# LAWRENCE TRANSIT SYSTEM 2013-2015 TITLE VI PROGRAM UPDATE

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Submitted by the:
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#### I. INTRODUCTION

The Lawrence Transit System (LTS) has updated its Title VI Program as required by the Federal Transit Administration (FTA) and to further ensure that the level and quality of LTS fixed route and demand-response services are provided pursuant to Title VI of the Civil Rights Act of 1964. That is:

"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." (42 U.S.C. 2000d)

LTS, as a recipient of federal financial assistance, will ensure full compliance with Title VI of the Civil Rights Act of 1964, as amended and related statutes and regulations in all LTS programs and activities. LTS provides, without regard to race, color, national origin, sex, age, or disability:

- 1. Transit services and benefits that are available and equitably distributed;
- 2. A level and quality of transit services that are sufficient to provide equal access and mobility for all persons;
- 3. Opportunities to participate in the transit planning and decision making processes; and,
- 4. Fair decisions on the location of transit services and facilities.

These objectives are the basis for the LTS Title VI program.

The program that follows was updated in conformance with FTA C 4702.1B (October 1, 2012). The new guidance in this circular integrates the responsibilities to Limited English Proficient (LEP) Persons into the programs.

This program contains all of the elements required of a transit provider operating in an urbanized area of less than 200,000 in population and operating less than fifty vehicles in peak service. It supersedes LTS's Title VI Program of 2010 and is effective as of October 1, 2013. It has been prepared using data from the most recent 2010 U.S. Census.

#### II. GENERAL REQUIREMENTS

#### 1. Annual Certifications and Assurances

LTS submits its annual Certifications and Assurances to the Federal Transit Administration each year in accordance with the requirement to do so within 90 days from the date of the publication of the notice in the Federal Register or with the first grant application, whichever comes first. The most recent submission was on March 4, 2013. Updated Certifications and Assurances will be submitted each year.

#### 2. Notice to Beneficiaries

Lawrence Transit System's Notice to Beneficiaries is posted in the Public Transit Administrative Office reception area, our website <a href="www.lawrencetransit.org">www.lawrencetransit.org</a>, our service provider's reception area, on public transit vehicles, and the University of Kansas offices of Parking and Transit. Copies of the notice are provided to the KU Department of International Student Services, Haskell Indian Nations University, Small World, Centro Hispano, and other locations as identified by the Title VI Coordinator. A copy of the Notice to Beneficiaries is attached as Appendix A to this program update.

#### 3. Title VI Complaint Procedures

In order to comply with 49 CFR Section 21.9 (b), the following complaint procedure will be followed by LTS in the event that any person believes that he or she, individually, or as a member of any specific class of persons, has been excluded from participation in, been denied the benefits of, or been subjected to discrimination on the basis of race, color, national origin, sex, age or disability with regard to:

- the availability and equitable distribution of transit services and benefits;
- the level and quality of transit services that are sufficient to provide equal access and mobility for all persons
- the opportunity to participate in the transit planning and decision making processes; and,
- the right to fair decisions on the location of transit services and facilities.

Any person who believes he/she has been subjected to any unlawful discriminatory practice under Title VI may file a complaint by:

- Calling Customer Service at 864-4644
- E-mail to info@lawrencetransit.org

- Completing and submitting Title VI Complaint Form on our website www.lawrencetransit.org
- Delivering or mailing written complaint to the Title VI Coordinator, 933 New Hampshire Street, Lawrence, KS 66044

In addition, complaints can be filed directly to the following:

City Attorney

City of Lawrence, KS

PO Box 708

6 East 6<sup>th</sup> Street

Lawrence, KS 66044

Federal Transit Administration, Region VII

Office of Civil Rights

901 Locust Street, Ste. 404

Kansas City, MO 64106

(816) 329-3920

Upon request, assistance will be provided to any person(s) that are unable to read, write, or have limited English proficiency.

If assistance is required the complainant will be required to sign and date the transcript of a verbal complaint. Refusal to sign the complaint will provide basis for administrative closure of the complaint. No unsigned, undated complaint will be considered.

Title VI and Civil Rights complaints should be filed immediately. However, LTS will investigate complaints up to 180 days after the alleged incident occurred. At a minimum, complaints shall include the following items:

- 1. Name, address, and phone number of the complainant.
- 2. Name and location of the city entity delivering the service.
- 3. A description of the incident that led the complainant to feel discrimination occurred.
- 4. The basis of the complaint (race, color, or national origin) must be stated.
- 5. Names, addresses, and phone numbers of other persons who may have knowledge of the alleged discrimination.
- 6. The date or dates on which the alleged discrimination occurred.

A copy of Lawrence Transit System's Title VI Complaint Form is attached as Appendix B to this program update.

#### **Complaint Processing**

Upon receipt of a Title VI complaint, the Lawrence Transit System investigator (Title VI Coordinator or City Attorney) will review the complaint for completeness, will assign a case number, and will send the complainant a letter acknowledging receipt of complaint, and whether the complaint has been accepted or rejected.

A complaint must meet the following criteria for acceptance:

- The complaint must be filed within 180 days f the alleged occurrence.
- The allegation must involve a covered basis such as race, color or national origin.
- The allegation must involve a Lawrence Transit service of a Federal-aid recipient, sub-recipient or contractor.

A complaint may be dismissed for the following reasons:

- The complainant requests to withdraw the complaint.
- The complainant fails to respond to repeated requests for additional information needed to process the complaint.
- The complainant cannot be located after reasonable attempts.

Lawrence Transit System has up to 30 days to investigate the complaint. If additional information is needed, the investigator may contact the complainant, or request it with the acknowledgement letter. The complainant has 30 days from the date of the letter to send requested information to the investigator assigned to the case. If the investigator is not contacted by the complainant or does not receive the requested additional information within 30 days, Lawrence Transit System can administratively close the case. A case may also be administratively closed if the complainant no longer wishes to pursue the case.

Upon completion of the investigation, the investigator will either send a Closure Letter or a Letter of Finding. A Closure Letter will summarize the allegations, identify persons interviewed, and will state the factors resulting in the determination that no Title VI violation occurred, and the case will be closed.

A Letter of Finding will summarize the allegations, identify persons interviewed, and will explain whether any disciplinary action, additional staff training, or other action will occur.

Notice shall include information regarding appeal rights of the Complainant and instructions for initiating such an appeal. A complainant has 10 days to appeal either decision. If new and pertinent information is presented in the appeal, the Title VI coordinator may reconsider the determination.

If Complainant is dissatisfied with the determination and/or resolution set forth, the same complaint may be submitted to FTA for investigation at:

Federal Transit Administration Office of Civil Rights 901 Locust, Suite 404 Kansas city, Missouri 64106

#### 4. Record of Title VI Investigations, Complaints, and Lawsuits

As required by 49 CFR Section 21.9(b), LTS maintains a list of all investigations, complaints and lawsuits against the LTS alleging discrimination on the basis of race, color, or national origin, which are investigated by entities other than FTA. The list includes the date the complaint or lawsuit is filed, summary of allegations, status of investigation, complaint or lawsuit, actions taken by Lawrence Transit System, and final findings related to the investigation, complaint, or lawsuit.

For the reporting period of November 7, 2010 through October 1, 2013, no Title VI complaints were received and no Title VI lawsuits have been filed.

#### 5. Governance

LTS is governed by the Lawrence City Commission, which consists of five elected commissioners. A nine-member Public Transit Advisory Committee (PTAC) is made up of individuals appointed by the Mayor to assist in transit planning activities. Emphasis has been placed on recruiting board members who represent a cross-section of our community. While not a requirement of board membership, we maintain a mix of riders, non-riders and community leaders and/or organizations that include the disabled, racial and ethnic minorities, and low-income residents. In addition, all public meetings are held in locations that are accessible by public transit and are compliant with the Americans with Disabilities Act. Upon advance notice deaf interpreters, translators, and Braille documents can be provided for public meetings. Other requests for alternate formats would be met upon request.

LTS encourages anyone that expresses interest in becoming a PTAC member to write a letter to the Mayor expressing their desire to be on the committee. Table 1 illustrates the breakdown of PTAC members by race. The Public Transit Administrator (PTA) acts as liaison between PTAC, the City Manager, and the City Commission. PTAC meets every other month to discuss transit business, issues, and planning activities. Notice of upcoming PTAC meetings are posted on the City of Lawrence Calendar, the Lawrence Transit website, as well as the Lawrence Journal World calendar of events. PTAC meetings are open to the public. Recommendations made by PTAC are submitted to the City Manager, who then submits them to the City Commission. The City Commission makes all final decisions in relation to transit policies.

Table 1 – Non-Elected Public Transit Advisory Committee Members

PTAC Member	Ethnicity	M/F	Term Expires
Chair Marian Hukle	Asian	Female	2015
Vice-Chair Jim Canaday	Caucasian	Male	2014
Lyle Hettinger	Caucasian	Male	2013
Howard Hill	Caucasian	Male	2014

Jane Huesemann	Caucasian	Female	2013
Jim Pavisian	Caucasian	Male	2015
Drew Humphries	Caucasian	Male	2013
Alan Black	Caucasian	Male	2014
Mark Hurt	Caucasian	Male	2015

In addition, LTS staff will continue to serve on Boards, Commissions and Committees of organizations and community partners that advocate for these impacted populations. The needs of effected populations are sometimes best articulated through the agencies they have affiliated with. Acting as liaisons, advocates share the barriers consumers face and remediation or explanation is filtered through these organizations.

#### 6. Commissioners' Resolution Approving Updated Title VI Program

At the October 1, 2013 meeting of the City Commission of Lawrence Kansas, this updated Title VI Program was approved and attached as Appendix C is the updated Title VI Policy Statement for all LTS services and programs.

#### 7. Provision of Additional Information to the FTA

LTS will provide the Federal Transit Administration (FTA) additional information upon request. Such information may be related to, but not limited to, investigation of complaints of discrimination or to resolve concerns about possible noncompliance with Title VI. In addition, LTS will submit an updated Title VI Program to the FTA's regional civil rights officer once every three (3) years.

#### III. INCLUSIVE PUBLIC PARTICIPATION

The LTS public participation strategy offers early and continuous opportunities for the public to be involved in the identification of social, economic, and environmental impacts of proposed transportation decisions. Engagement of the public in service planning and development is at the forefront of a responsive operation. The Transit District's ongoing public participation planning ensures that:

- Potentially affected community members will have an appropriate opportunity to participate in decisions about a proposed activity that will affect their environment and/or health and their ability to participate in life supporting activities;
- The public's contribution will influence the LTS's decision making;
- The concerns of all persons and groups participating in the process will be considered in the decision-making process; and
- LTS will seek out and facilitate the involvement of those potentially impacted.

LTS uses a variety of communication mechanisms to ensure that **all populations**, those residing in minority census tracts and those living in non-minority census tracts, persons with low-income, persons with disabilities, and persons with limited English proficiency have an opportunity to participate in service development and changes.

#### 1. Public Participation Plan

Public involvement is a necessary and integral part of Lawrence Transit System's planning process. LTS reviews all routes and schedules on an annual basis to determine if adjustments are necessary for the following year. Public open houses are held early in the year to collect information from the public on community transportation services, whether changes are planned or not.

Lawrence Transit System will follow its Public Participation Plan (PPP) when any of the following are proposed:

- New fixed-routes or increases in scheduled service;;
- Route modifications resulting in service reductions or elimination of route(s);
- A fare increase or change in method of payment;
- Any major service change that exceeds 10% of the current total service hours, systemwide; and
- Changes that will affect minority or low income Census tracts;

For minor service or schedule changes that do not rise to the 10% threshold, Lawrence Transit

System will post notices on transit vehicles, in transit administrative offices, on our web site, and sent to neighborhood associations and local media outlets no less than fourteen (14) days prior to implementation.

All capital projects such as facility and bus procurements go through the same public process as service and fare changes, but programmed into the Lawrence-Douglas County Metropolitan Planning Organization's (L-DCMPO) Transportation Improvement Plan (TIP), which goes through their public process as well.

#### 2. Process

<u>Service and Fare Changes</u> - Lawrence Transit System and the University of Kansas (KU) review all routes and schedules on an annual basis to determine if changes are necessary. Preliminary proposals on route modifications or service changes are then presented to the Public Transit Advisory Committee and KU Transit Commission for their input. The Public Transit Advisory Committee (PTAC) is structured to allow public comment at the beginning and end of each meeting and after each motion prior to the vote.

Transit staff finalizes the recommendations and then performs a Title VI review to develop a plan for public participation. Maps and copies of documents outlining the proposed changes are made available to the public at least fourteen (14) days prior scheduled public open houses. These documents are also available for download on our web site.

No less than three (3) open houses are held at different times, dates, and accessible locations to provide more detailed information to the public and to gather additional public input. Notice of the open houses are posted on all transit vehicles, in transit administrative offices, on our web site, and sent to neighborhood associations and local media outlets.

In addition to receiving public comment and educating those already interested and involved, the Lawrence Transit System will provide outreach to the community. Innovative and creative strategies will be implemented by the Marketing Coordinator to reasonably assess the general public sentiment as well as to solicit helpful public input and educate those individuals unaware of the services provided by the transit system. Examples of outreach efforts would be interaction with neighborhood associations, human resource organizations, schools, social service agencies, presentations to community civic groups.

Lawrence Transit System submits the finalized recommendations and a summary of comments received to the Lawrence City Commission for approval, KU Parking and Transit division staff submits the same to their Transit Commission for approval. Once approved by the governing bodies, staff further develops an implementation plan, and recommended changes go into effect August 1<sup>st</sup>.

<u>Capital Planning</u> - LTS works in concert with the LDCMPO on long range planning. Projects for replacement of vehicles and facility improvements are included on the Transportation Improvement Plan (TIP) which is vetted through an extensive public participation process. This document, adopted by the Metropolitan Planning Organization (MPO) is then moved on to the State Transportation Improvement Plan (STIP).

#### 3. Addressing Comments

Lawrence Transit System appreciates and gives careful, thoughtful consideration to all comments received, whether they are solicited during the public process, or if they are submitted any other time during the year.

#### 4. Surveys

The Lawrence Transit System conducts periodic satisfaction surveys on the fixed-route and paratransit systems.

#### 5. Outreach

Lawrence Transit System staff participates in many community activities, gives presentations, and provides travel training to Lawrence's diverse populations. Appendix D is a listing of outreach activities from January 1, 2010 through September 30, 2013.

#### 6. Next Steps

Although the LTS's public participation plan has been consistently applied, it is recognized that It is a challenge to engage other populations in transportation planning proactively. Public involvement greatly benefits the organization and the service that is provided and is viewed as integral to the LTS decision making process. Therefore, LTS continually strives to improve the public participation process.

#### IV. LANGUAGE ASSISTANCE PLAN

The Lawrence Transit System's Language Assistance Plan incorporates all reasonable steps to ensure meaningful access to benefits, services, information, and other important portions of the Transit District's programs and activities for LEP individuals. Limited English Proficient (LEP) persons refer to:

Persons for whom English is not their primary language and who have a limited ability to read, write, speak, or understand English. It includes people who reported to the U.S.Census that they speak English less than very well, not well, or not at all.

The plan has the following key elements:

- Identification of LEP individuals who need language assistance in the LTS service area (using the four factor analysis that follows);
- Determination of the appropriate language assistance measures based on what is learned:
- Training of all employees regarding LEP policies and procedures;
- Providing notification to LEP persons of the language services offered by LTS; and,
- Procedures to monitor and update the Language Assistance Plan.

As a recipient of federal funding, LTS must take reasonable steps to ensure meaningful access to the information and services it provides. As noticed in the **Federal Register/Volume 70**, **Number 239/Wednesday**, **December 14**, **2005/Notices**, there are four factors to consider in determining "reasonable steps". As a first step, and in order to ensure meaningful access to programs and activities, LTS uses the information obtained in a **Four Factor Analysis** to determine the specific language services that are appropriate. This analysis helps LTS determine if it communicates effectively with LEP persons and supports language access planning.

This Four Factor Analysis is a local assessment that considers:

- 1. The number or proportion of LEP persons eligible to be served or likely to be encountered by LTS;
- 2. The frequency with which LEP persons come into contact with LTS services and programs;
- 3. The nature and importance of LTS services and programs in people's lives; and,
- **4.** The resources available to LTS for LEP outreach, as well as the costs associated with that outreach.

The DOT Policy Guidance gives recipients of federal funds substantial flexibility in determining what language assistance is appropriate based on a local assessment of the four factors listed above. The following is an assessment of need in the Lawrence Transit System service area in relation to the four factors and the transportation planning process.

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#### 1. LEP Assessment (Four Factor Analysis)

Factor 1: Number or proportion of LEP persons eligible to be served or likely to be encountered by a program, activity, or service of LTS.

The first step in this process is to understand the proportion of LEP persons who may encounter any of the services provided by LTS, their literacy skills in English and their native language, the location of their communities and neighborhoods, and if they are underserved as a result of a language or other socio-economic barrier. Data for the review will include U.S. Census Bureau 2010 data. Currently LTS only operates local fixed-route and complimentary Americans with Disabilities Act (ADA) services within the incorporated area of Lawrence, Kansas. Therefore, only demographics representing City of Lawrence were used in this analysis.

For the purposes of this LEP Plan, persons that identified themselves during the 2000 United States Census as speaking English "not well" or "not at all" are considered LEP persons. This LEP Plan addresses only LEP persons and identifies specifically only the three most common languages spoken in the L-DC MPO planning area. Tables 1 and 2, below, encapsulate the relevant information derived from the 2000 United States Census.

Table 1 shows the number and the proportion of persons who are five years of age or older and who are identified as being LEP. As Table 1 discloses, only 4.23% of persons residing within the service area are identified as being LEP.

Table 1: Identifying Limited English Proficient Individuals

Lawrence Population 5 Years and Older	82,655
Lawrence LEP Population	3,494
LEP Percentage of Population	4.23%

Source: 2010 U.S. Censusl

Table 2, also shows the languages spoken of persons who are age five (5) and older in the city of Lawrence. Of the LEP persons within the city, 2.17% speaks Asian and Pacific Islander languages (Chinese, Vietnamese, Thai, Laotian, Korean and Japanese). The second most common language for the area's LEP population is Spanish. Indo - European languages

(Dutch, Italian, Portuguese, Russian, French or German) represent .55% while another .41% speaks "other" languages at home.

Table 2: Language Spoken by LEP Population

	%
902	1.09%
457	0.55%
1,797	2.17%
338	0.41%
	457 1,797

Total LEP Population Source: 2010 U.S. Census

3,494 4.23%

<u>Factor 2: The frequency with which LEP individuals come in contact with the program, activity, or service.</u>

To better understand the frequency with which LEP persons come into contact with LTS services staff assessed, as accurately as possible, the frequency with which LTS has or should have contact with LEP individuals seeking assistance. This assessment included:

- A thorough review of LTS public meetings (attendees) and public notices within the past two years.
- Interviews with LTS personnel and service contractors. This included drivers which have direct contact with patrons and customer service personnel provide operational information to patrons both in person and by telephone.
- A historical review of requests by LEP individuals to utilize the interpreting and translating services.

The results of this assessment found that there is a relatively small interaction with the LEP population. The increasing numbers reported under the 2010 U.S. Census indicates that there is an increasing probability that the LTS staff will interact with LEP persons in the future. However, to date, the LTS has received no requests, formal or otherwise, by LEP persons seeking the translation of documents or customer service assistance associated with our services.

# <u>Factor 3: The nature and importance of the program, activity, or service provided by LTS to the community.</u>

LTS provides regular public transit service to LEP individuals (daily); however, LTS personnel having direct contact with LEP transit patrons (LTS drivers and dispatchers) have stated that nearly all of the LEP patrons served by LTS have a "working ability" to speak English, and can communicate with LTS personnel in English. Because of the essential nature of the services and the importance of these programs in the lives of the region's residents, there is a need to ensure that language is not a barrier to access.

Using the information we have gathered from our demographic analysis, employee experiences, community partner observations and customer comments, LTS will provide the outreach necessary to ensure access is not compromised as a result of a language barrier.

#### Factor 4: The resources available to LTS and costs.

LTS is a small urban transit system, with a correspondingly small budget. Therefore, LTS has carefully explored the most cost-effective means of delivering competent and accurate language services to accommodate LEP individuals in the LTS service area. This included identifying what staff language interpreters are readily available, the cost of a contract with a company to provide professional telephonic "instant" conferencing interpretation services in various languages, the cost of professional language interpreters, which documents should be translated, taking an inventory of available local organizations that LTS could partner with for outreach efforts, and determining what, if any LTS staff training is needed to implement language assistance measures.

#### 2. Language Assistance Measures

The previous analysis shows there is a very small LEP population in the LTS service area. Given the small size of the entire LEP population, the following guidelines are provided to include the non-English speaking persons in the provision of services. There does not appear to be a need to produce documents, programs, and general information in languages other than English. These guidelines and actions will be reviewed on an ongoing basis in an effort to reduce language barriers in relation to the LTS services. LTS will continue to utilize the following methods to communicate with the LEP population::

#### Website

The LTS website may be translated into a number of different languages using free online translation services such as Google Translate. Similarly, the LTS service information, meeting agendas and minutes could be translated using available free online translation services and/or Microsoft 2007 translation software feature. However, the LTS staff does not include inhouse translation capabilities or expertise, and the LTS cannot accurately assess or guarantee the accuracy of translation services provided by online services or other software. When requested these services will be the first response to aiding LEP individuals, these services will be available within the first 24-48 hours after the language is requested.

#### Verbal

LTS staff uses language identification cards when first encountering an individual with LEP. These cards, developed by the U.S. Census Bureau, have the phrase "Mark this box if you read or speak [name of language]" translated into 38 different languages. It was developed by

the Census Bureau and is used by government and non-government agencies to identify the primary language of LEP individuals during face to face contacts. The Census Bureau's Language Identification Flashcard can be downloaded for free at <a href="http://www.lep.gov/ISpeakCards2004.pdf">http://www.lep.gov/ISpeakCards2004.pdf</a>.

The Language Identification Flashcards should be made available at public meetings and with LTS staff. Once a language is identified, staff will assess the feasibility of providing written translation service and/or oral translation assistance

The Kansas Relay Center offers, Language Line, a billable service available to facilitate communications between non-English speaking people and the agencies that serve them. Language Line makes it possible to bridge the language barrier at any time. More than 140 languages are available and interpreters are trained to handle all types of communications. The Kansas Relay Center can be reached by calling toll-free 1-800-766-3777. This service will be used when attempts to use free software have been exhausted.

Within the LTS service area there are a number of language departments at the University of Kansas campus in Lawrence, which could possibly be used as a resource in serving the area's LEP population. Availability for this type of partnership would be on a case by case basis.

#### Signs and Postings

LTS route and schedule information currently includes a statement offering assistance with alternative formats and languages by direct contact with customer service. Outside of these measures, the LTS has limited resources and will, to the extent possible, continue to carry-out the below-listed measures to notify LEP persons of language assistance services available to them free of charge:

- Post signs on LTS vehicles that language assistance is available;
- Provide translation, upon request, for LTS route guide and informational documents;
- Post signs at community agencies identified as those LTS could partner with for outreach to LEP persons including:
  - Centro Hispano
  - University of Kansas International Student Services
  - Haskell Indian Nations University
  - Kansas Department of Children and Families (formerly Social and Rehabilitative Services)
  - Lawrence Community Shelter
  - Independence Inc.
  - Lawrence Housing Authority
  - Lawrence Public Library
  - City Hall

#### 3. Training Staff

Training is an on-going activity. A reaffirmation of the entire Title VI policy must be issued annually. This commitment has to be embraced by all employees. An understanding of the importance of customer service will be reinforced through a variety of mechanisms. They will include, but not be limited to:

- Customer Service/Language Assistance will be a standing agenda item at monthly Operations Staff Meetings.
- Road supervisor, observations of drivers and their passenger interactions will continue will be reviewed by senior staff. Language encounters will be noted.
- Refresher training will be provided immediately with drivers when they are observed lacking sensitivity or responding inappropriately to persons with limited English proficiency.
- Distribution of the Language Identification Flashcards will be made available to all employees.
- Human resource posters focusing on diversity and cultural sensitivity will be placed in areas of high visibility and changed quarterly.
- Empowering more employees by providing opportunities to learn new languages
- Sharing and training on use of new language assistance technologies as they become available.

#### 4. Providing Notice to LEP Persons

As was stated previously, LEP persons will be notified of the language services available through LTS by the following means:

- On-board posters and posters at bus shelters
- Posting signs at the entry point of our facility and at intake areas or through the identified community organizations
- Website posting
- Posters at bus shelters
- Notice on schedules

#### 5. Monitoring and Updating the LEP Plan

This plan will be reviewed, to determine whether there have been changes in the Lawrence area LEP population demographics, types of LTS services, or other needs which indicate a need to update/expand LTS language assistance services. At a minimum, this review will follow the LTS Title VI Program update schedule.

During the plan review, the following will be assessed:

- Current LEP populations in the LTS service area;
- Frequency of LTS encounters with LEP persons;
- Nature and importance of LTS services to LEP persons;
- Whether sources identified in this plan for LTS language assistance are still available and viable;
- Availability of LTS resources (including technological advances and/or other new resources) and the costs entailed;
- Whether existing LTS language assistance measures are meeting the needs of LEP persons in LTS service area;
- Whether LTS employees continue to understand LTS's LEP plan and their part(s) in implementing it; and
- Review/contact community agencies/groups who deal with LEP persons.

#### 6. Safe Harbor Stipulation

Federal law provides a "safe harbor" stipulation so recipients of federal funding can ensure compliance with their obligation to provide written translations in languages other than English with greater certainty. A "safe harbor" means that as long as a recipient (i.e., the LTS) has created a plan for the provision of written translations under a specific set of circumstances, such action will be considered strong evidence of compliance with written translation obligations under Title VI. However, failure to provide written translations under the circumstances does not mean there is noncompliance, but rather provides for recipients a guide for greater certainty of compliance in accordance with the four factor analysis. Evidence of compliance with the recipient's written translation obligations under "safe harbor" includes providing written translations of vital documents for each eligible LEP language group that constitutes 5% or 1,000 persons, whichever is less of eligible persons served or likely to be affected. The LTS service area (i.e. City of Lawrence) meets neither of these thresholds requiring written translation of documents. Translation can also be provided orally. The "safe harbor" provision applies to the translation of written documents only. It does not affect the requirement to provide meaningful access to LEP individuals through competent oral interpreters where oral language services are needed and are reasonable to provide.

#### 7. Complaint Process

To file a complaint regarding LEP activities, please fill out the Title VI Complaint Form available at <a href="https://www.lawrencetransit.org">www.lawrencetransit.org</a>. Should an LEP complaint be filed, the Title VI review process will be followed.

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More information on filing an LEP complaint with the Department of Justice can be found at <a href="http://www.usdoj.gov/crt/cor/complaint.php">http://www.usdoj.gov/crt/cor/complaint.php</a>.

#### V. SERVICE STANDARDS AND CHARACTERISTICS

LTS has established the following standards as guidelines to assure the equitable distribution of services and the accessibility of the fixed-route services.

#### 1. Vehicle Assignments/Age of Vehicles

Buses are assigned on a random basis with no assignment to a specific route based on the age of the bus. The only vehicle requirement as related to a service is that which is associated with capacity. Those routes having the greatest ridership are assigned vehicles with an adequate passenger capacity.

#### 2. Vehicle Load

Vehicle load is expressed as the ratio of passengers to the total number of seats on a vehicle. Load factor characteristics are shown in the following table.

	Standing Passe	nger Area	Comments
0.00-0.50	>10.8†	>1.00†	No passenger need sit next to another
0.51-0.75	8.2-10.8†	0.76-1.00†	Passengers can choose where to sit
0.76-1.00	5.5-8.1†	0.51-0.75†	All passengers can sit
1.01-1.25*	3.9-5.4	0.36-0.50	Comfortable standee load for design
1.26-1.50*	2.2-3.8	0.20-0.35	Maximum schedule load
>1.50*	<2.2	< 0.20	Crush load

Source: TCRP Report #100, Transit Capacity and Quality of Service Manual

Vehicle loads are monitored on a daily basis. On routes that experience extremely high passenger activity vehicle loads are reported in real time. The standard load factor is 1.01 – 1.25. However, on routes that experience short peak loads a higher standard of 1.26 – 1.50 is acceptable. These high peak loads typically occur on routes which serve the university. Since the peak loads are for a short duration and occur at random times throughout the week they present difficulties in addressing on a permanent basis. The adverse affects of these high loads are generally mitigated through the frequency of service and the availability of numerous routes.

#### 3. Vehicle Headways (Frequencies)

Vehicle headway is the amount of time between two buses traveling in the same direction on a given route. For the convenience of the riding public LTS maintains uniform headways of either 30 or 60 minutes. Routes that experience continual high ridership operate at frequencies below our standard. Currently, nine of the thirteen routes serving minority areas operate at or below 30 minute frequencies. The remaining four routes operate in low density corridors or in areas with declining ridership.

To accommodate peak period demands on the busiest routes, an additional "tripper" bus is used. These trippers are necessary in order to address the passenger activity that is experienced as the result of fluctuations in annual academic calendars. Since trippers are used to address rapid changes in passenger activity they are not included in published headways.

#### 4. On-Time Performance

On-time performance is a measure of runs completed as scheduled. Among the most important service standard for customers is on-time performance or adherence to the published schedules.

In order to maintain a predictable service that operates with schedule confidence, LTS introduced a series of service changes and enhancements beginning in August 2009. Prior to these changes several routes were experiencing continual issues with running time. The subsequent service changes sought to address three issues. First, was to better utilize existing resources. Second, was to provide a higher level of transit service to the community and third was to improve the on-time performance (predictability) of the service by addressing issues associated with inadequate running times. After four years of change only three routes have not been adjusted.

As of August 2013, Automatic Vehicle Location (AVL) technology is now available on all vehicles. Prior to this date AVL technology was being utilized on a limited basis on high ridership routes. This technology provides real-time data and information and is our primary tool to monitor on-time performance. The use of this real-time data has been extremely beneficial in adjusting intermediate times and overall running times on new and/or restructured routes. Currently or standard is 90% (based on five minute late). At this time there is no route in our service that has a continual issue with schedule adherence. It should be noted that we have significantly increased the predictability and dependability during the past five years.

#### 5. Transit Access

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Bus service is intended to be provided to within a five to ten-minute walk of all residents of the City of Lawrence. This "coverage" service ensures that transit service is within easy walking distance to the majority of our population. The level of service may vary, however, due to ridership and demand. In areas with low ridership service frequency is provided at 60 minutes. In high density residential areas service frequency is 30 minutes or less. Service is provided within a five to ten-minute walk of virtually all businesses, professional offices, schools and public buildings within our community. Thirteen of sixteen routes currently operate in minority areas. After assessing the average performance for each route in the transit system, it has been determined that the service to minority areas is consistent with our standards.

#### 6. Distribution of Transit Amenities

#### **Bus Shelters**

Most shelters in the City of Lawrence are owned and maintained by LTS. However, site selection of all shelters in our community is either determined by or reviewed by LTS. Shelters are located in high travel zones throughout the City and in front of senior housing developments. Consideration of locations is based on ridership analyses as well as the ability to safely board and alight passengers.

LTS provides maintenance and oversight on their shelters on a regular basis or as appropriate. This work is provided by a contractor working for LTS. Graffiti is removed from any shelter as soon as it is reported. Damage to shelters is handled by LTS and is typically corrected within a week. Privately owned shelters are maintained by the respective owners. Twenty-two of the forty-four shelters in our service area are located in minority areas.

#### Benches

Currently LTS does not provide a "free standing" bench program. Benches are provided and included as part of all shelter installations. Site selection and maintenance of these benches are included under the shelter program.

The City of Lawrence Parks and Recreation Department provides a bench program throughout the city and does provide benches in the relative location of some bus stops. The University of Kansas also provides benches in support of activities in the relative location of some bus stops on campus.

#### **Bus Stop Signs**

Bus stop signs are located throughout the service area at major boarding locations. Passengers may also "wave down" a bus at locations that are not signed. However, drivers must make the determination as to whether the location is safe to pick up passengers. An

exception to this is Route 3 which operates without designated stops since service is provided as demand response. Passengers using Route 3 are picked up and dropped off at the curb near their location.

LTS recently finished a comprehensive review of bus stops in the service area. As a result, existing University and City signs were replaced with new generic bus stop signs. In order to make it easier for passengers to find bus stops two sided signs were installed. Additionally, the geometric shape, color and height were also changed in order to improve recognition of the signs and stops.

Each bus stop in the service area was also assigned a bus stop number which is displayed and visible to passengers. These bus stop numbers were included as part of the bus stop sign program in preparation of a future real-time bus information program.

#### Infoposts and Post Schedules

Schedule information, specific to the route(s), is provided at all shelters and at high passenger activity locations in the service area. LTS also utilizes infoposts to inform and educate passengers on service. Currently there are eighty-five infoposts and post schedules in our system of which sixty-two are located in minority areas.

#### 7. Monitoring Service Standards

Monitoring of the service standards is integral to operational planning. The age of the vehicles is part of capital planning which is evaluated annually; vehicle loads are measured when evaluating ridership on a monthly basis; headways relates to the ability to maintain a schedule and on-time performance which is monitored daily; service accessibility and transit amentias are part of the on-going annual planning activities.

The ability to measure the success towards these standards at a more accurate level will be realized with the full implementation and use of the AVL system.

A map illustrating Lawrence Transit System and University of Kansas transit routes and amenity placement is attached in Appendix E of this program update.

#### VI. ENVIRONMENTAL JUSTICE

The Lawrence Transit System, as a recipient of federal assistance, must abide by nondiscrimination policies as expressed in Title VI of the Civil Rights Act of 1964. These requirements were further enhanced by Presidential Executive Order No. 12898 issued February 11, 1994. This order directed all recipients of federal assistance to incorporate environmental justice as part of their mission by identifying and addressing the effects of all programs, policies and activities on minority and low-income populations. LTS will use the following fundamental principles when planning new services or revising existing services; when operating and administrative policies are reviewed; and, when construction of fixed facilities are contemplated or are in progress:

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

In accordance with U. S. Department of Transportation's Order to Address Environmental Justice in Minority and Low-Income Populations, all services, policies and projects must be analyzed to determine whether there would be a "disproportionately high and adverse effect on minority and low-income populations". For the effect to be determined as "disproportionately high and adverse" it must be borne or will be suffered by a minority or low-income population appreciably more or greater in magnitude than would be suffered by the non-minority or non-low-income population.

Although Environmental Justice practices are incorporated into the overall commitment of LTS to provide transit service and its benefits equitably, specific steps will be followed by LTS when conducting a service change, planning study or construction project. The major steps in the process includes:

- Identification of the study area;
- Compilation of population characteristics and identification of locations with populations of concern for environmental justice;
- Conducting public outreach;
- Identifying adverse effects on populations of concern; and,
- Evaluating the project's overall effects.

This data, as well as the detailed Tables referenced throughout this Title VI Assessment,

provide the baseline for the evaluation of environmental impacts to a population and the community. The public participation plan in Section III details the process followed by LTS to afford opportunity for inclusion by all impacted groups and stakeholders. LTS will follow federal guidance provided in FTA Circular 4703.1 (August 2012).

#### VI. OTHER PROGRAM SPECIFIC REQUIREMENTS

#### 1. Subrecipient Compliance

Lawrence Transit System does not pass through funds to subrecipients. Lawrence Transit System contracts with MV Transportation for the provision of fixed-route and demand response public transportation services, as well vehicle maintenance activities. The Title VI Coordinator reviews all complaints as they are received and on a monthly basis, whether they fall under Title VI or not

#### 2. Equity Analysis for Facility

During the past three years, LTS has not constructed a vehicle storage, operations or maintenance facility.

#### 3. Demographic Service Profile

LTS operates fewer than 50 vehicles in peak fixed-route service; therefore a demographic profile was not prepared for this plan update.

#### VII. CONTACT INFORMATION

For additional information on the Lawrence Transit System's Title VI Plan, or its efforts to comply with the Civil Rights Act of 1964 or Executive Order 13166 Improving Access to Services for Persons with Limited English Proficiency, please contact:

Robert A. Nugent, Transit Administrator Lawrence Transit System PO Box 708 Lawrence, KS 66044 785-832-3465

E-Mail: rnugent@lawrenceks.org

## **APPENDICES**

**Appendix A – Notice to Beneficiaries** 

Appendix B – Title VI Complaint Form

Appendix C – Updated Title VI Policy Statement Appendix D – Outreach Activities

Appendix E – Lawrence Transit Service Map

#### Appendix A – Notice to Beneficiaries

## **NOTICE TO BENEFICIARIES - TITLE VI POLICY STATEMENT**

The Lawrence Transit System (LTS), a division of the City of Lawrence, Kansas, is committed to providing high-quality public transportation services and that no person is excluded from participation in or denied the benefits of its services on the basis of race, color, or national origin, as provided by Title VI of the Civil Rights Act of 1964, as amended.

Any person who believes he/she has been subjected to any unlawful discriminatory practice under Title VI may file a complaint by:

- Calling Customer Service at 864-4644
- E-mail to info@lawrencetransit.org
- Submitting Title VI Complaint Form on our website www.lawrencetransit.org
- Delivering or mailing written complaint to the Public Transit Administrator, 933 New Hampshire Street, Lawrence, KS 66044

Title VI complaints must be filed within 180 days of the date of the alleged discrimination. Lawrence Transit System's Title VI Complaint Form can be accessed here, though you are not required to use this form to initiate a complaint. All Title VI Complaints will be forwarded to the Public Transit Administrator for investigation.

If you have questions regarding Title VI program or policies, please contact:
Robert Nugent
Public Transit Administrator
PO Box 708
Lawrence KS 66044

Lawrence, KS 66044 (785) 832-3465 Fax (785) 832-3462

rnugent@lawrenceks.org

## **Appendix B – Title VI Complaint Form**

#### **Lawrence Transit System Title VI Complaint Form**

The Lawrence Transit System is committed to ensuring that no person is excluded from participation in or denied the benefits of its services on the basis of race, color, or national origin in the provision of transportation services and transit-related benefits.

The purpose of this form is to assist you in filing a complaint with the Lawrence Transit System. You are not required to use this form; a letter containing the same information will be sufficient.

If you need assistance in completing this form, please call the Lawrence Transit System's Title VI Coordinator at 785-832-3465.

1. Name and	address of com	plainant:	
Name:			-
Address:			-
			-
			-
Telephone Nu	umber:		
Home: (	)	Work: (	)
2. Person dis	criminated agai	nst (if someone other than	complainant):
Name:			-
Address:			
			-
			-
Telephone Nu	umber:		
Home: (	)	Work: (	)

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Please explain your relationship to this person(s):	
3. Please indicate below the basis on which you believe t (e.g., "Race: African American" or ").	hese discriminatory actions were taker
Race:	
Color:	
National Origin:	
4. On what date(s) did the alleged discrimination take plac	e?
Date(s):	
5. Please describe the alleged incident of discrimination. P employees involved, if possible. Explain what happened a Please include how other persons were treated differently if necessary and attach a copy of written materials pertains	nd whom you believe to be responsible from you. (Please use additional sheets

allegations?	her information that you think		
	rson discriminated against) file ne Federal Transit Administration		
Yes			
No			
If so, list agency / agencies	es and contact information below:		
Agency:			
Contact name:			
Address:			
	)	_	
Date of filing:	Agency:		

Briefly, what was the complaint about?		
What was the result?		
8. We cannot accept a complaint if it has below.	s not been signed. Please sign an	d date this complaint forn
(Signature)	(Date)	
Please feel free to add additional sheets to	explain the present situation to us.	
Please mail the completed, signed Title VI	Complaint Form (please make one	e copy for your records) to:

Lawrence Transit System Attn: Title VI Coordinator PO Box 708 933 New Hampshire Street Lawrence KS 66044

Phone: (785) 832-3465

### Appendix C – Updated Title VI Policy Statement

#### <u>Title VI Policy Statement</u>

The Lawrence Transit System (LTS) assures that no person shall, on the grounds of race, color, or national origin, as provided by Title VI of the Civil Rights Act of 1964 and the Civil Rights Restoration Act of 1987 (PL 100.259), be excluded from participation in, be denied the benefits of, or be otherwise subjected to discrimination under any program or activity. LTS further assures that every effort will be made to ensure nondiscrimination in all of its programs and activities, whether they are federally funded or not.

In addition, LTS endeavors to ensure that:

- The benefits of public transit services are provided equitably throughout the service area;
- Promote full and fair participation of all affected populations in transportation decision making;
- No one is precluded from participating in LTS service planning and development process;
- A program is in place to correct any discrimination, whether intentional or unintentional;
   and
- Meaningful access to programs and activities by persons with limited English proficiency (LEP)

The Public Transit Administrator, contracted service provider, General Manager, and all employees share the responsibility for carrying out Lawrence Transit System's commitment in providing quality transportation services without regard to race, color, or national origin.

This program	update has been reviewed and app	proved by the Lawrence, KS City Commi	ssion
Mike Dever	Mavor, City of Lawrence, KS	Date	

## **Appendix D – Outreach Activities**

## Public outreach activities 2011-2013

Date Time	Agency/	Contact Person	Location	Doccription	Staff &
Time	Event	Contact Person	Location	Description	Activity
1/5/11 9 a.m.	Healthy Families	Jenn Preston, 856-5336	Douglas County Health Dept.	Visit staff meeting	Emily
pass along New pare	g to clients. Visit	5-7 people, nurses and supp t in home. High risk families cessed transit services. Cha ass along.	. Unemployment,	mental health, subs	tance abuse.
1/12/11 3 p.m.	KU International Student Orientation	Dept. of International Scholar & Student Services	Kansas Union	Orientation	Margretta
About: Sp	oke with incomi	ng international students at	oout available tran	sportation services	
4/14/11 4 to 6 p.m.	Resource Expo	Ranita Wilks, 841-0333, ext. 115	Free State High School	Information fair	Emily
About: Mo	ore than 50 ager	ncies that serve people with	disabilities in Dou	glas and Jefferson C	Counties.
4/15/11 1:15 p.m.	First Step at Lakeview	Brad Neff, 843-9262 ext. 233	First Step at Lakeview	Talk with residents at meeting	Emily
About: Ta	lk with residents	s about how to use transit.			
4/16/11 11:30 to 4	Earth Day	WRR	South Park	Information fair	Emily, Bob
	About: We will have a new T bus on display and an information table with route maps and giveaway items. Community-wide event.				
7/22/11 1:15 p.m.	First Step at Lakeview	Brad Neff, 843-9262 ext. 233	First Step at Lakeview	Talk with residents at meeting	Emily
About: Ta	About: Talk with residents about how to use transit.				

8/11/11 3:15 p.m.	KU International Student Orientation	Dept. of International Scholar & Student Services	Kansas Union	Orientation	Margretta		
About: Sp	oke with incomi	ng international students al	oout available tran	sportation services			
8/23/11 9 a.m.	Project Search	Lora Baska, 505-2996	Project Search	How to ride for six students	Emily		
About: Ta	lk with six stude	ents and three teachers abo	ut trip planning.				
9/6/11 10 a.m.	Small World	Kathy Mulinazzi, 841- 3645	First Presbyterian Church	Information fair	Emily		
About: Ta trips.	lk with people w	vith limited English proficien	cy that are new to	Lawrence about us	ing the bus. Plan		
9/8/11 10 a.m.	Small World	Kathy Mulinazzi, 841- 3645	First Presbyterian Church	Information fair	Emily		
About: Ta trips.	lk with people w	vith limited English proficien	cy that are new to	Lawrence about us	ing the bus. Plan		
9/9/11 2:30 p.m.	Babcock Place	Gayle Sigurdson, 832- 1692 gsirgurdson@ldcha.org	Babcock	How to ride	Bob		
About: Pre	esentation abou	t using the bus. Then they w	vill take a trip. Eld	derly and/or disable	d audience.		
9/10/11 10 a.m. - 4 p.m.	Energy Fair	WRR	Community Bldg	Information fair	Bob & Emily		
About: Co	About: Community-wide event. Talk with attendees about transit.						
9/20/11 7:30 p.m.	Haskell Indian Nations University	Wanda Trujillo, 749- 8465 wtrujillo@haskell.edu	Pocahontas Hall	How to ride	Bob & Emily		
About: Ta	About: Talk with Native American residents and staff about transit.						
9/23/11 5 p.m.	Kennedy School	Amanda, Rosalee Ramirez 832-5760, ext. 2290	Kennedy School	Information fair	Bob & Emily		
About: Resource Fair for parents. School serves minority census tracts.							

1 6:30	Haskell Indian Nations University	Jane Slater, jslater@haskell.edu	Blalock Hall	How to ride	Bob & Emily		
About: Tall	About: Talk with Native American residents about transit. There are 77 male residents, mostly freshmen.						
11/22/1 1	Haskell Indian Nations University		Student Senate	Transit update	Bob & Emily		

About: Talk with Native American student senate members and meeting attendees about recent changes to transit, encourage input and participation for next year.

Date/	Agency/				Staff &		
Time	Event	Contact Person	Location	Description	Activity		
1/6/12 3:45 p.m.	KU International Student Orientation	Dept. of International Scholar & Student Services	Kansas Union	Orientation	Margretta		
About: Sp	oke with incomi	ng international students at	oout available tran	sportation services			
1/10/12 6 p.m.	Haskell Indian Nations University Highlight Night	Leandra, Student Activities 749-8480	Tecumseh Hall	Information fair	Bob & Emily		
About: Ta	lk with Native A	merican students at start of	Spring semester	about public transit	options.		
3/21/12 9:30 a.m.	Housing Authority	Steven Mutz	Housing Authority Office	Small group	Bob & Emily		
	About: Talk with people interested in using the bus. Steven will take them on a practice trip. Housing for elderly and disabled citizens.						
4/14/12 11:30 to 4	Earth Day	WRR	South Park	Free ride day, information fair	Bob & Emily		
About: We will have a hybrid bus on display and an information table with route maps and giveaway items.							
4/18/12 4 to 6	Resource	Ranita Wilks, 841-0333,	Free State	Information fair	Emily		

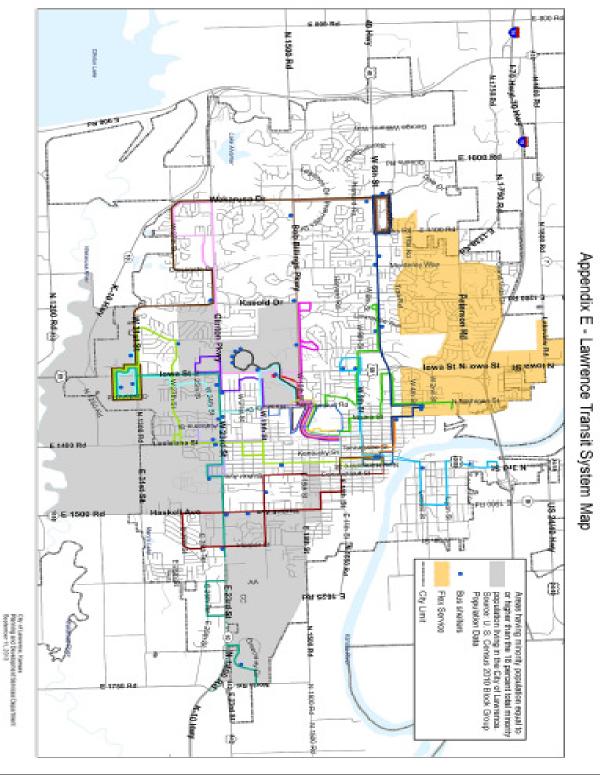
p.m.	Ехро	ext. 115	High School				
About: Mo	About: More than 50 agencies that serve people with disabilities in Douglas and Jefferson Counties.						
8/9/12 3:25 p.m.	KU International Student Orientation	Dept. of International Scholar & Student Services	Kansas Union	Orientation	Margretta		
About: Sp	oke with incomi	ng international students ab	out available tran	sportation services			
8/21/12 6:30 p.m.	Haskell Indian Nations University Highlight Night	Leandra, Student Activities 749-8480	Tecumseh Hall	Information fair	Bob & Emily		
•					•		
About: Ta new Route		merican students at start of	Fall semester abo	out public transit opt	ions, including		
9/4/12 10 a.m.	Small World	Kathy Mulinazzi, 841- 3645	First Presbyterian Church	Information fair	Emily		
	About: Talk with people who have limited English proficiency and are new to Lawrence about using the bus. Plan trips.						
9/5/12 10 a.m.	Small World	Kathy Mulinazzi, 841- 3645	First Presbyterian Church	Information fair	Emily		
About: Talk with people who have limited English proficiency and are new to Lawrence about using the bus. Plan trips.							
9/22/12 10 a.m. to 4 p.m.	Energy Fair	Kathy Richardson, WRR	Community Building	Free ride day	Bob		
About: Fre	About: Free ride day on the T. Community-wide event. Table to provide transit info.						

Date/ Time	Agency/ Event	Contact Person	Location	Description	Staff
1/8/13 6 p.m.	Haskell Indian Nations University	Leandra, Student Activities 749-8480	Tecumseh Hall	Information fair	Bob & Emily

	Highlight Night						
About: Ta	About: Talk with Native American students at start of Spring semester about public transit options.						
1/11/13 3:30 p.m.	KU International Student Orientation	Dept. of International Scholar & Student Services	Kansas Union	Orientation	Margretta		
About: Sp	oke with incomi	ng international students at	oout available tran	sportation services			
1/25/13 10 - 2	Pinnacle Career Institute		Pinnacle Career Institute	Job fair	Bob		
About: Op	portunity to talk	with people who might use	e the bus for work	. Low attendance.			
4/10/13 4 - 6 p.m.	Resource Expo	Sheila Vander Tuig svandertuig@eckce.com	Free State High School	Information fair	Bob & Serena		
About: Mo	ore than 50 ager	ncies that serve people with	disabilities in Dou	glas and Jefferson C	Counties.		
4/11/13 10 a.m.	LHS	Janelle Whisler, 330- 2386 jwhisler@usd497.org	LHS	Career and Development class (Special Ed)	Serena & Emily		
About: Pre	esentation to cla	ess about how to ride.					
4/20/13 11:30 - 4	Earth Day	WRR	South Park	Information fair	Bob, Emily & Serena		
About: We	e will have an in	formation table with route r	naps and giveawa	y items.			
4/25/13 10 a.m.	Small World	Kathy Mulinazzi	First Presbyterian	Celebration of 45th anniversary	Emily & Serena		
About: Invitation to attend a festival of cultures to celebrate the program. Talk with people who have limited English proficiency and are new to Lawrence about using the bus. Plan trips.							
6/1/13 10 - 12	Library	Karen Allen kallen@lawrence.lib.ks.u s	Library	Summer reading kickoff party	Serena		
	About: Invitation to participate in "Summer School," and teach people how to ride the bus. Promote student summer pass.						
8/15/13 2:40 p.m.	KU International	Dept. of International Scholar & Student	Kansas Union	Orientation	Margretta		

	Student Orientation	Services						
About: Sp	About: Spoke with incoming international students about available transportation services							
8/19/13 4 - 6	C-Tran	Gretchel Lister 766- 9510	2600 W. 25 <sup>th</sup> St	Transition Faire	Serena			
About: In	About: Information for families and students at C-Tran – mostly T-Lift and bus schedule information.							
8/20/13 6:30- 7:30	Haskell Indian Nations University	Rex or Leandra 749- 8480 Igalindo@haskell.edu	Tecumseh Hall	Haskell Hilight Night	Serena			
About: Ba	About: Back to school info table – give out schedules and bus information, giveaway items.							

**Appendix E – Lawrence Transit Service Map** 



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