period is specified by TCMHS the complainant will have ten (10) days from the date of the letter to send requested information to the TCMHS 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.

LETTERS OF CLOSURE OR FINDING: After the Title VI investigator reviews the complaint, the Title VI investigator will issue one of two letters to the complainant: a closure letter or 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 provides an explanation of the corrective action taken.

If the complainant disagrees with TCMHS's determination, the complainant may request reconsideration by submitting the request in writing to the Title VI 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. TCMHS 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, TCMHS 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, East Building, 5th Floor - TCR 1200 New Jersey Avenue SE, Washington, DC 20590.

If information is needed in another language, contact the Compliance Officer. at 3100 NE 83rd St., Suite 1001, Kansas City, MO 64119 or at 816-468-0400.

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

See sample
Title VI
Self-Survey Form

ATTACHMENT 3

Documenting Title VI Complaints/Investigations

All Title VI complaints will be entered and tracked in TCMHS’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.

During the reporting period, TCMHS had two Title VI Complaints. Neither were related to transportation.

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
1/12/2020	L.B.	Race	Alleged was discriminated against by Nurse Practitioner and stated she was not being heard by Nurse Practitioner due to race.	Closed	Spoke to complainant on phone about complaint. Complainant stated that NP did not say anything about race, but that complainant did not feel APRN was listening. Complainant met with APRN again and reported she felt heard and wanted to continue services with that APRN.	2/21/20		2/21/2020
8/11/2022	L.B.	Race	Alleged was discriminated against due to race. Did not agree with diagnosis given at intake.	Closed	Attempted to reach complainant by phone several times and sent letters requesting she call or come in, but no response.	9/13/2022		9/13/2022

Documenting Evidence of Agency Staff Title VI Training

TCMHS'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? yes
2. Do new employees receive this information via employee orientation? yes
3. Is Title VI information provided to all employees and program applicants? yes

4. Is Title VI information prominently displayed in the agency and on any program materials distributed, as necessary? yes

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:

- Board of Directors – the governing board of the agency. The role of the Board is to establish policy and legislative direction for the agency. The Board defines the agency’s mission, establishes goals, and approves then budget to accomplish the goals.
- 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
- Minority and low income populations, including 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. Consumer Advisory Board meetings
- c. Surveys
- d. Services for the Disabled (Notices of opportunities for public involvement include contact information for people needing these or other special accommodations.)

Public meetings are held at Tri-County Mental Health Services' main campus, which is 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. Website
 - ii. Regular mail
 - iii. Email to the Compliance Officer
 - iv. Phone calls to Compliance Officer

4. Response to Public Input

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

Title VI Outreach Best Practices

TCMHS ensures all outreach strategies, communications and public involvement efforts comply with Title VI. TCMHS’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, TCMHS provides the following:

- a. Public notices published in non-English publications (if available).
- b. Title VI non-discrimination notice on agency’s website.
- c. Agency communication materials in languages other than English (subject to Safe Harbor parameters).
- d. Services for Limited English Proficient persons. Upon advance notice, interpreters and translators may be provided.

2023 – 2026 Title VI Program Public Engagement Process

TCMHS will conduct a Public Engagement Process for the 2023-2026 Title VI Program. This process includes Community Meetings 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.

TCMHS will provide briefings to the Board of Directors and Advisory Bodies.

TCMHS will conduct a 30 day public comment period to provide opportunities for feedback on the 2023-2026 Title VI Program.

Comments are accepted during the public outreach period via:

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

Summary of 2020-2022 Public Outreach Efforts

Transportation Needs Assessment completed in 2021
Participation in the MARC Mobility Advisory Committee (quarterly)
Participation in the Regional Transit Coordinating Council (quarterly)
Public Board Meetings Held Monthly
Public events such as Tee Off for Tri-County Tournament, Mental Health KC Conference, Wellness Fairs, Diversity Fair, Community Blood Drive

G. Language Assistance Plan

TCMHS Limited English Proficiency Plan

This limited English Proficiency (LEP) Plan has been prepared to address TCMHS'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: Our service areas include routes in Kansas City, Gladstone, and Liberty. These three routes include travel in residential, industrial, and commercial areas. Once consumers have arrived at the Psychosocial Rehabilitation (PSR) program, they may also go on community outings in Clay, Platte, and Ray counties, and in the Kansas City area.

TCMHS 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 TCMHS. 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, TCMHS 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 TCMHS service area are proficient in the English language. Based on 2020 5-Year American Community Survey data, 2.5% of the population five years of age and older speak English "less than very well" – a definition of limited English proficiency.

LEP Population in TCMHS' Service Area

Population 5 years and over by language spoken at home and ability to speak English	Service Area 1- Clay County	Service Area 2- Platte Co.	Service Area 3- Ray Co.	Service Area Total	Percentage of Population 5 Years and Older
Population 5 Years and Over	220,407	90,850	21,532	332,789	100.00%
Speak English "less than very well"	5,884	2,611	145	8,640	2.60%
Spanish	6,124	2,286	136	8,546	2.57%
Speak English "less than very well"	2,325	523	78	2,926	0.88%
French, Haitian, or Cajun	387	261	35	683	0.21%
Speak English "less than very well"	72	17	3	92	0.03%
German	496	307	159	962	0.29%
Speak English "less than very well"	89	52	31	172	0.05%
Russian	453	146	0	599	0.18%
Speak English "less than very well"	145	27	0	172	0.05%
Indo-European	1,006	984	42	2,032	0.61%
Speak English "less than very well"	366	375	25	766	0.23%
Korean	263	171	0	434	0.13%
Speak English "less than very well"	148	121	0	269	0.08%
Chinese	725	485	8	1,218	0.37%
Speak English "less than very well"	321	347	0	668	0.20%
Vietnamese	1,514	262	5	1,781	0.54%
Speak English "less than very well"	1,064	113	4	1,181	0.35%
Tagalog	392	333	0	725	0.22%
Speak English "less than very well"	170	165	0	335	0.10%
Asian & Pacific Island	530	225	25	780	0.23%
Speak English "less than very well"	106	110	4	220	0.07%

Arabic	979	587	0	1,566	0.47%
Speak English "less than very well"	469	358	0	827	0.25%
All Other	1,533	711	0	2,244	0.67%
Speak English "less than very well"	609	403	0	1,012	0.30%

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

The TCMHS staff reviewed the frequency with which office staff, dispatchers and drivers have, or could have, contact with LEP persons. To date, TCMHS has, on average, 4 consumers who receive interpreting services at the PSR program

LEP Staff Survey Form
TCMHS is studying the language assistance needs of its riders so that we can better communicate with them if needed.
<ol style="list-style-type: none"> 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? <div style="text-align: center; margin-top: 5px;"> <input type="checkbox"/> DAILY <input type="checkbox"/> WEEKLY <input type="checkbox"/> MONTHLY <input type="checkbox"/> LESS THAN MONTHLY </div> 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	Bosnian
Weekly	Click or tap here to enter text.
Monthly	Click or tap here to enter text.
Less frequently than monthly	Click or tap here to enter text.

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

Outreach activities, summarized in TCMHS' Title VI Public Engagement Plan, include events such as public meetings and wellness fairs, 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. LEP individuals will be assessed to determine their language assistance needs. Interpreters will be arranged for any individual with LEP.

4. The resources available to TCMHS and overall cost to provide LEP assistance:

Strategies for Engaging Individuals with Limited English Proficiency include:

1. Interpreting Services. Upon advance notice, interpreters can be provided.
2. Language identification flashcards.
3. Written translations of vital documents (identified via safe harbor provision)
4. One-on-one assistance through outreach efforts.
5. Website information.
6. To the extent feasible, assign bilingual staff for community events, public hearings and Board of Directors meetings and on the customer service phone lines.

As applicable: Based on our demographic analysis (Factor 1) TCMHS has determined that individuals who speak Spanish and Arabic within its service area meets Safe Harbor criteria requiring written translated “vital documents” by language group(s).

TCMHS will provide assistance and direction to LEP persons who request assistance.

Staff LEP Training

The following training will be provided to TCMHS staff:

1. Information on TCMHS 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 TCMHS’s Title VI Plan requirement.

TCMHS 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 TCMHS 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 TCMHS' financial resources are sufficient to fund language assistance resources as needed.
6. Determine whether TCMHS has fully complied with the goals of this LEP Plan.
7. Determine whether complaints have been received concerning TCMHS' failure to meet the needs of LEP individual.

H. Advisory Bodies

Table Depicting Membership of Committees, Councils, By Race

Committee [examples]	Caucasian	Latino	African American	Asian American		Total
Population Committee						100%
Access Committee						100%
Citizens Advisory Council						100%

*** TCMHS does not currently track this for our Consumer Advisory Board. We continue to work with the Board to explore ways we can increase minority participation along with increasing participation overall.**

Description of efforts made to encourage minority participation on committees:

TCMHS's Consumer Advisory Board is open to any current consumer of TCMHS. Efforts are made to recruit new members by posting notifications in public areas of the agency and by staff members letting consumers know about the committee.

I. Subrecipient Assistance

Subrecipient Assistance

OPTION A

Tri-County Mental Health Services, Inc. does not have any subrecipients.

J. Subrecipient Monitoring

Subrecipient Monitoring

OPTION A

TCMHS does not have any subrecipients.

K. Equity Analysis of Facilities

OPTION A

TCMHS 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*

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

******This does not apply to TCMH because we are not a fixed route provider***

**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*

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

*****Does not apply to TCMHS***

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

N. Requirement to Monitor Transit Service*

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

*****Does not apply to TCMHS***

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

O. Service and Fare Equity Analysis*

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

****DOES NOT APPLY TO TCMHS**

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

