

**County of Milwaukee**  
**Interoffice Communication**

**DATE:** May 20, 2020

**TO:** Marcelia Nicholson, Chairwoman, Milwaukee County Board of Supervisors

**FROM:** Donna Brown-Martin, Director, Department of Transportation

**SUBJECT:** Resolution Approving of Milwaukee County Transit System (MCTS) 2020 Title VI Program Plan Update

POLICY

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.”

BACKGROUND

The Federal Transit Administration (FTA) requires transit providers prepare a Title VI Program Plan Update every three years to document compliance. The purpose of the Plan is to ensure that transit services are provided in a non-discriminatory manner, to promote full and fair participation in transit decision-making without regard to race, color, or national origin, and to ensure meaningful access to transit-related programs and activities by persons with limited English proficiency.

In addition, the FTA requires approval of the Title VI Program Plan Update by the County Executive and the County Board prior to the submittal deadline of October 1, 2020.

The MCTS 2020 Title VI Update is available at <https://www.ridemcts.com/about-mcts/title-vi>

The update includes the following content:

- Notice to the Public, Complaint Procedures and Form, and a Summary of Complaints
- Public Participation Plan and Public Outreach & Involvement Activities
- Limited English Proficiency Plan
- Minority Representation on Planning and Advisory Bodies
- Monitoring of sub-recipient Title VI programs
- Approval of Title VI Program by the Governing Entity
- Definitions of Major Service Changes, Disparate Impact, and Disproportionate Burden
- Service Standards / Policies and Demographic data on minority / low-income populations
- Service and Fare Equity Analyses of major service changes

In addition to documenting compliance, MCTS also seeks to advance racial equity in our community. MCTS requested a review of the Title VI Update by the Office on African American Affairs (OAAA) and will incorporate comments accordingly.

In 2019, several staff at MCTS participated in racial equity training coordinated by the OAAA. MCTS staff also met with representatives from OAAA to learn about the Government Alliance on Race & Equity (GARE) framework of normalizing, organizing and operationalizing racial equity.

Moving forward, MCTS planners will complete racial equity tool worksheets prior to making service changes and endeavor to build meaningful relationships with organizations that represent minority residents in order to improve data collection and information on meeting attendees and riders.


Finally, it should be noted that these actions will be consistent with and relevant to Milwaukee County General Ordinance Chapter 108 Achieving Racial Equity and Health. MCTS is an important partner in these efforts.

RECOMMENDATION

Approve the MCTS 2020 Title VI Update and allow MCTS to submit it to the Federal Transit Administration.

Prepared by: Dan Boehm, Managing Director, MCTS

Approved by:

  
Donna Brown-Martin  
Director, Department of Transportation

cc: David Crowley, Milwaukee County Executive  
Mary Jo Meyers, Chief of Staff, Milwaukee County Executive Office  
Kelly Bablitch, Chief of Staff, County Board of Supervisors  
Joe Lamers, Fiscal and Budget Administrator, Department of Administrative Services  
Steve Cady, Research Director, Office of the Comptroller