

Title VI Program Report

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Madison County Transit Background

Madison County Mass Transit District (MCT) was formed in 1980 to meet the public transportation needs of local residents and promote the efficient provision of public transit and paratransit services in Madison County, Illinois. The MCT service area encompasses 179 of the 191 census block groups and 94% of the Madison County population. As reported in the 2020 US Census, the population of the MCT Service Area is 249,471 and the overall population of Madison County is 265,859.

MCT's current Fixed-Route bus system is comprised of twenty-four regular fixed-routes operating on 665.86 directional route miles throughout western and central Madison County, as well as in the US 40 corridor of eastern Madison County.

Paratransit service did not exist in Madison County prior to 1985 when MCT contracted with the Agency for Community Transit, Inc. (ACT) to initiate countywide "curb-to-curb" demand response service. The level of paratransit service increased rapidly with the passage of the Americans with Disabilities Act in 1990. Since then, the complementary paratransit system has grown consistently with the expansion of the fixed-route system.

MCT's Title VI Report Purpose

The purpose of the Title VI Program Report is to show evidence of the steps MCT has taken and will continue to take to ensure services are provided without excluding or discriminating against individuals on the basis of race, color, and national origin. In addition, MCT will take steps to ensure that programs and activities do not exclude or discriminate against low-income individuals or other classes protected by Federal or State law.

INTRODUCTION

Madison County Mass Transit District (MCT) has prepared this Title VI Program Report in compliance with the Federal Transit Administration (FTA) Circular 4702.1B "Title VI Requirements and Guidelines for Federal Transit Administration Recipients," issued October 1, 2012 and the Department's Policy Guidance Concerning Recipients' Responsibilities to Limited English Proficiency ("LEP") Persons (70 FR 74087), dated December 14, 2005.

MCT's initial Title VI Assurance Program was approved by the Federal Transit Administration (FTA) on August 23, 1994, and subsequently reaffirmed in 1997, 2000, 2003, 2006, 2010, 2013, 2016, 2019, and 2022. This program update will be for the period of August 1, 2022 to May 31, 2025.

In compliance with federal guidelines, the objectives of this Title VI program are to:

- Ensure that the level and quality of public transportation service is provided in a nondiscriminatory manner;
- Promote full and fair participation in public transportation decision-making without regard to race, color, or national origin;
- Ensure meaningful access to transit-related programs and activities by persons with limited English proficiency.

Contact Information

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I. GENERAL REPORTING REQUIREMENTS

1. Title VI Notice to the Public

A copy of MCT's Title VI Notice to the Public can be found on the next page (page 6). The notice indicates that MCT complies with Title VI and informs the public of the procedures for requesting additional Title VI information, their Title VI protections, and the procedures for making a Title VI complaint. The notice has been posted and printed in both English and Spanish.

Copies of the Title VI Notice to the Public are posted at the following locations:

- MCT fixed-route buses
- MCT Transfer Stations
 - Alton, Collinsville, Edwardsville, Granite City & Wood River
- MCT's website, www.mct.org

Notice of Title VI Rights

Madison County Transit (MCT) operates programs without regard to race, color, national origin, or English proficiency. What are the Procedures for making a Title VI Inquiry or Complaint? All Title VI inquiries and complaints can be faxed to (618) 797-7547, emailed to info@mct.org or mailed to: Madison County Transit District, Attn: Managing Director, 1 Transit Way, Pontoon Beach, IL 62040-7500

The complaint should include the following information:

- a. Name, address, and phone number of the individual making the complaint
- b. Basis of complaint, i.e. race, color, national origin, English proficiency.
- c. The date or dates on which the alleged Title VI violation(s) occurred.
- d. Names, addresses, and phone numbers of person(s) involved.
- e. Description of the incident resulting in the perceived violation.
- f. Signature of individual making the complaint.
- g. If an individual wishing to make a complaint is unable to write the complaint, MCT staff will assist. Please contact (618) 797-4600 for details.

Federal law requires that complaints be filed within one-hundred eighty (180) calendar days of the alleged incident.

Aviso de los Derechos del Título VI

Madison County Transit (MCT) opera programas sin distinción de raza, color, origen nacional, o dominio del inglés. ¿Cuáles son los procedimientos para realizar una consulta o queja título VI? Todas las consultas y quejas de título VI pueden ser enviadas por fax al (618) 797-7547, por correo electrónico a info@mct.org o por correo a: Madison County Transit District, Attn: Managing Director, 1 Transit Way, Pontoon Beach, IL 62040-7500.

La queja debe incluir la siguiente información:

- a. Nombre, dirección y número de teléfono de la persona que presenta la queja.
- b. Bases de la demanda, es decir, raza, color, origen nacional, o dominio del inglés.
- c. La fecha o fechas en que la violación del título VI (s) ocurrió.
- d. Nombres, direcciones y números de teléfono de las personas que participan.
- e. Descripción del incidente que resulta en la violación percibida.
- f. Firma de la toma individual de la queja.
- g. Si una persona que desee presentar una queja no puede escribir la queja, el personal MCT asistirá. Póngase en contacto con (618) 797-4600 para obtener más información.

La ley federal requiere que las quejas se presentarán dentro de los ciento ochenta (180) días naturales del supuesto incidente.

2. Title VI Complaint Procedure & Complaint Form

As part of MCT's commitment to ensuring that no person is discriminated against on the basis of race, color, national origin, or any other federal and/or state protected category, and to ensure compliance with 49 CFR Section 21.9(b).

MCT has developed and adopted a Civil Rights Assurances (**Appendix A**), a Title VI Assurances (**Appendix B**) and a Title VI Statement, Complaint Procedures & Notification (**Appendix C**), which includes procedures for investigating and tracking Title VI complaints. MCT policy is to investigate complaints that are filed in writing within 180 days from the date of the alleged discrimination. Each complaint alleging discrimination based on race, color, or national origin is categorized as a Title VI complaint and investigated according to policy.

The MCT Title VI Complaint Form is included on the next page and can also be found on MCT's website:

[Madison County Transit Title VI and ADA Complaint Form](#)

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Complaint Form



Title VI and Americans with Disabilities Act
Complaint Form

Madison County Transit (MCT) operates programs without regard to race, color, or national origin, as described by Title VI of the Civil Rights Act of 1964. The Americans with Disabilities Act of 1990 (ADA) prohibits discrimination and ensures equal opportunity and access for persons with disabilities. MCT is committed to providing safe, accessible and efficient transportation services, in full compliance with 49 CFR Parts 27, 37, 38, and 39 of the ADA.

In order to make a Title VI or ADA complaint, please provide the following information. Assistance is available upon request. Complete this form and mail or deliver to: Madison County Transit, Attn: Managing Director, 1 Transit Way, Pontoon Beach, IL 62040. Alternatively, it can be faxed to (618) 797-7547 or emailed to info@mct.org. Federal law requires complaints be filed within one-hundred eighty (180) calendar days of alleged incident.

Type of complaint: ☐ Title VI ☐ Americans with Disabilities Act (ADA)

Individual registering this complaint:

Name: _____
Address: _____
City: _____ State: _____ Zip Code: _____
Telephone (Home): _____ (Business): _____

Individual discriminated against (if other than the individual mentioned above):

Name: _____
Address: _____
City: _____ State: _____ Zip Code: _____
Telephone (Home): _____ (Business): _____

What is the basis for the complaint? (Check all that apply):

☐ Race / Color / National Origin ☐ Disability

Date and approximate time of incident or violation: _____

Describe the incident or violation. What happened and who was responsible? Include any other information that is pertinent to the investigation (ex: bus number, bus route, employee involved in the complaint, direction of vehicle, details about weather conditions, etc.) For additional space, use back of form.

Please sign, verifying that the information above is accurate: _____

Attach any documents that will support your complaint.

If an individual wishing to make a complaint is unable to write the complaint, MCT staff will assist. Please call 618-797-4600.

3. Title VI Investigations, Complaints, and Lawsuits

MCT is not currently involved in any investigations, complaints, or lawsuits alleging discrimination on the basis of race, color, or national origin.

4. Public Participation Plan

In accordance with the guidelines set forth by the Federal Transit Administration (FTA), all transit providers who receive federal funds must develop a “Public Participation Plan” which outlines a targeted outreach to engage minority and Limited English Proficiency (LEP) populations. FTA also encourages the engagement of other traditionally underserved constituencies such as individuals with disabilities and low-income populations. The Public Participation Plan is included in this section along with an Executive Summary of MCT’s participation and outreach efforts since May 2022.

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MADISON COUNTY MASS TRANSIT DISTRICT TITLE VI PROGRAM PUBLIC PARTICIPATION PLAN

In accordance with the guidelines set forth by the Federal Transit Administration (FTA), all transit providers who receive federal funds must develop a “Public Participation Plan” which outlines a targeted outreach to engage minority and Limited English Proficiency (LEP) populations. FTA also encourages the engagement of other traditionally underserved constituencies such as individuals with disabilities and low-income populations. The Madison County Mass Transit District (MCT) has established the Public Participation Plan summarized below in compliance with applicable federal requirements (Title VI of the Civil Rights Act 1964, 49 CFR Section 21 and FTA Circular 4702.1B), amended on October 12, 2012.

The purpose of this plan is to ensure that MCT is proactive in providing complete information, timely public notice, diverse techniques, full public access to key decisions, and ongoing involvement in the planning process. The following are MCT’s core objectives for Public Participation:

- The process must be transparent, and meaningful.
- The public should be given adequate notice of public comment opportunities and then provided with the method and the steps for making public comments.
- Public comments should be considered, evaluated, and integrated into the decision-making process.
- As echoed in its Non-Discrimination Policy, efforts should be made to engage underserved populations such as minority, low income and LEP populations as well as individuals with disabilities.

Non-Discrimination Policy:

MCT operates programs without regard to race, color, national origin, or English proficiency.

Proposals Which Prompt Public Participation:

MCT will engage the public in a formal public participation process when a Major Service Change or a Fare Change is proposed. Major Service Changes and Fare Changes are defined in the “Title VI Major Service Change and Fare Change Policy” document which was subject to a public comment process and approved by the MCT Board of Trustees.

Public Engagement Plan:

MCT will take the following steps to ensure that all residents have an opportunity to review and comment on proposed Major Service Changes and proposed Fare Changes. In addition to accepting comments via e-mail, US mail or over the phone, MCT will also host public meetings to disseminate hard copies of the proposal, to answer questions and to collect written comments from the public.

Notification:

A copy of the proposed Major Service Change or Fare Change will be posted on the website and will be available in hard copy format. Copies of the proposal will also be available in Braille or translated into the language of the individual’s choice upon request.

MCT will notify the public of the dates, times, and locations of the public meetings at least 14 days before the scheduled meetings. Procedures for making public comments during the meeting will also be released in advance. MCT may use the following notification methods:

- Press releases distributed to regional media outlets
- On-board customer advisories on MCT Fixed-Route Buses
- Legal Notice in newspaper(s) of general circulation
- E-News e-mail to all registered subscribers
- Posting on MCT's website and Facebook page

Efforts to reach Minority and Low-Income Populations:

The MCT Passenger Demographic survey in 2024 revealed that minority bus riders constitute approximately 57 percent of MCT's Fixed Route ridership and approximately 64 percent of MCT's Fixed Route ridership is classified as "Low Income" using the State of Illinois' "Benefits Access Program" guidelines.

The Demographic Survey also revealed that the preferred method of receiving information about MCT services for those protected classes is spread among the following media:

PREFERRED METHOD	MINORITY	LOW-INCOME
<i>On-Board Customer Advisory</i>	21%	21%
<i>Social media</i>	9%	10%
<i>Google Transit</i>	10%	9%
<i>Newspaper</i>	3%	3%
<i>MCT Website</i>	23%	22%
<i>Text Message</i>	16%	18%
<i>Email</i>	16%	16%
<i>Other</i>	2%	1%
TOTAL	100%	100%

Currently, MCT utilizes email, Facebook, the MCT website, newspapers, text messaging, and onboard customer advisories on MCT buses to alert passengers of any route or schedule changes, appealing to 88 percent of minority respondents' and 90 percent of low-income respondents' preferred information outlet.

Due to a growing number of MCT bus riders preferring mobile text messaging as their desired form of communication, MCT implemented an automated MCT Text Alert program in 2015 and placed "Stay Informed" bus cards on all fixed route vehicles. This free service allows passengers to select which route or routes about which they'd like to receive information. Opting out of the program is simple as well.



MCT will take the following additional steps to ensure that the protected classes of passengers receive advanced notifications of proposals and can engage the process by reviewing, asking questions, and making comments:

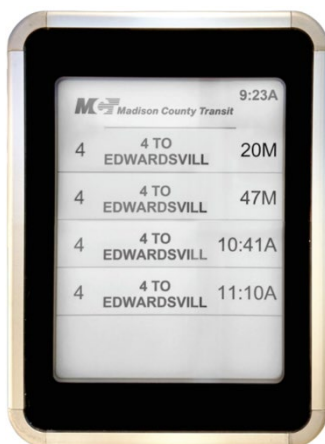
- Sending proposals to elected officials in minority and low-income areas
- Placing notices of public meetings at popular destinations such as grocery stores, senior centers, churches, etc.
- Identifying community and neighborhood opinion leaders who can assist MCT in disseminating information

Public Outreach and Passenger Information

MCT staff offers a Travel Training program and a Train the Trainer Program for individuals or groups of people in need of support, instruction, or assistance using the MCT fixed route service. Travel Training and Train the Trainer Programs are available to any individual or entity upon request.

To improve service and reduce confusion, MCT deployed a new CAD/AVL (Computer Aided Dispatch/Automatic Vehicle Location) system in October 2024. This new system involves a real-time GTFS feed via NextMCTbus.org where riders can view where the bus is currently located and provide real-time based predictions. This makes riding easier, more predictable, and more connected.

In addition to NextMCTbus.org, MCT is in the process of replacing all bus stop signs. The replacement signs have a unique number attached to that stop (which is linked to our CAD/AVL system). These signs will provide riders with information on text-to-find arrival times, a quick way to text and receive the next bus's expected arrival time. Passengers also can call our interactive voice response system and enter a stop number to receive real time updates via phone. This feature is especially helpful for riders without smartphones or internet access, providing a reliable way to get up-to-the-minute arrival information. The real-time voice calling system uses data from our CAD/AVL platform to give accurate, automated updates, helping ensure passengers can plan their trips with confidence.



Thirty-one stops throughout our service area now feature 13-inch e-ink digital displays showing predicted bus arrival times, referred to as Passenger Information Displays (PIDs).

At stations, larger 32-in digital e-ink displays have been installed inside stations and under canopies, offering passengers real-time arrival information.

With this system, passengers have reliable, up-to-date information to make their trips more seamless. Whether at a stop, a transit station, or from their smartphone, riders will have access to tools to navigate our service with ease.

5. Limited English Proficiency Plan

Efforts to reach Limited English Proficiency Populations:

MCT has outlined its efforts to reach Limited English Proficiency (LEP) populations in the LEP Plan of the 2025 Title VI Program Report. The following summary outlines MCT's efforts to identify whether an LEP population exists in the MCT Service Area and efforts to effectively engage that population.

The MCT Passenger Demographic survey in 2024 surveyed 632 passengers. Of those surveyed, no individuals were encountered who could not speak English. However, 54 individuals, or approximately 8.5% of respondents, did identify a language other than English as their "Primary Language" as indicated in the table below:

<i>Primary Language</i>	<i># Of Respondents</i>	<i>%</i>
<i>English</i>	537	85%
<i>Spanish</i>	6	1%
<i>Other</i>	48	8%
<i>Did Not Respond</i>	41	6%
<i>Grand Total</i>	632	100%

While 85 percent of MCT passengers identified "English" as their "Primary Language," it's clear that there are individuals living in our service area, and riding MCT, who primarily speak other languages. MCT defines an LEP population as any group that speaks "Less than Very Well." Data from the 2023 American Community Survey (ACS) found a total of 2,755 individuals living within the MCT Service Area who identified themselves as speaking English "Less than Very Well." This represents about 1% of the total Service Area population. At the census tract level, none of the census tracts in the MCT Service Area reported an LEP population of more than 5%.

Although the current data suggests that MCT does not have a significant LEP population in its service area or riding its Fixed-Route buses, MCT will work with the St. Louis International Institute if a need for translation services arise. Should it be determined that the primary language spoken in the MCT service area have changed, MCT will take the necessary steps to begin translation of information to the primary language.

In accordance with the guidelines set forth by the Federal Transit Administration (FTA), all transit providers who receive federal funds must assist individuals with Limited English Proficiency (LEP). LEP individuals who do not speak English as their primary language and who have a limited ability to read, speak, write, or understand English fall under Title VI of the Civil Rights Act. MCT's LEP Plan is included in this section.

MADISON COUNTY MASS TRANSIT DISTRICT

LIMITED ENGLISH PROFICIENCY AND LANGUAGE ASSISTANCE PLAN

Summary:

Limited English Proficiency (LEP) is a term used to describe individuals who do not speak English as their primary language AND who have a limited ability to read, speak, write, or understand English. Title VI of the Civil Rights Act of 1964 requires recipients of Federal funds to assess and address the needs of LEP individuals seeking assistance. The intent of this plan is to ensure that individuals, who do not speak or read English proficiently, have access to Madison County Mass Transit District (MCT) information and services.

MCT Limited English Proficiency Four Factor Analysis:

As a recipient of federal funds, MCT must take reasonable steps to ensure meaningful access to the information and services it provides for LEP persons in the MCT service area. In assessing the level of assistance MCT provides and the extent to which services are needed by LEP individuals, the following four factors are considered.

A. The number or proportion of LEP persons in the eligible service area.

To determine the number and proportion of LEP persons in the MCT Service Area, MCT reviews data from the most recent American Community Survey (ACS) and the 2020 U.S. Census. MCT defines an LEP population as any group that speaks English “Less than Very Well.” Data from the 2023 ACS found a total of 2,755 individuals living within the MCT Service Area who identified themselves as speaking English “Less than Very Well.” This represents about 1.10% of the total Service Area population. As indicated in the table below, the LEP population in the MCT Service Area increased in 2022, when there were 2,537 LEP individuals representing 1.02% of the Service Area.

	2022 ACS Data	2023 ACS Data	Change
<i>LEP Population in Service Area</i>	2,537	2,755	+218 individuals 8.6% increase
<i>Proportion of LEP Population</i>	1.02%	1.10%	+0.8% increase

At the census tract level, there were no census tracts in the MCT Service Area that reported an LEP population of more than 5%.

The LEP population in the MCT Service Area has increased slightly and one group, Spanish-speakers, represented over half of the Service Area’s LEP population.

- a) The 2024 MCT Demographic Study did not reveal any MCT Fixed-Route bus passengers who could not speak English. However, although they speak English, approximately 9% of respondents reported that English is not their “Primary language.”

- b) Based on data in the ACS, by far, the largest LEP population in the MCT Service Area is Spanish, accounting for 61% of all LEP individuals in the Service Area but is 1.10% of the MCT Service Area. As a result, the instructions on all MCT public schedules and fare charts are published in Spanish.
- a. All MCT timetables offer instructions and fare information in Spanish.
 - b. MCT has also translated the Notice of Title VI Rights into Spanish.

Other Primary Languages are listed in the table below, including a complete summary of LEP individuals by Primary Language spoken.

Language	2023 LEP Population	% of LEP Population	% of MCT Service Area
Spanish:	1686	61.20%	0.68%
French, Haitian, or Cajun:	56	2.03%	0.02%
German or other West Germanic languages:	49	1.78%	0.02%
Russian, Polish, or other Slavic languages:	77	2.79%	0.03%
Other Indo-European languages:	145	5.26%	0.06%
Korean:	123	4.46%	0.05%
Chinese (incl. Mandarin, Cantonese):	173	6.28%	0.07%
Vietnamese:	109	3.96%	0.04%
Tagalog (incl. Filipino):	74	2.69%	0.03%
Other Asian and Pacific Island languages:	71	2.58%	0.03%
Arabic:	11	0.40%	0.00%
Other and unspecified languages:	181	6.57%	0.07%
TOTAL	2755	100%	1.10%

At this time, MCT is not aware of the literacy skills of the LEP populations and data does not exist which would provide evidence one way or another.

Based on the low numbers of LEP individuals in the MCT Service Area, and the lack of requests for information, there does not appear to be an underserved population. The Spanish translations on the timetables provide a base level of information for this population.

B. The frequency with which LEP persons come into contact with the program.

The small LEP population in the MCT Service Area and the growing population in the greater St. Louis metro area, increases the probability of its contact with MCT. Due to the small size of the LEP population however, involvement is currently infrequent and unpredictable. No requests have been made for information by either individuals or groups.

As indicated above, the 2024 MCT Passenger Demographic Survey did not find any passengers who could not speak and/or read and write English. But as previously mentioned, it is believed that there are other LEP individuals riding MCT, which is why MCT has proactively translated the timetables and Title VI Notices into Spanish, the predominant LEP language in the Service Area.

Conversations with MCT staff who assist passengers with pass sales, customer information, and public meetings revealed that there have not been any problems for individuals attempting to access services or stories about non-native English speakers struggling due to the language barrier.

C. The nature and importance of the program, activity or service provided to people's lives.

MCT provides fixed-route and Paratransit transportation services in Madison County and to select destinations in downtown St. Louis and St. Clair County. MCT also provides a connection to MetroLink for access throughout the St. Louis region. To take full advantage of MCT's services, the ability to read a public timetable or other "How to Ride" information, is critical. As public transit is used for many life-sustaining trips such as work, school, medical appointments, errands, etc. the nature of the services provided by MCT are very important.

D. Resources available to the recipient for LEP outreach and costs associated with that outreach.

Because the LEP population in the MCT service area is not of a significant proportion and the cost of translating MCT's fixed-route timetables is high, MCT has determined that full translation of all materials is not necessary at this time. However, should an individual or agency make a request for translation of information into their primary language, MCT would do so in a timely manner.

MCT Language Assistance Plan

Based on the small number of residents with LEP in the MCT service area and the limited interaction with MCT that these individuals have, a full LEP plan is not necessary at this time. However, the region is dynamic and continues to attract diverse ethnic and cultural populations. Therefore, MCT has developed the following plan to ensure that if an LEP population does develop in the region, a plan is in place to meet their needs.

A. Results of the Four Factor Analysis and Description of the LEP Population Served

A full description of the LEP populations who reside in the MCT Service Area can be found on the previous pages of this document. Although it was discovered that 2,755 LEP individuals live in the Service Area, MCT has been unable to find evidence that these individuals are using MCT services. Even anecdotal conversations with MCT drivers, customer service representatives, and other staff who engage the public did not reveal that there are LEP populations riding MCT.

B. Language Assistance Services:

As stated above, MCT has translated its Title VI Notices, timetable instructions and fare charts into Spanish, as half of the LEP individuals who reside in the Service Area identified Spanish as their primary language.

Since the remaining language groups in the MCT Service Area are significantly smaller, MCT has worked with the International Institute of St. Louis to identify the largest non-English speaking populations in the St. Louis Metropolitan area and translated instructions for requesting materials in their language.

Perhaps the most dynamic effort to reach LEP populations is the development of “*I Speak...*” cards which have been placed in all MCT buses and transfer stations. Based on information from the ACS, demographic data from Southern Illinois University Edwardsville, and guidance from the International Institute, MCT has identified fifteen languages that appear on the card. The following text has been translated into those languages on the “*I Speak...*” card: *“I speak ... and need information about bus services. (Please check the box and give this card to the driver.)”*

The card also asks the LEP passenger to provide their name and contact information. Upon receipt, the card will then be forwarded to the Director of Marketing & Planning, Amanda Smith for timely follow-up and translation of materials if requested.

“I Speak...”

☐ **Español (Spanish):**
Hablo español y necesito la información sobre servicios del autobús. (Marque la caja y dé esta tarjeta al conductor del autobús)
Nombre: _____
Información del contacto: _____

☐ **Deutsch (German):**
Ich spreche Deutsches und benötige Informationen über Busdienstleistungen. (Kennzeichnen Sie den Kasten und geben Sie diese Karte zum Bustreiber)
Name: _____
Kontaktinformationen: _____

☐ **عربي (Arabic):**
أتحدث اللغة الإنجليزية وأحتاج معلومات عن خدمات الحافلة. (علامة مربعي وأعط هذه البطاقة للسائق)
الاسم: _____
معلومات الاتصال: _____

☐ **汉语 (Chinese):**
我讲中文并且需要信息关于总线服务。(标记箱子并且给这张卡片公共汽车司机)
名字: _____
联络信息: _____

☐ **Srpski (Serbian/Bosnian):**
Govorim srpski i potrebne informacije o uslugama. (Mark je sadržaj i da ova kartica na vozača autobusa)
Ime: _____
Kontakt informacije: _____

☐ **Русско (Russian):**
Мне говорю русского и нужна информация на обслуживание шин. (Марк коробка и дает эту карточку к водителю автобуса)
Имя: _____
Данные по контакту: _____

☐ **한국어 (Korean):**
나는 한국어를 말하고 버스 서비스에 정보를 필요로 한다. (상자 표를 하고 버스 운전사에게 이 카드를 주십시오)
이름: _____
교신 정보: _____

MCT Madison County Transit

C. Providing Notice to LEP Persons Regarding Availability of Language Assistance:

MCT has established the following methods to inform Spanish-speaking LEP individuals, supporting organizations, and the public, of available LEP services: MCT will notify area community-based organizations such as the Hispanic Chamber of Commerce in St. Louis and other stakeholders of available language assistance services. MCT will also periodically issue notices, in Spanish and English, about available LEP services to local Spanish-language newspapers in the region.

D. Monitoring, Evaluating and Updating the Language Assistance Plan:

MCT will continue to engage drivers, elected officials, the business community, religious leaders, and other stakeholders on identifying the area’s LEP populations. As additional LEP populations are identified, language assistance measures will be taken. If an LEP individual seeks information that MCT does not have available in their language, MCT will have information translated for that person in a timely manner.

MCT staff will monitor changing population levels and the language needs of LEP individuals in the service area. In the future, MCT will also consider conducting further assessment such as: conducting surveys and focus groups or collecting primary language data for individuals that participate in programs and activities.

E. Providing Timely and Reasonable Language Assistance:

As described above, the “I Speak...” cards are placed on all MCT buses and at Transfer Stations. The “I Speak...” cards have fifteen different language options and give the LEP person the opportunity to request additional information from MCT in their language. Operations staff is to forward the cards to the Director of Marketing & Planning for follow-up and translation as quickly as possible.

Public Engagement since 2022 Title VI Program Update:

Since May 2022, MCT has actively engaged the public regarding major service changes. For any major service change, MCT issued a legal notice, hosted public meetings to gather feedback, share information, answer questions, and provided details on its website. Additionally, an equity analysis was conducted to assess any potential disparate impacts or disproportionate burdens. In most cases, feedback received during public meetings or via email led staff to refine the final service change proposals.

January 12, 2025 (Major Service Change)

To better serve the student population, Madison County Transit (MCT) Planning staff proposed to extend the MCT Student Monthly Pass eligibility to include any student attending kindergarten through college/university who holds a valid student ID. Staff also proposed discontinuing the #15 East Collinsville Shuttle due to low ridership and in replacement, providing a microtransit service to the area to allow for more flexible, direct rides. Microtransit service is operated as an on-demand service, not a fixed route service. Due to low ridership, MCT Planning staff proposed to discontinue the 13X Highland-SIUE Express and transition the route to a vanpool.

Public Meetings & Proposed Plan

- October 15, 2024: Collinsville Station (12:00 – 1:00 pm)
- October 17, 2024: SIUE, MUC Missouri Room (11:30 – 1:00 pm)
- October 17, 2024: Virtual Meeting (4:30 – 5:30 pm)

#9 Washington Shuttle:

- Discontinue first trip from Alton Station to Alton High School

#13X Highland-SIUE Express:

- Discontinue route due to low ridership

#15 East Collinsville Shuttle:

- Discontinue route due to low ridership and the implementation of MCT Micro

#18 Collinsville Regional:

- Discontinue the last trip from Emerson Park to Collinsville Station

#19 Edwardsville-Collinsville:

- Discontinue last trip from Collinsville Station to Edwardsville Station

MCT Micro:

- Change from a pilot program to a permanent fixture

MCT received 19 public comments, 3 were positive and 4 were unrelated. All comments were summarized and presented to the MCT Board of Trustees for consideration. Individuals who could not attend the public meetings but wanted to comment could do so via phone, e-mail, or US Mail. The MCT Board of Trustees approved the proposal at the October 31, 2024 board meeting.

May 5, 2024 (Major Service Change, turned Minor Service Change)

Madison County Transit proposed to adjust five routes as part of the May 2024 Service Change. The changes include redirecting select trips to Emerson Park Metrolink Station in lieu of Downtown St. Louis, shifting two local routes in Upper Alton and extending the hours of the weekday route in Bethalto. Proposing to eliminate trips to Downtown St. Louis triggered a major service change. After hosting public meetings and reviewing rider comments, MCT planning staff were able to rework the routes to save the downtown trips turning it into a minor service change.

Public Meetings & Proposed Plan

- February 1, 2024: Virtual Meeting (11:30 – 12:30 pm)
- February 1, 2024: Virtual Meeting (4:30 – 5:30 pm)

#5 Tri-City Regional:

- Eliminate trips to Downtown St. Louis and substitute with trips to Emerson Park Metrolink Station

#9 Washington Shuttle:

- Shift route path to facilitate improved transfer opportunities in Upper Alton

#11 Brown Shuttle:

- Shift route path to facilitate improved transfer opportunities in Upper Alton

#12 Bethalto Shuttle:

- Extend weekday service span 2 hours in the evening

#20 Granite City-Pontoon Beach:

- Eliminate one southbound weekday trip at 6:02 am

MCT received 10 comments about the proposed changes, with 6 directly related to the changes, 4 of those comments being negative. After attending public meetings and collecting feedback, we were able to retain select trips into Downtown St. Louis, therefore no longer meeting the Major Service Change criteria by not reducing more than 25% of the route. The MCT Board of Trustees approved the proposal at the February 29, 2024 board meeting.

December 3, 2023 (Major Service Change)

Madison County Transit adjusted three routes and discontinued two as a part of the December 2023 Service Change. The change, which was moved earlier than originally scheduled, was in response to an ongoing workforce shortage. The routes proposed for elimination were due to low ridership, but service was still available to the destinations using alternative routes.

Public Meetings & Proposed Plan

- September 18, 2023: Virtual Meeting (10:30 – 12:00 pm)
- September 19, 2023: Wood River Station (8:00 – 9:00 am)
- September 20, 2023: Collinsville Station (4:00 – 5:30 pm)
- October 4, 2023: Alton Station (10:00 – 11:00 am)
- October 4, 2023: Collinsville Station (4:00 – 5:00 pm)
- October 5, 2023: Edwardsville Station (8:00 – 9:00 am)
- October 5, 2023: Virtual Meeting (1:00 – 2:00 pm)
- October 5, 2023: Wood River Station (3:00 - 4:00 pm)

#7 Alton-Edwardsville:

- Reduce frequency to every 60 minutes
- Remove trips to and from SIUE
- Only serve Alton Regional Multimodal Transportation Center (ARMTC) on weekdays

#10 State & Elm:

- Reduce frequency to 60 minutes
- End service at 9:12 pm
- Reduce morning service span

18 Collinsville Regional:

- Preserve AM service; reduce PM service to every 60 minutes

#24X Riverbend-Gateway Commerce Center Express:

- Discontinue 24X Riverbend-Gateway Commerce Center Express due to low ridership

#24X Collinsville-Gateway Commerce Center Express:

- Discontinue 25X Collinsville-Gateway Commerce Center Express due to low ridership

MCT received 13 public comments, 7 of which were directly related to the proposed service change and all of which were negative. While all public comments are taken into consideration for proposed changes, MCT was unable to change the proposal due to a workforce shortage. While the reduction did affect low-income and minority populations, they are still able to reach their destinations using MCT services, the reduction eliminated the fastest route. For MCT to provide reliable service, the changes needed to be made. The MCT Board of Trustees approved the proposal at the September 28, 2023 board meeting.

February 5, 2023 (Major Service Change)

Madison County Transit adjusted six routes as part of the February 2023 Service Change and discontinued one route. The goals were to improve service by extending weekday service span for evening classes at SIUE and SWIC, a route extension to a grocery store, improve frequency to three senior living centers, and make adjustments to running times for greater schedule accuracy.

Public Meetings & Proposed Plan

- October 18, 2022: Edwardsville Station (11:00 – 12:00 pm)
- October 18, 2022: Wood River Station (2:30 – 3:30 pm)
- October 19, 2022: Virtual Meeting (1:00 – 2:00 pm)
- October 20, 2022: ARMTC (10:00 – 11:00 am)
- October 20, 2022: Collinsville Station (5:00 – 6:00 pm)

#4 Madison-Edwardsville:

- Extend weekday service span to 9:46 pm

#6 Roxana-Pontoon Beach:

- Extend trips in all services to Schnucks grocery store on Illinois 143

#9 Washington Shuttle:

- Reinstate service to Skyline Towers, a senior living facility in Alton

#10 State and Elm Shuttle:

- Eliminate service to Bachman Lane group home

#13 Troy-Glen Carbon:

- Serve Cambridge House and Liberty Village on Illinois 162 on every trip

#20X Gateway Commerce Center Express:

- Adjust running times for schedule accuracy

#23 Gateway Commerce Center Shuttle:

- Discontinue route

MCT received 15 comments directly related to the proposed service change, 5 of which were negative and 9 were neutral. MCT's mission is to provide service that is commensurate with demand. While the discontinuation of the #23 Gateway Commerce Center Shuttle does affect some low-income and minority populations, trips are still available to those destinations using alternate routes. The MCT Board of Trustees approved this proposal at the October 27, 2022 board meeting.

6. Non-Elected Planning Boards

MCT does not have a non-elected planning board or advisory council. The members of the MCT Board of Trustees are appointed by the Madison County Board, in accordance with Illinois State Statute.

7. Subrecipient Compliance

MCT does not have any subrecipients.

8. Construction of Maintenance Facility of Operation Center

In June 2022, Madison County Transit (MCT) began construction of a new administration building at its existing Base of Operations. The project was completed in May 2024. The 27,000-square-foot, two-story facility was constructed on a previously undeveloped parcel of land owned by MCT since December 19, 1997. The property had been vacant and unused prior to construction, and no buildings were demolished. The project did not require the acquisition of additional property.

The new administration building is fully ADA-compliant and consolidates MCT's administrative and base operations staff into a single facility. It includes staff offices, a public-facing lobby for job applicants, pass purchasers, and lost and found services, as well as conference rooms and secure areas equipped with modern security and technology systems to support core operational functions.

Associated site improvements include:

- Installation of new video surveillance and access control systems
- Upgraded computer servers
- New fencing and security gates at all entrances
- Construction of a new bus pull-off and shelter on Chain of Rocks Road
- New employee and visitor parking areas
- Enhanced site lighting, sidewalks, utility infrastructure
- Improved stormwater drainage and detention systems

Title VI Equity Analysis

In accordance with FTA Circular 4702.1B, MCT determined that a Title VI equity analysis was not required for this project. The construction occurred on existing agency-owned property that had not been in active use, and no individuals or businesses were displaced. The project did not involve acquisition of land, disruption of existing structures, or changes that would result in disparate impacts on surrounding minority or low-income populations.

During construction, all work was conducted during weekday business hours to minimize disruption. MCT did not receive any complaints from neighboring residents or businesses regarding noise, traffic, or construction-related disturbances.

9. Service System-wide Standards and Policies

MCT's System-wide Service Standards and Policies document is included in this section.

MADISON COUNTY MASS TRANSIT DISTRICT SYSTEM-WIDE SERVICE STANDARDS AND POLICIES

Objective: To ensure service design and operations practices do not result in discrimination on the basis of race, color, or national origin.

SERVICE STANDARDS:

A. Vehicle Load by Size:

The passenger capacity of the four MCT vehicle types are listed in the table below. The Maximum Load Factor is calculated by dividing the number of seats by the number of seated and standing passengers combined.

AVERAGE PASSENGER CAPACITY				
Vehicle Type	Seated	Standing	Total	Maximum Load Factor
27' Bus	18	7	25	1.4
30' Bus	25	20	45	1.8
40' Bus	39	31	70	1.8

Standard: MCT monitors all trips to ensure that the Maximum Vehicle Load Factor does not exceed the established limits. When trips are approaching the limits listed above, MCT will evaluate making adjustments to frequency and/or trip times; or assigning an appropriate size bus to accommodate the load.

B. Vehicle Headway for Each Mode:

Headway refers to the amount of time between buses passing a given timepoint on a route. FY 2026 service headway targets by route classification are summarized on the table below.

Mode Classification	Weekday Peak (mins.)	Weekday Off-peak	Saturday	Sunday
Local	30-60	30-60	60	60
Regional	30	30	60	60
Express	30	None	None	None

Standard: MCT adjusts frequency commensurate with demand. Where ridership increases, MCT will continue to respond with service adjustments.

C. On Time Performance:

On-time performance is critical, particularly on routes with 60-minute headways. Customers are highly sensitive to early and excessively late buses.

Standard: Early Trips - An “Early Trip” is a one-way trip that passes time points ahead of the published time. No buses should operate early in scheduled revenue service.

Standard: On Time Trips – An “On Time Trip” is a trip which starts or reaches its terminus between zero and five minutes after the published time. For fixed routes operating on a 60-minute service frequency, at least ninety-five percent (95%) of all trips should operate on time in any given month. For routes operating on a 30-minute service frequency, at least ninety percent (90%) of all trips should operate on time in any given month.

Standard: Late Trips – A “Late Trip” is a trip which starts or reaches its terminus five minutes or more after the published time. For fixed routes operating on a 60-minute service frequency, no more than five percent (5%) of all trips should operate late in any given month. For routes operating on a 30-minute service frequency, not more than ten percent (10%) of all trips should operate late in any given month.

D. Service Availability by Mode:

Approximately 95% of residents in the MCT Service Area live within one-quarter ($\frac{1}{4}$) mile of a Fixed-Route. This calculation includes the residents of all census blocks which fall within or touch a $\frac{1}{4}$ mile boundary around an MCT Fixed-Route. If any portion of a census block falls within $\frac{1}{4}$ mile of a bus route the entire population of that census block is included. The Service Area Population Map which illustrates both the $\frac{1}{4}$ mile boundary around MCT Fixed-Routes and the census blocks is included in **Section 17, Map 1**.

SERVICE POLICIES:

E. Distribution of Transit Amenities:

Policy: MCT transit amenities will be distributed equitably throughout the MCT Service Area, without regard to race, color, national origin, income level, or English proficiency.

MCT places timetables and other informational brochures at over 100 distribution locations throughout Madison County and frequently adds locations by request. MCT’s greatest amenity are its transfer stations which provide a safe, clean climate-controlled waiting area and transfer point for passengers in the following five communities of Madison County: Alton, Collinsville, Edwardsville, Granite City and Wood River. Four of the stations, Alton, Collinsville, Edwardsville, and Granite City are located within Minority Census Block Groups and four are located within Low Income Census Block Groups: Alton, Collinsville, Granite City and Wood River.

MCT is working to ensure that amenities such as shelters and benches are not only placed at high ridership areas but are equitably distributed throughout the service area. MCT has and will continue to maintain Service Area maps which illustrate where amenities are located to ensure that Title VI areas and low-income areas are distributed equitably.

F. Vehicle Assignment:

Policy: MCT will assign vehicles without regard to race, color, national origin, income level, or English proficiency.

MCT Fixed-Route buses are deployed from one garage at the MCT Base of Operations in Pontoon Beach, Illinois. All MCT buses are ADA-accessible, equipped with climate control, and automated vehicle annunciators which announce transfer opportunities, route, and destination.

Operating characteristics of routes determine vehicle size assignments. Vehicles are rotated through each of the routes and assigned daily based on a pre-determined schedule within each bus size.

10. Board Resolution

The MCT Board of Trustees resolution approving the Title VI Program can be found in **Appendix F**.

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II. PROGRAM SPECIFIC REQUIREMENTS

As outlined in the FTA Circular 4702.1B, transit providers that receive federal funds, operate 50 or more fixed-route vehicles in peak service, and are in a UZA of 200,000 or more in a population shall provide the following information:

11. Demographic Analysis of the MCT Service Area

The Madison County Mass Transit District or the MCT Service Area, encompasses the following 16 townships in Madison County, Illinois:

Alton, Godfrey, Foster, Moro, Fort Russell, Wood River, Chouteau, Edwardsville, Venice, Granite City, Nameoki, Collinsville, Jarvis, Saline, St. Jacob and Helvetia.

The MCT Service Area includes 179 of Madison County's 191 Census Block Groups and with 248,281 residents, represents approximately 93% of Madison County's total population (See Service Area Map in **Section 17, Map 1**). The minority population of the MCT Service Area is 41,576 individuals, which represents 17% of the Service Area population (See Minority Population Map in **Section 17, Map 2**). The low-income population of the MCT Service Area is 30,792 individuals, which represents 12% of the service area (See Low Income Block Group Map in **Section 17, Map 3**).

12. MCT Customer Demographics and Travel Patterns

MCT Fixed-Route Passenger Demographic Survey was last completed in the summer of 2024. Average weekday ridership by route for CY 2023 (1,276,769 boardings) was inserted into a Raosoft calculator to determine sample size. With a margin of error of 5% and a 95% confidence level, 385 surveys needed to be collected. MCT exceeded the recommended sample size, collecting 604 surveys. The number of surveys required by route was based on each route's percentage of overall ridership. For example, the #17 Cougar Shuttle accounted for 15% of all boardings, so 15% of all surveys needed would be collected on that route. This methodology accurately reflected the fixed-route ridership and provided a representative sample in which respondents were spread proportionately across the routes.

MCT Passengers by Race:

As the table on the next page illustrates, the survey revealed that the 43% of all MCT passengers classified themselves as "White," and 40% classified themselves as "Black." Other categories that were reported included American Indian, Asian, Hispanic, and Middle Eastern.

<i>What is your racial or ethnic background?</i>		
	Count	Composition
<i>Caucasian / White</i>	257	43%
<i>African American / Black</i>	244	40%
<i>More than one</i>	24	4%
<i>Asian</i>	62	10%
<i>Hispanic / Latino</i>	10	2%
<i>Middle Eastern / North African</i>	4	1%
<i>Native American / American Indian</i>	3	>1%
<i>TOTAL</i>	604	100%

MCT Passengers by Income:

The survey also revealed that a large percentage of MCT's Fixed-Route ridership can be classified as "low income." Approximately 64% of MCT passengers reported earning less than \$33,362 annually, regardless of the number of persons in their household. The State of Illinois Benefit Access Program defines low income as a three-person household earning less than \$55,500 annually. In MCT's case, approximately 88% of all passengers can be characterized as low income, using the first three income levels.

<i>Persons in Household</i>	<i>\$0-\$33,562</i>	<i>\$33,563-\$44,533</i>	<i>\$44,534-\$55,500</i>	<i>\$55,501 +</i>	<i>Grand Total</i>
<i>1</i>	181	35	11	11	238
<i>2</i>	81	27	10	21	139
<i>3</i>	43	15	9	20	87
<i>4</i>	47	11	8	10	76
<i>5+</i>	36	13	7	8	64
<i>No Response</i>	0	0	0	0	0
<i>Grand Total</i>	388	101	45	70	604
<i>% of Ridership</i>	64%	17%	7%	12%	100%

MCT Passengers by National Origin:

84% of MCT passengers identified the USA as their country of origin, with another 14% reporting "Other" as their country of origin.

<i>What is your country of origin?</i>		
	Count	Percent
<i>USA</i>	509	84%
<i>Mexico</i>	1	>1%
<i>Other</i>	86	14%
<i>Did Not Respond</i>	8	1%
<i>TOTAL</i>	604	100%

MCT Passengers Purpose of Trip:

Passengers identified “Work” as the most common purpose for their trip at 47% of respondents. An additional 24% said “School”.

<i>What is the purpose of your MCT trip?</i>		
	Count	Percent
<i>Work</i>	285	47%
<i>School</i>	146	24%
<i>Other</i>	163	27%
<i>Did Not Respond</i>	10	2%
<i>TOTAL</i>	604	100%

MCT Fare Usage:

MCT tracks ridership by Fare Type each month. The survey results correlated very closely with the actual boarding numbers for most of the categories. Compared to actual boarding data, the only number that did not correlate and was low, was the “Metro Pass” category. In reality, Metro boardings typically account for approximately 14% to 20% of all boardings, and the survey number was 9%.

<i>How do you most frequently pay your bus fare?</i>		
	Count	Percent
<i>Cash</i>	205	34%
<i>Free/Reduced Fare ID</i>	105	17%
<i>MCT Pass</i>	103	17%
<i>Metro Pass, Ticket, or ID</i>	57	9%
<i>TokenTransit/Mobile Pass</i>	125	21%
<i>Did Not Respond</i>	9	1%
<i>TOTAL</i>	604	100%

13. Monitoring Program

MCT will measure and adhere to its service standards policy to ensure services and benefits are distributed equitably throughout the MCT Service Area. MCT will continue to produce a system map with minority census block group and MCT Fixed-Route overlays at every service change. To ensure an equitable distribution of vehicle capacities, vehicle loads will be compared between minority routes, non-minority routes and the system average. Additionally, MCT will continue to rotate vehicle assignments daily within geographic constraints. If an uneven distribution of services or benefits is found, MCT will evaluate and pursue changes that conform to established standards.

MCT has created the table below which identifies minority routes as well as low income routes. If one-third of the service miles on a route are located within minority census block groups, the route is characterized as a “Minority Route.” If one-third of the service miles on a route are located within a low income census block group, the route is characterized as a “Low Income Route.” MCT uses these designations to determine whether minority and low income routes are treated equitably as it relates to the service standards and policies. Using August 2024 operating data, the table below shows the service spans of each route, categorized by minority and non-minority status.

Route	Minority Route	Low Income Route	Weekday Span		Saturday Span		Sunday Span	
1 – Riverbend	Minority	Low Income	5:33 AM	11:13 PM	7:18 AM	9:13 PM	8:18 AM	9:13 PM
1X – Riverbend Express	Minority		5:54 AM	8:03 AM				
	Minority		3:43 PM	6:09 PM				
2 – Granite City Shuttle	Minority	Low Income	6:18 AM	6:40 PM	7:41 AM	5:43 PM	7:41 AM	5:43 PM
4 – Madison – Edwardsville	Minority		6:10 AM	9:46 PM	7:46 AM	6:10 PM	7:46 AM	6:10 PM
5- Tri-City Regional	Minority	Low Income	3:56 AM	1:01 AM	4:46 AM	1:01 AM	7:18 AM	9:15 PM
6 – Roxana Shuttle			5:47 AM	6:42 PM	6:47 AM	6:42 PM	6:47 AM	6:42 PM
7- Alton Edwardsville	Minority	Low Income	6:18 AM	6:43 PM	7:18 AM	6:43 PM	8:18 AM	6:11 PM
8 – Central Shuttle	Minority		8:18 AM	6:04 PM	8:18 AM	6:04 PM	8:18 AM	6:04 PM
9- Washington Shuttle	Minority	Low Income	6:18 AM	9:09 PM	7:47 AM	6:09 PM	7:47 AM	6:12 PM
10- State/Elm Shuttle	Minority		6:18 AM	9:12 PM	8:18 AM	7:12 PM	8:18 AM	7:12 PM
11 – Brown Shuttle	Minority	Low Income	7:51 AM	5:43 PM	7:51 AM	5:43 PM		
12 – Bethalto Shuttle	Minority		7:18 AM	6:10 PM	7:18 AM	4:49 PM		
13 – Glen Carbon - Highland	Minority		6:50 AM	6:36 PM				
13X - Highland - SIUE			one trip per peak					
14X – Highland Express			5:45 AM	8:01 AM				
			3:33 PM	6:09 PM				
15 –East Collinsville Shuttle	Minority		6:58 AM	6:52 PM	7:58 AM	6:52 PM		
16 –Edwardsville Shuttle			8:13 AM	6:09 PM	8:13 AM	6:09 PM		
16X – Edwardsville Express	Minority		5:35 AM	7:49 AM				
	Minority		3:32 PM	6:15 PM				
17 - Cougar Shuttle*	Minority		6:45 AM	11:49 PM	7:32 AM	11:50 PM	7:32 AM	7:45 PM
18 – Collinsville Regional	Minority	Low Income	4:58 AM	12:41 AM	6:58 AM	11:41 PM	7:58 AM	9:16 PM
19 –Edwardsville – Collinsville Shuttle	Minority		4:29 AM	12:16 AM	6:15 AM	10:50 PM	7:15 AM	9:17 PM
20- Granite - Pontoon Beach			3:17 AM	12:48 AM	5:17 AM	12:45 AM	6:47 AM	9:45 PM
20X - GCC Express			3:17 AM	7:59 AM				
			2:15 PM	6:50 PM				
21 - West Collinsville Shuttle	Minority		6:58 AM	6:54 PM	6:58 AM	6:54 AM		
22 - University Shuttle*	Minority		6:15 AM	12:02 AM	7:15 AM	12:04 AM	7:15 AM	7:59 PM

A. Performance Monitoring

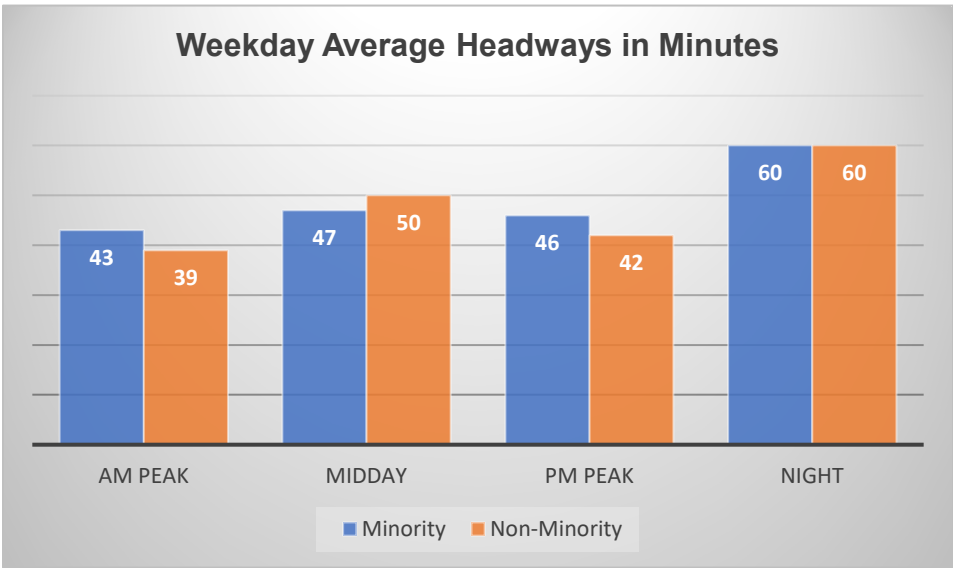
MCT will assesses the performance of each minority and non-minority route by assessing *Ridership by Minority and Non-Minority Routes*. The following table shows data as of August 2023, since then no major changes to span or routing have been made:

	Ridership	Percentage of Total Ridership
Minority Routes	123,584	83%
Non-Minority Routes	24,632	17%

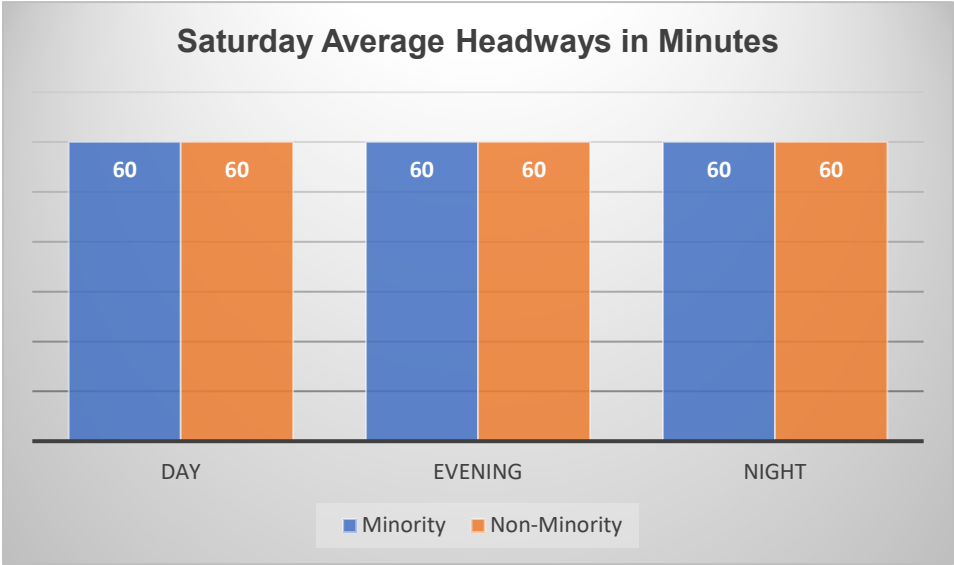
B. Characteristic Monitoring

MCT assesses the characteristics of each minority and non-minority route by period (Weekday, Saturday, Sunday) and span. This can be seen on the subsequent charts.

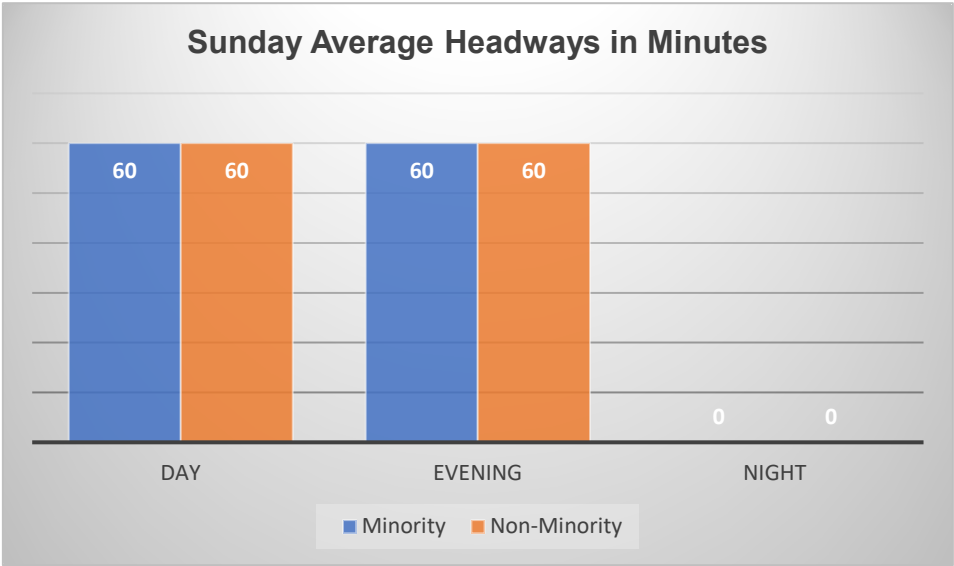
- a. **Service Period:** The tables below indicate that non-minority routes have slightly higher frequency in both peaks as well as the midday period and like frequency in the evening on the weekdays; equal frequency during the day on Saturdays and on Saturday nights. On Sundays, service between Minority and Non Minority routes are equal.



	AM Peak	Midday	PM Peak	Night
Minority	43	47	46	60
Non-Minority	39	50	42	60



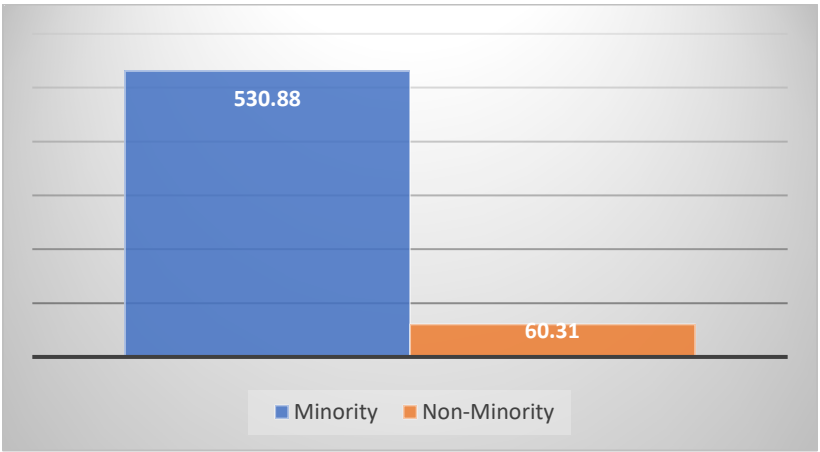
	Daytime	Evening	Night
Minority	60	60	60
Non-Minority	60	60	60



	Daytime	Evening	Night
Minority	60	60	0
Non-Minority	60	60	0

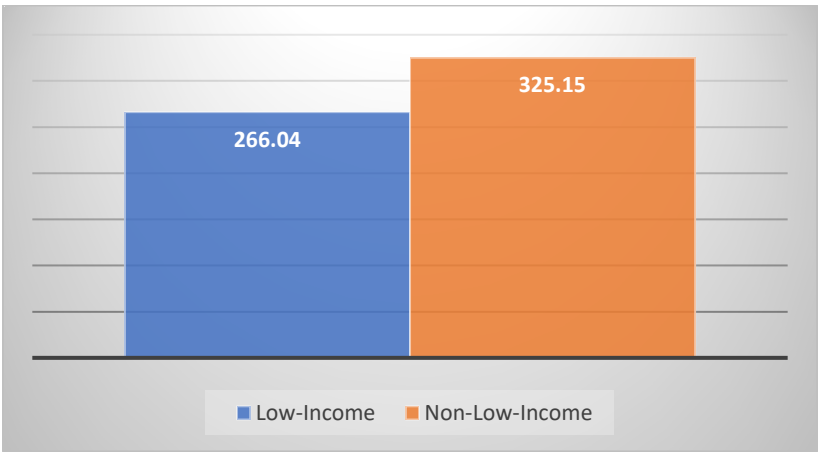
- b. **Service Span:** As the table on page 29 indicates, the span of service is greater on Minority routes and Low Income routes, compared to Non-Minority and Non-Low-Income routes. To illustrate this point more clearly, the following charts have been created. The first chart below indicates that each weekday there are eight times more revenue hours (530 hours) on Minority Routes, than Non-Minority routes (60 hours).

Weekday Revenue Hours of Minority Routes vs Non-Minority Routes



The number of weekday trips on Minority routes vs. Non-Minority routes is another useful indicator. MCT currently operates 709 trips each weekday on Minority routes, compared to 86 trips on Non-Minority routes.

Weekday Revenue Hours of Low-Income Routes vs Non-Low-Income Routes



There are similar weekday revenue hours on Low-Income routes (266 hours) as there are on Non-Low-Income routes (325 hours), as indicated in the chart above.

-
- c. **Any route changes that impact Minority Census Block Groups:** See Section 16 for a listing of route changes and the corresponding Equity Analyses performed since 2022.
- d. **Any route changes that impact Low Income Census Block Groups:** See Section 16 for a listing of route changes and the corresponding Equity Analyses performed since 2022.
- C. Transit Amenities Monitoring: As bus stops and transit amenities are placed, MCT annually assesses the location of amenities using a map that includes both the amenities, the Minority Census Block Groups and the Low-Income groups. The purpose of this exercise will be to ensure that amenities are distributed equitably. If discrepancies are found in minority or low-income areas MCT will take steps to correct the situation.
- D. Disparate Impact and Disproportionate Burden Monitoring: As discussed in Section 16 and **Appendix D**, MCT will evaluate transit service to determine whether a disparate impact or disproportionate burden exists on the basis of race, color, or national origin any time that a Major Service Change or Fare Change is proposed.

14. Public Engagement Process Policies

To engage the public on its proposed Major Service Change, Fare Change, Disparate Impact and Disproportionate Burden Policies, MCT hosted a series of open house-style information sessions to gather feedback and answer questions regarding the policy. Dates, times and locations of the meetings are listed below:

- MCT Alton Station Thurs., February 13, 2014 3:00 p.m. – 4:00 p.m.
- MCT Granite City Station Fri., February 14, 2014 10:00 a.m. – 11:00 a.m.
- MCT Wood River Station Fri., February 14, 2014 3:00 p.m. – 4:00 p.m.
- MCT Collinsville Station Tues., February 18, 2014 10:00 a.m. – 11:00 a.m.
- MCT Edwardsville Station Tues., February 18, 2014 3:00 p.m. – 4:00 p.m.

Although individuals were present at the transfer stations during the public meetings, and several read through the proposed policies, none of the individuals made any comments regarding the draft policies. The MCT Board of Trustees approved the policies at its regular Board Meeting on Thursday, February 27, 2014. A copy of the approved policy can be found in **Appendix D**.

15. Board Meeting Minutes and Resolution

A copy of the signed Resolution confirming the approval of Major Service Change Policy, Fare Change Policy, Disparate Impact Policy and Disproportionate Burden Policy can be found in **Appendix E**.

16. Equity Analysis of Major Service Changes

Since the last Title VI program submission in 2022, MCT has proposed and implemented several service changes which were characterized as “Major Service Changes” as defined in the Major Service Change policy in **Appendix D**.

Before changes are approved, MCT performs a Disparate Impact and Disproportionate Burden Analysis. The analysis determines whether a Disparate Impact on minority populations or a Disproportionate Burden on low-income populations would occur should changes be made. MCT has outlined an “Adverse Effect” as: If the proportion of persons in the protected class is 20% higher than the proportion of persons in the non-protected class.

For each Major Service Change since the 2022 submission MCT conducted the following analyses:

January 12, 2025 Service Change

The following Major Changes were proposed for the January 12, 2025 Service Change

- **13X Highland-SIUE Express**: Discontinue route due to reported low ridership and the opportunity to turn the riders into a vanpool using the RideFinders program along with the Madison County Vanpool Initiative.
- **#15 East Collinsville Shuttle**: Discontinue route due to low ridership and the implementation of a microtransit that covers more of the area, provides on demand rides to specific locations within the zone for the same cost.

Route	Minority			Low-Income		
	Route Ridership	System Ridership	Difference from System	Route Ridership	System Ridership	Difference from System
13X	0%	57%	57% Less Than	0%	64%	64% Less Than
15	50%	57%	7% More Than	75%	64%	11% Less Than

The analysis revealed there was not a disproportionate burden and disparate impact on minority and low-income individuals. However, after reviewing public comments MCT did not eliminate the 13X Highland-SIUE Express. There was no disproportionate burden or disparate impact greater than 20% with the elimination of the 15 East Collinsville Shuttle. If there was, MCT was able to validate the elimination of the route by creating a microtransit service within the area.

May 5, 2024 Service Change

The following service change initially started out as a major service change but then turned minor after reviewing public comments. MCT still performed an equity analysis even though it was not required.

- **#5 Tri-City Regional**: Eliminate trips to Downtown St. Louis and substitute with trips to Emerson Park Metrolink Station.

Route	Minority			Low-Income		
	Route Ridership	System Ridership	Difference from System	Route Ridership	System Ridership	Difference from System
5	42%	39%	3% More Than	47%	30%	17% More Than

The analysis revealed that there is no disproportionate burden or disparate impact on individuals that was greater than 20%. However, after reviewing public comments MCT did not follow through with the proposal and was able to save specific routes into Downtown St. Louis no longer triggering a major service change.

December 3, 2023 Service Change

The following Major Changes were proposed for the December 5, 2023 Service Change:

- **#7 Alton-Edwardsville:** Reduce frequency to 60 minutes due to a workforce shortage. Remove trips to and from SIUE. Only serve ARMTTC on weekdays.
- **#10 State & Elm:** Reduce frequency to 60 minutes due to workforce shortage. End service at 9:12 PM. Reduce morning service span.
- **#24X Riverbend-Gateway Commerce Center Express:** Discontinue route due to low ridership.
- **#25X Collinsville-Gateway Commerce Center Express:** Discontinue route due to low ridership.

Route	Minority			Low-Income		
	Route Ridership	System Ridership	Difference from System	Route Ridership	System Ridership	Difference from System
7	39%	10%	29% More Than	75%	30%	45% More Than
10	48%	39%	9% Less Than	23%	30%	7% Less Than
24X	90%	39%	51% More Than	0%	30%	-
25X*	-	39%	-	-	30%	-

*When the demographic survey was conducted, the #25X did not require any surveys based on the boarding data and average daily ridership.

MCT's mission is to provide service that is commensurate with demand. The primary objective for this analysis was to examine the proposed service change to ensure minority and low-income populations would not be more adversely affected than non-minority and non-low-income populations. While the analysis revealed there was an effect, individuals are still able to reach their destinations using MCT services but there is no longer a direct route. This choice was made to help provide reliable service and combat the driver shortage MCT faced.

February 5, 2023 Service Change

The following Major Changes were proposed for February 5, 2023, Service Change:

- **#23 Gateway Commerce Center Shuttle**: Discontinue route due to low ridership.

Route	Minority			Low-Income		
	Route Ridership	System Ridership	Difference from System	Route Ridership	System Ridership	Difference from System
23	36%	56%	20% Less Than	86%	86%	0%

While there was an adverse effect, MCT still went through with the proposed plan due to low route performance. Other routes were still available to take passengers to the same location.

17. Demographic & Service Maps

The following information shows the demographics of the MCT Service Area. These maps are used to assist MCT in determining to what extent transit services are available to minority and low-income populations within the MCT Service Area. The maps are taken out of our scheduling and planning software, Optibus.

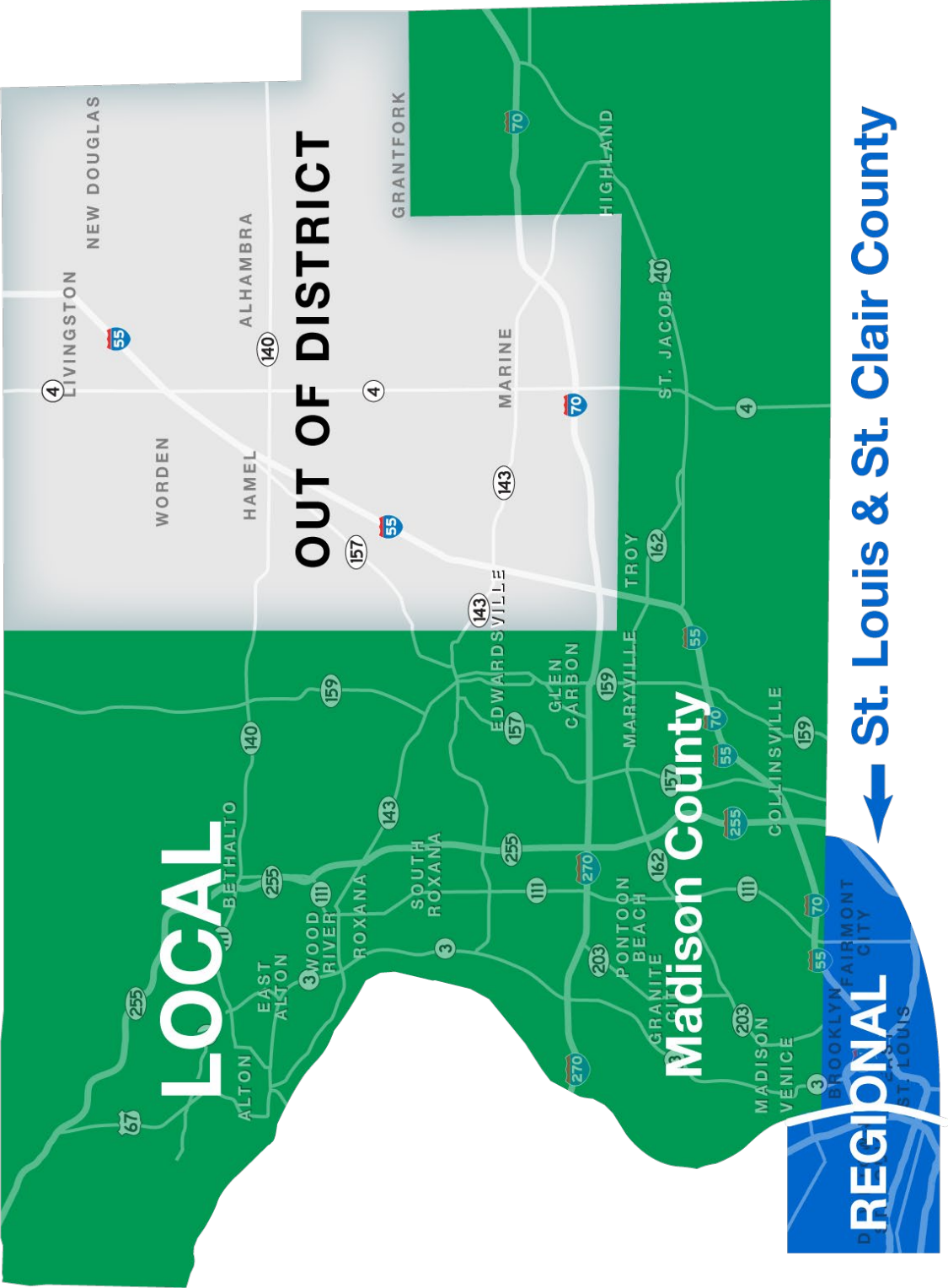
Map 1 Service Area: The MCT service area encompasses 179 of the 191 census block groups and 94% of the Madison County population. As reported in the 2020 US Census, the population of the MCT Service Area is 249,471 and the overall population of Madison County is 265,859. MCT's current Fixed-Route bus system is comprised of twenty-four regular fixed-routes operating on 665.86 directional route miles throughout western and central Madison County, as well as in the US 40 corridor of eastern Madison County.

Map 2 Minority Population: A Minority Block Group Map plots the MCT Service Area and census block groups where the percentage of total minority population residing in these areas exceeds the average percentage of minority populations for the service area as a whole.

Map 3 Low-Income: A Low-Income Block Group Map plots the MCT Service Area and census block groups where the percentage of the total low-income population exceeds the average percentage of low-income populations for the service area as a whole.

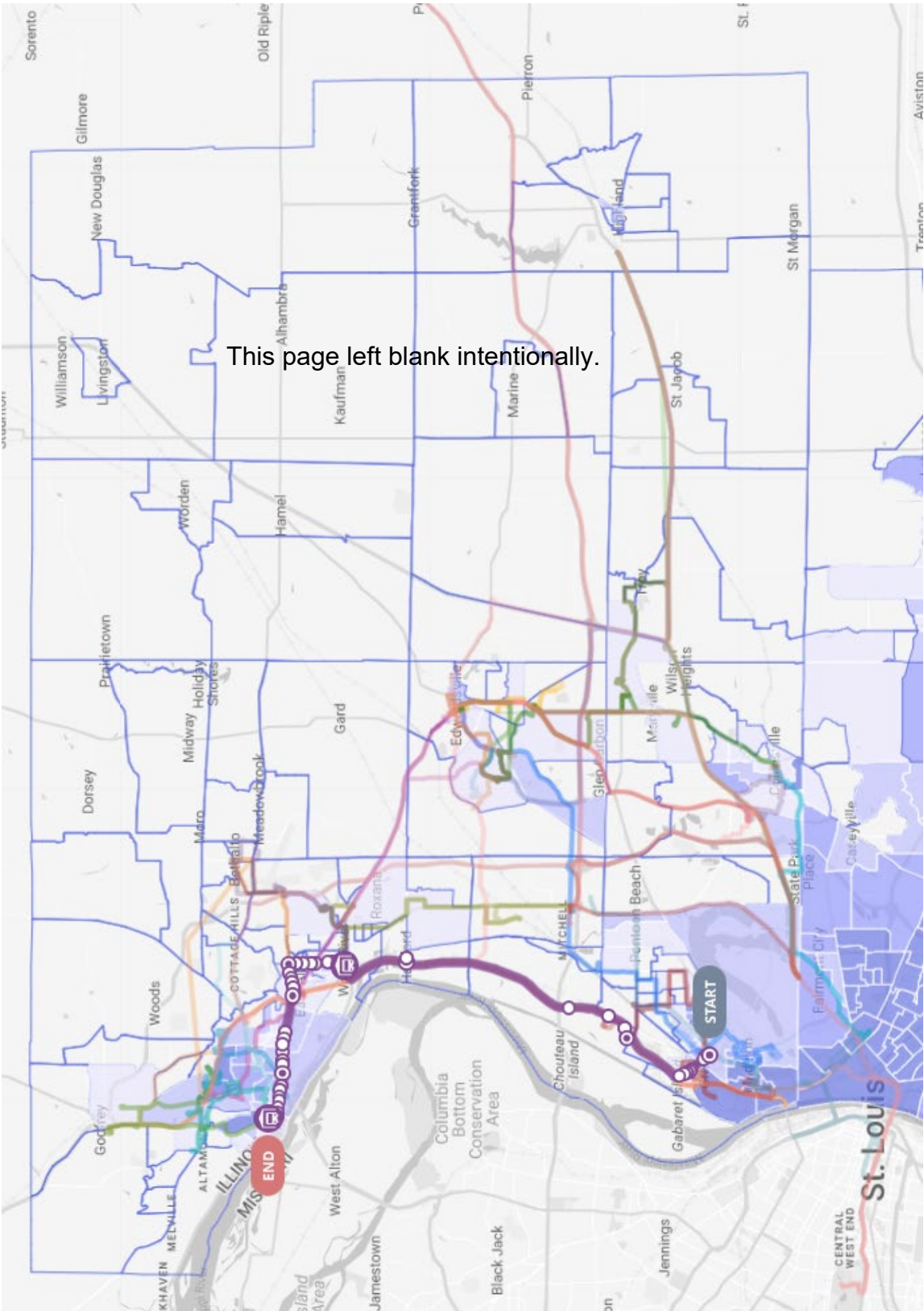
Map 4 Limited English Proficiency: A Limited English Proficiency Map plots the MCT Service Area and the percentage of Limited English Proficiency populations by census tract.

Map 1: Service Area

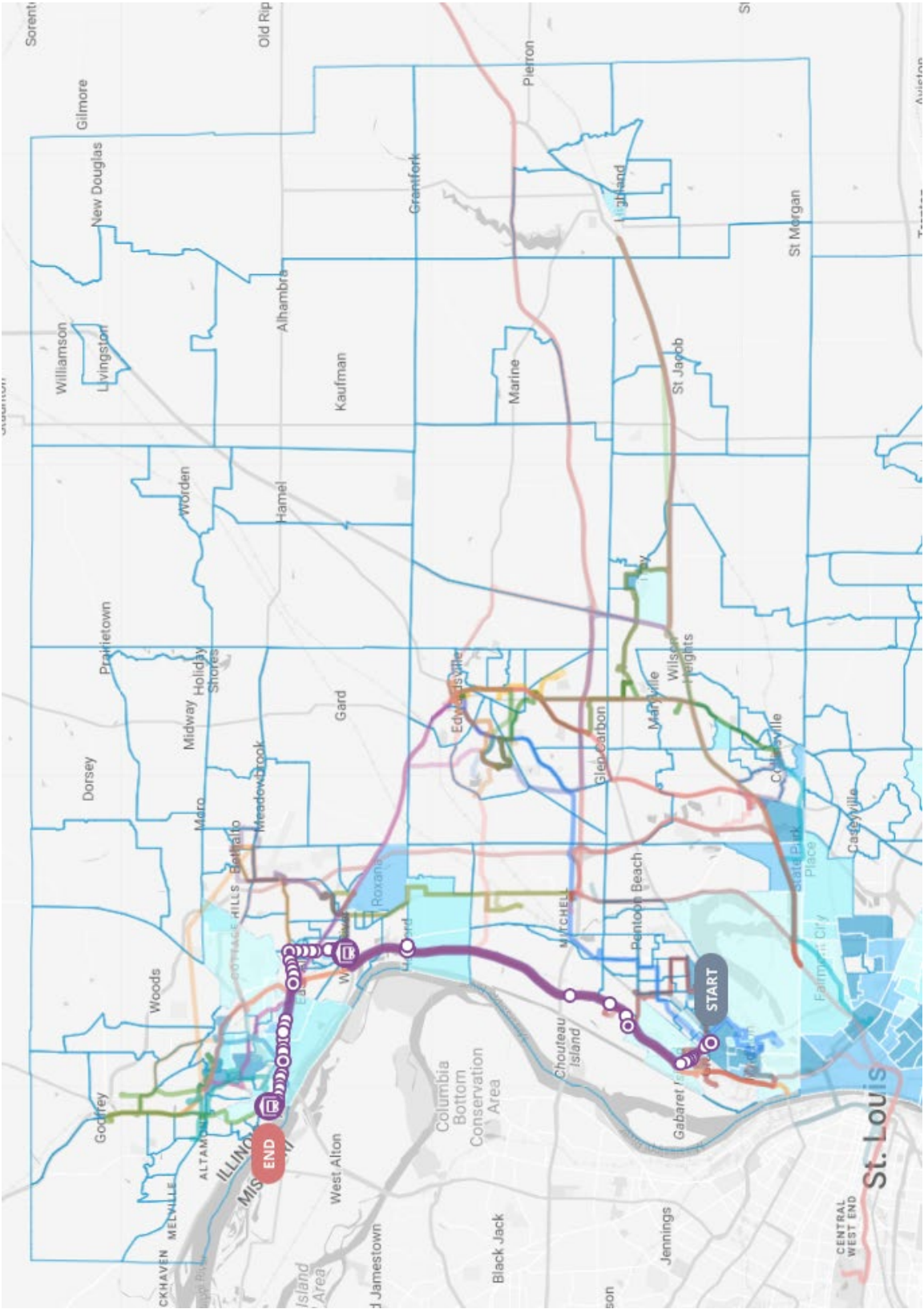


Map 2: Minority Population

Minority population is shown by the purple blocks on the map below.

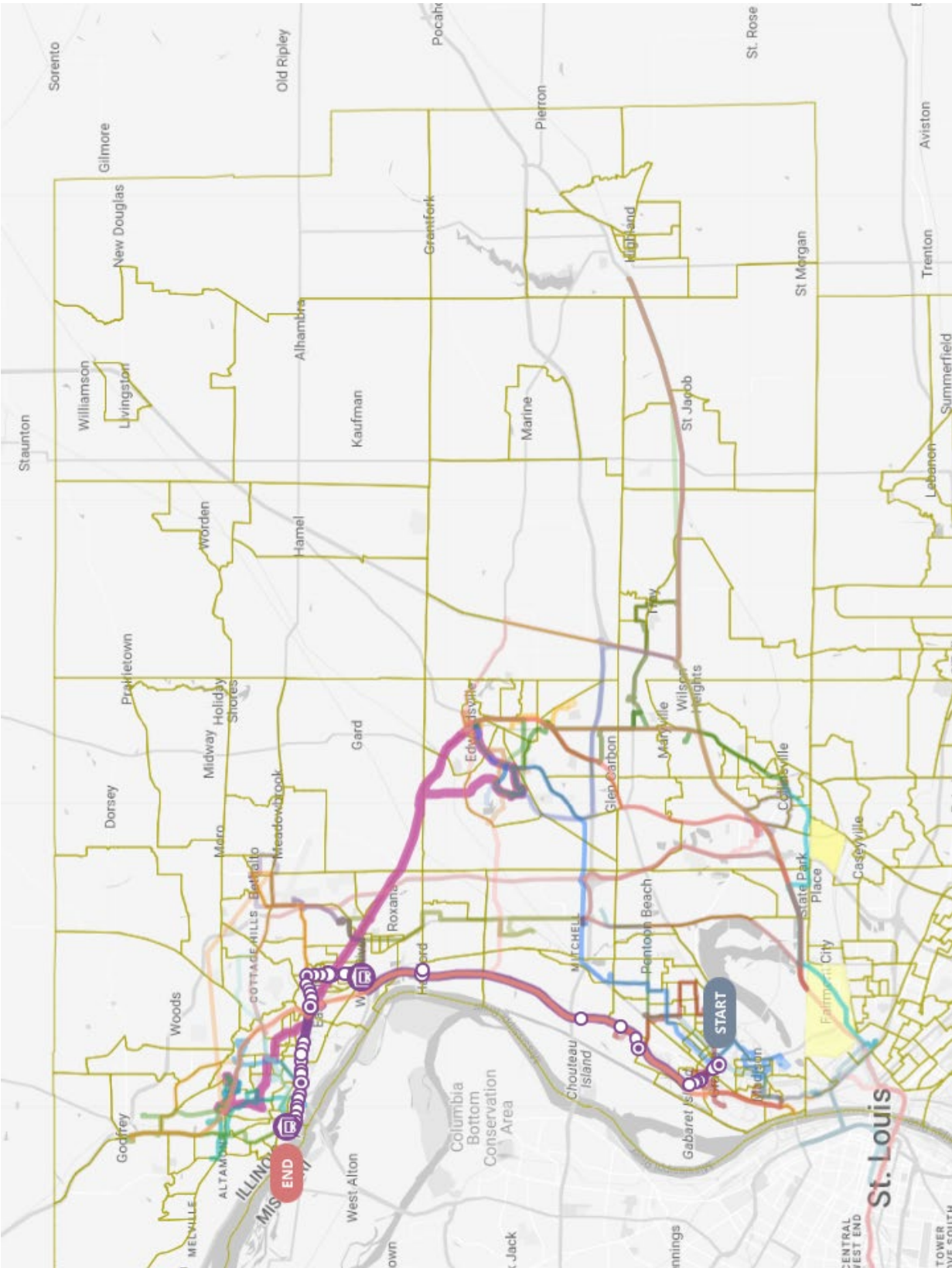


Map 3: Low-Income Population
Low-income populations are shown



Map 4: Limited English Proficiency

Limited English Proficiency populations are shown in yellow on the map.



III. APPENDIX

A. Civil Rights Assurances

DEPARTMENT OF TRANSPORTATION CIVIL RIGHTS ASSURANCE

Madison County Mass Transit District hereby agrees that, as a condition to receiving any Federal financial assistance from the Department of Transportation, it will comply with Title VI of the Civil Rights Act of 1964, 78 Stat. 252, 42 U.S.C. 2000d - 42 U.S.C. 2000d-4 (hereinafter referred to as the Act), and all requirements imposed by or pursuant to Title 49, Code of Federal Regulations, Department of Transportation, Subtitle A, Office of the Secretary, Part 21, Nondiscrimination in Federally-Assisted Programs of the Department of Transportation - Effectuation of Title VI of the Civil Rights Act of 1964 (hereinafter referred to as the Regulations) and other pertinent directives, to the end that in accordance with the Act, Regulations, and other pertinent directives, 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 otherwise subjected to discrimination under any program or activity for which Madison County Mass Transit District receives Federal financial assistance from the Department of Transportation, including the Federal Transit Administration, and hereby gives assurance that it will promptly take any measures necessary to effectuate this agreement. This assurance is required by subsection 21.7(a) of the Regulations.

More specifically and without limiting the above general assurance, Madison County Mass Transit District hereby gives the following specific assurances with respect to its FTA Section 5309 and 5307 assisted transit programs:

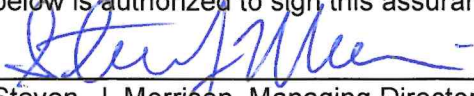
1. That Madison County Mass Transit District agrees that each "program" and each "facility" as defined in subsections 21.23(e) and 21.23(b) of the Regulations, will be (with regard to a "program") conducted, or will be ("with regard to a "facility") operated in compliance with all requirements imposed by, or pursuant to, the Regulations.
2. That Madison County Mass Transit District shall insert the following notification in all solicitations for bids for work or material subject to the Regulations and made in connection with its FTA Section 5309 and 5307 assisted transit programs and, in adapted form in all proposals for negotiated agreements:

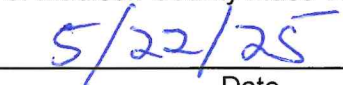
"Madison County Mass Transit District, in accordance with Title VI of the Civil Rights Act of 1964, 78 Stat. 252, 42 U.S.C. 2000d to 2000d-4 and Title 49, Code of Federal Regulations, Department of Transportation, Subtitle A, Office of the Secretary, Part 21, Nondiscrimination in Federally-Assisted Programs of the Department of Transportation issued pursuant to such Act, hereby notifies all bidders that it will affirmatively insure that in any contract entered into pursuant to this advertisement, minority business enterprises will be afforded full opportunity to submit bids in response to this invitation and will not be discriminated against on the grounds of race, color, or national origin in consideration for an award."

3. That Madison County Mass Transit District shall insert the clauses of Appendix A of this assurance in every contract subject to this Act and the Regulations.

4. That Madison County Mass Transit District shall insert the clauses of Appendix B of this assurance, as a covenant running with the land, in any deed from the United States affecting a transfer of real property, structures, or improvements thereon, or interest therein.
5. That where Madison County Mass Transit District receives Federal financial assistance to construct a facility, or part of a facility, the assurance shall extend to the entire facility and facilities operated in connection therewith.
6. That where Madison County Mass Transit District receives Federal financial assistance in the form, or for the acquisition of real property or an interest in real property, the assurance shall extend to rights to space on, over, or under such property.
7. That Madison County Mass Transit District shall include the appropriate clauses set forth in Appendix C of this assurance, as a covenant running with the land, in any future deeds, leases, permits, licenses, and similar agreements entered into by Madison County Mass Transit District with other parties: (a) for the subsequent transfer of real property acquired or improved under its FTA Section 5309 and 5307 assisted transit programs; and (b) for the construction or use of or access to space on, over, or under real property acquired, or improved under its FTA Section 5309 and 5307 assisted transit programs.
8. That this assurance obligates Madison County Mass Transit District for the period during which Federal financial assistance is extended to the program, except where the Federal financial assistance is to provide, or is in the form of, personal property, or real property or interest therein or structures or improvements thereon, in which case the assurance obligates Madison County Mass Transit District or any transferee for the longer of the following periods: (a) the period during which the property is used for a purpose for which the Federal financial assistance is extended, or for another purpose involving the provision of similar services or benefits; or (b) the period during which Madison County Mass Transit District retains ownership or possession of the property.
9. Madison County Mass Transit District shall provide for such methods of administration for the program as are found by the Secretary of Transportation of the official to whom he/she delegates specific authority to give reasonable guarantee that it, other recipients, subgrantees, contractors, subcontractors, transferees, successors in interest, and other participants of Federal financial assistance under such program will comply with all requirements imposed or pursuant to the Act, the Regulations and this assurance.
10. Madison County Mass Transit District agrees that the United States has a right to seek judicial enforcement with regard to any matter arising under the Act, the Regulations and this assurance.

This assurance is given in consideration of and for the purpose of obtaining any and all Federal grants, loans, contracts, property, discounts or other Federal financial assistance extended after the date hereof to Madison County Mass Transit District by the Department of Transportation under the FTA Section 5309 and 5307 programs and is binding on it, other recipients, subgrantees, contractors, subcontractors, transferees, successors in interest and other participants in the FTA Section 5309 and 5307 programs. The person whose signature appears below is authorized to sign this assurance on behalf of Madison County Mass Transit District.


Steven J. Morrison, Managing Director


Date

B. Title VI Assurances

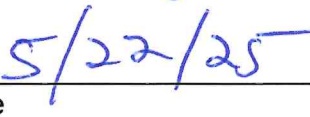
**MADISON COUNTY MASS TRANSIT DISTRICT
TITLE VI ASSURANCE**

Madison County Mass Transit District hereby certifies that, as a condition of receiving Federal financial assistance under the Fixing America's Surface Transportation (FAST) Act, signed into law on December 4, 2015, effective January 1, 2016, and reaffirmed May 26, 2022, it will ensure that:

1. No person on the basis of race, color, or national origin will be subjected to discrimination in the level and quality of transportation services and transit-related benefits.
2. Madison County Mass Transit District will compile, maintain, and submit in a timely manner, Title VI information required by FTA Circular 4702.1A and in compliance with the Department of Transportation's Title VI regulation, 49 CFR Part 21.9.
3. Madison County Mass Transit District will make it known to the public that those person or persons alleging discrimination on the basis of race, color, or national origin as it relates to the provision of transportation services and transit-related benefits may file a complaint with the Federal Transit Administration and/or the U.S. Department of Transportation.

I, Steven J. Morrison, Managing Director of Madison County Mass Transit, am authorized to sign this assurance on behalf of Madison County Mass Transit District.


Steven J. Morrison, Managing Director


Date

C. Title VI Statement, Complaint Procedures, & Notification

MADISON COUNTY MASS TRANSIT DISTRICT TITLE VI STATEMENT, COMPLAINT PROCEDURES & NOTIFICATION

- (1) Madison County Mass Transit District (MCT) is committed to enforcing the provisions of Title VI and protecting the rights and opportunities of all persons associated with MCT or affected by its services. MCT's Director of Marketing & Planning, serving under the direction of the Managing Director, is responsible for the implementation and compliance of these processes.
- (2) A copy of this information is available to the general public by contacting the Director of Marketing & Planning at (618) 797-4600.
- (3) Any person(s) or group(s) who feel that they have been discriminated against is encouraged to report such violations to MCT by following the process described below:

Title VI Complaint Procedures

1. Any person who believes that they have been subjected to discrimination may file a complaint with Madison County Mass Transit District. Federal law requires that complaints be filed within one-hundred eighty (180) calendar days of the alleged incident.
2. The complaint should include the following information:
 - a. Name, address, and phone number of the individual making the complaint.
 - b. Basis of the complaint, i.e., race, color, national origin, or English proficiency.
 - c. The date or dates on which the alleged discriminatory event(s) occurred.
 - d. Names, addresses, and phone numbers of person(s) who were allegedly discriminated against.
 - e. Description of the incident resulting in discrimination.
 - f. Signature of individual making the complaint.
 - g. If an individual wishing to make a complaint is unable to write the complaint, MCT staff will assist. Please contact (618) 797-4600 for details.
3. The complaint can be faxed to (618) 797-7547, e-mailed to info@mct.org or mailed to:
Madison County Mass Transit District
Attn: Managing Director
1 Transit Way
Pontoon Beach, IL 62040
4. Formal written complaints are immediately reviewed and tracked in the Title VI Investigation Log by the Managing Director or his/her designee.

5. The Managing Director or his/her designee will track the date of the complaint, summary of allegations, date and status of the investigation, and action taken by the District.
6. The Managing Director or his/her designee shall promptly and thoroughly investigate the circumstances of the formal complaint.
7. If an investigation confirms a violation has occurred, MCT will take corrective action, including discipline of an employee found to be willfully negligent and/or discriminatory.

If the information provided reveals that the incident addressed by the complaint relates to race, color, national origin or Limited English proficiency, the complaint will be identified as a "Title VI Complaint."

D. Title VI Major Service Change & Fare Change Policy

MADISON COUNTY MASS TRANSIT DISTRICT TITLE VI MAJOR SERVICE CHANGE & FARE CHANGE POLICY: FEBRAURY 2014

In accordance with the guidelines set forth by the Federal Transit Administration (FTA), all transit providers who receive federal funds must evaluate the impacts of proposed service and fare changes on minority and low-income populations. The Madison County Mass Transit District (MCT) proposes to establish the policies below in compliance with applicable federal requirements (Title VI of the Civil Rights Act 1964, 49 CFR Section 21 and FTA Circular 4702.1B), amended on October 12, 2012.

The purpose of the Title VI Service & Fare Equity Analysis is to define thresholds for determining Major Service Changes and whether potential changes to existing services or fares will have a “Disparate Impact” based on race, color, or national origin, or whether potential service changes will bear a “Disproportionate Burden” on low-income populations.

A) Title VI Major Service Change Policy:

If a proposed change is characterized as a “Major Service Change” a “Service Equity Analysis” must be performed to determine the impacts on both minority and low-income populations. MCT defines a “Major Service Change” as any change that meets one or more of the following criteria:

- Addition of a fixed-route.
- Addition or reduction of 25% or more of the total annual service hours or miles operated on a fixed-route.
- Addition or reduction of 25% or more of the Paratransit general public (non-ADA) coverage area.
- Addition or reduction of 25% or more of the coverage of existing street miles of a fixed-route due to proposed realignment or discontinuation.
- Addition or reduction that impacts 25% or more of the total daily ridership on a fixed-route or the average daily ridership of Paratransit general public (non-ADA) trips.

Emergency or temporary changes caused by street or bridge closure, public disaster, severe weather, floods, or governmental order may be implemented without triggering a Service Equity Analysis.

B) Title VI Fare Change Policy:

Any increase or decrease of MCT’s fares, which has been initiated by MCT, will be characterized as a “Fare Change” and will trigger a “Service Equity Analysis.”

C) Title VI Disparate Impact Policy:

A Major Service Change or Fare Change may be characterized as having a “Disparate Impact” on a minority population if the percentage of minority passengers on an affected

route is greater than the percentage of minority passengers in the overall fixed-route system. To determine if there is a disparate impact, the following steps will be taken:

- Determine what percentage of the affected ridership is characterized as a minority.
- Determine what percentage of the overall system ridership is characterized as a minority.
- Compare the ridership on an affected route with the ridership of the entire system. (Example: If the ridership on the affected route is 60% minority and the system ridership is 40% minority, there may be a Disparate Impact.)
- Compare the proportion of persons in the protected class who are adversely affected with the proportion of persons not in the protected class who are adversely affected.

Adverse Effects: If the proportion of persons in the protected class is 20% higher than the proportion of persons in the non-protected class, there may be Adverse Effects and a Disparate Impact. In the case of a Disparate Impact, MCT will consider modifying its proposal to avoid or minimize the impact.

D) Title VI Disproportionate Burden Policy:

A Major Service Change or Fare Change may be characterized as having a “Disproportionate Burden” on a low-income population if the percentage of low-income passengers on an affected route is greater than the percentage of low-income passengers in the overall fixed-route system.

A “low-income population” is defined by the State of Illinois’ Department of Aging’s low-income threshold for the “Benefits Access Program.” The State of Illinois changes the income threshold periodically, and MCT will modify the low-income definition accordingly. To determine if there is a disproportionate burden, the following steps will be taken:

- Determine what percentage of the affected ridership is characterized as low-income.
- Determine what percentage of the overall system ridership is characterized as low-income.
- Compare the ridership on an affected route with the ridership of the entire system. (Example: If the ridership on the affected route is 60% low-income and the system ridership is 40% low-income, there may be a disproportionate burden.)
- Compare the proportion of persons in the protected class who are adversely affected with the proportion of persons not in the protected class who are adversely affected.

Adverse Effects: If the proportion of persons in the protected class is 20% higher than the proportion of persons in the non-protected class, there may be Adverse Effects and a Disproportionate Burden. If a Disproportionate Burden is discovered, MCT will consider modifying its proposal to avoid or minimize the impact.

E) Data Analysis:

MCT will utilize ridership information, survey responses and/or US Census data to determine if a Major Service Change or Fare Change will have a Disparate Impact or Disproportionate Burden.

F) Public Engagement:

To engage the public on its proposed Major Service Change, Fare Change, Disparate Impact and Disproportionate Burden Policies, Madison County Mass Transit District hosted a series of open house-style information sessions to gather feedback and answer questions regarding the policy. Dates, times, and locations of the meetings are listed below:

- MCT Alton Station Thurs., February 13, 2014 3:00 p.m. – 4:00 p.m.
- MCT Granite City Station Fri., February 14, 2014 10:00 a.m. – 11:00 a.m.
- MCT Wood River Station Fri., February 14, 2014 3:00 p.m. – 4:00 p.m.
- MCT Collinsville Station Tues., February 18, 2014 10:00 a.m. – 11:00 a.m.
- MCT Edwardsville Station Tues., February 18, 2014 3:00 p.m. – 4:00 p.m.

E. Title VI Board Resolution Approving Major Service Change Policy

RESOLUTION 14-26

AUTHORIZING THE ADOPTION OF THE MADISON COUNTY MASS TRANSIT DISTRICT'S REVISED PUBLIC COMMENT PROCESS FOR FARE INCREASES AND MAJOR SERVICE CHANGES

WHEREAS, the District has the responsibility to operate and maintain fixed route and paratransit mass transportation as a public service for the welfare of the residents of the District and the vitality of Madison County, Illinois; and,

WHEREAS, in accordance with the guidelines set forth by the Federal Transit Administration (FTA), (Title VI of the Civil Rights Act 1964, 49 CFR Section 21 and FTA Circular 4702.1B), amended on October 12, 2012) all transit providers (with 50 or more fixed route vehicles operating peak service in an Urbanized Area of 200,000 or more) who receive federal funds, must have a written locally developed process for soliciting and considering public comment before raising a fare or carrying out a major transportation service reduction and must evaluate the impacts of proposed service and fare changes on minority and low income populations; and,

WHEREAS, following the 2013 Triennial Review, the District was advised to amend its public comment process to include a definition for major service reductions and fare increases for "general public demand response service"; and,

WHEREAS, in an effort to engage the public and solicit comments from passengers and community members regarding the proposed policy change, the District published legal notices in four newspapers of general circulation and held five public meetings at transit centers: Thursday, February 13, 2014, at Alton Station, Friday, February 14, 2014, at Granite City Station and Wood River Station and Tuesday, February 18, 2014, at Collinsville Station and Edwardsville Station; and,

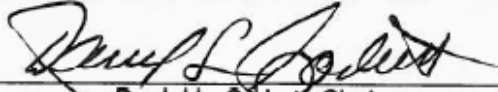
WHEREAS, the staff recommends the approval of the attached revised Public Comment Process for Fare Increases and Major Service Changes, which incorporates the required changes since the approval of the District's last policies in May 2013.

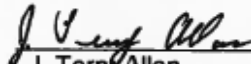
NOW, THEREFORE, BE IT RESOLVED BY THE BOARD OF TRUSTEES OF THE MADISON COUNTY MASS TRANSIT DISTRICT THAT:

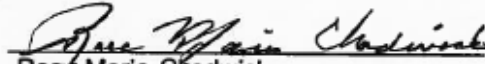
1. The Madison County Mass Transit District authorizes the adoption of the attached revised Public Comment Process for Fare Increases and Major Service Changes.
2. Daniel L. Corbett, Chairman, J. Terry Allan, Vice Chairman, and/or Jerry J. Kane, Managing Director, of the Madison County Mass Transit District, are hereby authorized to execute, complete, administer, and perform all obligations associated with the aforesaid actions, and to take any and all such further actions as are necessary and appropriate, including any and all amendments, on behalf of and in a manner most beneficial to the Madison County Mass Transit District.

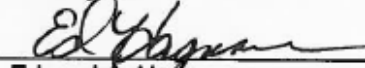
Appendix E (Continued):

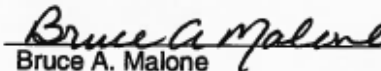
ADOPTED by the Board of Trustees of the Madison County Mass Transit District,
Madison County, Illinois, on this twenty-seventh day of February 2014.


Daniel L. Corbett, Chairman


J. Terry Allan


Rose Marie Chadwick


Edward A. Hagnauer


Bruce A. Malone

APPROVED as to Form:

John T. Papa, Legal Counsel

Appendix E (Continued):

MADISON COUNTY MASS TRANSIT DISTRICT PUBLIC COMMENT PROCESS FOR FARE INCREASES AND MAJOR SERVICE CHANGES

Prior to implementing a Fare Increase or Major Service Change to fixed-route or Paratransit services, Madison County Mass Transit District (MCT) will notify the public of the proposed changes and offer an opportunity for public comment and discussion prior to the Board of Trustees meeting at which MCT would consider enacting the proposed change. To explain the changes under consideration and to solicit and consider public comments in accordance with Federal Transit Administration guidelines, the following process has been developed:

Definition of a "Major Service Change":

MCT defines a "Major Service Change" as any change that meets one or more of the following criteria:

1. Addition of a fixed-route.
2. Addition or reduction of 25% or more of the total annual service hours or miles operated on a fixed-route.
3. Addition or reduction of 25% or more of the Paratransit general public (non-ADA) coverage area.
4. Addition or reduction of 25% or more of the coverage of existing street miles of a fixed-route due to proposed realignment or discontinuation.
5. Addition or reduction that impacts 25% or more of the total daily ridership on a fixed-route or the average daily ridership of Paratransit general public (non-ADA) trips.

Emergency or temporary changes caused by street or bridge closure, public disaster, severe weather, floods, or governmental order are not characterized as a "Major Service Change."

Notification:

A copy of the proposed Major Service Change or Fare Change will be posted on the website and will be available in hard copy format. Copies of the proposal will also be available in Braille or translated into the language of the individual's choice upon request.

MCT will notify the public of the dates, times and locations of the public meetings at least 14 days before the scheduled meetings. Procedures for making public comments during the meeting will also be released in advance.

MCT uses the following notification methods:

- Press releases distributed to regional media outlets
- On-board customer advisories on MCT Fixed-Route Buses
- Public Notices in newspapers of general circulation
- Email blast to all registered subscribers
- Posting on MCT's website and MCT's social media sites if applicable

Collecting Public Comments:

In addition to accepting comments via e-mail, US mail or over the phone, MCT will also host public meetings to disseminate hard copies of the proposal, to answer questions and to collect written comments from the public. Locations for the public meetings will be based on the geographic area affected by the proposed change, the availability of transit for those affected and accessibility for the disabled and elderly. Along with the comments, MCT staff will also attempt to obtain the commenter's name, address and phone or e-mail for follow-up purposes.

Consideration of Public Comments:

All comments received via e-mail, US mail and at the public meetings will be summarized and presented to the MCT Board of Trustees for consideration at their regular MCT Board meeting. The decision by the MCT Board of Trustees will appear in the board meeting minutes posted on the MCT website, www.mct.org, and will be available for the public upon request.

F. Resolution Approving Title VI Program Update

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RESOLUTION 25-63

**APPROVING THE MADISON COUNTY MASS TRANSIT DISTRICT'S
TITLE VI PROGRAM UPDATE**

WHEREAS, as a recipient of federal funds, the Madison County Mass Transit District (District) is required by the United States Department of Transportation, Federal Transit Administration (FTA), to administer and maintain a Title VI Program, pursuant to the Civil Rights Act of 1964 (42 U.S.C. Section 2000d) and the Federal Transit Laws, as amended (49 U.S.C. Chapter 53 et seq.); and,

WHEREAS, the District is required by the United States Department of Transportation, Federal Transit Administration, to submit triennial plan updates pursuant to guidelines as described in FTA Circular 4702.1B and the Department's Policy Guidance Concerning Recipients' Responsibilities to Limited English Proficient ("LEP") Persons (70 FR 74087).

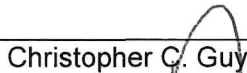
NOW, THEREFORE, BE IT RESOLVED BY THE BOARD OF TRUSTEES OF THE MADISON COUNTY MASS TRANSIT DISTRICT THAT:

1. Madison County Mass Transit District hereby approves the Madison County Mass Transit District's Title VI Program Update, dated May 2025, as attached.
2. Steven J. Morrison, Managing Director of the Madison County Mass Transit District, is hereby authorized to file the District's Title VI Program Update with the United States Department of Transportation, FTA.
3. Allen P. Adomite, Chairman, Christopher C. Guy, Vice Chairman, and/or Steven J. Morrison, Managing Director, of the Madison County Mass Transit District, are hereby authorized to take any and all actions as are necessary and appropriate to enact and administer the program, and maintain the District in full compliance with the provisions of FTA Circular 4702.1B and the Department's Policy Guidance Concerning Recipients' Responsibilities to LEP Persons (70 FR 74087).

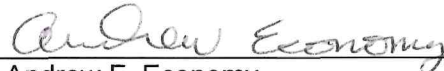
ADOPTED by the Board of Trustees of the Madison County Mass Transit District, Madison County, Illinois, on this twenty-second day of May 2025.



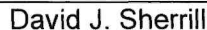
Allen P. Adomite, Chairman



Christopher C. Guy



Andrew F. Economy



David J. Sherrill



Michael J. McCormick

APPROVED as to Form:



Legal Counsel

CERTIFICATE

I, Julie Repp, do hereby certify that I am the fully qualified and acting Secretary of the Board of Trustees of the Madison County Mass Transit District, and as such Secretary, I am the keeper of the records and files of the Madison County Mass Transit District.

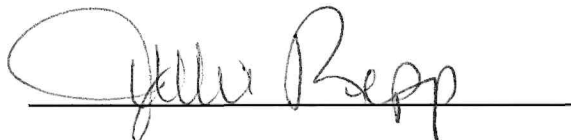
I do further certify that at a duly constituted and legally convened meeting of the Board of Trustees of the Madison County Mass Transit District held on Thursday, May 22, 2025, a resolution was adopted in full accordance and conformity with the by-laws of the Madison County Mass Transit District and the statutes of the State of Illinois, as made and provided, and that the following is a full, complete, and true copy of the pertinent provisions of said Resolution.

NOW, THEREFORE, BE IT RESOLVED BY THE BOARD OF TRUSTEES OF THE MADISON COUNTY MASS TRANSIT DISTRICT THAT:

1. Madison County Mass Transit District hereby approves the Madison County Mass Transit District's Title VI Program Update, dated May 2025, as attached.
2. Steven J. Morrison, Managing Director of the Madison County Mass Transit District, is hereby authorized to file with the United States Department of Transportation, FTA, said Title VI Program Update.
3. Allen P. Adomite, Chairman, Christopher C. Guy, Vice Chairman, and/or Steven J. Morrison, Managing Director, of the Madison County Mass Transit District, are hereby authorized to take any and all actions as are necessary and appropriate to enact and administer the program, and maintain the District in full compliance with the provisions of FTA Circular 4702.1B and the Department's Policy Guidance Concerning Recipients' Responsibilities to LEP Persons (70 FR 74087).

I further certify that the original of the complete said resolution is on file in the records of the Madison County Mass Transit District in my custody. I do further certify that the foregoing Resolution remains in full force and effect.

IN WITNESS WHEREOF, I have hereunto affixed my official signature as Secretary of the Madison County Mass Transit District on this twenty-second day of May 2025.

A handwritten signature in cursive script, reading "Julie Repp", is written over a solid horizontal line.