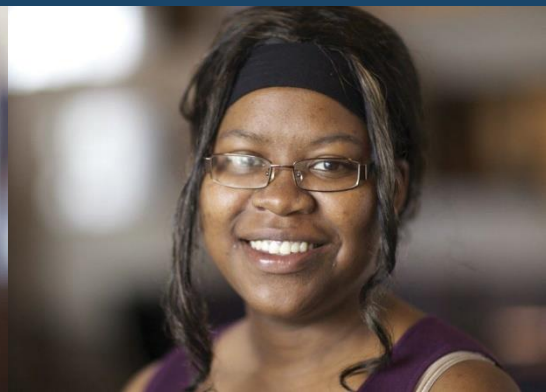
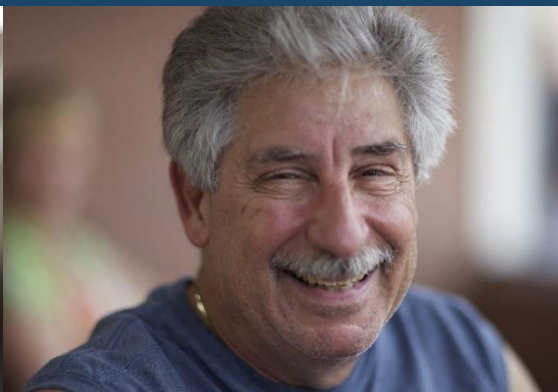




Central Oklahoma
Transportation & Parking
Authority

Title VI Program

April, 2022



Contents

Definitions	3
Introduction	5
Agency Profile	5
General Requirements	7
Title VI Notice to the Public	7
Title VI Complaint Process & Investigation Procedures	9
Title VI Complaint Form	9
Title VI Investigations, Complaints, and Lawsuits	13
Public Participation Plan	13
Language English Proficiency (LEP) Plan	15
Board Representation	15
Subrecipient Monitoring	15
Title VI Subrecipient Documentation	16
Equity Analysis – New Facilities	16
Board Approval	17
Requirements of Transit Providers	18
Service Standards	18
Service Policies	19
Demographic and Service Profile Maps and Charts	20
Demographic Ridership and Travel Patterns, Collected by Surveys	25
Service Monitoring	25
Major Service Change, Disparate Impact, and Disproportionate Burden Policies	31
Service and Fare Analysis	34
Appendix A: Public Engagement Plan	35
Appendix B: Limited English Proficiency Plan	47
Appendix C: Board Resolution	57
Appendix D: Service Equity Analyses (2020 and 2021)	

Table of Figures

Figure 1 - Title VI Notice to the Public - English	7
Figure 2 - Title VI Posted Notice	8
Figure 3 - Title VI Complaint Form (page 1).....	10
Figure 4 - Title VI Complaint Form (page 2).....	11
Figure 5 - Title VI Complaint Form (page 3).....	12
Figure 6 - Title VI Complaints (April 2019-March 2022)	13
Figure 7 - Summary of Outreach Efforts 2019-2022.....	14
Figure 8 – Racial Composition of COTPA Board of Trustees.....	15
Figure 9 - COTPA Transit Amenity Standards	20
Figure 10 – Minority Population, COTPA Service Area.....	21
Figure 11 – Population Living Below Poverty Line, COTPA Service Area	21
Figure 12 - EMBARK 2022 Service Area.....	22
Figure 13 - EMBARK 2022 Service Area - Minority Population.....	23
Figure 14 - EMBARK 2022 Service Area - Population Living Below the Poverty Line	24
Figure 15 - COTPA Route Classification: Minority/Non-Minority	26
Figure 16 - COTPA Service Headways.....	28
Figure 17 - COTPA On-Time Performance (Sep-Nov 2019)	29
Figure 18 - Service Area Population within 1/4 Mile of Fixed Route - Minority Population.....	30
Figure 19 - Service Area Population within 1/4 Mile of Fixed Route - Below Population	30
Figure 20 - COTPA Bus Fleet	31

Definitions

FTA Specific Definitions¹

Disparate Impact refers to a facially neutral policy or practice that disproportionately affects members of a group identified by race, color, or national origin, where the recipient's policy or practice lacks a substantial legitimate justification and where there exist one or more alternatives that would serve the same legitimate objectives but with less disproportionate effect on the basis of race, color, or national origin.

Disproportionate Burden refers to a neutral policy or practice that disproportionately affects low-income populations or riders more than non-low-income populations or riders. A finding of disproportionate burden requires the recipient to evaluate alternatives and mitigate burdens where practicable.

Disparate treatment refers to actions that result in circumstances where similarly situated persons are intentionally treated differently (i.e., less favorably) than others because of their race, color, or national origin.

Fixed route refers to public transportation service provided in vehicles operated along pre-determined routes according to a fixed schedule.

Low-income person refers to an individual whose family income is at or below 150 percent of the poverty line (as that term is defined in Section 673(2) of the Community Services Block Grant Act (42 U.S.C 9902(2)), including any revision required by that section, for a family of the size involved.

Low-income population refers to any readily identifiable group of low-income persons who live in geographic proximity, and, if circumstances warrant, geographically dispersed/transient persons (such as migrant workers or Native Americans) who will be similarly affected by a proposed FTA program, policy, or activity.

Minority persons include the following:

- (1) American Indian and Alaska Native, which refers to people having origins in any of the original peoples of North and South America (including Central America), and who maintain tribal affiliation or community attachment.
- (2) Asian, which refers to people having origins in any of the original peoples of the Far East, Southeast Asia, or the Indian subcontinent, including, for example, Cambodia, China, India, Japan, Korea, Malaysia, Pakistan, the Philippine Islands, Thailand, and Vietnam.

¹ FTA Circular 4702.1B

- (3) Black or African American, which refers to people having origins in any of the Black racial groups of Africa.
- (4) Hispanic or Latino, which includes persons of Cuban, Mexican, Puerto Rican, South or Central American, or other Spanish culture or origin, regardless of race.
- (5) Native Hawaiian or Other Pacific Islander, which refers to people having origins in any of the original peoples of Hawaii, Guam, Samoa, or other Pacific Islands.

Minority population means any readily identifiable group of minority persons who live in geographic proximity and, if circumstances warrant, geographically dispersed/transient populations (such as migrant workers or Native Americans) who will be similarly affected by a proposed DOT program, policy, or activity.

National origin means the particular nation in which a person was born, or where the person's parents or ancestors were born.

Predominantly minority area means a geographic area, such as a neighborhood, Census tract, block or block group, or traffic analysis zone, where the proportion of minority persons residing in that area exceeds the average proportion of minority persons in the recipient's service area.

Public transportation means regular, continuing shared-ride surface transportation services that are open to the general public or open to a segment of the general public defined by age, disability, or low income; and does not include Amtrak, intercity bus service, charter bus service, school bus service, sightseeing service, courtesy shuttle service for patrons of one or more specific establishments, or intra-terminal or intra-facility shuttle services. Public transportation includes buses, subways, light rail, commuter rail, monorail, passenger ferry boats, trolleys, inclined railways, people movers, and vans. Public transportation can be either fixed route or demand response service.

Service area refers either to the geographic area in which a transit agency is authorized by its charter to provide service to the public, or to the planning area of a State Department of Transportation or Metropolitan Planning Organization.

Introduction

This document contains information regarding transit services administered by the Central Oklahoma Transportation and Parking Authority (COTPA, dba EMBARK) and is intended to document compliance with Title VI of the 1964 Civil Rights Act. Section 601 of the Title VI of the Civil Rights Act of 1964 states:

No person in the United States shall, on the ground of race, color, or national origin, be excluded from participation in, be denied the benefits of, or be subjected to discrimination under any program or activity receiving Federal financial assistance.

Agency Profile

COTPA is a public trust of the City of Oklahoma City and the major public transportation provider within the Oklahoma City metropolitan area. COTPA is the urbanized area's designated recipient of Federal Transit Administration (FTA) funding.

Services Provided

The COTPA transit system, known as EMBARK, operates fixed route local and express bus service, streetcar service, paratransit service, and seasonal ferry service.

Local and Express Fixed Route Bus Service

EMBARK's 21-route bus system provides bus service in Oklahoma City, Midwest City, and unincorporated Oklahoma County and commuter express service between Oklahoma City and Norman. COTPA provides fixed-route bus service Monday through Sunday and operates a fleet of 50 buses during peak service. Increased local funding commitments in recent years have allowed EMBARK to add new weeknight service and Sunday service. EMBARK bus service is currently funded by Oklahoma City and through annual service agreements with Midwest City, Rose State College, and Oklahoma County (for service to and from Spencer).

Oklahoma City Streetcar

The Oklahoma City Streetcar (OKC Streetcar) provides service Monday through Sunday in Downtown Oklahoma City. The route consists of two loops. The smaller bricktown loop only operates Friday through Sunday. The OKC Streetcar operates a fleet of five vehicles during peak service.

Oklahoma River Cruises

Oklahoma River Cruises, provides seasonal passenger ferry service at five landings along the Oklahoma River between the months of April and November.

Paratransit & On-Demand Services

EMBARC Plus complementary paratransit services are provided as required by the Americans with Disabilities Act (ADA). Several additional COTPA-sponsored programs are provided to assist the elderly, persons with low income and persons with disabilities with their transportation needs. These include EMBARK Plus, Share-A-Fare discount taxi fares, Supplemental Transportation for Elderly and Disabled Persons (STEP), Congregate Meal Program, Interim Senior Transportation, the Daily Living Center, Helpline, Social Service Programs, Senior Companion Program, Non-Emergency Medical Transportation, and the Retired Senior Volunteer Program (RSVP).

COTPA's planning activities are included in the Unified Planning Work Program (UPWP), which is adopted annually by the Association of Central Oklahoma Governments (ACOG), the Metropolitan Planning Organization (MPO) that serves the Oklahoma City metropolitan area. Capital, operating, and planning activities are also reflected in various COTPA plans on the EMBARK website, www.embarkok.com, and in ACOG's short-range Transportation Improvement Program (TIP) and Metropolitan Transportation Plan (MTP).

General Requirements

Title VI Notice to the Public:

COTPA posts notice to the public of its rights under Title VI at the following locations:

- The EMBARK website
- The Transit Center
- On at least 75 percent of agency-operated vehicles including fixed route bus, streetcar, paratransit, and ferry services

The COTPA Title VI notice English version is shown in **Figure 1** below.

Figure 1 - Title VI Notice to the Public - English

Notifying the Public of Rights under Title VI

Central Oklahoma Transportation & Parking Authority (COTPA)

- COTPA operates its programs and services without regard to race, color, and national origin in accordance with the American's with Disabilities Act (ADA) and the Title VI of the Civil Rights Act. If you believe you have been wronged by any unlawful practice as outlined under ADA and Title VI, you may submit a written complaint to COTPA.
- If you need information in another language, contact 235-7433.

The posted notice is published in English, Spanish, Vietnamese, and Chinese for population concentrations specific to COTPA's service area according to the most recent analysis of limited English proficient (LEP) populations. The COTPA posted notice is shown in **Figure 2** below.

Figure 2 - Title VI Posted Notice

Notifying the Public of Rights under Title VI

Central Oklahoma Transportation & Parking Authority (COTPA)

- COTPA operates its programs and services without regard to race, color, and national origin in accordance with Title VI of the Civil Rights Act. If you believe you have been wronged by any unlawful discriminatory practice under Title VI, you may file a written complaint with COTPA at COTPA Title VI Officer, 2000 S. May, Oklahoma City, OK 73108.
- For more information on COTPA's Title VI complaints procedure and form, visit our website www.embarkok.com/CivilRights.
- If you need information in another language, contact 235-7433.

Notificación al público sobre los derechos en virtud del Título VI

- La Autoridad Central de Transporte y Estacionamiento de Oklahoma (Central Oklahoma Transportation and Parking Authority, COTPA) administra sus programas y servicios sin distinción de raza, color ni nacionalidad conforme al Título VI de la Ley de Derechos Civiles. Si considera que ha sido perjudicado a causa de algún acto discriminatorio ilegal en virtud del Título VI, puede presentar una demanda por escrito ante la COTPA enviándola a COTPA Title VI Officer, 2000 S. May, Oklahoma City, OK 73108.
- Si desea obtener más información acerca del formulario y los procedimientos de demandas del Título VI de la COTPA, visite nuestro sitio web www.embarkok.com/CivilRights.
- Si desea obtener la información en otro idioma, llame al 235-7433.

Thông Báo Quyền Hạn của Công Chúng theo Tựa Đề VI Cơ Quan Vận Chuyển và Đậu Xe Trung Tâm Oklahoma

- COTPA hoạt động chương trình và dịch vụ của cơ quan với chủ trương không phân biệt sắc tộc, màu da, và nguồn gốc quốc gia theo Tựa Đề VI của Luật Dân Quyền (Civil Rights Act). Nếu tin rằng mình bị đối xử không đúng theo bất cứ hành động kỳ thị bất hợp pháp nào theo Tựa Đề VI, quý vị có thể nộp đơn khiếu nại với COTPA tại COTPA Title VI Officer, 2000 S. May, Oklahoma City, OK 73108.
- Để biết thêm thông tin về thể thức và lấy mẫu khiếu nại về Tựa Đề VI của COTPA, viếng trang mạng của chúng tôi tại www.embarkok.com/CivilRights.
- Nếu quý vị cần thông tin bằng ngôn ngữ khác, xin liên lạc 235-7433.

告知公众《第六篇》下的权利 中央俄克拉荷马州交通和停车管理局

- COTPA 根据《〈民法法〉第六篇》管理其计划和服务，不会因种族、肤色和原国籍而区别对待任何人。如果您认为，根据《第六篇》，您受到任何非法歧视性做法的无理对待，可向 COTPA 提交书面申诉，地址为 COTPA Title VI Officer, 2000 S. May, Oklahoma City, OK 73108.
- 如需有关 COTPA 《第六篇》申诉程序和表格的更多信息，请浏览我们的网站 www.embarkok.com/CivilRights.
- 如您需要其他语言版本的信息，请致电 235-7433

LAST UPDATED 5/19

Title VI Complaint Process & Investigation Procedures

Complaint Process

Any person who believes he or she has been aggrieved by an unlawful discriminatory practice under Title VI may file a complaint with EMBARK. Title VI complaints must be in writing and filed with EMBARK within 180 days following the date of the alleged discriminatory occurrence.

Complaints may be filed online using the EMBARK Service Center, by submitting a completed Title VI Complaint form, or by contacting EMBARK using any of the contact methods below.

Instructions for filing a complaint can be found on EMBARK's website:

<https://embarkok.com/civilrights>

Delivery/Mail: COTPA

RE: Title VI
2000 S. May Avenue
Oklahoma City, OK 73108

Phone: 405-297-2104

Fax: 405-316-2104

Email: embarkok@okc.gov

Investigation Procedures

COTPA investigates all complaints received no more than 180 days after the alleged incident. COTPA will process complaints that are complete. Within ten (10) working days of receipt, COTPA will provide the complainant or his/her representative with a written acknowledgment that COTPA has received the complaint. Upon completed investigation, COTPA will provide the complainant or his/her representative written notice of complaint resolution.

Title VI Complaint Form

COTPA's Title VI Complaint form is shown in **Figure 3**, **Figure 4**, and **Figure 5** below.

Figure 3 - Title VI Complaint Form (page 1)

Title VI Complaint Form

Central Oklahoma
Transportation & Parking Authority

Title VI of the Civil Rights Act of 1964 requires that "No person in the United States shall, on the ground of race, color or national origin, be excluded from participation in, be denied the benefits of, or be subjected to discrimination under any program or activity receiving federal financial assistance."

All complaints must be in writing and signed by the complainant or his/her representative before action can be taken. Complaints shall state, as fully as possible, the facts and circumstances surrounding the alleged discrimination. The Central Oklahoma Transportation & Parking Authority (COTPA) will provide a written acknowledgment of the complaint within ten (10) working days.

The completed form should be sent to: COTPA
Re: Title VI
2000 S May
Oklahoma City, OK 73108

Complainant Contact Information (Person discriminated against)

NAME		DAY PHONE	
<input type="text"/>		<input type="text"/>	
MAILING ADDRESS		EVENING PHONE	
<input type="text"/>		<input type="text"/>	
CITY	STATE	ZIP CODE	E-MAIL
<input type="text"/>	<input type="text"/>	<input type="text"/>	<input type="text"/>

Person Discriminated Against (If Other Than Complainant)

NAME		DAY PHONE	
<input type="text"/>		<input type="text"/>	
MAILING ADDRESS		EVENING PHONE	
<input type="text"/>		<input type="text"/>	
CITY	STATE	ZIP CODE	E-MAIL
<input type="text"/>	<input type="text"/>	<input type="text"/>	<input type="text"/>

(Continued On Reverse)

Figure 4 - Title VI Complaint Form (page 2)

Incident Details

What was the discrimination based on? (Check all that apply)

Race Color Low Income Disability

National Origin Gender Limited English Proficiency

What COTPA representative (s) are the person alleging were involved? Date of incident resulting in discrimination Time of Incident

Describe how you were discriminated against. Who was responsible and what happened?
For additional space, attach additional sheets of paper.

Where did the incident take place? Please provide specific details. (i.e. location, bus number, drivers name, etc.)
For additional space, attach additional sheets of paper.

(Continued On Next Page)

Figure 5 - Title VI Complaint Form (page 3)

Witnesses? Please provide their contact information.

WITNESS 1

NAME DAY PHONE

MAILING ADDRESS EVENING PHONE

CITY STATE ZIP CODE E-MAIL

WITNESS 2

NAME DAY PHONE

MAILING ADDRESS EVENING PHONE

CITY STATE ZIP CODE E-MAIL

Did you file this complaint with another federal, state, or local agency or court? Yes No

If answer is yes, check agency complaint was filed with and provide agency contact information:

Federal Agency Federal Court State Agency State Court Local Agency

Other _____ Date Filed: _____

AGENCY NAME CONTACT PERSON

AGENCY MAILING ADDRESS PHONE

CITY STATE ZIP CODE E-MAIL

Sign the complaint in space below. Attach any documents you believe supports your complaint.

X _____ Signature Date _____

Complainant's Signature

Title VI Investigations, Complaints, and Lawsuits

A table summarizing investigated complaints alleging discrimination received by COTPA between April 2019 and March 2022 can be found in **Figure 6** below. No Title VI violations were found as a result of these investigations. Additionally, there were no Title VI lawsuits filed against COTPA during the previous program period (2019-2021).

Figure 6 - Title VI Complaints (April 2019-March 2022)

Date	EMBARK Complaint Number	Complaint Summary	Action Taken	Status
6/7/2019	7843	Customer complained the bus driver discriminated against her and threatened to put her off the bus.	No finding	Closed
12/24/2019	9035	Customer complained a security guard discriminated against him when he was asked to turn off music at the transit center.	No finding	Closed
1/4/2020	9091	Customer complained of discrimination when trying to board the bus.	No finding	Closed
2/11/2020	9261	Customer complained of discrimination when asked to quiet down.	No finding	Closed
2/21/2020	9319	Customer complained of discrimination.	No finding	Closed
3/11/2020	9431	Customer complained a supervisor discriminated against him.	No finding	Closed
7/16/2020	9842	Customer complained of discrimination.	No finding	Closed
9/4/2020	10016	Customer complained of discrimination.	No finding	Closed
10/9/2020	10151	Customer complained of discrimination when trying to board the bus.	No finding	Closed
6/3/2021	10984	Customer complained a security guard discriminated against them.	No finding	Closed
7/1/2021	11112	Customer complained of discrimination after attempting to board a bus without a mask.	No finding	Closed
8/10/2021	11330	Customer complained of discrimination when attempting to purchase a discount day pass.	No finding	Closed

Outreach Methods

EMBARC's Public Engagement Plan (PEP) acts as a guide for the agency to proactively initiate public involvement processes. The PEP endeavors to offer meaningful opportunities for the public, including low-income, minority, and limited English proficient populations, to be involved in the identification of social, economic, and environmental impacts of proposed transportation decisions. EMBARK takes pride in its work to maintain a collaborative relationship with the community and its stakeholders.

Outreach methods include:

- Invitations for Public Comment
- Open Houses/Forums
- Workshops
- Community Meetings
- Public Hearings
- Committee Meetings

All formal outreach meetings are conducted in facilities that are accessible to persons with disabilities and to people who rely on public transit. Formal outreach meetings are open format and held at various times and locations throughout the service area to maximize attendance.

A complete copy of EMBARK's PEP is available in **Appendix A**.

Summary of Outreach Efforts

A table summarizing COTPA's outreach efforts between April 2019 and March 2022 can be found in **Figure 7** below.

Figure 7 - Summary of Outreach Efforts 2019-2022

Date	Meeting Type	Meeting Location	Subject
7/14/2020	Public Meeting	Virtual, Microsoft Teams	Summer 2020 Proposed Service Changes
7/21/2020	Public Meeting	Virtual, Microsoft Teams	Summer 2020 Proposed Service Changes
7/30/2020	Public Meeting	Virtual, Microsoft Teams	Summer 2020 Proposed Service Changes
8/7/2020	Public Hearing	City Hall, 200 N Walker Ave, Oklahoma City	Summer 2020 Proposed Service Changes – Part of COTPA Board Meeting

5/18/2021	Public Hearing	City Hall, 200 N Walker Ave, Oklahoma City	Proposed Route 18 Service Change – Part of City Council Meeting
-----------	----------------	--	---

Language English Proficiency (LEP) Plan

COTPA’s LEP Plan is a critical tool for serving the mobility needs of the diverse service area, including those who do not speak English well. The latest COTPA on-board passenger survey, completed in 2020 on fixed route bus, revealed that zero percent (0%) of respondents indicated they speak English “not well at all” and just one percent (1%) indicated they speak English “less than well.” This is a notable decrease from survey results (7% combined) in previous years.

COTPA’s 2022 LEP Plan can be found in **Appendix B**.

Board Representation

COTPA was created by the City of Oklahoma City in 1966 to plan, develop, build, and operate balanced parking and transportation systems (dba EMBARK). The COTPA Board of Trustees is the governing body for the oversight of EMBARK’s downtown public parking services, bus transit, streetcar transit, paratransit service, seasonal ferry service, and downtown bike share. The Board of Trustees is composed of the Mayor, the City Manager, the City Finance Director and five (5) trustees appointed by the Mayor with the consent of the City Council. The Board of Trustees meets the first Friday of the month at 9 a.m. in the City Council Chambers. See **Figure 8** for a profile of the COTPA Board of Trustees composition by race.

Figure 8 – Racial Composition of COTPA Board of Trustees

	COTPA Board	Non-Minority	Minority
Trustees	8	6	2
Percent	100%	75%	25%

Applications for the COTPA Board of Trustees are available on the City of Oklahoma City website at the following link:

<https://www.okc.gov/government/boards-trusts-commissions/apply-to-serve-on-a-city-board>

The City of Oklahoma City and COTPA encourage and consider Board of Trustee candidates from diverse backgrounds that have an interest in transit and mobility issues.

Subrecipient Monitoring

Title VI of the Civil Rights Act of 1964 prohibits discrimination on the basis of race, color and national origin for programs and activities receiving Federal financial assistance. As part of their Interagency Agreement(s) with COTPA, subrecipients are required to certify compliance with the Title

VI laws and regulations. Currently, COTPA's only subrecipient is the City of Edmond, Oklahoma which operates a local fixed-route bus system known as Citylink.

COTPA annually monitors the following items in relation to the subrecipient's compliance with Title VI.

1. Title VI Assurance: COTPA will collect Certification and Assurances from subrecipients prior to passing through FTA funds.
2. Title VI Notice to Beneficiaries: A notice that sub-recipient complies with Title VI and procedures the public may follow to file a discrimination complaint. Such a notice should be posted on the website, transit vehicles, transit centers, etc.
3. Title VI investigations, complaints or lawsuits: A list of any Title VI investigations, complaints or lawsuits filed against the subrecipient.
4. Title VI Complaint Procedures: A copy of the subrecipient's procedures related to the filing of a Title VI complaint. It may include a complaint form, tracking system, and investigating procedures. These procedures must be available upon request.
5. Access to Services by Persons with LEP: Either a copy of the LEP plan for providing access to meaningful activities and programs for persons with LEP based on the DOT LEP guidance or a copy of the alternative framework for providing access to activities and programs. It includes the identification and distribution of LEP persons as well as the guidance for language assistance measures.
6. Summary of Outreach Efforts to Minority Population: A public participation strategy that offers early and continuous opportunities for the minority population to be involved in transportation decisions. It involves outreach to community-based organizations serving minority and low-income populations through meetings and other means of communications.

[Title VI Subrecipient Documentation](#)

Subrecipients, as part of their Interagency Agreement(s) with COTPA, certify compliance with the requirements of Title VI laws and regulations and are responsible for developing, routinely updating, and submitting their triennial Title VI Programs to COTPA and the FTA.

[Equity Analysis – New Facilities](#)

There were no capital facility construction projects undertaken by COTPA in the past three years (April 2019 – March 2022) with federal funding that required NEPA or environmental justice analysis.

Board Approval

The COTPA Board of Trustees Transportation Committee reviewed and approved the COTPA Title VI Program Update at its March 4, 2022 meeting. See **Appendix C** for related approval documents.

Requirements of Transit Providers

Service Standards

The COTPA Service Standards for fixed route bus were updated in 2021. The updated EMBARK Service Guidelines and Standards documents addresses service guidelines, performance measures, service changes, and Title VI analysis.

The following are the service standards and quantifiable criteria used by COTPA to monitor delivery of fixed-route services in accordance with Title VI requirements:

Vehicle Loads

Exceeding the seating capacity of transit vehicles may be acceptable at certain times of day and on certain types of service, generally during peak hours. COTPA standards for each service type are outlined below.

Fixed Route Bus

On Local Route, passenger loads should not exceed 133% during peak service and 100% during non-peak service.

Passenger loads should not exceed 100% on Express Routes.

OKC Streetcar

Passenger loads on streetcar vehicles should not exceed 100%.

Ferry

Passenger loads on ferry vessels should not exceed 100%.

Vehicle Headways

Determining frequency of service provided on transit is based upon several variables including the type of service, time of day, passenger demands, and system resources. Deviation from established headways should be based upon passenger counts, employment and/or residential demand data and ridership surveys.

Fixed Route Bus

Headways for local bus service should not exceed 30 minutes during peak and base service. During weekday evening and weekend service, headways should not exceed 60 minutes. Headways for coverage routes should not exceed 60 minutes during peak and base service.

OKC Streetcar

Headways for streetcar service should not exceed 15 minutes.

Ferry

Headways for ferry service should not exceed 1 hour 40 minutes.

On-time Performance

An important part of customer satisfaction is the reliability of services to run on-time. Passengers using services where the vehicles cannot consistently meet their schedule will look for other means of transportation because the route is unreliable.

Fixed Route Bus

Local bus service should operate with an 75% on-time schedule adherence, which is defined as departing between one minute early and five (5) minutes late at a designated timepoint.

OKC Streetcar

Streetcar service should operate with a 92% on-time schedule adherence, which is defined as departing a stop no earlier than the scheduled time and arriving at the final station no later than five (5) minutes after the scheduled arrival time.

Ferry

Ferry service should operate with an 85% on-time schedule adherence, which is defined as departing a designated timepoint no later than 10 minutes after the scheduled time.

Service Availability

COTPA transit services are the product of local funding commitments and requests of the three (3) area communities (Oklahoma City, Midwest City, and Oklahoma County for bus route service to Spencer) that have annual service contracts with COTPA for transit service. Therefore, COTPA does not have a service availability standard, although efforts are made to maximize ridership through effective route design.

Service Policies

Distribution of Transit Amenities

Figure 9 below summarizes the guidelines for placement of Transit Amenities according to COTPA's Service Standards.

Figure 9 - COTPA Transit Amenity Standards

Type of Amenity	Typical Daily Ridership	Elements
Basic Transit Stop	<10 boardings	Sign, paved boarding area, sidewalk connection, street lighting
Transit Stop with Bench	10-15 boardings	Sign, paved boarding area, sidewalk connection, street lighting, seating, pavement markings
Transit Stop with Shelter	15-75 boardings	Sign, paved boarding area, sidewalk connection, street lighting, shelter, seating, pavement markings
High Volume Transit Stop	>75 boardings	Real-time display, concrete pad, lighting, bicycle racks

Vehicle Assignment

Fixed Route Bus

COTPA operates a fleet of 50 buses during peak service. Vehicles are assigned to routes based upon mechanical availability, service readiness, and the operational needs of each route. To prevent a newer bus from accruing excessive mileage or premature wear, an older bus may be assigned when it can perform the same or equivalent level of service based upon its mechanical dependability, passenger amenities, and seating capacity.

OKC Streetcar

There are seven (7) streetcars in the fleet, all built in 2018. Streetcars are assigned based on mechanical availability and are rotated to equally distribute use.

Ferry

There are three (3) ferry boats in the fleet. Vessels are assigned based on mechanical availability and service hours. Vessels are rotated throughout the year to equally distribute use.

Demographic and Service Profile Maps and Charts

The COTPA service area is comprised of the three communities (Oklahoma City, Midwest City, and Spencer) in which EMBARK has annual operating agreements to provide transit services. Most of the EMBARK transit services are in Oklahoma City, which is funded through the City of Oklahoma City’s annual budget. An annual contract with the Midwest City supports the operations of fixed route 015 Midwest City. Fixed route 019 Spencer, which operates in northeastern Oklahoma County, is funded through a contract with Oklahoma County.

Demographic analysis of U.S. Census American Community Survey data (2015–2019 estimates) indicates the COTPA service area has a population of approximately 700,000, which is the combined population of Oklahoma City, Midwest City, and Spencer. Approximately 32.83% of the service area’s population is minority, and 15.95% of the service area population is considered “living below the poverty line.”

Figure 10 – Minority Population, COTPA Service Area

City	Total Population	Minority Population	Percent Minority
Oklahoma City	643,692	208,029	32.32%
Midwest City	57,288	20,773	36.26%
Spencer	3,995	2,664	66.68%
Service Area Total	704,975	231,466	32.83%
<i>Source: U.S. Census Bureau, 2015-2019 American Community Survey 5-Year Estimates, Table DP 05</i>			

Figure 11 – Population Living Below Poverty Line, COTPA Service Area

City	Total Population	Population in Poverty	Percent in Poverty
Oklahoma City	630,764	101,335	16.07%
Midwest City	56,837	8,415	14.81%
Spencer	3,957	585	14.78%
Service Area Total	691,558	110,335	15.95%
<i>Source: U.S. Census Bureau, 2015-2019 American Community Survey 5-Year Estimates, Table B17021</i>			

The maps on the following pages further illustrates the demographic and service profile of the COTPA transit system:

- **Figure 12:** EMBARK 2022 Service Area
- **Figure 13:** EMBARK 2022 Service Area – Minority Population
- **Figure 14:** EMBARK 2022 Service Area – Population Living Below the Poverty Line

As with the tables above, the demographic analysis of minority and poverty population in the COTPA Service Area was evaluated at the Census block group level and included Census block groups in Oklahoma City, Midwest City, and Spencer.

Figure 12 - EMBARK 2022 Service Area

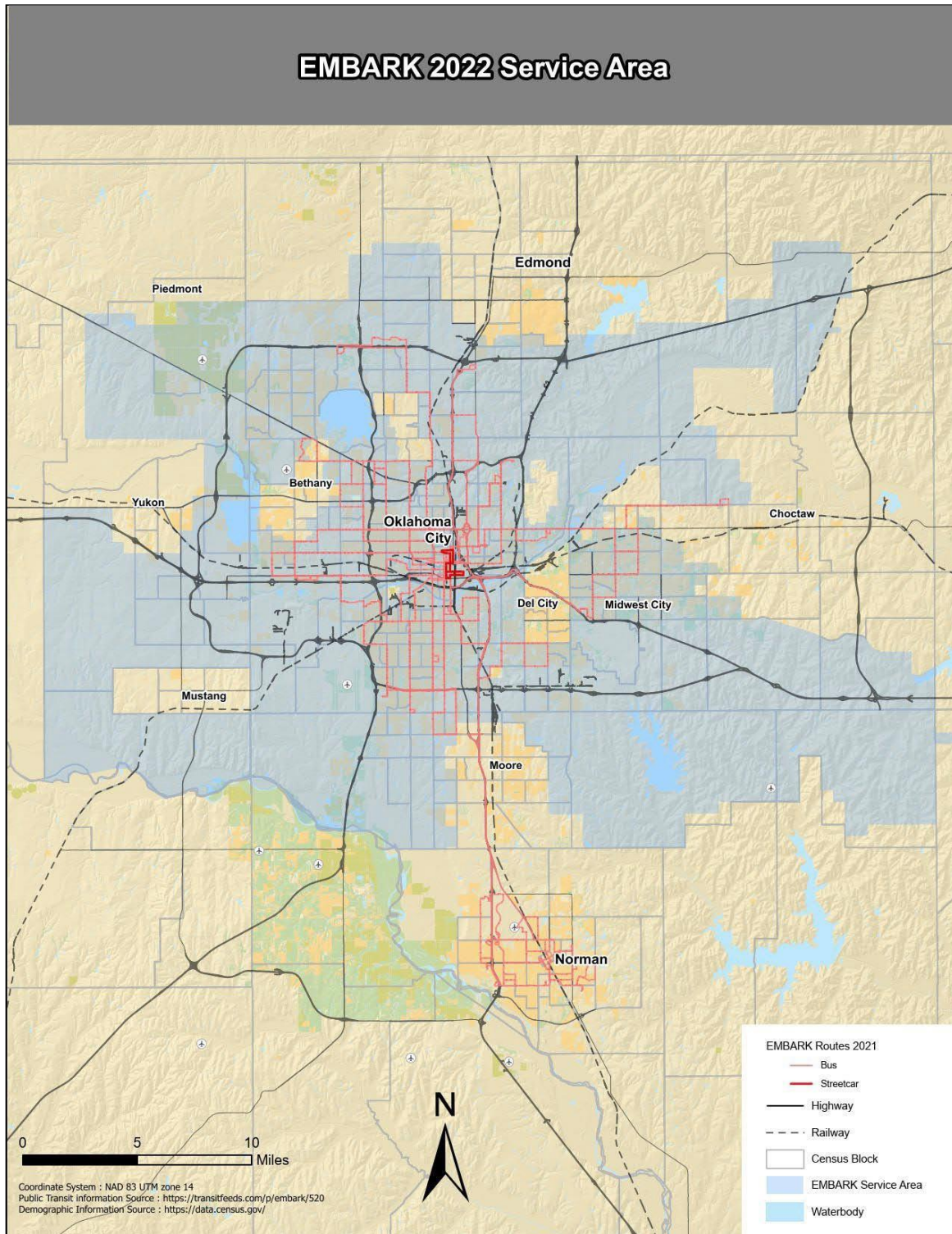


Figure 13 - EMBARK 2022 Service Area - Minority Population

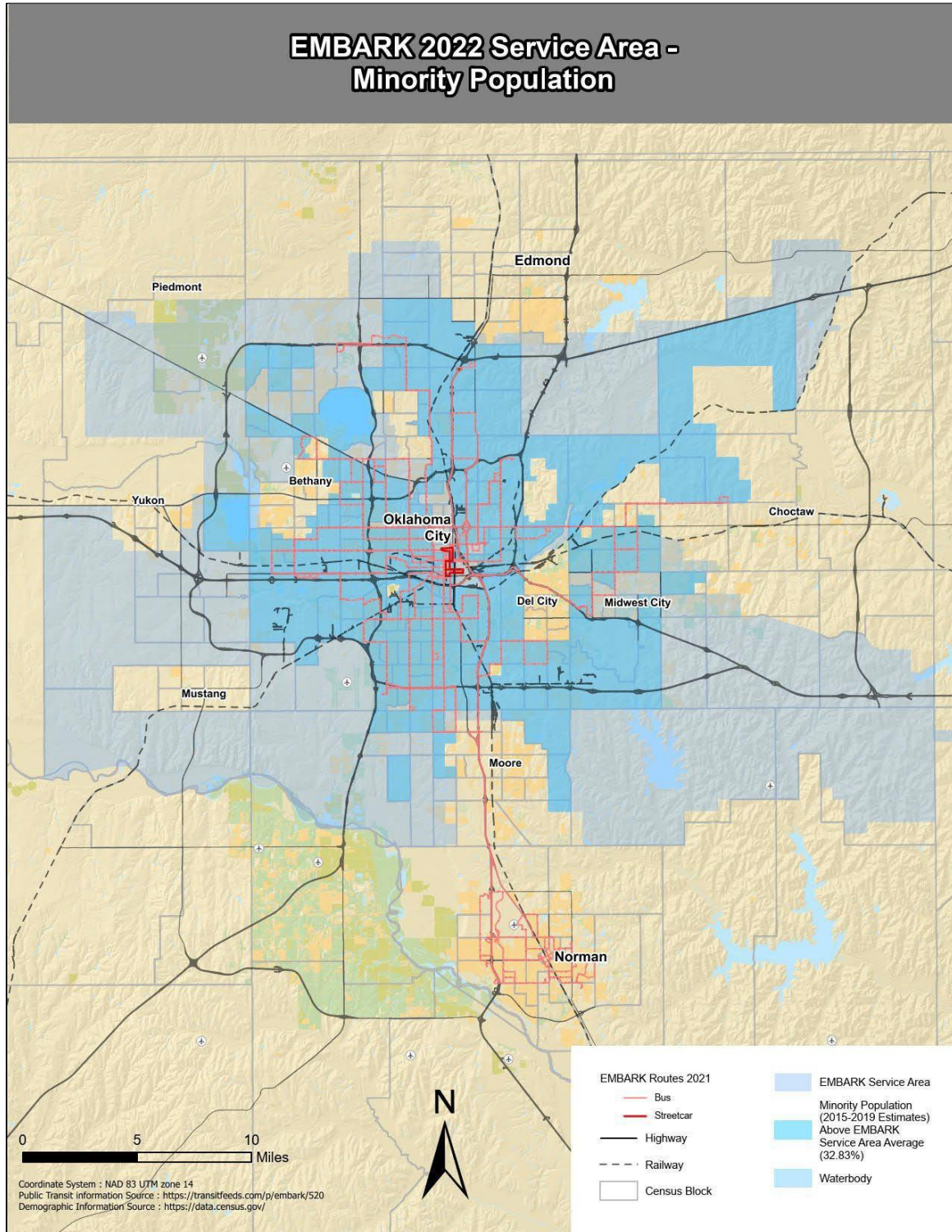
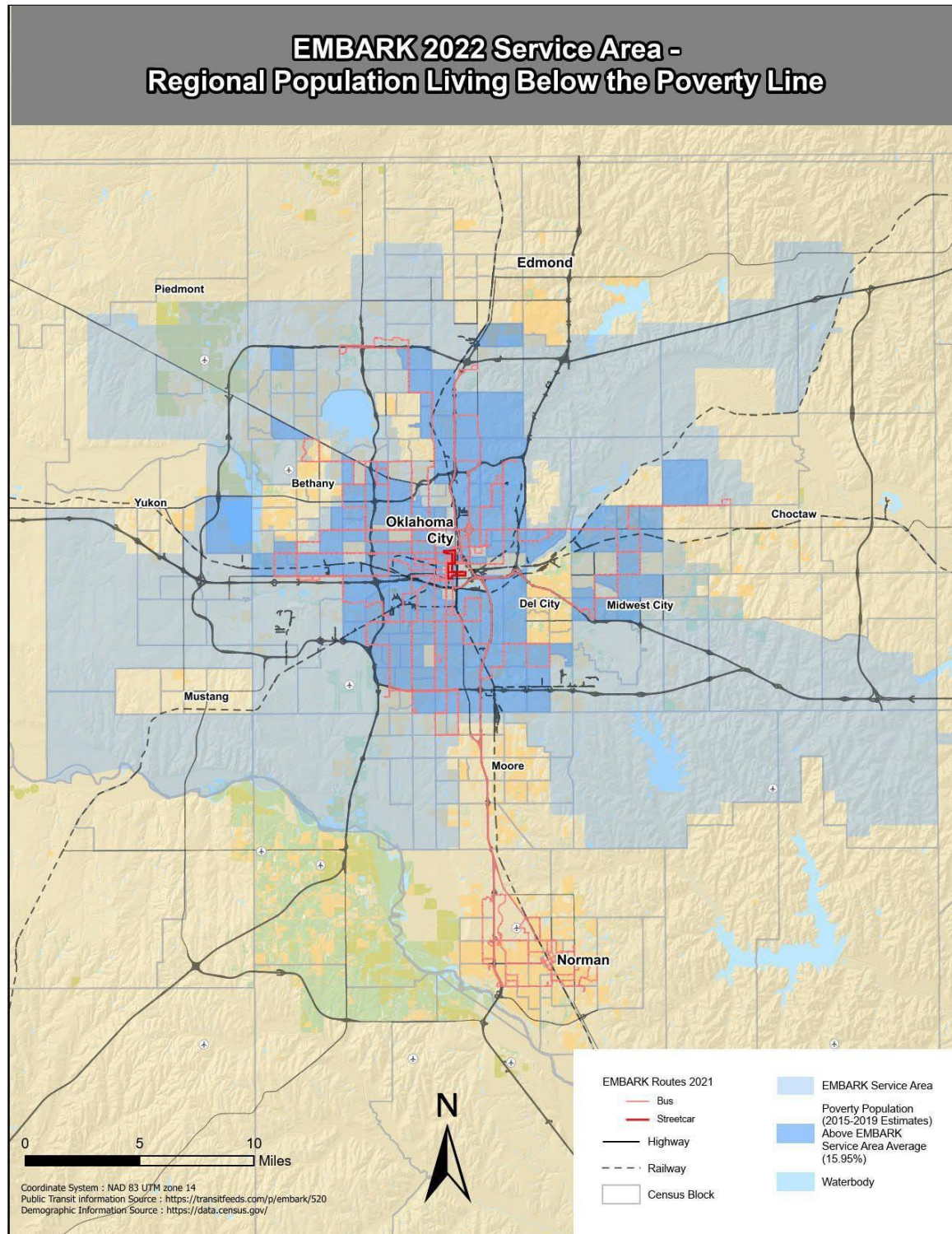


Figure 14 - EMBARK 2022 Service Area - Population Living Below the Poverty Line



Demographic Ridership and Travel Patterns, Collected by Surveys

On an annual basis, COTPA conducts an On-Board Transit Survey to stay current on the demographic profile and travel needs of transit system riders. The statistically accurate survey is designed to provide a demographic profile of EMBARK riders as well as critical ridership trends, travel preferences, and other market information to inform service planning decisions. The EMBARK 2020 On-Board Survey's key demographic findings include:

- **Ethnicity/Race:** Forty-one percent (41%) of respondents indicated they were Black/African American, while thirty-eight percent (38%) indicated they were White/Caucasian, fifteen percent (15%) indicated they were Native American, and eleven percent (11%) of respondents indicated they were Hispanic, Latino, or of Spanish origin. These results are consistent with previous years.
- **English Proficiency:** Zero percent (0%) of respondents indicated they speak English “not well at all” and only one percent (1%) indicated they speak English “less than well.” A combined ninety-four percent (94%) responded they speak English “well” and “very well,” and the remaining six percent (6%) declined to answer the question.
- **Language Spoken at Home:** Fourteen percent (14%) of respondents indicated they speak a language other than English at home; eighty-seven percent (87%) identified as speaking English at home.
- **Household Income:** Fifty-nine percent (59%) of respondents indicated they had annual household incomes of less than \$10,000 in 2020; this is an increase of 7% from 2019. Twenty-one percent (21%) indicated they had incomes between \$10k-\$19,999; a decrease of 4% from 2019. Eighty percent (80%) of respondents reported an annual income of \$19,999 or less; this is an increase of 3% from 2019.
- **Purpose of Trip:** Thirty-seven percent (37%) of respondents specified the purpose of their trip was for work. Nineteen percent (19%) indicated their trip was for shopping or errands. Other purposes included: Medical (8%), entertainment/social (8%), social service (5%), School (Tech, College, University) (2%), and School (K-12) (1%).

Service Monitoring

Per FTA Circular 4702.1B, a “minority transit route” is defined as a route that has at least 1/3 of its total revenue mileage in a Census block or block group, or traffic analysis zones with a percentage of minority population that exceeds the percentage of minority population in the transit service area.

As previously noted, COTPA’s service area includes Oklahoma City, Midwest City, and Spencer, which have a combined percentage minority population of 32.83%. Classifying COTPA routes as “minority” and “non-minority” involved calculating each route’s percentage of revenue miles within minority and non-minority Census block groups. For this analysis, “minority block groups” are defined as block groups with percentage of minority population equal to or greater than the transit service area’s minority population percentage of 32.83%. “Non-minority block groups” are defined as block groups with percentage of minority population less than 32.83%. COTPA routes in which more than 1/3 of total revenue mileage occurs in minority block groups (with minority population of 32.83% or greater) are classified as Minority Transit Routes.

Analysis determined that all of COTPA’s bus, streetcar, and ferry routes are considered Minority Transit Routes. **Figure 15** below provides a breakdown by route of revenue miles in minority and non-minority block groups.

Figure 15 - COTPA Route Classification: Minority/Non-Minority

ROUTE	CLASSIFICATION	TOTAL REVENUE MILES PER ROUNDTRIP	PERCENTAGE OF REVENUE MILES IN MINORITY BLOCK GROUPS	PERCENTAGE OF REVENUE MILES IN NON-MINORITY BLOCK GROUPS
002 - Coltrane	MINORITY	13.23	81.91%	18.09%
003 - N Kelly	MINORITY	23.46	83.02%	16.98%
005 - Memorial Rd	MINORITY	23.66	66.22%	33.78%
007 - N May	MINORITY	11.06	94.19%	5.81%
008 - N Penn/NW 63rd	MINORITY	19.91	79.22%	20.78%
009 - W Reno Crosstown	MINORITY	14.51	93.94%	6.06%
010 - N Portland	MINORITY	11.11	91.84%	8.16%
011 - 29th St Crosstown	MINORITY	18.26	95.52%	4.48%
012 - S May	MINORITY	12.86	93.35%	6.65%
013 - S Western/I-240 Crosstown	MINORITY	33.70	92.27%	7.73%
014 - SE Bryant or Sunnyslane	MINORITY	18.17	97.44%	2.56%
015 - Midwest City	MINORITY	24.60	73.52%	26.48%
016 - S Penn	MINORITY	11.63	92.02%	7.98%
018 - Lincoln	MINORITY	17.20	95.67%	4.33%
019 - Spencer	MINORITY	13.73	79.06%	20.94%
022 - Martin Luther King	MINORITY	11.05	94.22%	5.78%
023 - 23rd St Crosstown	MINORITY	20.01	85.39%	14.61%
024 - Norman	MINORITY	50.34	51.80%	48.20%

038 - 10th St Crosstown	MINORITY	16.11	94.12%	5.88%
040 - S Walker	MINORITY	12.76	83.21%	16.79%
SC - Downtown Loop	MINORITY	2.02	42.29%	57.71%
SC - Bricktown Loop	MINORITY	4.86	37.70%	62.30%
Ferry	MINORITY	7.59	83.62%	16.38%

Service Monitoring – Vehicle Loads

Analysis of ridership and Riders Per Service Hour (RPSH) shows that the average maximum load per trip on all fixed route services (fixed route bus, streetcar, and ferry) is below 100% seating capacity on all services.

Fixed Route Bus (FY2021)

Weekday: 9.37 RPSH

Weekend: 10.52 RPSH

A time-of-day ridership analysis was also completed for Fixed Route Bus, which indicated the service currently averages less than 600 passengers at any time of day on the 50 vehicles in service.

OKC Streetcar (FY 2021)

Weekday: 6.8 RPSH

Weekend: 12.7 RPSH

Ferry

Seasonal: 6.17 RPSH

Should data analysis, operator reports, or customer comments indicate the standard for vehicle loads on any service is being exceeded, that service or route will be evaluated, and adjustments made to address any load issues.

Service Monitoring – Vehicle Headways

Figure 16 below outlines current headways for COTPA’s fixed route bus, streetcar and ferry services. Routes with scheduled headways that do not meet the service standard are highlighted in grey. As part of its strategic plan, COTPA is working towards implementing the 2021 Service Standards guidelines, as budget allows.

Figure 16 - COTPA Service Headways

Route	Weekday Base	Weekday Night	Weekend
<i>Fixed Route Bus Local</i>			
002 - Coltrane	30	-	60
003 - N Kelly	30	-	60
005 - Memorial Rd	30	60	60
007 - N May	30	-	60
008 - N Penn/NW 63rd	30	-	60
009 - W Reno Crosstown	30	-	60
010 - N Portland	30	-	60
011 - 29th St Crosstown	30	60	60
012 - S May	30	-	45
013 - S Western/I-240 Crosstown	30	-	45
13N - S Western Night	-	60	-
014 - SE Bryant or Sunnyslane	45	-	45
015 - Midwest City	70	-	-
016 - S Penn	30	-	60
018 - Lincoln	60	-	-
019 - Spencer	60	-	-
022 - Martin Luther King	30	60	60
023 - 23rd St Crosstown	30	-	60
23N - 23rd St Crosstown Night	-	60	-
038 - 10th St Crosstown	30	-	60
040 - S Walker	30	-	60
<i>Fixed Route Bus Express</i>			
024 - Norman	60-120	-	-
<i>OKC Streetcar</i>			
Downtown & Bricktown Loops	15	15	15
<i>Ferry</i>			
Seasonal Ferry	100	-	-

Service Monitoring – On-Time Performance

On a monthly basis, COTPA monitors on-time performance trends to ensure reliable and dependable service delivery. Service changes and adjustments are implemented as necessary to improve on-time performance and reoccurring schedule adherence issues. **Figure 17** below outlines a representative sample of on-time performance for COTPA’s routes between September and November 2019.

Figure 17 - COTPA On-Time Performance (Sep-Nov 2019)

Route	Classification	On-Time Performance
<i>Fixed Route Bus Local</i>		
002 - Coltrane	Minority	56%
003 - N Kelly	Minority	73%
005 - Memorial Rd	Minority	72%
007 - N May	Minority	78%
008 - N Penn/NW 63rd	Minority	75%
009 - W Reno Crosstown	Minority	72%
010 - N Portland	Minority	78%
011 - 29th St Crosstown	Minority	68%
012 - S May	Minority	74%
013 - S Western/I-240 Crosstown	Minority	65%
13N - S Western Night	Minority	75%
014 - SE Bryant or Sunnyslane	Minority	86%
015 - Midwest City	Minority	75%
016 - S Penn	Minority	86%
018 - Lincoln	Minority	74%
019 - Spencer	Minority	77%
022 - Martin Luther King	Minority	74%
023 - 23rd St Crosstown	Minority	50%
23N - 23rd St Crosstown Night	Minority	62%
038 - 10th St Crosstown	Minority	82%
040 - S Walker	Minority	73%
<i>Fixed Route Bus Express</i>		
024 - Norman	Minority	58%
<i>OKC Streetcar</i>		
Downtown & Bricktown Loops	Minority	96%
<i>Ferry</i>		
Seasonal Ferry	Minority	98%

Service Monitoring – Service Availability

Though COTPA does not have a service availability standard, service availability is monitored by the percentage of population in proximity to its transit services. **Figure 18** and **Figure 19** below summarize the service proximity for minority and low-income populations within Census block groups ¼-mile from a COTPA route.

Analysis indicates COTPA routes are located within ¼-mile of the majority of minority and low-income populations within the service area:

- 62.09% of the COTPA service area population is within ¼-mile of a COTPA route
- 75.98% of the COTPA service area minority population is within ¼-mile of a COTPA route.
- 84.36% of the population living below the poverty line in the COTPA service area is within ¼-mile of a COTPA route.

Figure 18 - Service Area Population within 1/4 Mile of Fixed Route - Minority Population

	Service Area Population		Service Area Population Within 1/4 Mile of EMBARK Fixed Route	
	Population	Percent	Population	Percent
Minority	324,876	32.83%	246,825	75.98%
Non-Minority	380,099	67.17%	200,108	44.77%
Totals	704,975	100%	446,933	63.40%

Source: U.S. Census Bureau, 2015-2019 American Community Survey 5-Year Estimates, Table DP 05

Figure 19 - Service Area Population within 1/4 Mile of Fixed Route - Below Population

	Service Area Population		Service Area Population Within 1/4 Mile of EMBARK Fixed Route	
	Population	Percent	Population	Percent
Below Poverty Line	112,476	15.95%	94,886	84.36%
Above Poverty Line	592,499	84.05%	342,832	57.86%
Totals	704,975	100%	437,718	62.09%

Source: U.S. Census Bureau, 2015-2019 American Community Survey 5-Year Estimates, Table B17021

Service Monitoring – Vehicle Assignment

COTPA has a bus fleet of 57 buses, with 50 buses operating during peak service. There are seven (7) vehicles in the streetcar fleet, all built in 2018. Ferry service has a fleet of three (3) vessels. As previously discussed, vehicles for all services are assigned on a rotating basis with considerations for service availability, mechanical dependability, and operational needs specific to each service and route. **Figure 20** further details the COTPA bus fleet and the age of buses by series and size.

Figure 20 - COTPA Bus Fleet

Series	Vehicles	Make	Length	Seating	Year	Age
902-914	6	Gillig	35'	32	2009	13
1100-1107	8	Gillig	35'	32	2011	11
1180-1181	2	New Flyer	35'	40	2011	11
1200	1	Nova	40'	39	2012	10
1301-1306	6	Gillig	30'	28	2012	10
1307-1310	4	Gillig	35'	32	2012	10
1311-1312	2	Gillig	40'	39	2013	9
1601-1606	6	New Flyer	41'	39	2016	6
1701-1711	11	New Flyer	41'	39	2017	5
2000	1	New Flyer	36'	31	2020	2
2002-2003	2	New Flyer	41'	39	2020	2
2102-2109	8	New Flyer	41'	39	2021	1

Service Monitoring – Transit Amenity Distribution

COTPA has a Service Standard policy of providing passenger shelters for transit stops averaging 15 or more boardings per day and benches at stops averaging between 10 and 15 boardings per day. These boarding thresholds are generally much lower than other transit providers.

Based on Fiscal Year 2019 ridership and COTPA’s current Transit Amenity Policy, there are 81 stops which require placement of a shelter. Currently, six (6) of these locations, or 7%, lack a shelter. This is primarily due to adjacent sidewalk conditions or other geographical restrictions exist. Two (2) of these have a bench in place of a shelter. Presently, there are 59 stops which require placement of benches according to COTPA’s current policy. Eight (8) of these locations, or 13%, currently lack a bench. As with shelters, this is primarily due to stop conditions.

Currently, COTPA’s bus service has three (3) stops identified as High-Volume Transit Stops. Two of these locations present zoning and right-of-way challenges. COTPA is currently seeking funding for installation of a high-volume shelter at the third location.

Major Service Change, Disparate Impact, and Disproportionate Burden Policies

Major Service Change Policy

A major service change is defined as the following:

- A 25% or more addition, reduction or change in the service hours or miles of any route that would remain in effect for twelve (12) or more months.
- A change which affects more than 25% of the stops that make up the route’s boardings.
- A new transit route that would remain in effect for twelve (12) or more months.

All Major Service Changes will be subject to a Service Equity Analysis which will include determination of potential Disparate Impact or Disproportionate Burden, as described below.

A review is not required for seasonal changes, changing a route number or other designation, additional demonstration/experimental service within the first twelve months, service changes on Special Service routes, or route changes caused by an emergency.

All fare changes, regardless of size, are subject to a fare equity analysis which will include an examination of potential Disparate Impact or a Disproportionate Burden, as described below.

Disparate Impact Policy

The Disparate Impact Policy establishes a threshold for determining when adverse effects of a Major Service Change are borne disproportionately by minority populations. COTPA's threshold for statistically significant disparity is when minority populations or riders will experience a 20% or greater adverse effect than that borne by the non-minority population or riders, then such changes will be considered to have a disparate impact.

Additionally, if benefits associated with the Major Service Change accrue to non-minority riders greater than 20% when compared to minority riders, then that change will be determined to have a disparate impact.

If a disparate impact is identified, COTPA will consider modifying the proposed changes in order to avoid, minimize, or mitigate the disparate impacts of the proposed changes. Any proposed modifications to the original proposal will also be analyzed to assess whether disparate impacts would result. If, after considering alternatives, COTPA finds that a disparate impact will still result from the major service change, COTPA will implement the change only if:

- There is a substantial legitimate justification for the proposed change, and
- There are no alternatives that would have a less disparate impact on minority riders while still accomplishing the legitimate goals for the proposed change.

Disproportionate Burden Policy

The Disproportionate Burden Policy establishes a threshold for determining when adverse effects of a Major Service Change are borne disproportionately by low-income populations. COTPA's threshold for statistically significant disparity is when low income populations or riders will experience a 20% or greater adverse effect than that borne by the non-low-income population or riders, then such changes will be considered to have a Disproportionate Burden.

Additionally, if benefits associated with the Major Service Change accrue to non-low-income riders greater than 20% when compared to low-income riders, then that change will be determined to have a disproportionate burden.

If a disproportionate burden is identified, COTPA will consider modifying the proposed changes in order to avoid, minimize, or mitigate the disparate impacts of the proposed changes. Any proposed modifications to the original proposal will also be analyzed to assess whether disproportionate burden would result.

Evaluating Fare Changes

In accordance with FTA guidelines, COTPA will conduct a Fare Equity Analysis of any proposed fare changes to assess whether the changes would cause a Disparate Impact on minorities or a Disproportionate Burden for low-income individuals. COTPA will use the same threshold of 20% for determining Disparate Impact and Disproportionate Burden as used in Service Equity Analyses. If a disparate impact is identified, COTPA will consider and analyze alternatives to determine whether those alternatives would have less of a Disparate Impact on the basis of race, color, or national origin. COTPA will then implement the alternative with the smallest Disparate Impact that still achieves the legitimate objectives of the fare change. If a Disproportionate Burden is identified, COTPA will take steps to avoid, minimize or mitigate impacts where practicable. COTPA will describe alternatives available to low-income populations affected by the fare changes.

A review is not required for the following:

- “Spare the air days” or other instances when a local municipality or transit agency has declared that all passengers ride free.
- Temporary fare reductions that are mitigating measures for other actions. For example, construction activities may close a segment of the streetcar system for a period of time and require passengers to alter their travel patterns. A reduced fare for these impacted passengers is a mitigating measure and does not require a Fare Equity Analysis.
- Promotional fare reductions. If a promotional or temporary fare reduction lasts longer than six months, then FTA considers the fare reduction permanent, and the transit provider must conduct a Fare Equity Analysis.

When conducting the fare change analysis, COPTA will compare the absolute and percentage change borne by minority riders (and low-income riders) compared to the absolute and percentage change borne by non-minority riders (or non-low-income riders) for each of the fare changes proposed. If the total fare change results in a 20% or greater adverse impact to minority riders (or low-income riders) when compared to non-minority riders (or non-low-income riders), then the fare change will be determined to have a Disparate Impact for minority riders and/or a Disproportionate Impact for low-income riders.

Additionally, if benefits associated with the fare change accrue to non-minority riders (or non-low-income riders) greater than 20% when compared to minority riders (or low-income riders), then the change will be determined to have a Disparate Impact and/or a Disproportionate Burden.

Data Sources

COTPA will utilize Census data and GIS maps to conduct Service Equity Analyses. For Fare Equity Analyses, ridership and onboard survey data will be utilized. These data sources were chosen based on availability, accuracy, and applicability.

Public Engagement Process

Prior to the implementation of a proposed fare increase or major service change, notice of a public hearing shall be published on the EMBARK website as well as in a newspaper of general circulation in the service area. The notice shall also be published in media outlets oriented to specific groups or neighborhoods that may be affected. The notice shall be published at least 14 days prior to the public hearing. The notice shall contain a description of the proposed service change(s) and/or the fare change(s) as appropriate, and the date, time, and place of the hearing. Additional outreach will be conducted as deemed appropriate by COTPA staff.

Service and Fare Analysis

Major Service Changes Since 2019 Submission

There have been two occurrences of Major Service Changes (in Summer 2020 and Summer 2021) to the COTPA fixed route bus service since the last submission; related Service Equity Analysis reports can be found in **Appendix D**.

Fare Increases Since 2019 Submission

There have been no fare increases for COTPA transit services since the last submission.

APPENDIX A
PEP

April 2019

Σ M B A R K



Public Engagement Plan

Introduction

The Public Engagement Plan (PEP) is a guide for the Central Oklahoma Transportation and Parking Authority (COTPA) doing business as EMBARK, to proactively initiate public involvement processes. The purpose of this PEP is to promote the use of effective methods to inform and provide meaningful opportunities for input by all members of the public on transportation decisions, as required by Title VI of the Civil Rights Act of 1964 and its implementing regulations.

This plan is a living document which will evolve to help EMBARK deepen and sustain its work to engage all stakeholders in its service area. The plan allows the opportunity for the public to be involved in all phases of the public comment process by providing complete information, timely public notice, the opportunity for making a comment, and full access to crucial decisions. All comments are ultimately shared with the Board of Trustees for consideration before decision making.

Definition of Public Engagement

Public engagement is the process through which stakeholders' concerns, desires, and values are incorporated into the decision-making process related to services provided by EMBARK. Distinct from those processes carried out by staff or elected officials that result in administrative decisions, public engagement refers to methods that enable stakeholders to affect and/or influence a decision-making process directly.

Primarily consisting of the public, stakeholders can include a broad range of individuals and interests such as:

- Transit customers
- Individual or groups affected by a transportation project or action
- Individual or groups that believe they are affected by a transportation project or action
- Traditionally under-served and under-represented communities
- Residents of affected geographic areas
- Government agencies
- Community-based organizations (CBOs)
- Non-governmental organizations (NGOs)

Public engagement is often described as a continuum with many possible combinations of activities that include methods related to informing, listening to, and engaging stakeholders. These activities typically culminate in the development of agreements and/or expectations related to decision outcomes.

Regulations

EMBARC functions under a wide variety of federal, state, and local requirements. The list below provides an overview of the basic laws, regulations, and regional policies EMBARK operates within.

Federal Requirements:

- Americans with Disabilities Act of 1990
- Title VI of the Civil Rights Act of 1964
- Executive Order 13166 -- Improving Access to Services for Persons with Limited English Proficiency
- Executive Order 12898 -- Federal Actions to Address Environmental Justice in Minority Populations and Low-Income Populations
- National Environmental Policy Act (NEPA)

State of Oklahoma Requirements:

- Open Meetings Act
- Open Records Act
- Other Requirements

Goals & Guiding Principles

The PEP endeavors to offer meaningful opportunities for the public, including low income, minority, and limited English proficient populations, to be involved in the identification of social, economic, and environmental impacts of proposed transportation decisions by EMBARK.

Specific goals and outcomes include:

- **Quality Input and Participation**
Comments received are useful, relevant and constructive, contributing to better plans, projects, programs, strategies, and decisions.
- **Consistent Commitment**
EMBARC strives to communicate regularly and develop trust with communities while helping build community capacity to provide public input.
- **Diversity**
Participants represent a range of social, economic, ethnic, and cultural perspectives, with representative participants including residents from low-income neighborhoods, ethnic communities, and residents with limited English proficiency (LEP), and other traditionally underserved people.
- **Accessibility**
Every effort is made to ensure that opportunities to participate are physically, geographically, temporally (time of day), and linguistically accessible.

- **Relevance**
Issues should be framed clearly and simply such that the significance and potential effect may be understood by the greatest number of participants.
- **Participant Satisfaction**
EMBARC should encourage the public to participate in project or initiative related discussions, recognizing that people who take the time to participate feel it is worth the effort to join the discussion and provide feedback.
- **Clarity in Potential for Influence**
The process should identify and communicate where and how participants can have influence and direct impact on decision making.
- **Partnerships**
EMBARC develops and maintains partnerships with communities and community-based organizations through the activities described in this Public Engagement Plan.
- **Opportunities to Build Trust & Compromise**
EMBARC should ensure that discussions, mainly where there are conflicting views, are structured to allow for levels of compromise and consensus that will satisfy the most significant number of community concerns and objectives. EMBARC recognizes that processes which will enable for consensus to be achieved are critical to enable public support for recommended actions.

Guiding Principles

Effective public participation should be based on the following principles:

- **Flexible:** The engagement process should accommodate involvement in a variety of ways and be adjusted as needed.
- **Inclusive:** EMBARC should proactively notify and engage low income, minority, and LEP populations from its service area to encourage participation from all stakeholders.
- **Respectful:** All feedback received should be given careful and respectful consideration.
- **Tailored:** EMBARC's public participation methods should be adapted to match local and cultural preferences as much as possible.
- **Proactive & Timely:** Participation methods should allow for early involvement and be ongoing and dynamic so participants can influence EMBARC's decisions.

- **Clear, Focused and Understandable:** Participation methods should have a clear purpose and use for the input, and should be described in language that is easy to understand.
- **Trustworthy:** Information provided should be accurate and trustworthy.
- **Responsive:** EMBARK should strive to respond and incorporate appropriate public comments into transportation decisions.
- **Transparent in Impact:** EMBARK should communicate the results of the public's input in terms of the impact on decisions at a broad summary level, providing the major themes, the conclusions reached and rationale for the decisions.
- **Authentic & Meaningful:** EMBARK should support public participation as a dynamic and meaningful activity that requires teamwork and commitment at all levels of the organization.

Identification of Stakeholders

Stakeholders are those who are either directly or indirectly affected by an outreach effort, system or service change plan or recommendations of that plan. Stakeholders include:

Board of Trustees –The governing body for trust, their role is to establish policy and direction for EMBARK. Three members serve by position – the Mayor of Oklahoma City, the City Manager and the City Finance Director – and five trustees are appointed by the Mayor and approved by City Council. One of the five members must live outside the city limits of Oklahoma City. In accordance with the inter-local operating agreement between the Trust and the City, the Administrator of EMBARK is appointed by the City Manager and approved by the Board of Trustees.

The Board defines the organization's mission, establishes goals and expectations, approves service plans, sets fares, and approves the budget to accomplish the goals. The 8-member Board of Trustees meets on the first Friday of each month in the City Council Chambers. Board meetings allow for communication among the trustees, administrator, staff, and residents.

Transit Customers

- EMBARK Bus – Fixed-Route and Commuter services
- EMBARK Plus – ADA paratransit services
- EMBARK Vanpool
- Ferry Transit Services – Oklahoma River Cruises
- Bike Share – Spokies
- OKC Streetcar

- Other transit services provided or sponsored by EMBARK

Other audiences include:

- Minority Populations
- Limited English Proficiency (LEP) Customers
- Low-Income Customers
- Residents
- Students
- Local Jurisdictions
- Private Businesses or Organizations
- Employers
- Partner Agencies
- Government Stakeholders

Public Engagement Approach

EMBARK's PEP allows the opportunity for the public to be involved in all phases of the public comment process by providing complete information, timely public notice, the opportunity for making a comment, and full access to key decisions.

Outreach Efforts

EMBARK takes pride in its work to maintain a collaborative relationship with the community and its stakeholders. EMBARK's public outreach effort rests on utilizing multiple communication channels to distribute information to, and solicit input from, affected constituencies. EMBARK typically communicates with the public and its customers through one or more of the following methods.

1. Types of Outreach

- Public Comment – is used when EMBARK has developed a new policy, regulation, or procedure, and public input is sought. Topics are open for public comment for at least 30 days.
- Open House/Forum – is used when no set agenda or presentation takes place. Participants engage with informal exhibits and staff. Opinions, comments, and preferences are encouraged may be provided orally or in writing to staff.
- Workshop – is used to inform and solicit input on a particular policy, issue, plan, or project. Materials and agenda are prepared and posted in advance. No formal action is taken at a workshop.
- Community Meeting – is used to inform and or seek input on a specific topic. Community meetings are conducted by staff or a facilitator. Materials and agenda are prepared and posted in advance. Decision-

making officials may or may not be present.

- Public Hearings – is used to formally inform and or seek input on a specific topic. Staff or a facilitator conducts community meetings. Materials and agenda are prepared and posted in advance. Decision-making officials are present and decisions may be rendered at the conclusion of the hearing.
- Committee Meeting – is used to inform and or seek input on a specific topic. Community meetings are conducted by staff. Materials and agenda are prepared and posted in advance. Decision-making officials may be present.
- Board Meeting – is used to conduct official Trust business. Senior staff members present reports and answer questions concerning programs. All board meetings include a time for the public to comment. Only board members participate in voting. Materials and agenda are prepared and posted in advance.

2. Meeting Times, Locations, and Accessibility

All of EMBARK's formal outreach meetings are conducted in facilities that are accessible to persons with disabilities and to people who rely on public transit. Formal outreach meetings will be an open format, held at various times and locations throughout the service area to maximize attendance.

3. Public Notices

Legal public notices will be published for any of the above formal outreach efforts where public input can impact decisions being made about the stated subject.

Public notices will be promoted at least 7 calendar days and not more than 14 calendar days in advance of set dates for: Public comment periods, Open houses or Forums, Workshops, and Community Meetings.

Legal notices for Board and Committee meetings will adhere to the requirements as outlined in the Oklahoma Open Meetings Act.

Legal notices for Public Hearings will adhere to timelines established in EMBARK's Major Change Policy.

Public notices will be:

- published in a newspaper of general circulation and relevance to impacted audiences within the EMBARK service area when possible. The official advertisement will be published as a display advertisement in the non-legal section of the appropriate news outlet;
- posted on EMBARK's social media channels and website relevant to the mode impacted;

- o posted at the Transit Center and onboard vehicle (s) of the affected mode.

4. Communication Methods

a. Website

EMBARC maintains a comprehensive parent website for all of its family of services – embarkok.com. This site is updated regularly and is home to bus route and schedule information, bus stop listings, system maps, other transit options, disability, and accessibility information, as well information pertinent to projects, plans and outreach efforts. The site also includes a Title VI and ADA page aimed at educating the public about our Title VI and ADA programs. Additionally, public notices of all EMBARK public meetings, public hearings, community meetings, open houses, workshops, and public comment periods are posted on this site. Some programs and projects may have dedicated landing pages (or micro-sites) that include information about upcoming meetings, fact sheets, and projects and plans. Embarkok.com includes the ability for users to translate pages into 90 different languages using Google Translate.

b. Customer Comments

There are multiple ways that individuals can provide verbal or written comments about any subject to us. Comment Cards are supplied at all community meetings, open houses, workshops, public hearings, and public meetings. The EMBARK website has multiple mechanisms to receive comments including a comment form, an email button that automatically begins an email to the Agency, comment forms on project pages, mailing address, and the Customer Service phone number where staff will take comments over the phone. Written public comments can also be submitted to staff at the Customer Relations window at the Downtown Transit Center located at 420 NW 5 St.

c. Social Media:

EMBARC’s Facebook and Twitter pages, and EMBARK’s website provide two-way communication with customers to deliver messaging and information regularly. EMBARK has social media pages and websites for its family of services. They include:

	Bus	Streetcar	Ferry	Bike Share
Website	embarkok.com	okcstreetcar.com	okrivercruises.com	spokiesokc.com
Facebook	@embarkok	@okcstreetcar	@okrivercruises	@spokiesokc
Twitter	@embarkok	@okcstreetcar	@okrivercruises	@spokiesokc
Instagram	@embarkokc	@okcstreetcar	@okrivercruises	@spokiesokc
LinkedIn	@embarkok	-	-	-
Nextdoor	@embarkok	-	-	-

- d. Customer Relations
 - Customer Relations Window at Transit Center
 - (405) 235-RIDE (7433)
 - TTY 711
- e. Paid Advertisements

To promote its services or collect public comments, EMBARK may place paid advertisements in local printed or online publications or websites. Advertisements will be in publications most appropriate for reaching the impacted audiences. Print publications may include The Oklahoman, OK Gazette, Black Chronical, El Nacional, and Dan Quyen.
- f. Focus Groups

At times, the complexity of a project, controversial issues, or the reality of having multiple large Title VI groups to address may require engaging targeted audiences of stakeholders.
- g. Printed Materials

EMBARK produces publications as needed such route and schedule book, maps, brochures, rack cards, and posters, and makes them available to anyone. These publications include technical and policy information and often use visualization techniques to enhance understanding of transit planning and use. Materials are translated into other languages, as needed. All publications are available free of charge.
- h. Community Events

Occasionally, EMBARK will participate in community events and public gathering spaces to raise awareness of our services and/or promote ridership.
- i. News Releases & Media Relations

EMBARK distributes news releases as appropriate on events and other important information to news media. Press releases are posted on embarkok.com. Also, EMBARK's Public Information Officer(s) (PIO) is available to speak with reporters regarding various topics.
- j. Direct Mail, Emails, and Canvassing

EMBARK regularly provides information about its services through direct mailings, emails, and neighborhood canvassing to targeted households.
- k. Surveys

EMBARK may conduct surveys in print, by phone, in-person, and or online to collect public opinion on specific topics or issues. Depending on the

data being collected, EMBARK considers the methodologies that provide statistically valid data when possible. Surveys are available in English and Spanish, to increase the response rate from low income, minority, and LEP populations.

5. Visualization

EMBARK uses visualization techniques such as maps, charts, graphs, illustrations, presentations and videos at all types of meetings, including board meetings, to explain concepts behind actions and decision-making. EMBARK may also use handouts and posters to display visual information. EMBARK’s boardroom is equipped with computers, projectors, and sound systems for displaying visual and audio information. EMBARK uses style guides for data presentation and PowerPoint presentations to present a consistent, streamlined, and easy to understand the visual message.

6. Strategies for Engaging Individuals with Limited English Proficiency (LEP)

EMBARK will take reasonable steps to ensure that LEP persons receive the language assistance services necessary by translating “vital” written materials.

Vital documents are defined either as:

1. any document that is critical for obtaining services and benefits, and/or
2. any document that is required by law. The “vital” nature of a document depends on the importance of the information or service involved, mainly the consequence to the LEP person if the information is neither accurate nor timely.

The designation of a document as “vital” may not mean that a word-for-word translation of that document will be required. In some cases, a vital document may be translated by providing a summary of the critical information in the document. In other cases, notice of the availability of language assistance services may be sufficient.

a. Language Translation Services

EMBARK staff will work to identify the specific language services that community members may expect to be provided. When EMBARK is hosting public meetings in a particular geographic area with a known, significant LEP population, the following should be done:

- a. Meeting notices should be produced and distributed according to the language translation threshold identified in the EMBARK LEP Plan, encouraging community members to participate. Also, participants can request interpreter services 48 hours in advance of the meeting, if needed; and
- b. EMBARK will provide at least one qualified interpreter at these meetings who are fluent in the designated LEP language(s).

b. Print Advertisements

- c. One-on-One Assistance through Outreach Efforts
- d. Website Information with Google Translate option
- e. Direct Mail

Response to Public Input

All public comments are provided to the Board of Trustees before decision making. A summary report is compiled, as well as the availability of all individual comments either in electronic form or hard copy. Summary reports are also posted on the EMBARK website.

Conclusion

EMBARK understands the importance of reaching under-represented populations, both as part of its commitment to being a valued community partner and in recognition of the significant proportion of its customer base which is included in these populations. It is necessary to establish procedures that allow for, encourage, solicit and monitor participation of all stakeholders in the EMBARK service area to ensure proactive public involvement in the planning process. The goal of this public engagement plan is to have significant and ongoing public involvement, by all identified audiences, in the public participation process for major agency outreach efforts.

APPENDIX B

LIMITED ENGLISH PROFICIENCY PLAN

INTRODUCTION

The Need for an LEP Plan

Individuals with a limited ability to read, write, speak, or understand English are Limited English Proficient or “LEP.” This language barrier may prevent individuals from accessing public services and benefits, including public transit services.

Federal Requirements

Title VI of the Civil Rights Act of 1964 and Executive Order 13166 signed on August 11, 2000, are the federal legislation necessitating LEP plans from public agencies receiving Federal funds.

Title VI of the Civil Rights Act of 1964, 42 U.S.C. 2000d et seq., and its implementing regulations provide that no person in the United States shall, on the grounds of race, color, or national origin, be excluded from participation in, be denied the benefits of, or be otherwise subjected to discrimination under any program or activity that receives Federal financial assistance. The U.S. Supreme Court has ruled that LEP is a component of the protected class of national origin.

Executive Order 13166, “Improving Access to Services with Limited English Proficiency,” requires Federal agencies to examine the services they provide, identify any need for services to those with LEP, and develop and implement a system to provide those services so LEP persons can have meaningful access to them. Executive Order 13166 also requires that the Federal agencies work to ensure that recipients of Federal financial assistance provide meaningful access to their LEP applicants and beneficiaries. The Executive Order applies to all Federal agencies and all programs and operations of entities that receive funding from the Federal government—including state agencies, local agencies and governments, private and non-profit entities, and sub-recipients, such as public transit agencies.

The U.S. Department of Transportation (DOT) published revised LEP guidance for its recipients on December 14, 2005. The Federal Transit Authority (FTA) references the DOT LEP guidance in its Circular 4702.1A, “Title VI and Title VI-Dependent Guidelines for FTA Recipients,” which was published on April 13, 2007. This Circular reiterates the requirement to take responsible steps to ensure meaningful access to benefits, services, and information for LEP persons and suggests that FTA recipients and sub-recipients develop a language implementation plan consistent with the provisions of Section VII of the DOT LEP guidance.

EMBARK LEP Plan

The Central Oklahoma Transportation and Parking Authority (COTPA, dba EMBARK) is a public trust and a political subdivision of the State of Oklahoma. It is governed by an eight-member Board of Trustees that includes the Oklahoma City Mayor, City Manager, and City Finance Director. EMBARK is a designated direct recipient of FTA funding and is required to develop and routinely update its LEP plan as part of its Title VI Program.

EMBARK's LEP plan is a critical component in serving the transit needs of the diverse communities comprising its service area. Providing language assistance in a competent and effective manner will help ensure that EMBARK's services are safe, reliable, convenient, and accessible to LEP persons in the community. Ideally, these efforts will attract additional LEP riders to EMBARK's services.

THE "FOUR FACTOR ANALYSIS"

DOT guidance outlines "four factors" recipients are to consider when assessing language needs and determining appropriate steps to ensure meaningful access to transit services for LEP riders. Through conducting the "Four Factor Analysis," EMBARK is better positioned to formalize and implement a cost-effective and appropriate mix of proactive language assistance measures and to respond to requests for LEP assistance from constituents. The four (4) factors are as follows:

1. The number or proportion of LEP persons eligible to be served or likely to be encountered by a program, activity, or service of the recipient or grantee.
2. The frequency with which LEP individuals come in contact with the program.
3. The nature and importance of the program, activity, or service provided by the recipient to the LEP Community.
4. The resources available to the recipient and the overall cost.

Factor 1: The number or proportion of LEP persons eligible to be served or likely to be encountered by a program, activity, or service of the recipient or grantee.

For planning purposes, EMBARK considers its current service area to be the City of Oklahoma City and the two (2) communities it has annual service contracts with to provide transit services, the cities of Midwest City and Spencer. Analysis of U.S. Census Bureau American Community Survey 5-Year Estimates (2015–2019) data was conducted to estimate the LEP population in EMBARK's service area.

Examination of America Community Survey table C16001, "*Language Spoken at Home for the Population 5 Years and Over,*" by geographic place determined that there are nine (9) non-English

language categories spoken at home by over 1,000 persons in EMBARK’s service area (See Table 1). People who speak Spanish at home represent 14.11% of EMBARK’s service area population. Each of the other eight (8) language categories were spoken by less than 1.63% of the population five (5) years and older in EMBARK’s service area or, when totaled, comprised 4.49% of the service population five (5) years and older.

Table 1: Language Spoken at Home by 1000+ Persons in EMBARKS’s Service Area

Language Spoken at Home	Persons 5 Years of Age and Older	Percentage of EMBARK Service Area Population Five Years and
English	527,866	81.00%
Spanish	91,973	14.11%
French, Haitian, or Cajun	1,487	0.23%
Korean	1,022	0.16%
Chinese (including Mandarin, Cantonese)	2,449	0.38%
Vietnamese	10,649	1.63%
Arabic	1,095	0.17%
Other Indo-European languages	4,124	0.63%
Other Asian and Pacific Island languages	4,321	0.66%
Other and unspecified languages	4,100	0.63%

Source: U.S. Census Bureau, 2015-2019 American Community Survey 5-Year Estimates, Table C16001, “Language Spoken at Home”

Ability to speak English was also examined for the EMBARK service area utilizing the same American Community Survey data from Table 16001. Using FTA guidelines, the LEP population is considered all those who speak English less than “very well”. The data is categorized by the language groups spoken by respondents.

This study determined that approximately 7.88% (51,321/651,684) of the population over the age of 5 in EMBARK’s service area speaks English less than “very well” and hence is characterized as LEP (See Table 2). The majority of the LEP population—approximately 38,613 of the 51,321, or 75%, LEP non-English speaking persons—speak Spanish.

Table 2: Ability to Speak English by Place in EMBARK's Service Area

US Census Bureau - American Community Survey 2015-2019 (5-Year Data)	EMBARK Service Area			
	Total	%	< Well	LEP %
Population 5 Years and Over	651,684			
Speak only English	527,866	81.00%		
Spanish	91,973	14.11%	38,613	5.93%
Vietnamese	10,649	1.63%	6,197	0.95%
Chinese (incl. Mandarin, Cantonese)	2,449	0.38%	1,314	0.20%
French, Haitian, or Cajun	1,487	0.23%	211	0.03%
Arabic	1,095	0.17%	341	0.05%
Korean	1,022	0.16%	506	0.08%
Tagalog (incl. Filipino)	1,014	0.16%	236	0.04%
German or other West Germanic languages	976	0.15%	87	0.01%
Russian, Polish, or other Slavic languages	608	0.09%	209	0.03%
Other Asian and Pacific Island languages	4,321	0.66%	1,765	0.27%
Other Indo-European languages	4,124	0.63%	994	0.15%
Other and unspecified languages	4,100	0.63%	848	0.13%
			51,321	7.88%

Source: U.S. Census Bureau, 2015-2019 American Community Survey 5-Year Estimates, Table C16001, "Language Spoken at Home"

Conclusions: Spanish is the most prevalent language spoken by LEP persons in EMBARK's service area and should be the primary focus of any translation or language assistance activities. However, Vietnamese and Chinese meet the Safe Harbor Provision LEP language threshold of 1,000 or 5%. The following vital documents and content will be provided in Spanish, Vietnamese, and Chinese:

- Title VI Notice of Nondiscrimination
- Title VI Complaint Procedure
- EMBARK website (via Google Translate)

Factor 2: The frequency with which LEP individuals come in contact with EMBARK services.

Participation in Public Meetings

EMBARK does not have records of any LEP customers participating in recent public meetings, but all public notices are published in local alternative language newspapers.

Customer Service Interactions

EMBARK operates a call center to provide customer assistance and travel information via telephone for those seeking to use EMBARK services, and a language line (known as, “Universal Language Services (ULS)”) is available for LEP customers. At least one Spanish-speaking Customer Service Representative is assigned to each shift in the call center. The ULS language line acts as a backup if that assigned Representative is not available. If a Customer Service Representative interacts with an LEP customer needs assistance in another language, then the ULS Language Line will be utilized, and the interaction will be logged on the Customer Service LEP form.

On-Board Transit Survey

EMBARK’s most recent On-Board Transit Survey was conducted in 2020. The survey found that 14% of respondents reported speaking a language other than English at home. This is 2% higher than reported in the previous survey, completed in 2019. Just 1% of respondents reported speaking English less than or not well at all. This is significantly lower than the 7% reported in the 2019 survey.

Factor 3: The nature and importance of service provided by EMBARK.

Access to public transportation is critical for many to fully participate in society. EMBARK provides a range of important transportation options to the community through its fixed route, paratransit, streetcar, seasonal ferry, and other mobility management services. Riders use EMBARK transit services for a multitude of travel needs within the community including trips to work, school, job interviews, grocery stores, retail shops, medical offices, community service agencies, and more.

Factor 4: The resources available to EMBARK and the overall cost.

EMBARK’s annual operating budget has funded outreach efforts and translation services to effectively communicate with LEP persons in the community for many years. As funding allows, EMBARK intends to continue such efforts into the foreseeable future.

The EMBARK Marketing Department spent approximately \$2,300 in Fiscal Year 2021 on bilingual advertising placements in local community newspapers. Modest funding is available for translation services, which are typically used for news releases, route information, passenger bulletins, and other marketing effort targeted at Spanish speaking audiences.

Actual annual costs for the Universal Language Services (ULS) translation phone services are dependent upon usage. Because utilization is currently very low, annual expenditures are also low. The current annual budget is \$500.

Because of the lack of comprehensive and reliable LEP contact data, COTPA is seeking a way to capture and report this data efficiently and effectively on a regular basis. EMBARK has implemented an LEP training program to help frontline employees work with LEP customers. The training initiatives include multi-cultural awareness, how to work with non-English speaking passengers, and opportunities to provide feedback and help design language materials for use in daily operations and customer service.

IMPLEMENTING THE LEP PLAN

The DOT LEP guidance recommends that recipients develop an implementation plan to address the needs of the LEP populations they serve. The DOT LEP guidance notes that effective implementation plans typically include the following five (5) elements:

1. Identifying LEP individuals who need language assistance
2. Providing language assistance measures
3. Training staff
4. Providing notice to LEP persons
5. Monitoring and updating the plan

Element 1: Identifying LEP Individuals who need language assistance

Census data

As discussed above, the 2015-2019 American Community Survey 5-year estimate (Table C16001) data indicates that Spanish-speaking LEP persons are the primary group requiring language assistance in EMBARK's service area. EMBARK will continue monitoring and using Census data to identify and locate significant and emerging LEP populations.

Customer Satisfaction Surveys

Occasionally, EMBARK conducts a "Customer Satisfaction Survey" which provides detailed information about passenger demographics and travel patterns. Future passenger satisfaction surveys will include questions to quantify LEP riders, their travel patterns, and route use. This will become important information in further identifying and understanding the transit needs of LEP persons. The last customer satisfaction survey was conducted in 2020.

Documenting Staff Encounters with LEP Persons at EMBARK Public Meetings

When open houses or public meetings are held, EMBARK staff will have the Census Bureau's "I Speak" flashcards available to help identify LEP persons. While EMBARK staff may not be able to provide translation assistance on the spot, the flashcards can be an important tool in identifying language needs for future public events. A continuous record will be kept detailing the primary languages of LEP persons attending EMBARK's public meetings.

Tracking Calls to the Language Line

EMBARC will continue to monitor and quantify the volume and trends of calls utilizing the ULS service line for language assistance.

Tracking staff encounters with LEP Persons at the EMBARK call center

EMBARC will continue to monitor and quantify the volume of LEP Persons calling the EMBARK call center. EMBARK's Spanish-speaking Customer Service Representative on-duty will continue to assist Spanish LEP customers as needed. Should a Customer Service Representative interact with an LEP customer needing assistance in another language, then the ULS Language Line will be utilized, and the interaction will be logged on the Customer Service LEP form.

Element 2: Providing Language Assistance Measures

EMBARC currently employs various methods and strategies to provide LEP customers with information critical to using EMBARK services. Many of these efforts focus on reaching Spanish-speaking persons, the dominant LEP population in the EMBARK service area.

EMBARC's current efforts to provide language assistance to LEP customers include the following:

- Translation services via phone – ULS: EMBARK has access to interpreters who can assist riders with bus schedule information in more than 200 languages. Callers to the center (405) 235-RIDE (7433) and visitors to the EMBARK Transit Center needing language assistance are personally directed to the language line services. This free service is available from 6 AM to 7 PM., Monday through Friday.
- Pocket schedules and route maps in Spanish: All route pocket schedules and maps are printed in both English and Spanish.
- EMBARK website translation: Google Translate is available for use on the EMBARK website for Spanish, Vietnamese, and Chinese. Analytics during the previous submission period indicate 96.8% of website traffic was viewed in English. About 0.54% of website traffic was translated to Spanish and 0.39% to Chinese.
- Vital documents and content such as the Title VI Notice of Nondiscrimination and translation information for all Public Notices are provided in Spanish, Vietnamese, Chinese. EMBARK will translate critical documents in any of these languages upon request.
- Additional documents in Spanish: Reduced fare and paratransit applications are available in Spanish on the EMBARK website and upon written, telephone or in-person request. Title VI and ADA complaint forms are available in Spanish at the following link: <https://embarkok.com/about/rights>.
- Assisting LEP Persons on-board EMBARK Buses: Written EMBARK protocol for providing LEP passenger assistance is included in the operator route book (bus operations

manual). If an LEP passenger needs assistance while on-board an EMBARK bus, recommended approaches to understand and appropriately respond to the passenger's needs and situations are as follows:

- The bus operator may inquire if another passenger can serve as a translator.
- The driver will direct the LEP person to any schedule and route information that has been placed aboard the vehicle or to the EMBARK customer service line for language assistance.
- Complex or emergency situations may necessitate contacting Transportation Supervisors or Dispatch for additional help in utilizing phone access to language line interpreters.

Element 3: Training of Staff

In order to establish meaningful access to information and services for LEP individuals, various personnel and departments that regularly interact with the public are trained on the LEP plan for providing language assistance.

Programmed training efforts include the following:

- LEP protocol is reviewed with staff from the Planning and Marketing departments in preparation for EMBARK public meetings and open houses to quantify and engage LEP persons who may attend and participate.
- The Customer Service department, which is responsible for the call center and the EMBARK on-site reception area, has annual refresher training on directing LEP callers and walk-in customers to the ULS service phone line for interpretation services. New hires to the Call Center receive LEP protocol training during orientation activities.
- The Operations Department trains dispatchers, roadside supervisors, and operators on best practices and procedures for assisting LEP passengers.
 - LEP passenger assistance protocol training is incorporated into the formal curriculum for new operators and annual refresher training for current operators. Training for new operators occurs during orientation; refresher training sessions for current operators are scheduled on a quarterly basis.
 - An annual operations bulletin is issued to all personnel to increase awareness and reinforce LEP passenger assistance protocol.

Element 4: Providing Notice to LEP Persons of the Availability of Language Assistance

EMBARK's current and planned measures to inform LEP persons of the availability of language assistance includes, but is not limited, to the following:

Public Notices: EMBARK includes a statement on important notices that informs LEP persons of the availability of the information in a language accessible to them. This statement currently includes Spanish, Vietnamese, and Chinese.

Local non-English newspapers: EMBARK will continue to issue media press releases in Spanish and purchase advertisements in local non-English newspapers publicizing language assistance measures offered by EMBARK.

Direct engagement with LEP populations and community organizations: Through working with various community organizations, EMBARK will seek to identify and engage LEP populations in the community and inform them of available public transportation services and related language assistance mediums. Conducting “How to Ride” clinics in partnership with community organizations is a great tool in educating LEP persons on how to use EMBARK services. Direct engagement with LEP persons will also help EMBARK learn what additional agency information may need translation.

Element 5: Monitoring and Updating the LEP Plan

EMBARK will routinely review and update its LEP Plan as new demographic information becomes available. Anticipated updates will include the incorporation of new Census data, LEP ridership trends identified through the biennial “Customer Satisfaction Survey,” and public comments about the LEP Plan. Full review of the LEP Plan will occur with each triennial Title VI program submission.

DISSEMINATION OF EMBARK’S LEP PLAN

EMBARK posts its LEP plan on its website at the following link:

<https://embarkok.com/civilrights>

Any person or agency with Internet access will be able to access and download the plan from the EMBARK website.

Alternatively, any person or agency may request a copy of the plan via telephone, email, fax, mail, or in-person and shall be provided a copy of the plan at no cost. Requests for copies of EMBARK’s LEP plan and questions or comments about the plan should be directed to the following:

EMBARK
2000 S May
Oklahoma City, OK 73108
Phone: 405-297-1331
Fax: 405-316-2104
Email: embarkok@okc.gov

APPENDIX C

SUBRECIPIENT MONITORING - CITY OF EDMOND TITLE VI PLAN (2017)

<https://www.edmondok.gov/1415/Title-VI-Plan>

Site visits are conducted annually

APPENDIX D
COTPA BOARD OF TRUSTEES APPROVAL OF TITLE VI PROGRAM UPDATE
(2022)



TO: Chairman and Board of Trustees

FROM: Administrator

Resolution to Approve the Title VI Program for FY 2022-25.

Background:

COTPA is committed to providing transit service to any resident or visitor in the Central Oklahoma Region that desires to use public transportation. This mission is consistent with Title VI requirements which prohibit recipients of federal financial assistance from discriminating on the basis of race, color or national origin in their programs or activities, and it obligates agencies receiving federal funding to enforce compliance. Title VI also requires these agencies to reduce language barriers that may impede access to important services to customers who may not be proficient in English.

The Federal Transit Administration (FTA) requires that all direct and primary recipients of federal funds document their compliance with the Department of Transportation’s Title VI regulations by submitting a Title VI Program to their FTA regional civil rights officer once every three years or as otherwise directed by the FTA. The FTA Circular 4702.1B, as implemented on October 1, 2012, also requires that the Title VI Program be approved by the recipient’s board of directors or appropriate governing entity or officials responsible for policy decisions prior to submission to the FTA. Staff has prepared an updated Title VI program that will be submitted to the FTA upon approval of the board of trustees.

Recommendation:

Resolution be adopted.

Review Public Transportation and Parking Department and Municipal
Counselor’s Office

Jason Ferbrache
Administrator

**RESOLUTION TO APPROVE THE
TITLE VI PROGRAM FOR FY 2022-2025**

WHEREAS, Central Oklahoma Transportation and Parking Authority (“COTPA”) is the recipient of Federal transit funds; and

WHEREAS, 49 CFR Section 21.9(b) requires COTPA to have a Title VI Program; and

WHEREAS, COTPA is required to submit its updated Title VI Program to the Federal Transit Administration (FTA) every three years; and

WHEREAS, the proposed Title VI Program is submitted herein for the Trustees’ review and approval.

NOW, THEREFORE, BE IT RESOLVED by the Trustees of the Central Oklahoma Transportation and Parking Authority, they do hereby approve the attached Title VI Program for FY 2022-2025.

APPROVED by the Trustees of the Central Oklahoma Transportation and Parking Authority and **SIGNED** by the Chairman on this 4th day of March, 2022.



**CENTRAL OKLAHOMA
TRANSPORTATION AND PARKING
AUTHORITY**



Chairman

ATTEST: (Seal)



Secretary

Reviewed for form and legality.



Assistant Municipal Counselor



Central Oklahoma Transportation & Parking Authority

Summer 2020

Service Changes

Title VI Service Equity Analysis

Introduction

As part of regularly scheduled biannual service analysis, Central Oklahoma Transportation & Parking Authority (COTPA, dba EMBARK) staff recommended Summer 2020 Service Changes to the COTPA Board of Trustees, which included:

- Elimination of Route 50 CIRC
- Reallocation of resources from eliminated route to increase frequency on Route 009 Reno Crosstown

EMBARK's Title VI Program requires a Title VI Service Equity Analysis to be completed for the service changes identified above. The completed Service Equity Analysis determined there is no Disparate Impact for minority populations and no Disproportionate Burden for low-income populations. Public engagement and outreach activities were performed by EMBARK staff to notify the public of the service changes.

EMBARK Title VI Program

Major Service Change

EMBARK's Title VI Program defines a Major Service Change as:

- A 25% or more addition, reduction or change in the service hours or miles of any route that would remain in effect for twelve (12) or more months.
- A change which affects more than 25% of the stops that make up the route's boardings.
- A new transit route that would remain in effect for twelve (12) or more months.

All Major Service Changes are subject to a Service Equity Analysis that includes an analysis of potential Disparate Impact or Disproportionate Burden.

Disparate Impact Policy

The Disparate Impact Policy establishes a threshold for determining when adverse effects of a Major Service Change are borne disproportionately by minority populations. COTPA's threshold for statistically significant disparity is when minority populations or riders will experience a 20% or greater adverse effect than that borne by the non-minority population or riders, then such changes will be considered to have a Disparate Impact.

Additionally, if benefits associated with the Major Service Change accrue to non-minority riders greater than 20% when compared to minority riders, then that change will be determined to have a Disparate Impact.

Disproportionate Burden Policy

The Disproportionate Burden Policy establishes a threshold for determining when adverse effects of a Major Service Change are borne disproportionately by low-income populations. COTPA's threshold for statistically significant disparity is when low income populations or riders will experience a 20% or greater adverse effect than that borne by the non-low-income population or riders, then such changes will be considered to have a Disproportionate Burden.

Additionally, if benefits associated with the Major Service Change accrue to non-low-income riders greater than 20% when compared to low-income riders, then that change will be determined to have a Disproportionate Burden.

Analysis

EMBARK’s Summer 2020 Service Changes for Route 50 CIRC and Route 009 Reno Crosstown exceed the 25% Major Service Change threshold outlined in the EMBARK Title VI Program. Route 50 was rerouted in 2018 to provide streetcar connectivity for downtown residents. Over the initial 24 months following the reroute, the service averaged 85 daily riders, which is 63% below EMBARK’s minimum service standard of 234 daily riders. These changes would bring Route 009 in line with EMBARK’s Service Standards for headways on local routes.

The table below illustrates the Major Service Change thresholds associated with the proposed changes on these two routes.

Major Service Change Determination (Service Hours & Miles)

	Current Weekday Miles	Proposed Weekday Miles	Change	%		Current Weekday Hours	Proposed Weekday Hours	Change	%
50 - CIRC	88.29	0	-88.29	-100%		12.92	0	-12.92	-100%
9 - Reno Crosstown	199.66	397.09	197.43	+99%		13.55	27.04	+13.49	+100%

Demographic data from U.S. Census American Community Survey (ACS) data (2015-2019) was used to evaluate whether the proposed changes would result in a Disparate Impact for minority populations or a Disproportionate Burden for low-income populations. Census data by route was used to evaluate impacts of the services changes on minority and low-income populations in comparison to the EMBARK service area. Analysis of the ACS data indicates that the Route 50 elimination would have a greater adverse effect on non-minority and non-low-income populations than on minority and low-income populations. The increase of service on Route 9 would result in a greater benefit to minority and low-income populations.

Summer 2020 Service Changes: Minority Comparison of Route to System (2015-2019 ACS)

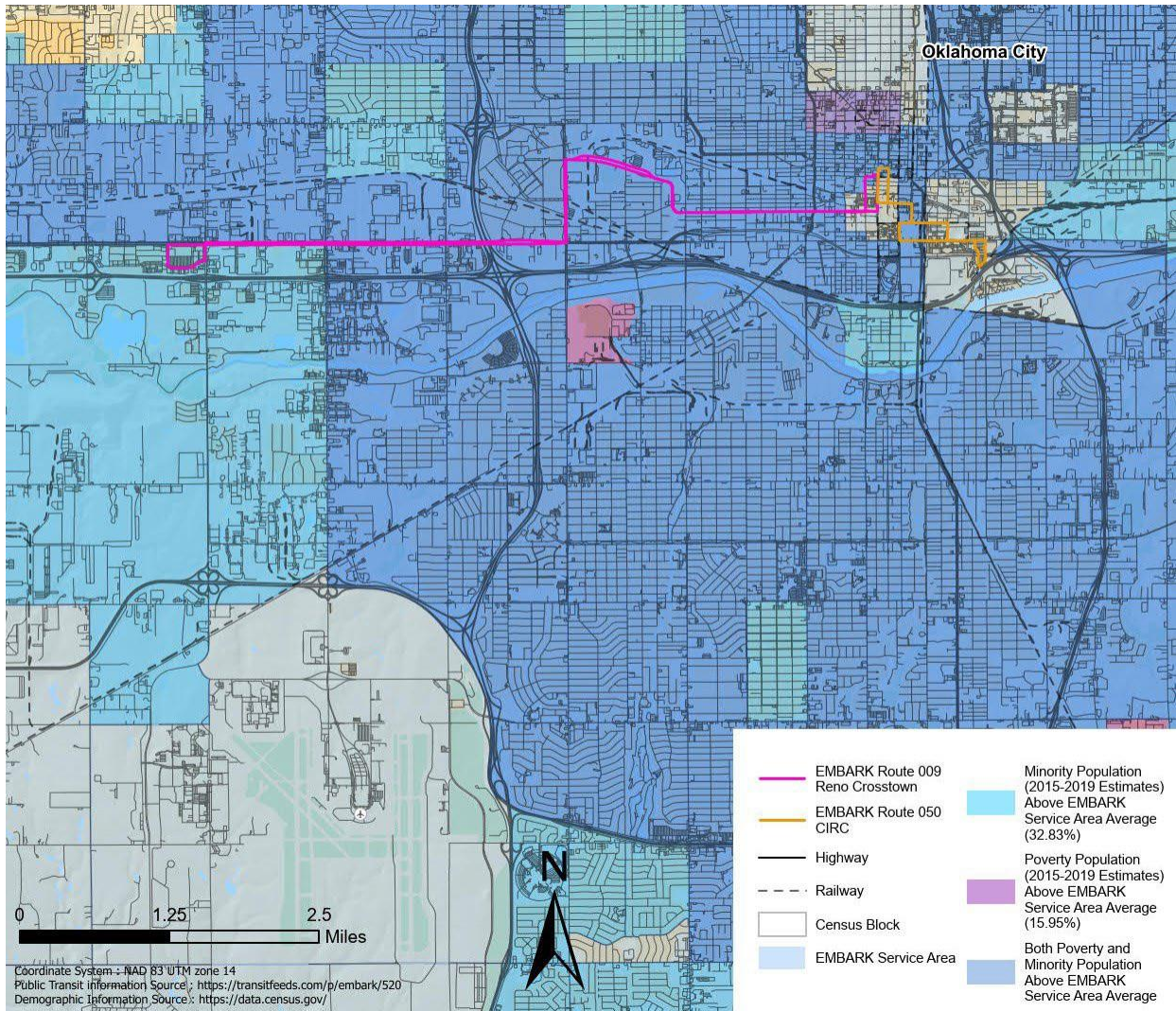
Route	Percent (%) of Revenue Miles in Minority Block Groups	System % of Revenue Miles in Minority Block Groups	% Difference
50 - CIRC	16.60%	72.53%	-55.93%
9 - W Reno Crosstown	93.94%	72.53%	21.41%

Summer 2020 Service Changes: Low-Income Comparison of Route to System (2015-2019 ACS)

Route	Percent (%) of Revenue Miles in Low-Income Block Groups	System % of Revenue Miles in Low-Income Block Groups	% Difference
50 - CIRC	36.02%	57.15%	-21.13%
9 - W Reno Crosstown	84.93%	57.15%	27.78%

The map below shows the affected routes with additional layers indicating minority and low-income populations greater than the service area average.

Route 050 and Route 009 Census Tracts – Minority & Low-Income Populations



Public Engagement

Public Engagement regarding the Proposed Changes was completed in accordance with EMBARK's Title VI Program. Public meeting notifications were posted across multiple media platforms, in English, Spanish and Vietnamese. The public was notified by newspaper, rider alerts, on-board notices, and social media channels (embarkok.com, Twitter, and Facebook). EMBARK staff received one comment against the Route 50 elimination and two comments in support of the increased frequency on Route 009. The following table summarizes Public Engagement efforts performed for the Summer 2020 Service Changes.

Summary of Public Engagement Efforts (Summer 2020)

Date	Meeting Type	Meeting Location	Subject
7/14/2020	Public Meeting	Virtual, Microsoft Teams	Summer 2020 Proposed Service Changes
7/21/2020	Public Meeting	Virtual, Microsoft Teams	Summer 2020 Proposed Service Changes
7/30/2020	Public Meeting	Virtual, Microsoft Teams	Summer 2020 Proposed Service Changes
8/07/2020	Public Hearing	City Hall, 200 N Walker Ave, Oklahoma City	Summer 2020 Proposed Service Changes – Part of COTPA Board Meeting

Determination of Impacts

Based on the details of these service changes and the related Census data and GIS map analysis, the elimination of Route 050 CIRC and increased frequency on Route 009 Reno Crosstown will not generate any Disparate Impacts or Disproportionate Burden.



Central Oklahoma Transportation & Parking Authority

Summer 2021

Service Change

Title VI Service Equity Analysis

Introduction

As part of regularly scheduled biannual service analysis, Central Oklahoma Transportation & Parking Authority (COTPA, dba EMBARK) staff recommended the following Summer 2021 Service Change to the COTPA Board of Trustees:

- Increased frequency on Route 018 Lincoln

EMBARK's Title VI Program requires a Title VI Service Equity Analysis to be completed for the service change identified above. The completed Service Equity Analysis determined there is no Disparate Impact for minority populations and no Disproportionate Burden for low-income populations. Public engagement and outreach activities were performed by EMBARK staff to notify the public of the service change.

EMBARK Title VI Program

Major Service Change

EMBARK's Title VI Program defines a Major Service Change as the following:

- A 25% or more addition, reduction or change in the service hours or miles of any route that would remain in effect for twelve (12) or more months.
- A change which affects more than 25% of the stops that make up the route's boardings.
- A new transit route that would remain in effect for twelve (12) or more months.

All Major Service Changes are subject to a Service Equity Analysis that includes an analysis of potential Disparate Impact or Disproportionate Burden.

Disparate Impact Policy

The Disparate Impact Policy establishes a threshold for determining when adverse effects of a Major Service Change are borne disproportionately by minority populations. COTPA's threshold for statistically significant disparity is when minority populations or riders will experience a 20% or greater adverse effect than that borne by the non-minority population or riders, then such changes will be considered to have a Disparate Impact.

Additionally, if benefits associated with the Major Service Change accrue to non-minority riders greater than 20% when compared to minority riders, then that change will be determined to have a Disparate Impact.

Disproportionate Burden Policy

The Disproportionate Burden Policy establishes a threshold for determining when adverse effects of a Major Service Change are borne disproportionately by low-income populations. COTPA's threshold for statistically significant disparity is when low income populations or riders will experience a 20% or greater adverse effect than that borne by the non-low-income population or riders, then such changes will be considered to have a Disproportionate Burden.

Additionally, if benefits associated with the Major Service Change accrue to non-low-income riders greater than 20% when compared to low-income riders, then that change will be determined to have a Disproportionate Burden.

Analysis

EMBARC's Summer 2021 Service Change for Route 018 Lincoln exceeded the 25% Major Service Change threshold outlined in the EMBARK Title VI Program. Staff submitted a budget request to increase frequency on Route 018 from 60 minutes on weekday to 30 minutes and to add 60-minute service on weekends. These changes would bring Route 018 in line with EMBARK's Service Standards for headways local routes.

The table below illustrates the Major Service Change threshold associated with the proposed change on this route.

Major Service Change Determination (Service Hours & Miles)

Route	Current Weekday Miles	Proposed Weekday Miles	Change	% Difference	Current Weekday Hours	Proposed Weekday Hours	Change	% Difference
18 - Lincoln	243.79	505.5	261.71	+107%	13.23	27.83	14.6	+110%

Demographic data from U.S. Census American Community Survey (ACS) data (2015-2019) was used to evaluate whether the proposed changes would result in a Disparate Impact for minority populations or a Disproportionate Burden for low-income populations. Census data by route was used to evaluate impacts of the services changes on minority and low-income populations in comparison to the EMBARK service area. Analysis of the ACS data indicates the increase of service on Route 18 would result in a greater benefit to minority and low-income populations compared to non-minority and non-low-income populations.

Summer 2021 Service Changes: Minority Comparison of Route to System (ACS 2015-2019)

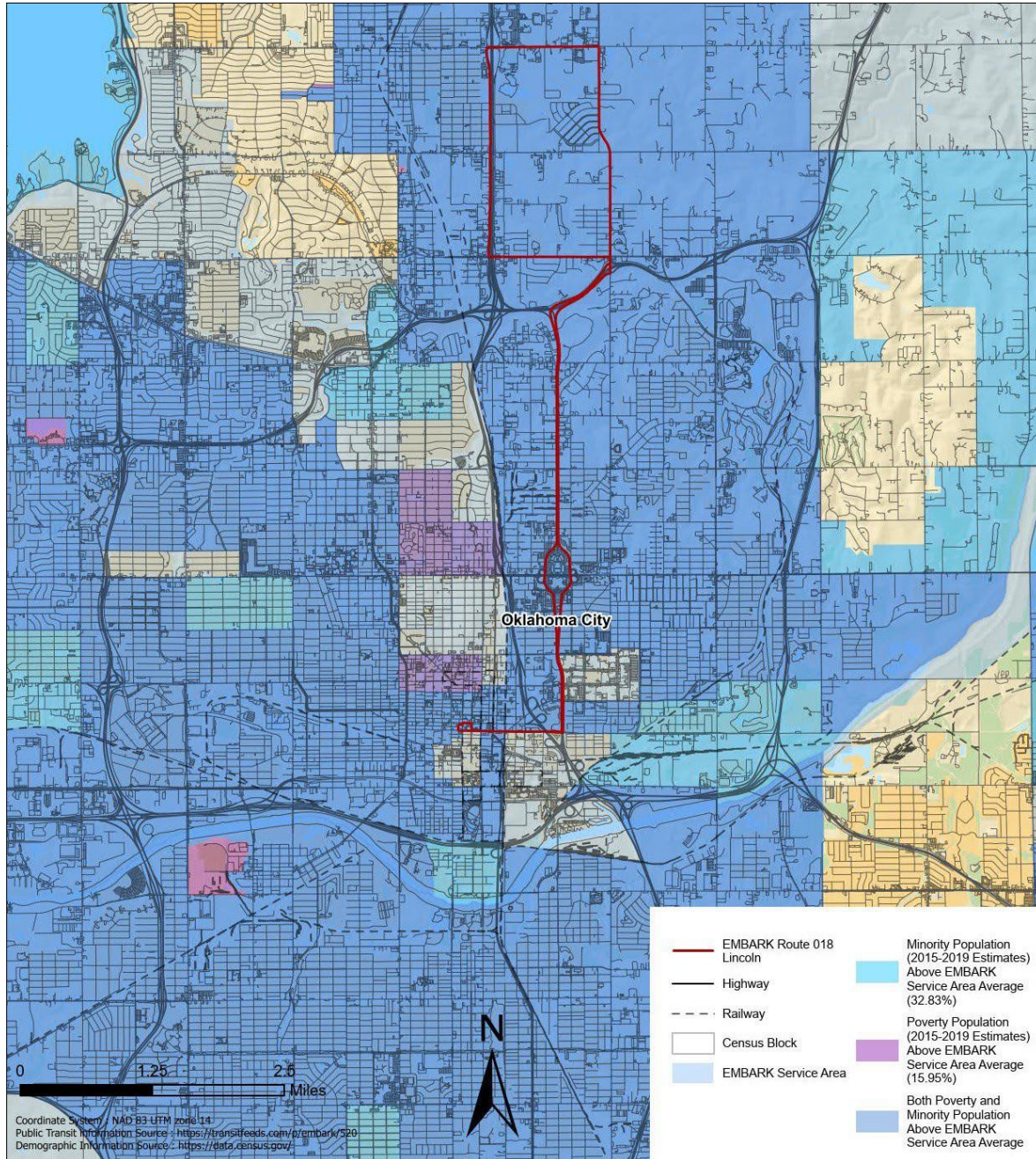
Route	Percent (%) of Revenue Miles in Minority Block Groups	System % of Revenue Miles in Minority Block Groups	% Difference
18 - Lincoln	95.67%	72.53%	23.14%

Summer 2021 Service Changes: Low-Income Comparison of Route to System (ACS 2015-2019)

Route	Percent (%) of Revenue Miles in Low-Income Block Groups	System % of Revenue Miles in Low-Income Block Groups	% Difference
18 - Lincoln	95.67%	57.15%	38.52%

The map below shows the affected Route 018 with additional layers indicating minority and low-income populations greater than the service area average.

Route 018 Lincoln Census Tracts – Minority & Low-Income Populations



Public Engagement

Public Engagement regarding the Proposed Changes was completed in accordance with EMBARK's Title VI Program. No public comments were received regarding the proposed change to Route 018. The proposed change was part of a public hearing and City Council Meeting held on May 18, 2021.

Determination of Impacts

Based on the details of this service change and the related Census data and GIS map analysis, the increased frequency on Route 018 Lincoln will not generate any Disparate Impacts or Disproportionate Burden.