**TITLE VI COMPLIANCE REVIEW**

**OF THE**

**Kansas City Area Transportation Authority**

**(KCATA)**

**Kansas City, MO**

**Final Report**

**March 2011**

**Prepared For**

**U.S. DEPARTMENT OF TRANSPORATION**

**FEDERAL TRANSIT ADMINISTRATION**

**OFFICE OF CIVIL RIGHTS**

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1. GENERAL INFORMATION

Grant Recipient: Kansas City Area Transit Authority

City/State: Kansas City, MO

Grantee No: 1827

Executive Official: Mr. Mark Huffer

General Manager

Kansas City Area Transportation Authority

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Site Visit Dates: June 8-10, 2010

Compliance Review

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1. JURISDICTION AND AUTHORITIES

The Federal Transit Administration (FTA) Office of Civil Rights is authorized by the Secretary of Transportation to conduct civil rights compliance reviews. The Kansas City Area Transportation Authority (KCATA) is a recipient of FTA funding assistance and is therefore subject to the Title VI compliance conditions associated with the use of these funds pursuant to the following:

* Title VI of the Civil Rights Act of 1964 (42 U.S.C. Section 2000d).
* Federal Transit Laws, as amended (49 U.S.C. Chapter 53 et seq.).
* Uniform Relocation Assistance and Real Property Acquisition Policies Act of 1970, as amended (42 U.S.C. 4601, et seq.).
* Department of Justice regulation, 28 CFR part 42, Subpart F, “Coordination of Enforcement of Nondiscrimination in Federally-Assisted Programs” (December 1, 1976, unless otherwise noted).
* DOT regulation, 49 CFR part 21, “Nondiscrimination in Federally-Assisted Programs of the Department of Transportation—Effectuation of Title VI of the Civil Rights Act of 1964” (June 18, 1970, unless otherwise noted).
* Joint FTA/Federal Highway Administration (FHWA) regulation, 23 CFR part 771, “Environmental Impact and Related Procedures” (August 28, 1987).
* Joint FTA/FHWA regulation, 23 CFR part 450 and 49 CFR part 613, “Planning Assistance and Standards,” (October 28, 1993, unless otherwise noted).
* DOT Order 5610.2, “U.S. DOT Order on Environmental Justice to Address Environmental Justice in Minority Populations and Low-Income Populations,” (April 15, 1997).
* DOT Policy Guidance Concerning Recipients’ Responsibilities to Limited English Proficient Persons, (December 14, 2005).
* Section 12 of FTA’s Master Agreement, FTA MA 13 (October 1, 2006).
1. PURPOSE AND OBJECTIVES

#### Purpose

The Federal Transit Administration (FTA) Office of Civil Rights periodically conducts discretionary reviews of grant recipients and subrecipients to determine whether they are honoring their commitments, as represented by certification, to comply with the requirements of 49 U.S.C. 5332. In keeping with its regulations and guidelines, FTA determined that a Compliance Review of the Kansas City Area Transportation Authority (KCATA) Title VI Program was necessary.

The Office of Civil Rights authorized the DMP Group to conduct the Title VI Compliance Review of KCATA. The primary purpose of this Compliance Review was to determine the extent to which KCATA has met its General Reporting and Program-Specific Requirements and Guidelines, in accordance with FTA Circular 4702.1A, “Title VI and Title VI-Dependent Guidelines for Federal Transit Administration Recipients”. Members of the Compliance Review team also discussed with KCATA the requirements of the DOT Guidance on Special Language Services to Limited English Proficient (LEP) Beneficiaries that is contained in Circular 4702.1A. The Compliance Review had a further purpose to provide technical assistance and to make recommendations regarding corrective actions, as deemed necessary and appropriate. The Compliance Review was not an investigation to determine the merit of any specific discrimination complaints filed against KCATA.

#### Objectives

The objectives of FTA’s Title VI Program, as set forth in FTA Circular 4702.1A, dated May 13, 2007, “Title VI and Title VI-Dependent Guidelines For Federal Transit Administration Recipients” are to:

* Ensure that the level and quality of transportation service is provided without regard to race, color, or national origin;
* Identify and address, as appropriate, disproportionately high and adverse human health and environmental effects, including social and economic effects of programs and activities on minority populations and low-income populations;
* Promote the full and fair participation of all affected populations in transportation decision making;
* Prevent the denial, reduction, or delay in benefits related to programs and activities that benefit minority populations or low-income populations;
* Ensure meaningful access to programs and activities by persons with limited English proficiency. The objectives of Executive Order 13166 and the “DOT Guidance to Recipients on Special Language Services to Limited English Proficient (LEP) Beneficiaries” are for FTA grantees to take reasonable steps to ensure “meaningful” access to transit services and programs for limited English proficient (LEP) persons.

IV. BACKGROUND INFORMATIOn

The Kansas City Area Transportation Authority (KCATA) was formed with the signing of a Bi-State compact created by the Missouri and Kansas legislatures on December 28, 1965. Transit operations began on February 1, 1969. KCATA was governed by a 10-member Board of Commissioners, with five Commissioners from the State of Missouri and five from the State Kansas. Missouri Commissioners served four-year terms and were limited to two terms.

KCATA’s transit district encompasses seven counties in the two states. According to the 2000 Census, the population of KCATA’s service area was 1,672,418. KCATA serves Jackson, Cass, Clay, and Platte Counties in Missouri and Johnson, Wyandotte, and Leavenworth Counties in Kansas. Approximately 20% of the service area’s population was minority and 8.4 percent was low-income.

KCATA contracts annually with nine area communities to provide transit service throughout the region. The partner communities include the cities of Blue Springs, Gladstone, Independence, Kansas City, Lee’s Summit, North Kansas City, Raytown, Riverside in Missouri and Kansas City, Kansas. Each community pays KCATA for the level of transit service it decides to operate.

At the time of the Compliance Review, KCATA operated a network of 67 bus routes, with the majority of service located and scheduled in minority and/or low-income census tracts. Forty-one of the 67 routes (61%) were classified as “minority routes.” Most of KCATA’s service was located in the urban core of Kansas City (Jackson County), Missouri. In general, the KCATA route system was based on a design that used downtown Kansas City (CBD) as the system hub with routes radiating to and from various parts of the community. In the urban core, the street grid layout allowed routes to operate on north-south and east-west arterials—allowing multiple connections for on-street transfers between routes. Outside of the urban core, the street grid and population density was not present so these routes typically followed major arterials and parkways and connected with other routes at satellite transit centers in various suburban areas. Ridership was typically highest on routes serving the CBD and the urban core. In 2010, KCATA carried approximately 15 million passengers and averaged 52,000 passengers per weekday.

KCATA operated several types of transit services:

* Fixed-Route: KCATA operated local, express and community-based fixed-route service on 57 routes. These routes were provided with a mix of vehicles – ranging from full size (40’) transit buses to smaller buses of varying sizes.
* Bus Rapid Transit (BRT): KCATA operates one Bus Rapid Transit line (MAX) and was constructing a second line (Troost MAX) to open in late 2010. Other BRT services were being planned. The BRT services were arterial services utilizing 42’ low floor BRT vehicles operating on existing city streets.
* MetroFlex: KCATA operated demand-responsive, neighborhood circulator service in selected geographic areas of the metropolitan area. This service was paratransit type service for the general public provided primarily on a phone-in reservation basis. Currently there were nine MetroFlex routes.
* Share-A- Fare: Operated by a private contractor, this program providesddoor-to-door service to eligible elderly and persons with disabilities. The service was provided seven days a week from 5:00 am to 12:00 am. The fare for the ADA eligible trips was $2.50. The fare for the non-ADA trips was based on trip length, starting at $2.75 for a three mile trip. KCATA’s paratransit services were managed and scheduled by KCATA staff, but were operated under contract by Veolia Transportation.
* AdVantage Vanpool: KCATA administered a program of 27 vanpools operating commuter routes to employment centers such as Crown Center, KCI Airport, and the CBD of Kansas City, Missouri.

KCATA transit service was provided on weekdays from 4:30 a.m. to 1:00 a.m., and from 5:00 am to 12:00 am on Saturdays, Sundays, and holidays. KCATA operated from a single maintenance and administration facility in Kansas City, Missouri. KCATA had an active fleet of 252 buses for fixed-route and 13 for flex-route services. The peak requirement in April 2010 was 207 vehicles. KCATA’s operation of these services was governed by the terms of the agreement between the KCATA and Amalgamated Transit Union local 1287.

The basic adult fare for both fixed and flex bus service was $1.50 for local routes and $3.00 for commuter express routes. A reduced fare of 75¢ was offered to elderly, persons with disabilities, and Medicare Card holders at all times.

According to KCATA’s 2007 on-board survey, passenger and trip profiles indicated the following:

* 72% of passenger trips were work, school and medical trips
* 11% were shopping trips
* 74% used the bus at least five days /week
* 71% of passengers had an annual household income < $30,000
* 42% had no car available to them
* 17% share one family car

KCATA’s National Transit Database Report for FY2009 provided the following financial and operating statistics for each of its four service modes:

|  |  |  |  |  |
| --- | --- | --- | --- | --- |
| **Service Mode** | **Fixed-Route** **(MBDO)** | **Metroflex** **(DRDO)** | **Share-A-Fare (DRPT)** | **Vanpool** **(VPDO)** |
| Unlinked Passengers | 15,004,166 | 184,306 | 266,219 | 59,572 |
| Revenue Hours | 615,523 | 42,413 | 189,985 | 10,230 |
| Operating Expenses | $63,816,070 | $2,747,734 | $7,980,848 | $304,789 |

A demographic profile of the KCATA service area from the 2000 Census, as presented on the following table, showed that nearly 80 percent of the population was White, non-Hispanic, 13.4 percent was Black, nearly six percent was Hispanic and fewer than two percent as Asian.

**Racial/ Ethnic Breakdown of the Kansas City Area Transit Authority**

Source: 2000 U.S. Census

|  |  |  |  |  |
| --- | --- | --- | --- | --- |
| **Racial/ Ethnic Group** | Kansas City, MO | Kansas City,KS | Johnson County, KS | Total Service Area |
| **Number** | **Percent** | **Number** | **Percent** | **Number** | **Percent** | **Number** | **Percent** |
| White | 267,931 | 60.7 | 81,910 | 55.8 | 410,990 | 18.2 | 1,335,832 | 79.9 |
| Black | 137,879 | 31.2 | 44,240 | 30.1 | 11,780 | 9.8 | 224,689 | 13.4 |
| American Indian and Alaska Native | 2,122 | 0.5 | 1,103 | 0.8 | 1,481 | 0.3 | 8,034 | 0.5 |
| Asian | 8,182 | 1.9 | 2,527 | 1.7 | 12,768 | 2.8 | 28,447 | 1.7 |
| Hawaiian/Pacific Islander | 493 | 0.1 | 56 | 0.0 | 156 | 0.0 | 1,815 | 0.1 |
| Other Race | 14,158 | 3.2 | 12,645 | 8.6 | 6,976 | 1.5 | 40,003 | 2.4 |
| Two or More | 10,780 | 2.4 | 4,385 | 3.0 | 6,935 | 1.5 | 33,594 | 2.0 |
| Hispanic Origin[[1]](#footnote-1) | 30,604 | 6.9 | 24,639 | 16.8 | 17,957 | 4.0 | 91,615 | 5.5 |
| Total Population | **441,545** | **100%** | **146,866** | **100%** | **451,086** | **100%** | **1,672,418** | **100%** |

|  |  |  |  |  |  |  |  |  |
| --- | --- | --- | --- | --- | --- | --- | --- | --- |
| Low-Income | 61,958 | 14.3 | 24,820 | 17.1 | 15,323 | 3.4 | 140,071 | 8.4 |
| Limited English Proficiency | 25,632 | 5.8 | 14,647 | 10.0 | 25,531 | 5.7 | 122,570 | 7.3 |

V. SCOPE AND METHODOLOGY

#### Scope

The Title VI Compliance Review of KCATA examined the following requirements as specified in FTA Circular 4702.1A:

1. General Reporting Requirements and Guidelines - All applicants, recipients and subrecipients shall maintain and submit the following:
2. A summary of public outreach and involvement activities undertaken to ensure that minority and low-income people had meaningful access to these activities.
3. A copy of the agency’s plan for providing language assistance for persons with limited English proficiency that was based on the DOT LEP Guidance or a copy of the agency’s alternative framework for providing language assistance.
4. A copy of the agency procedures for tracking and investigating Title VI complaints.
5. A list of any Title VI investigations, complaints, or lawsuits filed with the agency since the time of the last submission. This list should include only those investigations, complaints, or lawsuits that pertain to the agency submitting the report, not necessarily the larger agency or department of which the entity is a part.
6. A copy of the agency’s notice to the public that it complies with Title VI and instructions to the public on how to file a discrimination complaint.
7. Program-Specific Requirements and Guidelines for Recipients Serving Large Urbanized Areas - all applicants, recipients and subrecipients that provide public mass transit service in areas with populations over 200,000 shall also submit the following:
8. Demographic Data;
9. Systemwide Service Standards and Policies;
10. Evaluation of Service and Fare Changes;
11. Monitoring Transit Service.

#### Methodology

Initial interviews were conducted with the FTA Headquarters Civil Rights staff to discuss specific Title VI issues and concerns regarding KCATA. Following these discussions, an agenda letter was sent to KCATA advising it of the site visit and indicating additional information that would be needed and issues that would be discussed. The Title VI Review team focused on the compliance areas that are contained in FTA Title VI Circular 4702.1A that became effective on May 13, 2007. These compliance areas are: (1) General reporting requirements and guidelines, and (2) Program-specific requirements and guidelines for recipients serving large urbanized areas.

The general reporting requirements and guidelines now include implementation of the Environmental Justice (EJ) and Limited English Proficiency (LEP) Executive Orders.

KCATA was requested to provide the following documents in advance of the site visit:

* Description of KCATA’s service area, including general population and other demographic information using the most recent Census data.
* Current description of KCATA’s public transit service, including system maps, public timetables, transit service brochures, etc.
* Roster of current KCATA revenue fleet, to include acquisition date, fuel type, seating configurations and other amenities.
* Description of transit amenities maintained by KCATA for its service area. Amenities include stations, shelters, benches, restrooms, telephones, passenger information systems, etc.
* KCATA Organization Chart.
* Any studies or surveys conducted by KCATA, its consultants or other interested parties (colleges or universities, community groups, etc.) regarding ridership, service levels and amenities, passenger satisfaction, passenger demographics or fare issues for its public transit service during the past three years.
* Summary of KCATA’s current efforts to seek out and consider the viewpoints of minority, low-income, and LEP populations in the course of conducting public outreach and involvement activities.
* A copy of KCATA’s four factor analysis of the needs of persons with Limited English Proficiency.
* A copy of KCATA’s plan for providing language assistance for persons with Limited English Proficiency that is based on the USDOT LEP Guidance.
* KCATA’s procedures for investigating and tracking Title VI complaints and documentation that the procedures for filing complaints are available to members of the public upon request.
* A list of any investigations, lawsuits, or complaints naming KCATA that alleges discrimination on the basis of race, color, or national origin during the past three years. This list must include:
* the date the investigation, lawsuit, or complaint was filed;
* a summary of the allegation(s);
* the status of the investigation, lawsuit, or complaint; and
* actions taken by KCATA in response to the investigation, lawsuit, or complaint.
* Copy of KCATA’s Notice to Beneficiaries of Protections Under Title VI.
* Documentation of efforts made by KCATA to notify members of the public of the protections against discrimination afforded to them by Title VI.
* Copies of any environmental justice assessments conducted for construction projects during the past three years and, if needed, a description of the program or other measures used or planned to mitigate any identified adverse impact on the minority or low-income communities.
* KCATA’s most recent Title VI Update that was submitted to FTA.
* A copy of KCATA’s demographic analysis of its urban beneficiaries. This can include either demographic maps and charts prepared or a copy of any customer surveys conducted since the last Title VI submittal that contain demographic information on ridership, or KCATA’s locally developed demographic analysis of its customer’s travel patterns.
* Quantitative system-wide service standards and qualitative system-wide service policies adopted by KCATA to guard against discriminatory service design or operations decisions.
* Documentation of KCATA’s methodology for evaluating significant system-wide service and fare changes and proposed improvements at the planning and programming stages to determine whether those changes have a discriminatory impact (Note: per Circular 4702.1A Chapter V part 4, this requirement applies to “major service changes” only and KCATA should have established guidelines or thresholds for what it considers a “major” service change to be). If KCATA has made significant service changes or fare changes in the past three years or is currently planning such changes, provide documentation of KCATA’s Title VI evaluations of the service or fare changes.
* Documentation of periodic service monitoring activities undertaken by KCATA, during the past three years, to compare the level and quality of service provided to predominantly minority and low-income areas with service provided in other areas to ensure that the end result of policies and decision-making is equitable service. If KCATA’s monitoring determined that prior decisions have resulted in disparate impacts, provide documentation of corrective actions taken to remedy the disparities.

KCATA assembled most of the documents prior to the site visit and provided them to the Compliance Review team for advance review. A detailed schedule for the three-day site visit was developed.

The site visit to KCATA occurred June 8-10, 2010. The individuals participating in the Review are listed in Section VIII of this report. An Entrance Conference was conducted at the beginning of the Compliance Review with KCATA senior management staff, an Equal Opportunity Specialist from the FTA Headquarters Office of Civil Rights and the contractor Review team. The Review team showed the participants a video on Title VI during the Entrance Conference. Also, during the Entrance Conference, the Review team explained the goals of the Review and the needed cooperation of staff members. A detailed schedule for conducting the on-site visit was discussed.

Following the Entrance Conference, the Compliance Review team conducted a detailed examination of documents submitted in advance of the site visit and documents provided at the site visit by KCATA staff on behalf of the agency.

**Site Visits**

With the assistance of KCATA staff, the Review team identified minority bus routes, non-minority bus routes, and a bus route that served both minority and non-minority areas. During the site visit, the Review team toured these routes in their entirety to observe ridership, vehicle assignment and condition, bus stops and transit amenities. The following are the routes toured and their respective characteristics with respect to transit ridership:

Minority routes:

* Route 71 – Prospect
* Route 101 – Minnesota/State
* Route 24 – Independence Avenue

Non-minority routes:

* Route 51 Broadway
* Route 142 – North Oak

Minority and non-minority route:

* Route 175 – 75th Street Service

As previously noted in the Background section of this report, KCATA contracted annually with nine area jurisdictions to provide transit service throughout the region. Each jurisdiction paid KCATA for the level of transit service it decided to operate each year. The Review team counted and observed buses, stops, benches, shelters, trash cans, park and ride lots and other conditions along the routes. The team found no disparate impacts regarding buses, shelters, benches and other basic amenities. The most glaring disparity was found at two transfer centers, one along a minority route (#101) and a similar center along a non-minority route (#142). Route 101 operated 13 morning trips and 18 afternoon/evening trips ending at 1:10 pm. The route included the Indian Springs Transit Center and park and ride lot, in a nearly abandoned mall parking lot. There were no benches or shelter, just concrete islands for passengers to board the buses. Six other KCATA bus routes also use this as a transfer point. Conversely, Route 142, which operated north from Kansas City, Missouri into North Kansas City, Kansas and contained two park and ride lots/transfer centers, one at the terminus of the route, the Boardwalk Square MetroCenter. This facility served four other KCATA bus routes and included shelters, benches and transit information. This route operated ten morning trips and 13 afternoon/evening trips ending at 7:32 pm.

Regarding this disparity in amenities, KCATA explained that the jurisdiction in which the Indian Springs Transit Center was located provided very little funding for transit and none to improve facilities. KCATA did advise the Review team that funds from an ARRA grant, which provided 100 percent funding, were being used to build a new Indian Springs Transit Center.

**VI. FINDINGS AND RECOMMENDATIONS**

The Title VI Compliance Review focused on KCATA's compliance with the General Reporting Requirements and Guidelines and the Program-Specific Requirements and Guidelines for Recipients Serving Large Urbanized Areas. This section describes the requirements, guidance and findings at the time of the Compliance Review site visit. In summary, deficiencies were identified in three of the 12 requirements of the Title VI Circular applicable to recipients serving large urbanized areas. The three areas of deficiency were *Language Access to LEP Persons, Submit Title VI Program,* and *Demographic Data*.

#### FINDINGS OF THE GENERAL REPORTING REQUIREMENTS AND GUIDELINES

1. Inclusive Public Participation

**Guidance:** *FTA recipients should seek out and consider the viewpoints of minority, low-income, and LEP populations in the course of conducting public outreach and involvement activities. An agency’s public participation strategy shall offer early and continuous opportunities for the public to be involved in the identification of social, economic, and environmental impacts of proposed transportation decisions.*

**Finding:** During this Title VI Compliance Review of KCATA, no deficiencies were found regarding KCATA’s compliance with FTA guidance for Inclusive Public Participation. Prior to the site visit, KCATA submitted a document entitled, “*KCATA Public Input Policy for Service Changes and Fare Increases.”* This document established procedures for soliciting public input specifically when KCATA is considering or planning service changes and/or fare increases. The document stated that public input would be solicited when there was a fare increase or service change likely to affect more than one-third of the riders utilizing the existing route(s) or service(s).

While the document did a good job of establishing procedures to solicit public input for service changes and fare increases, it did not offer early and continuous opportunities for the public to be involved in the identification of social, economic, and environmental impacts of proposed transportation decisions, as required by the Circular. The document did not describe any LEP efforts or outreach to minority and low-income communities.

During the site visit, the Review team requested examples of KCATA outreach efforts that were conducted in accordance with FTA Circular 4702.1A within the last year. KCATA indicated that while it did periodic outreach through community organizations, job fairs, community events, and minority newspapers, it could not produce a list of outreach events it had participated in, nor did it provide any examples of outreach via minority newspapers. At the exit conference, the KCATA Marketing Manager stated that KCATA would be able to document its efforts to meet in the minority and low-income communities, publish information in minority media, and conduct ongoing inclusive participation. The Review team’s meetings with community representatives generally supported the fact that KCATA attempted to include the public, however, one community representative felt KCATA needed to improve efforts in Hispanic communities.

Following the site visit, KCATA provided documentation of extensive public participation and outreach to minorities, low-income and limited English proficient communities during the period from January 2008 through July 2010. These efforts included:

* Public Hearings - 13 community meetings held to discuss fare and service changes – The meetings were held at various times of the day, including morning, evenings and weekends. Seven of the meetings were held in minority or low-income neighborhoods, four others were held at several city halls of the affected jurisdictions.
* Community Outreach – KCATA participated in over 100 events, including those identified as educational (schools), business and community events. Over half of the community events appeared to be located in minority communities.
* Paid Advertising and Press Releases – KCATA documented that it had spent over 50 percent of its advertising budget in the following minority publications:
	+ KC Hispanic News (Hispanic)
	+ Dos Mundos (Hispanic)
	+ The Call (African American)
	+ The Globe (African American)
1. Language Access to LEP Persons

**Requirement:** *FTA recipients shall take responsible steps to ensure meaningful access to the benefits, services, information, and other important portions of its programs and activities for individuals who are Limited English Proficient (LEP).*

**Finding:** During this Title VI Compliance Review of KCATA, deficiencies were found regarding KCATA’s compliance with FTA requirements for Language Access to LEP persons. Prior to the site visit, KCATA submitted a Draft LEP document prepared by Mid America Regional Council (MARC, the region’s MPO), a pocket route schedule translated into Spanish, and a snapshot of a page on the KCATA website explaining the agency’s non-English resources. While these documents suggested that KCATA was making an effort to address the needs of the LEP community in its service area, these efforts did not comply with FTA Circular 4702.1A, IV, 4.a and DOT Policy Guidance, as illustrated in the following table:

| **Elements Required for LEP Assessment and Language Access Plan** **(Per FTA C. 4702.1A, IV, 4. a. and DOT Policy Guidance)** |
| --- |
|  | **Included in KCATA’s****Plan**  | **Notes/Comments** |
| **Part A – Four-Factor Assessment** |
| 1. Demography –The number or proportion of LEP persons eligible to be served or likely to be encountered
 | Yes | LEP populations were adequately identified |
| 1. Frequency of Contact - the frequency with which LEP individuals come in contact with the program and/or activities
 | No | Undetermined by KCATA |
| 1. Importance - the nature and importance of the program, activity, or service to people's lives;
 | No | Undetermined by KCATA |
| 1. Resources - the resources available and costs
 | No | Undetermined by KCATA |
| **Part B - Develop Language Assistance Plan** |
| 1. Identification of LEP Persons
 | No | LEP Populations were adequately identified |
| 1. Language Assistance Measures
 | No | Undetermined by KCATA |
| 1. Training of Staff
 | No | Undetermined by KCATA |
| 1. Provide Notice to LEP Persons
 | No | Undetermined by KCATA |
| 1. Monitor and Update the LAP
 | No | Undetermined by KCATA |

The draft LEP document prepared by MARC did not mention KCATA. The document only addressed one element of the four-factor assessment – demography, and did not include, or mention the development of a language assistance plan, as required by FTA Circular 4702.1A.

The MARC Draft LEP document also stated that,

“…*the greater the number or proportion of LEP persons served or encountered, the more likely language services are needed. As a standard, MARC has determined that any area, where more than 5% of the population speaks a language other than English, will require additional resources to meet the needs of the LEP population.*”

The Review team communicated to KCATA that the threshold of more than five percent was not consistent with DOT guidance, which states that any area where five percent of the population or 1,000 people, whichever is less, is limited English proficient, language assistance services must be provided.

At the time of the site visit, KCATA could not identify or quantify how many route schedules were translated, nor could it explain the process by which routes were selected for schedule translation.

KCATA’s non-English resources posted on the agency’s website were written in English, with the exception of one paragraph. This particular paragraph communicated that KCATA had language interpreters available to assist riders and states that riders could call for more information. This same paragraph was provided in English higher up on the page and included a phone number to call. The Review team noted that the Spanish version of this paragraph located towards the bottom of the web page did not include the phone number.

KCATA had not developed any standard LEP policy or procedure that complied with FTA and DOT guidelines.

**Corrective Actions and Schedules:** Within 90 days, KCATA must submit to the FTA Equal Opportunity Specialist in FTA’s Headquarters Office of Civil Rights, documentation that it has conducted a LEP four-factor assessment and developed a Language Assistance Plan, as required by FTA Circular 4702.1A.

1. Title VI Complaint Procedures

**Requirement:** *FTA recipients shall develop procedures for investigating and tracking Title VI complaints filed against them and make their procedures for filing a complaint available to members of the public upon request.*

**Finding:** During the site visit of the Title VI Compliance Review of KCATA, no deficiencies were found regarding KCATA’s compliance with FTA requirements for Title VI Complaint Procedures. Prior to and during the site visit, KCATA demonstrated that procedures were in place to receive, identify, investigate, and respond to Title VI complaints, as required by FTA Circular 4702.1A. Further, the Review team noted that riders were adequately notified and provided with instructions on how to file a Title VI complaint. KCATA included information on how to file a Title VI complaint in the non-discrimination policy statement, on its website, and on bus placards that were posted on all KCATA buses. It was noted during the site visit that the complaint procedure, shown below, could potentially inhibit its riders, many of whom might not feel comfortable with the requirement to provide a written detailed description of the alleged discriminatory act.

KCATA Title VI Complaint Process as of June 1, 2010

**Title VI Complaint Process**

The Kansas City Area Transportation Authority (KCATA) is committed to offering

safe, on-time, cost-effective, customer-focused transportation to the community.

As such, KCATA’s Metro bus system operates its programs and services without

regard to race, color, national origin, age, gender or disability.

If you feel you have been discriminated against based on one of the above

characteristics, you have the right to file a complaint. To file a complaint, contact:

Planning Director

KCATA

1350 E. 17th St.

Kansas City, MO 64108

816-346-0311

The complaint should be submitted in writing to the KCATA and at a minimum

should include the following information:

Complainant’s name and address, and a telephone number where complainant

may be reached weekdays during business hours (8 a.m. to 4:45 p.m.);

A general description of the person(s) or class of persons injured by the alleged

discriminatory act(s);

A detailed description of the alleged discriminatory act(s) in sufficient detail to

enable KCATA to understand and investigate what occurred, when it occurred,

where it occurred and the basis of the discrimination complaint (race, color,

national origin, age, gender, or disability);

A list of all witnesses with contact information and/or copies of any documents,

pictures, or other supporting information;

The letter must be signed and dated by the person filing the complaint or by

someone legally authorized to do so on his or her behalf.

The complainant also has the right to file a complaint with an external agency such

as the Department of Transportation (DOT), a federal or state agency or a federal

or state court.

Following the site visit, KCATA revised its complaint process to make it less burdensome for the public to file a complaint. The new complaint procedure was posted in English and Spanish at: <http://www.kcata.org/about_kcata/entries/title_vi_complaint_process/>

and is shown below.

KCATA Title VI Complaint Process as of August 1, 2010

**Title VI Complaint Procedure**

Any person who believes that he or she has been subjected to discrimination under Title VI on the basis of race, color or national origin may file a Title VI complaint with KCATA within 180 days from the date of the alleged discrimination. To file a complaint or for more information on your rights, contact:
     Planning Director
     KCATA
     1350 E. 17th St.
     Kansas City, MO 64108
     816-346-0311

Title VI Complaint Forms can be downloaded in English or Spanish, or by calling 816-346-0311.

* [English](http://www.kcata.org/about_kcata/entries/title_vi_complaint_process/%20http%3A/www.kcata.org/documents/uploads/TitleVIEng.pdf)
* [Spanish](http://www.kcata.org/about_kcata/entries/title_vi_complaint_process/%20http%3A/www.kcata.org/documents/uploads/SpanishTitleVIComplaint_Form.pdf)

The written, signed complaint should include:

* Your name, address and telephone number,
* How, why, and when you believe you were discriminated against.
* Include as much specific, detailed information as possible, and
* The names of any people, if known, who KCATA can contact to support or to clarify your allegations.

KCATA will provide appropriate assistance to complainants who are limited in their ability to communicate in English.

Complaints may also be filed with the U.S. Department of Transportation:
      Federal Transit Administration
      Region VII
      901 Locust Street, Suite 404
      Kansas City, MO 64106

1. Record of Title VI Investigations, Complaints, and Lawsuits

**Requirement:** *FTA recipients shall prepare and maintain a list of any active investigations conducted by entities other than FTA, lawsuits, or complaints naming the recipients that allege discrimination on the basis of race, color, or national origin. This list shall include the date that the investigation, lawsuit, or complaint was filed; a summary of the allegation(s); the status of the investigation, lawsuit, or complaint; and actions taken by the recipient in response to the investigation, lawsuit, or complaint.*

**Finding:** During this Title VI Compliance Review of KCATA, no deficiencies were found regarding KCATA’s compliance with FTA requirements for Record of Title VI Investigations, Complaints, and Lawsuits. Prior to the site visit, KCATA provided a Title VI Complaint Log that included all elements required by FTA Circular 4702.1A. The Review team noted that while the log included gender and disability complaints in addition to Title VI discrimination complaints, KCATA did have an adequate process in place for identifying Title VI complaints, and clear procedures for recording and investigating those complaints.

1. Notice to Beneficiaries of Protection Under Title VI

**Requirement:** *FTA recipients shall provide information to the public regarding their Title VI obligations and apprise members of the public of the protections against discrimination afforded to them by Title VI. Recipients shall disseminate this information to the public through measures that can include but shall not be limited to a posting on its Web site.*

**Finding:** During this Title VI Compliance Review of KCATA, no deficiencies were found regarding KCATA’s compliance with FTA requirements for Notice to Beneficiaries of Protection under Title VI. Prior to the site visit, KCATA submitted its Notice to Beneficiaries, which included all of the three elements required in FTA Circular 4702.1A, as shown on the following table:

|  |  |
| --- | --- |
| **Elements Required in Title VI Notification****(Per FTA Circular 4702.1A Chapter IV Section 5.a)** | **Included in KCATA Policy?** |
| A statement that the agency operates programs without regard to race, color, and national origin | Yes |
| A description of the procedures that members of the public should follow in order to request additional information on the recipient’s nondiscrimination obligations | Yes |
| A description of the procedures that members of the public should follow in order to file a discrimination complaint against the recipient. | Yes |

KCATA submitted an internal document and a Notice posted on its website. The Review team noted that the internal document included a statement about how to request additional information on KCATA’s obligations, however, the website did not include the same statement. KCATA stated that the website would be updated to include this statement prior to the issuance of the Compliance Review draft report. Following the site visit, the Review team confirmed that this information was added to the notice posted on the KCATA website.

1. Annual Title VI Certification and Assurance

**Requirement:** *FTA**recipients shall submit its annual Title VI certification and assurance as part of its Annual Certifications and Assurances submission to FTA (in the FTA web based Transportation Electronic Award Management (TEAM) grants management system.*

**Findings:** During this Title VI Compliance Review of KCATA, no deficiencies were found regarding KCATA’s compliance with FTA requirements for Annual Title VI Certification and Assurance. The FTA Civil Rights Assurance is incorporated in the Annual Certifications and Assurances submitted annually to FTA through the Transportation Electronic Award and Management (TEAM) system. KCATA executed its FY 2010 Annual Certifications and Assurances in TEAM on December 8, 2009. KCATA checked as applicable, 01. Certifications and Assurances required of all applicants. This is the category where the nondiscrimination assurance is located.

1. Environmental Justice Analysis of Construction Projects

**Guidance:** *FTA**recipients should integrate an environmental justice analysis into its National Environmental Policy Act (NEPA) documentation of construction projects. (Recipients are not required to conduct environmental justice analyses of projects where NEPA documentation is not required.). In preparing documentation for a categorical exclusion (CE), recipients can meet this requirement by completing and submitting FTA’s standard CE checklist, which includes a section on community disruption and environmental justice.*

**Findings:** During this Title VI Compliance Review of KCATA, no deficiencies were found regarding KCATA’s compliance with FTA guidance for Environmental Justice (EJ) Analyses of Construction Projects. KCATA construction projects in the last three years and the foreseeable future did not require an Environmental Assessment (EA) or an Environmental Impact Statement (EIS). Minor landscaping and road infrastructure associated with the Troost and State Avenue Bus Rapid Transit (BRT) projects, and non-transit related projects associated with KCATA’s TIGER grant did not have a significant impact. KCATA did document that for projects that qualified for a Categorical Exclusion (CE), it conducted the required assessment of impacts on minority and low-income persons.

1. Submit Title VI Program.

**Requirement:** *FTA recipients serving large urbanized areas are required to document their compliance with the general reporting requirements by submitting a Title VI Program to FTA’s Regional Civil Rights Officer once every three years.*

**Findings:** During this Title VI Compliance Review of KCATA, deficiencies were found regarding KCATA’s compliance with FTA requirements to Submit Title VI Program. KCATA submitted its most recent Title VI Report to FTA on November 13, 2008. The Report, however, was not prepared in accordance with the current guidance, FTA Circular 4702.1A, dated May 13, 2007. The submittal followed the guidance of the previous Circular (4702.1) and included such sections as *Pending Applications for Federal Financial Assistance*, and *Summary of All Civil Rights Compliance Reviews Conducted by other Local, State or Federal Agencies*. The following table summarizes KCATA’s 2008 Title VI Program with respect to the current Circular for the General Reporting Requirements:

| **ELEMENTS REQUIRED FOR TITLE VI PROGRAM** |
| --- |
| **GENERAL REporting REQUIREMENTS** **(Per FTA C. 4702.1A, IV, 7. a. (1) – (5))** | **In KCATA Title VI Program Submittal?** |
| * A summary of public outreach and involvement activities undertaken since the last submission and a description of steps taken to ensure that minority and low-income people had meaningful access to these activities.
 | Yes |
| * A copy of the agency’s plan for providing language assistance for persons with limited English proficiency that was based on the DOT LEP Guidance or a copy of the agency’s alternative framework for providing language assistance.
 | No |
| * A copy of the agency procedures for tracking and investigating Title VI complaints.
 | No |
| * A list of any Title VI investigations, complaints, or lawsuits filed with the agency since the time of the last submission. This list should include only those investigations, complaints, or lawsuits that pertain to the agency submitting the report, not necessarily the larger agency or department of which the entity is a part.
 | Yes |
| * A copy of the agency’s notice to the public that it complies with Title VI and instructions to the public on how to file a discrimination complaint.
 | No |

KCATA’s submission did include all of the Program Specific Requirements for Recipients Serving Large Urbanized Areas.

KCATA’s next submittal is due on September 15, 2011.

**Corrective Actions and Schedules:** Within 90 days, KCATA must submit to the FTA Equal Opportunity Specialist in FTA’s Headquarters Office of Civil Rights, an outline that includes all the elements required by FTA Circular 4702.1A for Submit Title VI Program. This outline should form the basis of KCATA’s 2011 Title VI Program submission.

1. Demographic Data

**Requirement:** *FTA recipients serving large urbanized areas shall collect and analyze racial and ethnic data showing the extent to which members of minority groups are beneficiaries of programs receiving Federal financial assistance.*

**Findings:** During this Title VI Compliance Review of KCATA, deficiencies were found regarding KCATA’s compliance with FTA requirements for Demographic Data. Using the options presented in FTA C. 4702.1A, V, 1.a., KCATA selected Option A: Demographic and Service Profile Maps and Charts.

This Option requires the following items:

|  |  |
| --- | --- |
| **Elements Required for Demographic Data****(Per FTA C. 4702.1A, V, 1. a.)** | **Included in KCATA’s****Title VI Submittals?** |
| A base map of the agency’s service area that includes each census tract or traffic analysis zone (TAZ), major streets, etc., fixed transit facilities and major activity centers. The map should also highlight those transit facilities that were recently modernized or are scheduled for modernization in the next five years. | Yes |
| A demographic map that plots the above information and also shades those Census tracts or TAZ where the percentage of the total minority and low-income population residing in these areas exceeds the average minority and low-income population for the service area as a whole. | No |
| A chart for each Census tract or TAZ that shows the actual numbers and percentages for each minority group within the zone or tract.  | Yes |

Prior to the site visit, KCATA submitted charts showing the minority and low-income areas by census tract and maps entitled *Title VI – 2008 KCATA Service Area Base Map* and *Title VI – 2008 KCATA Service Area Demographic Map*. Both maps were based on Census 2000 data. The base map showed the KCATA service area and identified the central business district, employment areas, hospitals, bus garages, schools, transit stations, bus shelters, core bus routes, and MetroFlex routes. The Review team found the base map difficult to read.

The demographic map further identified minority, and what KCATA called, “below poverty,” tracts. The Review team noted that the minority and “below poverty” tracts were shown on the map as if they are one in the same. The map suggested that all minority tracts were also “below poverty” (low-income) and that all non-minority tracts are above the poverty line (non low-income). The maps showed minority and low-income areas at different rates, such as below 10 percent, between 10 percent and 20 percent, etc., but did not specifically identify those areas where the minority and low-income communities exceeded the averages found in the service area. According to the census data, the KCATA service area was 29.1 percent minority and 10.88 percent low-income.

In summary, the demographic maps:

* Did not relate to the minority and low-income thresholds
* Did not identify LEP populations
* Did not identify areas where there were high concentrations of African-Americans, Hispanics, Asians, etc.

**Corrective Actions and Schedules:** Within 90 days, KCATA must submit to the FTA Equal Opportunity Specialist in FTA’s Headquarters Office of Civil Rights, maps showing areas with concentrations of minorities greater than 29.1 percent in the area and maps with concentrations of greater than 10.88 percent low-income. KCATA is further advised to show concentrations of the predominate minorities and LEP populations in its service area.

1. Systemwide Service Standards and Policies

**Requirement:**  *FTA recipients serving large urbanized areas shall adopt quantitative system-wide service standards necessary to guard against discriminatory service design or operations decisions. Recipients serving large urbanized areas shall adopt system-wide service policies necessary to guard against discriminatory service design or operations decisions. Service standards differ from service policies in that they are not based necessarily on a quantitative threshold.*

**Findings:** During this Title VI Compliance Review of KCATA, no deficiencies were found regarding KCATA’s compliance with FTA requirements for Systemwide Service Standards and Policies. FTA Circular 4702.1A describes effective practices to fulfill the service standard requirements. FTA recommends that recipients set standards for the following indicators, giving transit agencies latitude to set standards for different/or additional indicators at their discretion:

|  |  |
| --- | --- |
| Service Standards | Service Policies |
| * Vehicle Load
 | * Vehicle Assignment
 |
| * Distribution of Transit Amenities
 | * Transit Security
 |
| * Vehicle Headway
 |  |
| * Service Availability
 |  |
| * On-time Performance
 |  |

In its 2008 Title VI submittal, KCATA identified the following service standards that were used to monitor service:

|  |
| --- |
| **KCATA Service Policies and Standards**  |
| **Acceptable Vehicle Load**  | Urban Lines: 120% of seated capacity for a maximum distance of 3 miles or a maximum time of 10 minutes from its maximum load point Suburban Lines: 110% of seated capacity for a maximum distance of 4 miles or a maximum time of 10 minutes from its maximum load point.  |
| **Weekday Frequency**  | Peak Hour Service: Time between buses should not exceed 30 minutes for urban lines or 60 minutes for suburban lines. Midday and Evening Service: Time between buses should not exceed 60 minutes.  |
| **Weekend and Holiday Frequency**  | Saturday, Sunday, and Holiday Hours: Time between buses should not exceed 60 minutes  |
| **Distribution of Transit Amenities – Shelter Placement Priority (minimum activity)**  | Major Passenger Load Point: 8 passengers per bus during peak hour, 4 passengers per bus during other periods, 15-minute frequency. Transfer Points: 5 passengers transferring each 10 minutes during peak hour or 3 passengers transferring per bus during the operating day. Park & Ride Lots: Either 7 passengers boarding each bus during peak period, 3 passengers per bus during base period or 3 passengers per bus average during operating day. Major Employment Concentrations With Higher Than Average Percentage of Work Force in Low- to Moderate-income Jobs: subject to same minimum activity as transfer points. Housing Concentrations for Poor, Elderly, or Disabled: Minimum activity is one- |

KCATA did not have service policies for vehicle assignment. During the site visit, the Review team evaluated vehicles assigned to minority and non-minority routes for Monday, June 7, 2010 and did not identify a disparity with respect to the age or amenities of the vehicle assignments.

KCATA was reminded to include currently used service standards and policies in its 2011 Title VI update.

1. Evaluation of Service and Fare Changes

**Requirement:** *FTA recipients shall evaluate significant system-wide service and fare changes and proposed improvements at the planning and programming stages to determine whether those changes have a discriminatory impact. For service changes, this requirement applies to “major service changes” only. Recipients should have established guidelines or thresholds for what it considers a “major” change.*

**Findings:** During this Title VI Compliance Review of KCATA, no deficiencies were found regarding KCATA’s compliance with FTA requirements for Evaluation of Service and Fare Changes. The following table contains the elements required for the evaluation of service and fare changes:

| **ELEMENTS REQUIRED FOR EVALUATION OF SERVICE AND FARE CHANGES (PER FTA C. 4702.1A, V, 4.A.)** |
| --- |
| 1. ASSESS THE EFFECTS OF THE PROPOSED FARE OR SERVICE CHANGE ON MINORITY AND LOW-INCOME POPULATIONS.
 |
| *Route changes – produce maps of service changes overlaid on a demographic map of the service area* |
| *Span of service – Analyze available data from surveys that indicate whether minority and low-income riders are more likely to be impacted* |
| *Fare changes – Analyze available data from surveys that indicate whether minority and low-income riders are more likely to be impacted* |
| 1. ASSESS THE ALTERNATIVES AVAILABLE FOR PEOPLE AFFECTED BY THE FARE INCREASE OF MAJOR SERVICE CHANGE.
 |
| *Service changes – Analyze what, if any, modes of transit are available for people affected by the service expansion or reduction. Analysis should compare travel time and costs to the rider of the alternatives.* |
| *Fare changes – Analyze what, if any, alternative transit modes, fare payment types or fare payment media are available for people affected by the fare change. Analysis should compare fares paid under the change with fares that would be paid through available alternatives.* |
| 1. DESCRIBE ACTIONS THE AGENCY PROPOSES TO MINIMIZE, MITIGATE, OR OFFSET ANY ADVERSE EFFECTS OF CHANGES ON MINORITY AND LOW-INCOME POPULATIONS.
 |
| 1. DETERMINE ANY DISPROPORTIONATELY HIGH AND ADVERSE EFFECTS ON MINORITY AND LOW-INCOME RIDERS. IF ANY, DESCRIBE THAT ALTERNATIVES WOULD HAVE MORE SEVERE ADVERSE EFFECTS THAN THE PREFERRED ALTERNATIVE
 |

KCATA had defined the “significant” service change threshold. KCATA also documented that it had considered Title VI issues and mitigated where needed for its 2009 service reductions. KCATA produced maps of the service changes overlaid on a demographic map and quantified the level of reductions to confirm that minorities and low-income persons were not disproportionately adversely impacted by the service reductions. KCATA had also conducted an equity evaluation of service improvements, including the implementation of Troost and State Avenue Bus Rapid Transit (BRT) service. These enhanced services, operating in largely minority and low-income corridors were expected to benefit the communities through improved travel times at no increase in costs to the rider.

1. Monitoring Transit Service

**Requirement:** FTA *recipients shall monitor the transit service provided throughout its service area. Periodic service monitoring activities shall be undertaken to compare the level and quality of service provided to predominantly minority areas with service provided in other areas to ensure that the end result of policies and decision-making is equitable service. Monitoring shall be conducted at minimum once every three years. If recipient monitoring determines that prior decisions have resulted in disparate impacts, it shall take corrective action to remedy the disparities.*

**Findings:** During this Title VI Compliance Review of the KCATA, no deficiencies were found regarding KCATA’s compliance with FTA requirements for Monitoring Transit Service. FTA requirements for service monitoring are presented below:

|  |
| --- |
| **Elements Required for Monitoring – Option A: Level of Service Methodology****(Per FTA C. 4702.1A, V, 5. a.)** |
| Select a sample of bus routes and fixed guideway routes that provide service to a demographic cross-section of the recipient’s population. A portion of the routes in the sample should be those routes that provide service to a predominantly minority and low-income areas.  |
| Assess the performance of each route in the sample for each of the recipient’s service standards and policies.  |
| Compare the transit service observed in the assessment to the established service policies and standards. |
| In cases in which observed service does not meet the stated service policy or standard, recipients should determine why the discrepancy exists and take corrective action to correct the discrepancy. |

KCATA performed 100 percent Level of Service monitoring by route, and by census tract, for the following standards in its 2008 Title VI Program submittal:

* Vehicle load
* Weekday frequency
* Weekend and holiday frequency
* Distribution of transit amenities

For each standard, KCATA compared the performance of minority and “below poverty” routes against the standard. KCATA also assessed non-minority routes against each standard. The comparisons did not identify any major disparities. Where minority/low-income or non-minority routes did not meet the standard, KCATA provided an explanation for the variance, such as low-ridership, or that the service was specifically designed as a neighborhood circulator or commuter express service. KCATA’s analysis showed, for example, that 73 percent of minority routes met the service standard for minimum headway, while 60 percent of non-minority routes met this standard.

KCATA also conducted Quality of Service monitoring by comparing travel from sample minority census tracts and sample majority census tracts to the Kansas City, MO Central Business District (CBD) and to another popular destination, Country Club Plaza. The analysis considered:

* Average peak hour travel time
* Number of transfers
* Total cost of trip
* Trip distance (miles)
* Cost per mile of trip

The analysis revealed that average travel time, number of transfers, and trip distances were all lower for travel from minority census tracts. The total cost of trips was equal at $1.25, since KCATA did not charge for distance or transfers.

VII. SUMMARY OF FINDINGS AND CORRECTIVE ACTIONS

| **Title VI Requirements For Recipients Serving Large Urbanized Areas** | **Site Review Finding** | **Description of Deficiencies** | **Corrective Action(s)** | **Response Days/Date** | **Date Closed** |
| --- | --- | --- | --- | --- | --- |
| **GENERAL REQUIREMENTS** |
| 1. Inclusive Public Participation
 | ND |  |  |  |  |
| 1. LEP Language Assistance Plan
 | D | No four-factor assessment. No Language Assistance Plan. | KCATA must submit to the FTA Equal Opportunity Specialist in FTA’s Headquarters Office of Civil Rights, documentation that it has conducted a LEP four factor assessment and developed a Language Assistance Plan, as required by FTA Circular 4702.1A. | 90 Days |  |
| 1. Title VI Complaint Procedures
 | ND |  |  |  |  |
| 1. List of Title VI Investigations, Complaints, and Lawsuits
 | ND |  |  |  |  |
| 1. Notice to Beneficiaries of Protection Under Title VI
 | ND |  |  |  |  |
| 1. Annual Title VI Certification and Assurance
 | ND |  |  |  |  |
| 1. Environmental Justice Analyses of Construction Projects
 | ND |  |  |  |  |
| 1. Prepare and Submit a Title VI Program
 | D | Most recent Title VI update was not prepared in accordance with the current guidance, FTA Circular 4702.1A, dated May 13, 2007. | KCATA must submit to the FTA Equal Opportunity Specialist in FTA’s Headquarters Office of Civil Rights, an outline that includes all the elements required by FTA Circular 4702.1A for Submit Title VI Program. This outline should form the basis of KCATA’s 2011 Title VI Program submission. | 90 Days |  |
| **PROGRAM SPECIFIC REQUIREMENTS FOR LARGE URBANIZED AREAS** |
| 1. Demographic Data
 | D | Demographic maps not adequate | KCATA must submit to the FTA Equal Opportunity Specialist in FTA’s Headquarters Office of Civil Rights, maps showing areas with concentrations of minorities greater than 29.1 percent in the area and maps with concentrations of greater than 10.88 percent low-income. KCATA is further advised to show concentrations of the predominate minorities and LEP populations in its service area. | 90 Days |  |
| 1. System-wide Service Standards and Policies
 | ND |  |  |  |  |
| 1. Evaluation of Fare and Service Changes
 | ND |  |  |  |  |
| 1. Monitoring Transit Service
 | ND |  |  |  |  |

Findings at the time of the site visit: ND = No Deficiencies; D = Deficiency; NA = Not Applicable;

NR = Not Reviewed; AC = Advisory Comment

**A**TTENDEES

| **Name** | **Title** | **Phone****Number** | **Email** |
| --- | --- | --- | --- |
| ***Kansas City Area Transportation Authority (KCATA)*** |
| Mark Huffer | General Manager | 816-346-0210 | mhuffer@kcata.org |
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| Darryl Bell | Day Service Line Supervisor | 816-346-0330 | dbell@kcata.org |
| ***Federal Transit Administration (FTA)*** |
| Thomas Harris | Regional Civil Rights Officer, Region VII | 816-329-3928 | thomas.harris@dot.gov |
| Steve Chu | Intern, Region VI | 816-329-3920 | steven.chu@dot.gov |
| Cindy Terwilliger | Deputy Administrator, Region VII | 816-329-3920 | Cindy.terwilliger@dot.gov  |
| Amber Ontiveros | Equal Opportunity Specialist, FTA Headquarters | 202-366-5130 | amber.ontiveros@dot.gov |
| ***Review Team – The DMP Group, LLC*** |
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| Khalique Davis | Reviewer | 202-726-2630 | khalique.davis@thedmpgroup.com |
| Donald Lucas | Reviewer | 202-726-2630 | donald.lucas@thedmpgroup.com |

1. Per the 2000 Census, people of Hispanic origin can be, and in most cases are, counted in two or more race categories. [↑](#footnote-ref-1)