

**Collier County Board of County Commissioners
Collier Area Transit (CAT)**

**Title VI Program
2014 - 2017**

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Introduction

Collier Area Transit, (d.b.a. “CAT”) began its fixed route service in February 2001, offering service in Collier County, to include the cities of Naples, Marco Island and the Immokalee area. Collier Area Transit (CAT) operates under the supervision of the Collier County Department of Alternative Transportation Modes (ATM) for the Collier County Public Services Division. CAT provides public transit service including fixed-route bus, express bus, Americans with Disabilities (ADA) and Transportation Disadvantaged (TD) paratransit service. CAT coordinates through the State of Florida Commission for the Transportation Disadvantage with the transportation vendor providing public transportation services to Medicaid individuals.

CAT is submitting this report to the Federal Transit Administration, (FTA), providing a program to ensure that transit services made available is equitably distributed, and provides equal access and mobility to any person, without regard to race, color, or national origin. This program is updated every three (3) years and received approval by FTA through April 4, 2014.

This program has been prepared pursuant to Title VI of the *Civil Rights Act of 1964*; Title 49, Chapter 53, Section 5332 of the United States Code; and the FTA Circular 4702.1A, “Title VI Program Guidelines for Federal Transit Administration Recipients,” (May 13, 2007). Additionally, this update summarizes the CAT transit service provisions since the last program was approved and has been prepared in accordance with the March 8, 2011, “Dear Colleague” letter on proposed Title VI Equity Analysis for Urbanized Areas of 200,000 or More Residents for Major Service Changes or Any Fare Change. This update will provide compliance with all parameters of the FTA Title VI Compliance Checklist for All Grantees and Urbanized Areas with a Population of 200,000 or more shown below as Table 1 and Table 2, respectively. The source for both tables is the FTA website.

Table 1: FTA Title VI Program Checklist for all Grantees

Provision	Circular Reference	Citation	Information to be included in the Title VI Report
Title VI Complaint Procedures	Chapter IV, part 2	49 CFR 21.9(b)	A copy of the agencies procedures for filing a Title VI complaint.
Record of Title VI Investigations, Complaints, or Lawsuits	Chapter IV, part 3	48 CFR 21.9(b)	A list of any Title VI investigations, complaints, or lawsuits filed with the agency since the time of the last submittal.
Access to Services by Persons with LEP	Chapter IV, part 4	49 CFR 21.5(b) and the DOT LEP Guidelines	Either a copy of the agency’s plan for providing access to meaningful activities and programs for persons with Limited English Proficiency, which was based on the DOT LEP guidance, or a copy of the agency’s alternative framework for providing access to activities and programs.
Notifying Beneficiaries of Their Rights under Title VI	Chapter IV, part 5	49 CFR 21.9(d)	A notice that the agency complies with Title VI and procedures the public may follow to file a discrimination complaint.
Inclusive public participation	Chapter IV part 9	DOT Order 5610	A summary of public outreach and involvement activities undertaken since the last submission and a description of steps taken to ensure that minority persons had meaningful access to these activities.

**Table 2:
FTA Title VI Program Checklist for Urbanized Areas with a Population of 200,000 or More**

Provision	Circular Reference	Citation	Information to be included in the Title VI Report
Demographic Data Collection	Chapter V, Part 1 49	49 CFR 21.9(b)	Either demographic maps and charts prepared since the most recent decennial census, results of customer surveys that include demographic information, or demographic information on beneficiaries through locally developed procedures.
Service Standards	Chapter V, Part 2	49 CFR 21.5(b)(2); 49 CFR 1.5(b)(7); Appendix C to 49 CFR 21	System-wide service standards (such as standards for vehicle load, vehicle headway, distribution of transit amenities, on-time performance, transit availability, and transit security).
Service Policies	Chapter V, Part 3	49 CFR 21.5(b)(2); 49 CFR 21.5(b)(7); Appendix C to 49 CFR 21	System-wide policies (such as policies for vehicle assignment or transit security).
Equity Evaluation of Service and Fare Changes	Chapter V, Part 4	49 CFR 2 1.5(b)(2); 49CFR 21.5(b)(7); Appendix C to 49 CFR 21	An analysis of the impacts on minority and low-income populations of any significant service and fare changes that occurred since the previous report was submitted.
Monitoring	Chapter V, Part 5	49 CFR 21.5(b)(2); 49CFR 21.5(b)(7); Appendix C to 49 CFR 21	The results of either level of service monitoring, quality of service monitoring, analysis of customer surveys, or locally developed monitoring procedure.

The objectives of this Title VI Program include the following:

1. Ensure that federally-assisted benefits and related services are made available and are equitably distributed.
2. Ensure that the level and quality of federally-assisted services are sufficient to provide equal access and mobility to all persons.
3. Ensure adequate opportunities for all to participate in the planning and decision-making processes.
4. Ensure that placement of transit services and facilities are equitable.
5. Ensure that corrective and remedial actions are taken for all applications and receipts of federal assistance to prevent discriminatory treatment of any beneficiary.
6. Provide procedures for investigating Title VI complaints.
7. Take responsible steps for ensuring that meaningful access to programs and activities is provided for persons with Limited English Proficiency.
8. Inform the public of their rights under Title VI.

Background

Collier County, like most jurisdictions, has been drastically impacted by the downward housing market and the economy over the past several years. It has been a challenge to continue to provide public transportation services in an area that due to the economic downturn, the budget for CAT has decreased or remained stagnant over the recent years. The challenge is that with a reduction in disposable income the public is looking for more affordable options like public transportation. Consequently, after an initial reduction in ridership with the initial reduction in jobs, ridership on the CAT system has increased to record levels over the last 2 years.

The demand for service coupled with budget constraints has prompted service restructuring and adjustments for efficiency purposes. The greater number of service adjustments occurred in January 2011, and are described in more detail later in this document. Table 3 presents the CAT budget over the past five years. Despite these budgetary changes, CAT continues to provide public transit service aimed at serving the maximum number of persons in the most efficient and equitable manner.

**Table 3: CAT Budget
Fiscal Years 2009 – 2013**

Fiscal Year	FY 2009	FY 2010	FY 2011	FY 2012	FY 2013
Fixed Route Budget	\$4,714,200	\$4,875,200	\$5,002,900	\$5,307,600	\$5,865,900
Paratransit Budget	\$3,160,100	\$3,374,200	\$3,592,100	\$3,669,500	\$3,491,800
Total	\$7,874,300	\$8,249,400	\$8,595,000	\$8,977,100	\$9,357,700
Percent Change		5%	4%	4%	4%

Over the past three years, CAT has participated in a number of compliance reviews with the Collier Metropolitan Planning Organization (MPO), FDOT, and the FTA with regard to ensuring federal and state guidelines are adhered to in transportation planning and service delivery.

Over the past three years, CAT has completed a Comprehensive Operations Analysis (COA) and three (3) Minor Transit Development Plan (TDP) Updates, which have allowed ample opportunity for public input into the planning, service delivery, and capital investment program process. These planning resources have also provided CAT with significant data on its customers and the surrounding area that can be used for identification of service area populations and any necessary equity analysis prior to proceeding with decision-making activities. From the TDP/COA on-board survey, CAT was able to identify its typical rider and determine its customers' qualitative and quantitative opinions of the service provided and focus areas for future service and capital purchases. The TDP also provides an in-depth analysis of how CAT performs in comparison with peer agencies. Many aspects of the TDP and COA will be utilized to support compliance with Title VI guidelines and the full documents can be found on the CAT website at <http://www.colliergov.net/CAT>.

The public transit services in Collier County, provided by CAT, are governed by the Collier County Board of County Commissioners. The commissioners are elected in accordance with the State of Florida District Designations as follows:

- District 1 – Donna Fiala

- District 2 – Georgia A. Hiller
- District 3 – Tom Henning
- District 4 – Fred W. Coyle
- District 5 – Tim Nance

The Collier County Board of County Commissioners is the official decision-making body for Collier County and, because they are elected by the general public, CAT has no ability to ensure that there is adequate representation of minorities on this body.

CAT utilizes a newly appointed Public Transit Advisory Committee (PTAC) as well as the Collier MPO and its committees to assist in decision-making. The MPO has a Technical Advisory Committee (TAC), a Citizen’s Advisory Committee (CAC) and the Local Coordinating Board (LCB) who are consulted for transit decisions. The racial composition of the committees is provided below in Table 4.

Table 4: Racial Composition of Bodies that Provide Input to Decision-Making Bodies

PTAC Racial Composition	TAC Racial Composition	CAC Racial Composition	LCB Racial Composition
White Male - 7	White Male - 9	White Male - 3	White Male - 2
White Female - 1	White Female - 0	White Female - 3	White Female - 8
Black Male - 0	Black Male - 0	Black Male - 1	Black Male - 0
Black Female - 0	Black Female - 1	Black Female - 0	Black Female - 1
Hispanic Male - 0	Hispanic Male - 0	Hispanic Male - 1	Hispanic Male - 3
Hispanic Female - 0	Hispanic Female - 0	Hispanic Female - 0	Hispanic Female - 1
Other Male - 0	Other Male - 0	Other Male - 0	Other Male - 0
Other Female - 0	Other Female - 0	Other Female - 0	Other Female - 0
Vacancy - 1	Vacancy - 1	Vacancy - 4	Vacancy - 2

Title VI Program Policy Statement

CAT operates under the Alternative Transportation Modes (ATM) Department which is one of six (6) Departments within the Public Services Division of Collier County Government. CAT is the provider of public transportation, whose purpose is to deliver quality public transportation services to the general public. CAT's employees who have extensive daily contact with the public, recognize its responsibility to the community it serves and is committed to a policy of non-discrimination. Governed by the Collier County Board of County Commissioners and serving the cities of Naples, Marco Island, Everglades City, the Immokalee community, and other areas of unincorporated Collier County, CAT complies with Title VI of the Civil Rights Act. It is CAT's policy to ensure non-discriminatory transportation practices throughout Collier County.

Title VI of the Civil Rights Act of 1964 prohibits discrimination on the basis of race, color, or national origin in programs and activities receiving Federal financial assistance. Specifically, Title VI provides that "no person in the United States shall, on the grounds of race, color, or national origin, be excluded from participation in, be denied the benefits of, or be subjected to discrimination under any program or activity receiving federal financial assistance.

Environmental Justice (EJ) Executive Order 12898 included as a component of the Title VI requirements guarantees fair treatment for all people regardless of race and income. The requirements under EJ include CAT identifying and addressing, as appropriate, any potential disproportionate and/or adverse impact of its programs, policies, and activities on minority and low-income populations. In addition to EJ considerations in the administration of public transit, CAT in accordance with Executive Order 13166 will undertake reasonable steps to ensure that Limited English Proficiency (LEP) persons have meaningful access to programs, services, and information.

The three fundamental Environmental Justice concepts are to:

1. Avoid, minimize, or mitigate disproportionately high and adverse human health or environmental effects, including social and economic effects, on minority and low-income populations.
2. Ensure the full and fair participation by all potentially affected communities in the transportation decision-making process.
3. Prevent a denial, reduction, or significant delay in the receipt of benefits by minority and low-income populations.

The Public Transit Manager has been designated as the CAT Civil Rights Officer responsible for civil rights compliance and monitoring to ensure the nondiscriminatory provision of transit services and programs. In addition to the Transit Manager, the ATM Director and all Transit agency staff share in the responsibility of making CAT's Title VI program a success. Title VI compliance is given the utmost importance by CAT and its governing board.

To request a copy of the agency's Title VI Program, contact the Alternative Transportation Modes (ATM) Department at the phone number, e-mail, or physical address provided below or access it on the CAT

website at <http://www.colliergov.net/CAT>. Any person who believes that they have been denied a benefit, excluded from participation in, or discriminated against under Title VI has the right to file a formal complaint in writing to the Public Transit Manager, responsible for civil rights compliance and monitoring to ensure non-discriminatory provision of transit services and programs. File your formal complaint in writing, via e-mail, or by phone using the following contacts:

By Mail: Alternative Transportation Modes Department
3299 East Tamiami Trail, Suite 103
Naples, FL 34112

By Phone: CAT - (239) 252-5832

Online: <http://www.colliergov.net/index.aspx?recordid=70&page=3178>

Please be sure to include your name, address, and how to contact you (physical address, phone number, and/or e-mail address, etc.). Complaints are documented in the County's database, logged and tracked for investigation. Once the investigation is completed, the customer is notified of the outcome of the investigation.

The Title VI Policy statement is disseminated to all staff and is available on CAT's website. Implementation of the Title VI Program is considered a legal obligation accepted as part of the financial assistance agreement entered into with the U.S. Department of Transportation's Federal Transit Administration.

Individuals and organizations also have the right to file a complaint with the Federal Transit Administration's Office of Civil Rights by obtaining the complaint form from: http://www.fta.dot.gov/civilrights/title6/civil_rights_5104.html

Record of Title VI Complaints, Investigations, or Lawsuits

Active Lawsuits or Complaints

Members of the public and staff who believe that they have been discriminated against based on race, color, national origin, age, gender, or disability are afforded the opportunity to have their concern documented. The following complaints indicated in Table 5 were filed or concluded between submittal of the last Title VI Plan in April 2011 through March 2014. There were no external complaints or internal complaints filed by management during this time period. The complaints noted below were registered to the vendor hired to operate the transit system, Keolis and provided to the County in accordance with their Contract.

Table 5: Internal Complaints Initiated by Complainant

Complainant	Basis	Date Filed	Outcome
Operator – bus driver	National Origin	August 22, 2013	Open investigation, informal settlement talks
Operator – bus driver	Race, Religion, National Origin, Retaliation	August 23, 2011	Dismissal, Notice of Right to Sue – Unable to conclude the information obtained establishes violation of the statutes.

All complaints received are given the highest priority and thoroughly investigated to ensure that any substantiated complaint is addressed and that appropriate follow-up actions are taken to correct discriminatory actions and prevent future discriminatory policies, practices, and environments.

General Reporting Requirements

Pending Applications for Financial Assistance to FTA and Agencies Other than the FTA

As of January 31, 2014, CAT had the following pending grant applications:

FTA

- FL-90-X816 USC 5307 FY 2013
- FL-34-0004 USC 5339 FY 2013
- FL-95-X069 XU FHWA Flex Funds

Agencies Other than FTA

- FDOT – USC 5311 Non-urbanized Area Formula Grant
- FDOT – Passenger Amenities Grant (Service Development Grant)
- FDOT – USC 5310 Transportation for Elderly Persons and Persons
- FDOT – Downtown Fort Myers Circulator (Service Development Grant)

CAT utilizes the active grants listed in Table 6 to support public transit services in Collier County.

Table 6: CAT Active Federal Grant Assistance

Grant Number	Available Funding	Program
FL-03-0264-01	\$ 737,759	FTA Section 5309 FY 03
FL-04-0034-00	\$ 226,710	FTA Section 5309 FY 06
FL-04-0033-00	\$ 238,000	FTA Section 5309 FY 07
FL-04-0047-00	\$ 259,000	FTA Section 5309 FY 08
FL-04-0117-00	\$ 274,000	FTA Section 5309 FY 09
FL-90-X699-00	\$ 2,230,554	FTA Section 5307 FY 09
FL-96-X019-00	\$ 2,963,261	FTA Section 5307 FY 09 – ARRA
FL-90-X731-00	\$ 2,536,548	FTA Section 5307 FY 10
FL-90-X766-00	\$ 2,982,115	FTA Section 5307 FY 11
FL-90-X784-00	\$ 2,543,557	FTA Section 5307 FY 12
FL-95-X062-00	\$ 336,872	FTA XU Funding FY 12 – FHWA
AQR01	\$ 272,797	FTA Section 5311 FY 13
AQQ16	\$ 888,278	FDOT State Block Grant FY 13

FTA Civil Rights Assurance, DOT Title VI Assurance

CAT submitted the Fiscal Year 2013 Certifications and Assurances in FTA’s Transportation Electronic Award Management (TEAM) system. A copy of the signed Certifications and Assurances is provided in Appendix A, including the 01 Assurance required for each applicant, which incorporates the following sections:

- D. Non-Discrimination Assurance
- E. Assurance of Non-Discrimination on the basis of disability

The Certifications and Assurances were electronically signed and submitted on February 27, 2013. CAT has a process in place that staff follows to prepare for the annual execution of the FTA Annual Certifications and Assurances. Transit staff prepares a request to the County Attorney’s Office for review and approval. Upon review, the Public Service Division Administrator is notified of the County Attorney’s approval and the Administrator executes the document. The Collier County Board of County Commissioners has delegated the Public Services Division Administrator with the obligation to review and execute the Certifications and Assurances. Upon review and acceptance, the County Attorney, and the Public Service Division Administrator complete the requirements for execution of the Certifications and Assurances.

Program Specific Requirements

Civil Rights Compliance Review Activities

Internal Review Process for Service Delivery and Capital Programs Decisions

As previously stated, CAT implemented a Title VI Internal Interview Review process that provides an opportunity for staff to review decisions related to service delivery and capital investments. In addition,

the Mobility Manager acts as a secondary Title VI review to the Office of Equal Opportunity for CAT-related activities. Due to the Grants Analyst review and approval of the use of grant funding, this process affords CAT an additional step to ensure equity in capital investments. During CAT staff meetings to discuss service delivery, service changes, and/or capital investments, managers discuss with the ATM Director potential implications of proposed actions prior to moving forward with implementation. Because the ATM Director has ultimate responsibility for the agency's services and the compliance with Title VI guidelines, these meetings provide an opportunity to ensure equity through internal review.

Public Involvement

CAT's public involvement process is two-fold in that the CAT has its own Public Participation Plan (PPP) but the agency also participated in the Collier MPO public involvement activities to ensure that a wider range of opportunities are available for all persons to provide feedback on public transit service. The CAT process has been designed to obtain a wide range of input from the community of both users and non-users. The CAT PPP can be reviewed in its entirety on the CAT website at www.colliergov.net/CAT and additional details on the public involvement activities are found in the Limited English Proficiency section of this Plan.

Through participation with the community, CAT can gather public input on a daily basis. As part of the public involvement, the general public is provided an opportunity to comment on CAT's services and capital investments through the Public Transit Ad Hoc Advisory Committee, the MPO Committees and MPO Board Meetings. They also are provided an additional opportunity when those same items viewed through the MPO process are taken to the Collier County Board of County Commissioners.

CAT recognizes that in compliance with Title VI, public involvement activities must focus on low-income and minority populations and thereby ensures access to the transportation planning process for low-income and minority populations through its public involvement process.

As part of CAT's public outreach process all meeting notices, press releases, and public service announcements are translated into other languages as requested or needed based on documentation of previous requests. CAT staff refreshes the printed materials monthly or as needed and monitors the frequency of requests for other than English materials. In addition, whenever possible, CAT utilizes pictographs to display information and instructions. Bus cards and printed schedules are also utilized to convey information on CAT's Title VI requirements.

Future service planning efforts often include the dissemination of customer demographic and opinion surveys to collect information about who is using the service and how the service could be improved for those persons. CAT disseminates on-board surveys in English and Spanish to ensure that Spanish speaking customers have meaningful access to provide input in the planning process. This process also reaches out to obtain input from low-income and minority persons who may not attend a formal public meeting.

As a result of the public outreach process implemented by CAT, portions of the Golden Gate Estates and other low-income and minority areas in the eastern most portion of the county have been identified by

the public as areas in need of transportation options. CAT, through its upcoming Transit Development Plan (TDP) will be defining ways to efficiently provide transportation service to these areas.

Project Level Public Involvement and Outreach Activities

Transit Development Plan (TDP)

CAT, as part of the process for planning services and determining its capital program, develops a Transit Development Plan (TDP). The TDP is a requirement of the FDOT. Statute requires Florida transit agencies to complete a major update every five years and in the interim years provide annual progress reports on any changes and accomplishments in implementing the Plan. The TDP is a requirement to receive block grant operating assistance from the FDOT. CAT completed its Major TDP Update in September 2010 for fiscal years 2011-2020. As part of the TDP process, CAT develops a 10-year operating and capital financial plan, which is inclusive of its Program of Projects (POP). Through the TDP public involvement process, the community has an opportunity to provide feedback on existing and future planning projects, transit services, and capital investments and the POP. Depending on the type of public involvement activity, direct invitations are sent, notices are placed in a newspaper of general circulation, flyers are placed on vehicles and at public facilities, and information is provided on the CAT and/or MPO websites. The most recent TDP Major Update included an extensive public involvement process. The 2011- 2020 TDP Update public involvement activities were as follows:

- Review Committee Meetings - A project committee of stakeholders from throughout the community were invited to guide the TDP process and review documentation.
- Stakeholders Interviews - To assess the attitudes of key local officials and community leaders regarding the transit system, nine stakeholder interviews were conducted political and community leaders' views on transit's current and future role in the community, transit finance and governance, and other issues relevant to the transit plan.
- Public Workshops - Three public workshops were conducted, one in January 2010, at the Golden Gate Community Center and two in June 2010, one at the Immokalee Library and the other at the Collier County Museum directly adjacent to the Primary Transfer Station for the system. The public workshop included a presentation of the TDP development process, key findings from the stakeholder interviews completed to-date, the peer review selection process and results, and the trend review results. After the presentation, participants were asked to break into four groups to complete an interactive exercise. The interactive exercise required the meeting participants to improve or expand transit services within the County using a limited amount of funding.
- Transit Survey - A short survey was administered at each of these workshops to collect participant opinions on specific transportation- and transit-related issues, as well as basic demographic information and attitudinal information regarding the importance of specific aspects of CAT service.
- On-Board Survey - On-Board surveys were conducted during the month of February 2010. The surveys were translated into both Spanish and Creole language versions for distribution to Spanish and Creole-speaking patrons who were not able to complete the English version. A total of 1,504 CAT bus riders responded to the survey. For analysis purposes, the 23 questions on the

survey were divided into three major categories. Analysis categories include travel characteristics, rider demographics, and customer service and satisfaction.

- Discussion Groups - To supplement the information collected during the public workshops and to support the TDP update process, three discussion groups were scheduled in geographically diverse locations across the County.
- Collier MPO and Committees - The TDP methodologies and document are taken to the MPO for feedback and approval. All MPO Board and Committee meetings are open to the public.
- Collier County Board of County Commissioners - Prior to submittal to the FDOT, the CAT governing board must adopt the TDP. The meeting for adoption of the TDP is a regular County Commission meeting noticed in accordance with the Florida Sunshine Law and open to the general public.

CAT recognizes that its operators have the majority of contact with customers who provide them with input on the system; therefore, during the update to the TDP, CAT also gathered public input through operators. Bus operators are a valuable source of information as they reflect the eyes and ears on the road for CAT's daily operation. Operator insight into public opinion and need can also supplement information that cannot be collected through other means. Information can include safety and security issues, an understanding of travel characteristics on specific routes, and representation of needs for those who may not be willing to participate in other public outreach activities. To gather feedback from operators the operators were interviewed.

The first year of the TDP financial plan is used as the agency's POP (Program of Projects). The POP is also provided to the Collier MPO for use in the development of the Transportation Improvement Plan (TIP). Through the Collier MPO's TIP process, the POP is available for additional public comment. CAT publishes the POP at the time of grant application.

Fare Increases and Service Changes

The Collier County Board of County Commissioners, in its efforts to ensure Title VI Compliance, established local guidelines for service changes and fare increases as part of the Transit Development Plan. Major service changes require a public hearing announcement in a newspaper of general circulation (the Naples Daily News) and Board of County Commissioners approval. Determination as to whether or not a modification constitutes a major change is determined on a case-by-case basis, with the exception of total elimination of a specific route service which is automatically considered a major service reduction. The CAT Route Fare or Service Change Policy is provided in Appendix C of this plan.

In 2012 CAT conducted a fare equity analysis to evaluate the fare structure for the system. This study has been completed to meet the FTA Title VI requirement and in an effort to examine potential alternatives for generating additional revenue to cover the operating budget shortfall. CAT at the time was experiencing an 8 to 10 percent increase in paratransit trips resulting in an anticipated FY 2013 shortfall of \$164,000 to \$250,000, depending on the actual increase in ridership for the complete fiscal year. To avoid any reductions in current transit services, CAT had to generate additional revenue and create efficiencies within the existing system.

In compliance with FTA Circular 4702.1A, minority and low-income populations were examined to determine whether any disproportionate impacts would occur based on the potential fare changes. In addition, if a disproportionate impact was identified, justification on how an alternate action would result in an even greater impact to these populations or actions to mitigate the potential impacts has been identified. Section 7 of the report includes the fare equity analysis that is required when considering the implementation of a fare change. The analysis was completed using the County’s most recently available demographics and transit agency statistics.

Public outreach efforts during the fare study indicated that the implementation of a fare increase rather than any future service elimination is preferred by the general public. The analysis demonstrates that alternatives other than an across the board \$1.00 increase may disproportionately impact the low-income and minority populations using the CAP system. Therefore, the fare equity analysis concludes that implementation of the \$1.00 across the board fare increase to TD and ADA customers should be the preferred alternative and is justified under the Title VI program in accordance with FTA Circular 4702.1A. The Board of County Commissioners approved a fare increase of \$1.00 for the paratransit service on April 24, 2012. There have been no further changes to the CAT fare structure since that time.

Service Changes

CAT completes minor service changes on a regular basis related to running time adjustments to improve the efficiency and effectiveness of service. Ridership and stop-level automatic passenger counter (APC) data along with supervisor and operator input are utilized when making these minor service changes.

Prior to a service change, CAT posts notices on-board its vehicles to notify customers of the impending change. Customers are always able to comment on services and proposed changes using the CAT customer service or by through the County website by clicking on the link “Contact ATM Department” and send their comments by email to AltTransModes@colliergov.net. All comments are tracked and responded to, if warranted.

Table 7: Service Changes Since the Last Title VI Update through December 2013

Route	Type of Change
January 2011	
Route 1A	This route was converted into the new Route 10. This route operates Monday through Saturday with limited service on Sunday.
Route 3A	A timed transfer option was added at the CAT Operations Facility on Radio Road.
Route 3B	A timed transfer option was added at the CAT Operations Facility on Radio Road.
Route 5	Three additional trips were added as well as a timed transfer option was added at the CAT Operations Facility on Radio Road.
Route 6	Re-aligned to include the addition of service along Pine Ridge Road establishing a much needed and requested east/west connection in Collier County.
Route 8	Added an additional bus stop at 2050 Commerce Avenue, allowing passengers in the rural area of Immokalee additional access to a variety of human services.
March 2011	
Route 5	Due to route demand and public feedback, this modification was revised in March 2011 to add the segment along Davis Boulevard back to the Route and allow it to continue to the Government Center.

Major service changes, which represent modification to a route or a route's ridership without elimination of the route, are reviewed through CAT's internal meeting process, where managers, the Department Director, and the Mobility Manager (serving as the secondary Title VI contact) review the impact of the potential route modifications. These types of service changes occur when a route is deemed to be a consistent low performer with regard to ridership, farebox recovery, and latent demand from the service area of the route (evaluated using APC data) or when the agency's budget has been cut requiring service reductions. For these route changes, the public has an opportunity to comment consistent with the adopted CAT PPP.

Service elimination is the final type of service change that might have an adverse impact to Title VI populations. Extensive analysis and public input is required for the elimination of a route. To ensure compliance with Title VI requirements, public meetings are to be conducted in locations that are convenient and accessible for minority and LEP communities. Coordination with community- and faith-based organizations, educational institutions, and other organizations to implement public engagement strategies that reach out specifically to members of affected minority and/or LEP communities. Multiple means of communication will be offered to the public and notices of such communication efforts will be consistent with the adopted CAT PPP.

Service increases may be implemented with approval of the Department Director with final decision to implement any major service changes (as defined Appendix C of this report) made by the Collier County Board of County Commissioners.

The Alternative Transportation Modes (ATM) Department is responsible for the direction of CAT services and, as such, has initiated this Comprehensive Operational Analysis (COA) to evaluate existing fixed-route services to identify short term (five-year) recommendations for maximizing route efficiencies and service in Collier County and the surrounding areas. As times change and dynamics change, the Collier County Alternative Transportation Modes (ATM) and CAT request that the Collier MPO jointly conduct this review of current public transportation services through the COA process. The analyses conducted through a COA provides the transit agency with a wealth of objective information for use in business planning, including use of services provided and how those services meet the needs of the customers.

In order to determine the community's transportation needs, data was gathered from a number of sources including an on-board survey of bus passengers, discussions with drivers who interact with customers daily, and discussions with CAT staff and supervisors about where service can be improved. The following factors were evaluated from the data for each route as part of the service analysis: ridership patterns, span of service, frequency of service, transfers, schedule adherence, and overall route productivity, efficiency and effectiveness. Based on this analysis, service operation recommendations were made. The recommendations were created to meet both passenger needs and address CAT operational needs.

Table 8: Service Change Recommended Related to the COA - Effective May 2014

Route	COA Recommendation
ALL	Local Service (Route 1 – 99) – CAT local bus service will be the backbone of the Collier County transit system.
NA	Rapid Transit Service (R-500 series used for route numbers) – Rapid transit service for Collier County is for service along primary corridors with frequent bus service and transit vehicle preemption. CAT does not have this type of service today.
7	Express Service (100 series used for route numbers) – CAT currently operates express service to Marco Island.

Description of the Agency’s Criteria for Selecting Transit Providers to Participate in any FTA Grant Program

The Collier County Alternative Transportation Modes (ATM) Department is responsible for planning, operating, and managing CAT public transportation services through a contract operator. CAT utilized the Collier County procurement process to ensure that the procurement process is fair and open to all providers. CAT transit services have always been contracted since its inception in 2001 and have not affected the level of service for the system. If any changes in the contracted provision of service results in a change to the level of service provided, an analysis of such change on Title VI populations will be conducted and submitted to FTA as an addendum to this plan. If any adverse impact is found through the analysis, appropriate and swift action will be taken to remedy or mitigate the impact. In addition, the CAT Disadvantaged Business Enterprise Program is incorporated into the procurement to allow disadvantaged businesses an opportunity to provide service. There has been no Transit providers that receives grant funding through CAT however in the event that occurs CAT requires Transit providers to complete CAT’s customer service and ADA training course and agree to the same FTA Certifications and Assurances as CAT. Having the Certifications and Assurances as well as the sub-recipient monitoring allows CAT to ensure that contract transit providers are delivering service in an equitable and non-discriminatory manner. Final approval of any selected transit provider is completed by the Collier County Board of County Commissioners at County Commission meetings, which are advertised and open to the public.

Process for Ensuring that all Sub-recipients are Complying with the General Reporting Requirements of this Circular

As previously stated, CAT will complete sub-recipient training and monitoring to ensure that sub-recipients are complying with all Certifications and Assurances, including those regarding nondiscrimination.

The monitoring would be randomly scheduled for all sub-recipients to ensure compliance.

A Description of the Procedures the Agency uses to Pass-through FTA Financial Assistance in a Non-Discriminatory Manner

The following procedure has been established to be utilized when FTA funds are pass-through to sub-recipients. CAT utilizes an independent selection committee comprised of various racial backgrounds to assist in the decision making regarding FTA financial assistance. CAT will confirm that the agency is valid

to operate in the state and is registered with the Central Contractor Registration (CCR). Applications for assistance from CAT are then provided to the independent selection committee for review and comment. The selection committee is provided a form for rating contractors and guidance on each rating category. The selection committee is not allowed to discuss the applications until the advertised selection committee meeting, which is open to the public. For all uses of FTA financial assistance the Collier County procurement process and federal purchasing guidelines are utilized. Whenever, there is a conflict between the Collier County Procurement Policy and the Federal Procurement Guidelines and FTA funding is being utilized the Federal Procurement Guidelines are utilized throughout the purchasing process. Collier County provides vendor of all procurement opportunities to allow open and non-discriminatory access on its website. The full procurement policies for Collier County can be found on their website at: <http://www.colliergov.net/index.aspx?page=762>

Narrative of Implementation of Internal Review Process for at Least One Service Delivery or Capital Program Decision that was Implemented in the Past 3 Years

CAT made limited service adjustment in the past 3 years. However, CAT is in the process of making a number of service adjustments and route restructuring in response to route monitoring, passenger requests and findings of its COA. As part of the COA process, CAT provided various opportunities for public input including an on-board survey. CAT also conducted a route-by-route assessment of existing services to determine those services that were efficient and inefficient. CAT through the COA process had vehicle loads, capacity, headways, and access monitored and received recommendations. Prior to approval of the recommendations, notice will be published in the Naples Daily News affording the public an opportunity to comment. During the COA, various staff meetings were held to review the route-level recommendations and any potential implications. Additional internal review and public input will be obtained prior to receiving approval by the Board of County Commissioners for implementation of the route restructuring recommendations. Most of these changes will occur within the next 3 year and information will be updated in the next Title VI plan. Appropriate evaluation will be conducted to insure that any route restricting implemented will not created a disparity in the provision of public transit service to Title VI protected classes.

Disparity in Levels and Quality of Service

No disparities in either levels or quality of service during the past three (3) years have been found. A review of the CAT service area maps and minority census tracts was completed to ensure that service is provided in an equitable manner. The LEP and Environmental Justice sections of this Plan further identify CAT's compliance with Title VI.

Service Standards and Policies

CAT service standards and policies are reviewed regularly to ensure equitable transit service to all persons in Collier County. The following categories are evaluated to ensure equitable transit service:

- Level of Service by County and Minority Group – CAT provides service throughout Collier County. It is CAT's goal that its service is provided to the majority of minority census tracts, as funding permits.

- Vehicle Load – CAT, as shown in the TDP capacity analysis included in Section 4 has capacity on the majority of its routes. During various peak times, excessive loads are experienced on two routes. The COA identified capacity issues on three routes and made recommendations to improve the capacity through route modifications. CAT’s goal is to operate vehicle loads at a threshold that meets safety and performance standards. When reviewing CAT APC data, routes with excessive loads will be identified so that, as funding permits, scheduling or routing adjustments can be made.
- Vehicle Assignments – CAT randomly assigns vehicles to routes on a daily basis to assure that there are no equity issues. The random daily assignment prevents specific vehicles being placed on specific routes and also ensures that all routes will have access to newer vehicles. While the vehicle assignment process is random, CAT does review APC data during the process to ensure that the vehicle size meets the capacity requirements on each route. It is important to note that some routes have vehicle size restrictions based on the operating environment; therefore, the vehicle assignments on those routes are based on vehicle size rather than random selection of the entire fleet.
- Service Headways – Headways are reviewed when vehicle load issues arise based on review of stop-level data, when customer service or operator complaints are received, or when public requests for additional services are received through the various opportunities for public input. When funding is available, headways are increased on routes without excess capacity or in areas that, because of development patterns, have greater density to successfully support increased transit service. When adjustments are made to headways, the CAT staff reviews the system to ensure that there are no disparate impacts created from the frequency adjustments.
- Transit Access – CAT makes every effort to ensure that transit services are accessible to all persons in Collier County and are provided in a manner consistent with the ADA of 1990. Transit access is reviewed during the TDP process to determine whether there are areas without access and develop a cost feasible financial plan to provide service in the future. The TDP process also encourages CAT to continue working with other county departments and other agencies to review and approve development in areas with existing transit service or require new developers to assist in providing additional transit service. The COA conducted in February 2013 combined with the TDP Major Update last completed in September 2010, provided two key opportunities for CAT to complete an in-depth review of its levels of service and the manner in which services are provided. The next TDP will be completed in September 2015.

Table 9 presents the existing service levels, including service span, frequency, and geographic area served for each of the existing CAT routes.

Table 9 - CAT Service Levels by Routes

Route	Route Description/Geographic Location	Monday - Saturday		Sunday	
		Service Span	Frequency	Service Span	Frequency
1A	Red Route: US 41/Creekside	6:00 AM-7:20 PM	90 minutes	7:30 AM-5:50 PM	90 minutes
1B	Red Route: Airport Rd./ Creekside	6:00 AM-7:19 PM	90 minutes	7:30 AM-5:49 PM	90 minutes
2A	Orange Route: NCH/Mall	6:00 AM-6:46 PM	60 minutes	7:00 AM-5:46 PM	60 minutes
2B	Orange Route: Mall	6:30 AM-6:19 PM	60 minutes	No service	N/A
3A	Purple Route: Golden Gate City	5:35 AM-6:51 PM	90 minutes	6:51 AM-5:21 PM	90 minutes
3B	Purple Route: Golden Gate City	4:35 AM-5:49 PM	90 minutes	7:19 AM-5:49 PM	90 minutes
4A	Green Route: Rattlesnake/Edison	6:00 AM-6:57 PM	90 minutes	7:30 AM-5:45 PM	90 minutes
4B	Green Route: Naples Manor	6:30 AM-6:15 PM	90 minutes	No service	N/A
5	Blue Route: Golden Gate Estates	3:45 AM-8:08 PM	60 minutes	7:15 AM & 5:00 PM	2 runs
6	Yellow Route: Pine Ridge Road	6:00 AM-5:44 PM	90 minutes	9:00 AM-2:44 PM	90+ minutes
7	Light Blue: Marco Circulator*	7:40 AM-4:55 PM	90 minutes	7:40 AM-4:55 PM	90 minutes
8A	Pink Route: Immokalee Circulator*	7:00 AM-6:55 PM	90 minutes	No service	N/A
8B	Pink Route: Immokalee Circulator*	7:30 AM-7:25 PM	90 minutes	No service	N/A
9	Brown Route: Charlee Estates	7:00 AM-6:44 PM	90 minutes	8:30 AM-5:14 PM	90 minutes
10	Lime Green: Golden Gate Pkwy	6:00 AM-5:52 PM	90 minutes	12:00 AM-4:22 PM	180 minutes

Transit Security

CAT makes every effort to ensure that its vehicles and facilities are safe for the general public and staff. As a department of Collier County, CAT works with the Collier County’s Security Personnel on campaigns and efforts that increase the safety and security of the transit system. Other transit security efforts completed by CAT include regular training sessions with the Collier County Emergency Management Staff in coordination with local Fire and Law Enforcement Departments on Tabletop sessions, and the installation of cameras on buses. CAT also maintains a preventative maintenance schedule in accordance with FTA guidelines to ensure the safe performance of vehicles.

Assessment of Compliance

Monitoring

As stated earlier in this Plan, CAT conducts several efforts to monitor the quality of the service it provides. Regular monitoring efforts including service review and amenities placement, are conducted by CAT. Quarterly monitoring efforts to review service for Title VI compliance include, but are not limited to, various planning studies such as the TDP and COA. As part of the monitoring activities, CAT also reviews travel patterns and journey to work characteristics of the County population. CAT utilizes staff input and public feedback to monitor performance as well as conduct a review of statistical data reported to the National Transit Database. As part of its monitoring, CAT also reviews the performance of peer agencies to ensure that it is on par with the performance of similarly-sized or adjacent area transit systems. The peer review is included as Appendix #.

As part of CAT's monitoring process, the following procedures and guidelines are carried out to monitor compliance with Title VI. Periodic compliance assessments are undertaken to determine whether transit service provided by CAT to minority communities and minority users is consistent with the objectives of this Plan. The assessments will identify possible areas of noncompliance and implement corrective actions to include the following:

- Establish procedures for developing and maintaining standards for compliance with Title VI.
- Establish internal guidelines for making determinations of compliance with Title VI as part of the local decision-making processes and continue project management and contract administration responsibilities.
- Establish internal guidelines for making determinations.
- Evaluate system-wide service changes and proposed improvements at the planning and programming stages to determine whether the overall benefits and costs of such changes or improvements are distributed equitably and are not discriminatory.
- Conduct compliance assessments of transit services and benefits to assure compliance with the spirit and intent of Title VI.
- Take action on findings and recommendations made by review officials to remedy such findings.

Other Areas of Title VI Considerations

Information Dissemination

CAT will continue to provide information to minority communities and the general public using its website, public notices, meetings, workshops, hearings, presentations, and posting information on vehicles. Additional public information dissemination to minority and low-income populations is covered in the LEP section of this Plan. CAT staff will also continue to participate at various community events throughout Collier County to disseminate information.

Minority Representation on Decision-Making Bodies

CAT will continue to utilize the Collier Public Transit Ad-Hoc Advisory Committee (PTAC) and if applicable, supplement with the Collier MPO process for decision-making and will encourage diversity on these committees.

Customer Service Surveys

CAT from time to time will conduct customer surveys to assess its performance and gather information on market demands. Customer survey information can be a useful tool in assessing performance and guiding future direction.

Incorporating Corrective Action

Upon identification of the need for corrective action by the FTA, CAT will commence corrective actions to remedy identified deficiencies and incorporate the corrective actions into the Transportation Improvement Plan to assure compliance with Title VI.

Procedures

CAT will maintain procedures identified in this Plan to assure continued compliance with Title VI. These procedures will allow for comparing the level and quality of transit services against overall system averages. These procedures will document both the Level of Service Methodology and the Quality of Service Methodology used.

Public Information

In compliance with the requirement of the U.S. Department of Justice, the Department of Transportation, and the FTA, the following information will be disseminated and made available to the public upon request.

1. This plan and its requirements will be made available to the public upon request and will be available for review from the CAT website or in the CAT offices during regular business hours.
2. CAT will maintain records and submit compliance reports and assessments as required and make available such information to the general public upon request.

Filing a Discrimination Complaint

Collier County has provided procedures for filing complaints alleging discrimination on the basis of race, color, or national origin. Information on how to file a complaint is provided through the County Manager's Office of Equal Employment Opportunity, on CAT's website, and appears routinely on publications, interior bus cards, schedules, and on other materials available at public facilities. The information is also posted at the CAT administrative facility, at the Transfer terminals, and at other public facilities frequented by transit users such as libraries and community health centers.

Any person who believes that he or she, individually or as a member of any specific class of persons, has been subjected to discrimination on the basis of race, color, or national origin may file a written complaint with the FTA or the Secretary of Transportation. Persons are encouraged to first notify Collier County and file a complaint through the local office.

Limited English Proficiency

Executive Order 13166, *Improving Access to Services for Persons with Limited English Proficiency (LEP)*, was signed by President Clinton in August 2000. The Executive Order directs each federal agency to examine the services it provides and develop and implement a system by which LEP persons can meaningfully access those services. Failure to ensure opportunities for LEP persons to effectively participate in or benefit from federally-assisted programs may constitute national origin discrimination.

As a public transportation provider receiving federal funding from the U.S. Department of Transportation (DOT), CAT has a responsibility, under Title VI of the Civil Rights Act of 1964, to take reasonable steps to ensure that LEP persons have meaningful access to benefits, services, information, and other important programs and activities provided by CAT. LEP persons include individuals who have a limited ability to read, write, speak, or understand English. Many LEP persons rely on public transit services to achieve greater mobility and access to employment. Creating a positive environment for LEP persons may help to retain existing riders and attract new riders who otherwise would be excluded

based on language barriers. The DOT developed LEP guidance to assist public transit agencies in determining the best ways to comply with the statutory and regulatory LEP obligations. Transit agencies should conduct an LEP needs assessment based on the four-factor framework.

Four-Factor Framework

The four-factor framework includes four steps that assist transit agencies in developing a cost effective mix of language assistance measures. The factors that should be considered during the LEP needs assessment include:

1. The number and proportion of LEP persons served or encountered in the eligible service population;
2. The frequency with which LEP persons come into contact with the agency's programs, activities, and services;
3. The importance of the programs, activities, and services to LEP persons; and
4. The cost and resources available.

Collier Area Transit (CAT) Service Area

CAT provides over 1.1 million trips each year within the Collier County area. CAT is continually providing information to LEP residents of the community. Over 15 percent of the population residing in the CAT service area who are five years of age or older speak a language other than English. Due to the number of persons speaking a language other than English, CAT has translated the system maps into Spanish and provides instructive information to the public on its website in Spanish and Creole. The County website also has a device that allows viewers to translate the information on the website into Spanish, Creole, French and German. In addition, CAT provides printed information in Spanish at all stations and public locations disseminating CAT information.

CAT has developed this LEP Plan to document the steps being taken to provide assistance for LEP persons seeking meaningful access to CAT programs and to identify any additional LEP needs that are not being met through the existing information dissemination processes.

The number and proportion of LEP persons within the CAT service area was assessed using a mix of data sources, including the 2010 Census and the 2012 American Community Survey (ACS) 5 year estimates. The ACS data were reviewed to determine the number of people who speak English "very well" and "less than very well" for each Census tract within the CAT service area. Collier County Public Schools (CCPS) enrollment data were also assessed to determine the percentage of LEP children who may encounter CAT services. In addition, community organizations that serve LEP persons can provide input that confirms the data collected from other sources.

The geographic boundaries of the CAT service area and the existing routes that have been modified based on recent recommendations from the CAT staff are presented in Maps # and #. The 2010 Census tracts are depicted in <color>. All Census tracts with an LEP population percentage above the Collier County average (#%) are depicted in yellow.

Table 10 presents the total population and LEP populations for all Census tracts within the CAT service area. In addition, Table # details the number of persons in each of the four major language categories who speak English “less than very well.” These four major language categories include Spanish, Indo-European, Asian-Pacific Island, and all other populations.

Table 10:

If we can get the Census Tract data by tract insert here

Table # presents a summary of the total number and percentage of LEP persons for all census tracts located within the CAT service area. The LEP population accounts for approximately 10 percent of the total population. Figure 1 illustrates the distribution of all populations within the CAT geographic boundaries.

Table 13: Summary of Limited English Proficiency Persons within the CAT Service Area
(information to be inserted)

Total Census Tract Population	Total LEP Spanish Population	Total LEP Indo-European Population	Total LEP Asian-Pacific Island Population	Total LEP All Other Population	Total LEP Population

Figure 1: Distribution of Limited English Proficiency Persons within the CAT Service Area
(Graph and information to be inserted)

CAT Service Area Population Distribution

According to the latest statistics provided by CCPS, the total number of enrolled LEP students is more than #. CCPS students represent # countries and speak approximately # different languages. Spanish-speaking students represent the largest LEP population, followed by Creole-speaking Haitian students, and then Portuguese-speaking students. These students and their parents may rely on public transit for transportation to school and other activities.

Table 14 presents the percentage of LEP students enrolled at CCPS.

Table 14: Percentage of Limited English Proficiency Students within Collier County Public Schools
(data to be inserted in table)

Total CCPS Student Population	Total LEP Student Population	Percentage of LEP Students

The number of CCPS Limited English Proficiency students very closely mirrors that of the overall population in Collier County over the age of five.

Language Assistance Measures

The frequency with which LEP persons could or have come into contact with CAT programs, activities, and services can be measured based on the analysis presented in the previous section. The more frequent the contact with LEP persons, the greater the need to provide language enhanced services. The following measures were implemented by CAT to provide assistance to LEP persons and to document and measure the frequency of contact with LEP individuals.

Implemented Measures

CAT Website – Collier County’s website had previously included the capability to translate information on the website into Spanish. As of October 2013, the Collier County website was enhanced to allow the text to be translated to German, French, and Creole by clicking on the preferred language. In addition, the website provides customers with general information about CAT, including fares and passes, announcements, ADA and TD services, and “How to Ride.”

CAT Transfer Stations – Paper materials provided at CAT Transfer stations, including “How to Ride” guides, fares, and schedules are available in both English and Spanish versions. CAT documents the number of printed materials requested in languages other than English to determine the frequency of LEP persons using the system.

In addition to schedules and route maps, rider alerts and notices posted at the stations are translated to Spanish and placed next to the English versions in visible locations.

Printed Materials – Spanish translations of the “How to Ride” guide and other notices and information are provided at all locations where bus passes are sold, including libraries and other public places that post CAT information. CAT staff refreshes the printed materials monthly or as needed and monitors the frequency of requests for other than English materials. In addition, whenever possible, CAT utilizes pictographs to display information and instructions.

Announcements – Safety and security announcements are provided in both English and Spanish. Radio announcements, including public service messages, rider alerts, and ads promoting transit are broadcast on both English and Spanish stations. CAT staff continues to monitor the need to provide safety and security announcements in other languages and opportunities to provide public announcements on radio stations of other languages.

Press and Public Relations – All meeting notices, press releases, and public service announcements are translated into other languages as requested or needed based on documentation of previous requests.

On-board Surveys – Future service planning efforts often include the dissemination of customer demographic and opinion surveys to collect information about who is using the service and how the service could be improved for those persons. CAT disseminates on-board surveys in both English and Spanish to ensure that Spanish-speaking customers have meaningful access to provide input in the planning process. During the 2012 CAT COA process, a total of 2,500 on-board surveys were distributed in English, Spanish and Creole. Every passenger over the age of 15 received a survey. A total of 1,033 completed surveys were analyzed, which equaled a response rate of 41 percent, which exceeded the projected response rate of 25 percent.

CAT also completes periodic surveys to explore the need for providing surveys in languages other than English and Spanish. CAT staff is made available to assist with completing surveys and taking public comment.

Planning Meetings – According to the Collier MPO LEP Plan, the MPO advertises the availability of Spanish interpreter services, free of charge, at least seven (7) days prior to MPO Board and Committee meetings, workshops, forums, or events that will be noticed on the MPO website, in meeting notices (packets), and using the following additional tools as appropriate:

- Signage
- Public outreach materials
- Community-based organizations
- Local newspapers
- Collier County Library System

CAT representatives are members of many of the MPO Committees, including the Technical Advisory Committee, the Congestion Management System/ Intelligent Transportation Systems (CMS/ITS), the Local Coordinating Board, and the Pathways Advisory Committee. Therefore, Spanish interpreter services are available at many of the meetings where CAT staff may participate in the transportation planning process.

Customer Service – CAT drivers complete the driver training program as new employees and participate in refresher training courses annually. As part of the training, drivers are reminded of the importance of conveying information to passengers, particularly assisting passengers with using the transit system, especially those with language or other barriers. CAT also makes every effort to ensure that its customer service telephone lines are staffed with persons who speak other languages. All CAT personnel complete customer service training with periodic refreshers to underscore the importance of providing assistance to persons with language and other barriers.

Community Outreach – CAT makes available persons who can serve as translators at all community outreach meetings. CAT strives to ensure the competency of interpreters and translation services per the DOT LEP guidance.

Additional Language Assistance

CAT recognizes that based on the LEP population shown as part of the Census and CCPS analysis, special effort is necessary to communicate important transit information to some of its riders in languages other than English. In order to meet this need, CAT will continue to conduct the activities listed previously and enhance its LEP outreach by taking the additional steps listed below.

Community Outreach – Community organizations that serve LEP persons within the CAT service area Census tracts where the LEP populations are greater than the county average have the ability to confirm the statistical analysis completed using the Census data. During various transit planning processes, community organizations will be asked to provide information pertaining to the population(s) that they serve. The questions will focus on the number of people served, the languages spoken, age, gender, education levels, expectations for public services, public transportation inquiries, most frequently traveled destinations, locations that are difficult to access, transit needs, and travel patterns. The key concerns mentioned by the community organizations will be reviewed by CAT in an effort to improve the provision of service to LEP persons. A listing of community agencies in Collier County is presented in Appendix F.

CAT will also present outreach materials to schools in an effort to provide transit service information to LEP students and their parents who may rely on public transportation to access school and other activities.

Staff Training and Development – CAT will continue to train staff on the importance of assisting LEP persons with obtaining information and accessing the transit system. Staff will be provided with LEP policies and procedures. In addition, all CAT staff will complete customer service training and be provided guidance on working effectively with in-person and telephone interpreters.

Signage – CAT will continue to post signs to communicate language services available at initial customer contact points. As additional resources permit, CAT will enhance the availability of outreach documents, brochures, booklets, and recruitment materials in multiple languages.

Planning – CAT will participate in annual updates to the County’s evacuation and disaster preparedness plans to ensure that the plans include the needs of all community members and especially those in minority populations.

LEP Resources

Based on the current resources available, CAT is providing the most cost-effective means of delivering competent and accurate language services within its service area. CAT will continue to monitor the need for additional language assistance, including the need for greater dissemination of information in the existing languages provided and/or translation to new languages. If additional services are needed, CAT will determine which additional language assistance measures are cost-effective and feasible for implementation based on the current and projected financial resources.

CAT will continue to monitor the costs associated with the existing language assistance measures and the costs associated with implementing enhanced language assistance measures, including an estimate

of the number of staff and the percentage of staff time necessary to provide the current and proposed LEP resources.

Environmental Justice

Executive Order 12898, *Federal Actions to Address Environmental Justice (EJ) in Minority and Low-Income Populations*, was signed by President Clinton on February 11, 1994. The Executive Order and accompanying Presidential Memorandum focus federal attention on the environmental and human health conditions in minority and low-income communities, enhance efforts to assure nondiscrimination in federal programs affecting human health and the environment, and promote meaningful opportunities for access to public information and for public participation in matters relating to minority and low-income communities and their environment.

As part of the grant agreements between CAT and the FTA, CAT is required to facilitate compliance with Executive Order 12898 and DOT's Implementing Order 5610.2, Environmental Justice in Minority Populations and Low-Income Populations. As a recipient of FTA funds, CAT incorporates environmental justice principles into every stage of its public transportation decision-making process. Key components to integrating principles of environmental justice into transit planning include:

1. Fully engaging EJ populations in the public transportation decision-making process;
2. Determining whether EJ populations would be subjected to disproportionately high and adverse human health or environmental effects of a public transportation project, policy, or activity;
3. Avoiding, minimizing, or mitigating disproportionately high and adverse human health or environmental effects of a public transportation project, policy, or activity.

CAT EJ Outreach

CAT provides outreach opportunities that have been designed to ensure that all persons, including low-income, minority, and LEP persons, have meaningful access to programs, services, and information. The public involvement process used by CAT is similar but separate from the Collier

MPO's Public Involvement Plan. Although CAT utilizes its PTAC for outreach it also brings transit related items through the MPO committees. As noted previously, this plan may be viewed in its entirety at <http://www.colliergov.net/CAT>.

Outreach activities that are conducted as part of the TDP, the COA, and the Locally Coordinated Human Services Transportation Plan (LCHSTP) have strived to obtain input from all persons in the community, both users and non-users of the transit system. A variety of public involvement techniques have been used including on-board surveys, transit user surveys, interviews, workshops for human service agency representatives, transit user workshops, and public workshops.

Meetings are often scheduled at multiple times throughout the day to provide greater opportunities for participation based on schedules.

CAT has compiled an extensive contact list of representatives from a variety of agencies that represent the disabled, low-income, and elderly. In addition to the general public and the MPO committees, persons on the contact list are notified of all public outreach activities.

Determination of Disproportionately High Effects on EJ Populations

An EJ analysis starts with determining whether there are any minority or low-income populations potentially impacted by the activity. After assessing the proportionality of impacts of the activity, the burdens and benefits of the activity experienced by EJ populations should be compared to those experienced by non-EJ populations. This section describes CAT's practices for complying with Title VI and evaluating whether or not an activity will impact EJ populations.

Fares

Prior to any fare change, CAT conducts fare equity analysis to review the existing fare structure based on industry practice, community standards, and fiscal responsibility. The CAT 2012 Fare Study included a specific section to address CAT's commitment to Title VI Compliance regarding equity evaluation of service and fare changes. The study can be used as a guide for implementing a fare policy and structure, establishing an acceptable fiscal policy, and developing a model for future evaluation of CAT's fare structure. Prior to implementing any additional fare increases, CAT will conduct an equity analysis to assess the potential impacts on EJ populations.

Shelters

In the past year, CAT has installed 5 new bus shelters and 3 benches. CAT is in the process of a shelter study to evaluate the design as well as adding features (increased size and adding sides) to enhance the protection of the passengers using the system. Currently there are 66 shelters installed at the 533 stops throughout the system. An additional 44 shelters are planned for construction once the shelter study is completed and a design is finalized. Shelter sites are selected based on the number of people boarding and alighting routes, the availability of right of way, and the need to upgrade the shelter accessibility. APC data are utilized to determine stop-level ridership. Placing shelters in the highest use locations ensures access to more customers, while maximizing customer service and fiscal investments.

CAT evaluates the number of passenger shelters located throughout Collier County in comparison to the minority census tracts to guarantee equitable distribution of amenities. **Map 3** depicts the location of shelters and the minority Census tracts. Of the 66 existing shelters, # shelters or # percent are located within minority Census tracts. **Map 4** depicts the location of shelters and the Census tracts below the poverty level. Of the 66 existing shelters, # shelters or # percent are located within census tracts below the poverty level. These shelters provide a benefit to EJ persons accessing transit services.

Transit Service

CAT evaluates the availability of full or partial transit service within the County's minority and low-income Census tracts. Of the # Census tracts containing populations below the poverty level, all but # have full or partial transit service. Of the # minority Census tracts within ¼-mile of the existing fixed-route, all but # have full or partial transit service. The majority of low-income and minority Census tracts without transit service and many tracts with just one route are located in the eastern portion of Collier County, an area with rural characteristics and low densities not ideal for fixed-route service. **Map 1 and**

1B presented in the “Program Specific Requirements” section of this report show the County’s minority Census tracts and the CAT fixed-route and ADA service areas. Map 5 and 5B display the County’s below poverty Census tracts with the CAT fixed-route and ADA service areas.

Construction Projects

CAT Operations and Transfer Station – 8300 Radio Road

The existing CAT administration facility is located on the south side of Radio Road, east of Santa Barbara Boulevard within the Gallman Olds Dealership Planned Unit Development (PUD). On March 23, 2010, Collier County was granted a conditional use which allowed CAT to utilize the site as a secondary transfer center. Collier County resolution 2010-70 authorizing the conditional use is attached for reference. Collier County commissioned an environmental assessment for the future development of the site which evaluated the impacts and feasibility of developing the site. The assessment also addressed EJ and Title VI compliance, including analysis of potential impacts on minority communities and minority-owned businesses. CAT held public hearings and issued a public notice. All public comments were considered and included in the environmental document submitted to the FTA on October 10, 2011. FTA reviewed the document and submitted and issued a final declaration of Categorical Exclusion Concurrence on March 16, 2012.

The proposed 8300 Radio Road passenger transfer facility will reconfigure the existing site facilities to provide a passenger transfer facility in addition to the administrative and operational services currently provided. The proposed conceptual site plan illustrated on Figure 1 illustrates all future improvements.

The facility will function as a transfer point for public transportation services, including local bus, express bus, and the potential for alternative transportation modes for passengers. Transfer site improvements will include sawtooth bus bays with sheltered boarding platforms that will allow four buses to stage at one time. It is anticipated that numerous passenger amenities involving emerging technologies will be implemented in the transfer Station.

Future building improvements will include constructing a secure ticketing area, accessible public restrooms, information kiosks, a secure farebox drop location, and an elevator to provide access to the second floor.

The maintenance and service facilities will not undergo any significant renovations. A portion of the maintenance building is currently being utilized for vehicle maintenance and the other bays are being used as a miscellaneous storage area. This area will be improved to serve as an expanded vehicle maintenance area. The storage area will be moved when the vehicle maintenance area is expanded. The roof may need to be raised to allow for larger bay doors to accommodate buses. A mezzanine may be added in part of the maintenance building for additional storage. The traffic pattern will be addressed as part of the design and may require slightly modifying the maintenance building to allow bus traffic to circulate around the building. A permanent bus washing facility and fueling island will be added to the proposed site which will require reconfiguring the bus circulation and the addition of an egress driveway.

Figure 1



CAT is committed to monitoring the effects of this project on minority and low-income communities, and will continue to document compliance. Monitoring will include:

- The potential impact on minority communities and minority-owned businesses during and after construction.
- The potential of negative environmental impacts, such as noise, air, or water pollution.
- A detailed list of minority-owned businesses and households that will be affected by the construction project.
- The potential for significant changes or impacts on minority communities such as increased traffic, reductions in the amount of available parking, and other impacts as warranted.
- The applicability of relocation programs and/or other measures adopted to mitigate any identified adverse social, economic, or environmental effects of the proposed construction project.

CAT Intermodal Transfer Facility

CAT was operating its main transfer facility in a parking lot located adjacent to the Collier County Museum on the Collier County Government Center property. The transfer site was temporary while the County constructs a permanent transfer facility nearby on the government campus.

CAT was awarded two grants to design and build a permanent multimodal passenger transfer station at the Collier County Government Center adjacent to US 41 (Tamiami Trail) as shown in Figure 2. The Florida Department of Transportation (FDOT) has partnered with Collier County by providing an

Intermodal Hub Capacity Grant in the amount of \$1.3 million and a Transportation Regional Incentive Program (TRIP) grant in the amount of \$1.4 million. Construction of the permanent Intermodal Transfer Facility was completed in July 2013. The facility was creatively built as a component of the existing parking garage and provides a place for passengers to come out of the elements. The facility consists of six bus bays, air-conditioned and exterior covered waiting areas, restrooms, customer service area, and ATM machine, and real-time route and scheduling information. The Intermodal station was constructed in an area with a proportionately high concentration of low income populations and households with no vehicles.

Figure 2



Avoiding, Minimizing, or Mitigating Disproportionate Impacts

From a public transportation perspective, examples of actions that may have one or more adverse effects include service cuts, changes, or restructuring; building a new rail line or extending an existing rail line; establishing a multi-modal transfer station; or increasing fares. After consideration of the potential effects of an activity on the EJ populations, CAT reviews each activity to determine whether human health or environmental effects on an EJ population can be avoided, minimized, or mitigated. In some cases, while a service change or fare increase does impact EJ populations, the change is necessary to avoid a more severe impact due to budgetary constraints and increasing operational costs. The impacts of one activity may help to avoid another activity (i.e., increasing fares to avoid service reductions) or consequently result in a benefit to the community (i.e., additional mobility resulting from the construction of a new transfer facility). At all times, CAT's main goal is to avoid disproportionate impacts while maximizing public transit access. Activities that will result in a disparate impact will only be carried out if:

1. A substantial need for the program, policy, or activity exists that is in the public interest; and
2. Alternatives would have more severe adverse effects than the preferred alternative.

Title VI Program Complaint Procedures

Any person who believes that he, or she, or any specific class of persons, has been subjected to discrimination or retaliation prohibited by the Title VI of the Civil Rights Act of 1964, as amended, and related statutes, under CAT's program of transit service delivery or related services or programs is encouraged to file a report with Collier County's Office of Equal Employment Opportunity at:

Collier County Office of Equal Employment Opportunity
Alternative Transportation Modes Department
3299 East Tamiami Trail, Suite 103, Naples, Florida, 34112
Telephone (239) 252-5832, fax (239) 252-6610
www.colliergov.net/CAT

CAT encourages the filing of a complaint in writing and includes a name, addresses, and other information so that you may be contacted in regards to the matter. Please see the Title VI Complaint Form. You are asked to provide information regarding:

- How, why, when, and where you believe you were discriminated against, including the location, names, and contact information for witnesses. If the alleged incident occurred on a CAT vehicle, provide the bus, the date, time of day, and bus number, if available.
- You must sign your letter of complaint. All complaints will be investigated promptly. Reasonable measures will be undertaken to preserve any information that is confidential. The EEO Officer will review every complaint, and when necessary, begin the investigation process. At a minimum, the investigation will:
 - Identify and review all relevant documents, practices, and procedures;
 - Identify and interview persons with knowledge of the Title VI violation, including the person making the complaint, witnesses, or anyone identified by the complainant; anyone who may have been subject to similar activity or anyone with relevant information.

Upon completion of the investigation a final report will be prepared. If a Title VI violation is found to exist, the Collier County Alternative Transportation Modes Department will take remedial steps, as appropriate and necessary, immediately.

The Complainant will also receive a final report together with any remedial action plan. If no violation is found and the complainant wishes to appeal the decision, the complainant may contact the Federal Transit Administration as follows:

Federal Transit Administration Office of Civil Rights
Attention: Title VI Program Coordinator
East Building, 5th Floor - TCR
1200 New Jersey Ave., SE
Washington, DC 20590

Complainants may also file their initial Title VI complaints directly to the Federal Transit Administration, no later than 180 days after the date of the alleged discrimination attention Title VI Program Coordinator, Federal Transit Administration Office of Civil Rights, East Building, 5th Floor – TCR, 1200 New Jersey Ave., SE, Washington, DC 20590. Complaints must be made by completing and signing the Title VI Complaint form located at http://www.fta.dot.gov/civilrights/12328_5104.html. CAT's Title VI notice is presented as Appendix G of this plan.

Title VI Complaint Form

Before completing this form, please read the CAT Title VI Complaint Procedures located on our website or by visiting our office.

The following information is necessary and required to assist in processing your complaint. If you require assistance in completing this form, please contact us at the phone number listed. Complaints must be filed within 180 calendar days after the date alleged discrimination occurred.

Complainant's Name: _____

Address: _____

City: _____ State: _____ Zip Code: _____

Telephone Numbers: Home _____ Work: _____ Cell: _____

E-mail Address: _____

Date of alleged discrimination: _____

Which of the following best describes the reason you believe the discrimination took place? Was it because of your: Race/Color: _____ National Origin: _____

Person discriminated against (if someone other than complainant). Please confirm that you have obtained the permission of the aggrieved party if you are filing on behalf of a third party.

Name: _____

Address: _____

City: _____ State: _____ Zip Code: _____

Have you filed this complaint with any other federal, state, or local agency?

- Yes
- No

If yes, check each box that applies:

- Federal Transit Administration
- Department of Transportation
- Dept. of Justice
- Equal Opportunity Commission
- Other: _____

Appendix A
Certifications and Assurances

Appendix B
Sub-recipient Monitoring Form

Appendix C

Collier Area Transit

Route Fare or Service Change Policy

In accordance with the Federal Transit Administration (FTA) Circular 4702.1A Title VI of the Civil Rights Act of 1964, Transit providers within service areas containing more than 200,000 residents to evaluate service and fare changes and their corresponding impacts to ensure transit service is planned operated and distributed in an equitable manner without regard to race, color or national origin. The required policies fall in the following three categories:

- Major Service Change Policy
- Disparate Impact Policy
- Disproportionate Burden Policy

Major Service Change Policy

The FTA requires that funding recipients prepare and submit service and fare equity analyses for public comment in consideration of proposed major service or fare changes. The purpose of this policy is to establish thresholds that define a “major service change”, and the definition of an adverse impact created by a “major service change”.

As contained within this policy, a major service change is defined as meeting one of the following criteria:

1. Proposed service expansions and reductions including all routing and timetable changes remaining in effect after 12 months that exceed 25 percent of the current configurations.
2. Total elimination of service on a specific route.
3. All proposed fare changes, excluding ride free promotional events and temporary fare reductions, that in effect after 6 months.

If a proposed major service change falls within one of the three categories above, CAT will conduct a Title VI service and/or fare equity analysis for review and consideration by the Board of County Commissioners and the public prior to implementing changes.

An adverse effect is defined as a major geographical or time-based reduction in service which may include, but is not limited to, span of service changes, frequency changes, route segment elimination, re-routing, or route elimination. CAT shall consider the degree of adverse effects in the form of an equity analysis when planning major service changes.

The following types of service changes are exempt:

- Minor route alignment, frequency, span, or time point adjustments;
- Routing or bus stop changes due to temporary road detours caused by construction, maintenance, closures, emergencies, labor disruptions or strikes, fuel shortages, or safety concerns;
- Any temporary service addition, change, or discontinuation of a route with less than twelve months of operation;
- Changes on special service routes serving sporting events, special events, or service contracted through other cities or agencies;
- Any service change that does not meet the definition of a major service change described above.

Disparate Impact Policy

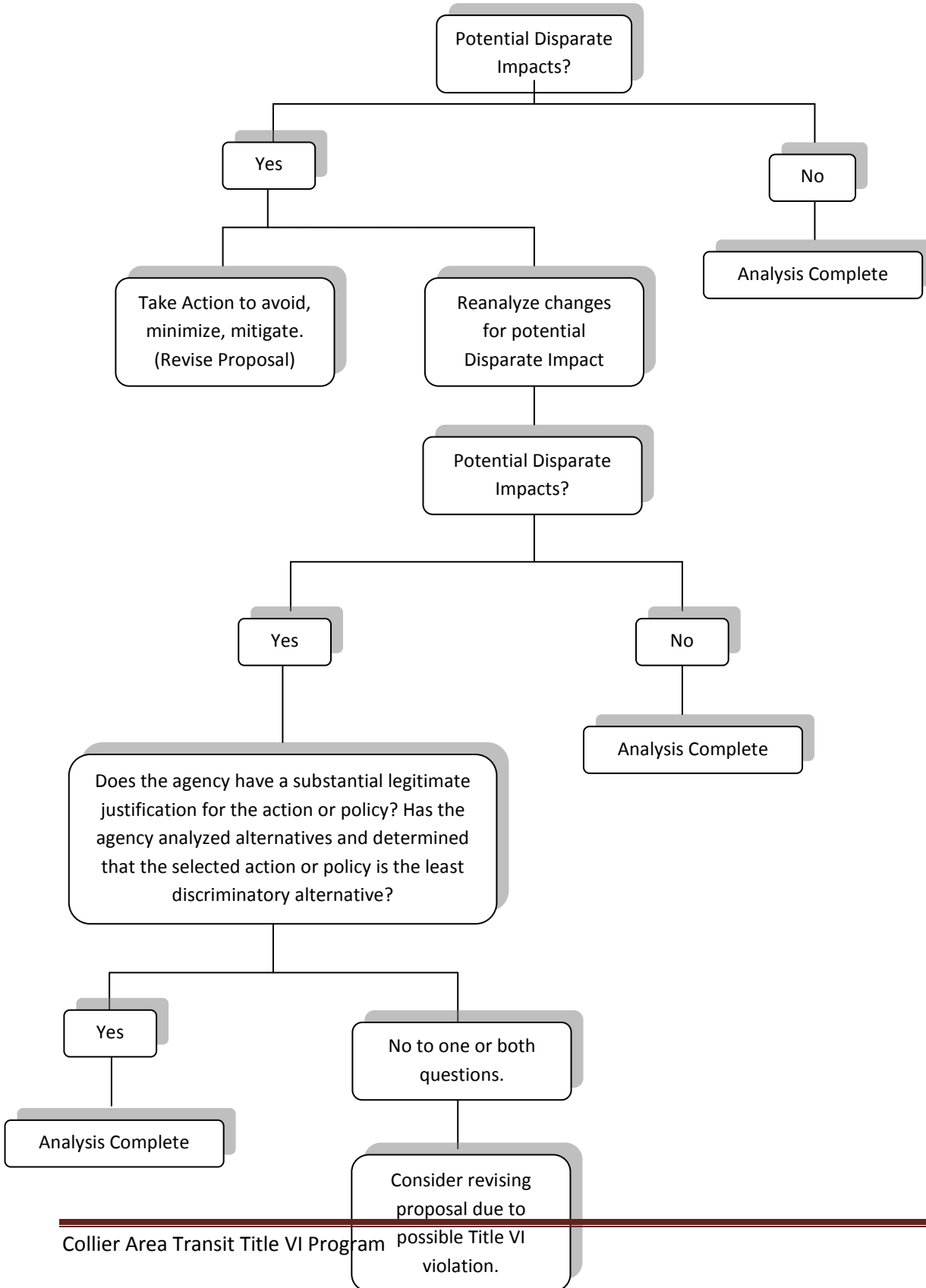
The purpose of this policy is to establish a threshold which identifies when adverse effects of a major service or fare change are borne disproportionately by minority populations. For the purpose of this policy, a minority population is defined as any readily identifiable group of minority persons who live in geographical proximity, and if circumstances warrant, geographically dispersed/transient populations (such as migrant workers or Native Americans) who will be similarly affected by a proposed program, policy, or activity.

A “disparate impact” is defined as occurring when an adverse effect of a major service or fare change on minority populations is at least 20 percent greater than the adverse effect on the average minority population of CAT’s service area. In order to identify a potential impact, CAT will follow the process illustrated within the flow chart below.

Should a proposed major service change result in a disparate impact, CAT will consider modifying the proposed change to avoid, minimize, or mitigate the disparate impact of the change. The modified proposed change due to potential disparate impacts will then be reanalyzed in order to determine whether the modifications actually removed the potential disparate impacts of the changes.

If the CAT chooses not to alter the proposed changes, they may implement the service or fare change if there is substantial legitimate justification for the change and it can be shown that there are no alternatives that would have less impact on the minority population and would still accomplish program goals.

**Title VI Service and Fare Equity Analysis Process
to Identify Potential Disparate Impacts**



Disproportionate Burden Policy

The purpose of this policy is to establish a threshold which identifies when adverse effects of a major service or fare change are borne disproportionately by low-income populations. For purposes of this policy, low-income population is defined as any readily identifiable group or households who are at or below 150 percent of the U.S. Department of Health and Human Services Poverty Guidelines listed below.

2013 POVERTY GUIDELINES FOR THE 48 CONTIGUOUS STATES AND THE DISTRICT OF COLUMBIA

Persons in family/household	Poverty guideline
1	\$11,490
2	15,510
3	19,530
4	23,550
5	27,570
6	31,590
7	35,610
8	39,630

For families/households with more than 8 persons, add \$4,020 for each additional person.

Source: Department of Health and Human Services, Office of the Secretary, Annual Update of the HHS Poverty Guidelines (Federal Register / Vol. 78, No. 16 / Thursday, January 24, 2013 / Notices)

A “disproportionate burden” is defined as occurring when the low-income population adversely affected by a major service or fare change is 20 percent more than the average low-income population of CAT’s service area.

Similar to the approach in identifying a potential disparate impact, should a proposed major service or fare change result in a disproportionate burden, CAT will consider modifying the proposed change to avoid, minimize, or mitigate the disproportionate burden of the change. The modified proposed change due to a potential disproportionate burden will then be reanalyzed in order to determine whether the modifications actually removed the potential disproportionate burden of the changes.

If the CAT chooses not to alter the proposed changes, they may implement the service or fare change if there is substantial legitimate justification for the change and it can be shown that there are no alternatives that would have less impact on the low-income population and would still accomplish program goals.

Appendix D

Transit Development Plan (TDP) Capacity Analysis

Appendix E

Transit Development Plan (TDP) Peer Review

Appendix F
List of Community Agencies

LCA, Smart Growth, JFCS, Catholic Charities, Refugee Coalition, etc.

Appendix G

CAT Title VI Notice

Collier Area Transit Title VI Notice

Collier Area Transit (CAT) hereby gives public notice of its policy to assure full compliance with Title VI of the Civil Rights Act of 1964. CAT is committed to ensuring that no person is excluded from participation in, or denied the benefits of its services on the basis of race, color or national origin.

Any person who believes that they have, individually, or as a member of any specific class of persons, been subjected to discrimination on the basis of race, color, or national origin may file a complaint with CAT.



For more information visit our website at www.colliergov.net/CAT or contact CAT at 3299 East Tamiami Trail, Suite 103, Naples Florida 34112 or 239-252-5832