



SouthWest Transit (SWT) Title VI Plan

SouthWest Transit

14405 W 62nd St

Eden Prairie, MN 55346

Adopted by SWT Commission June 23rd 2022

I - Introduction / Plan Statement

Title VI of the Civil Rights Act of 1964 prohibits discrimination on the basis of race, color, or national origin in programs and activities receiving Federal financial assistance. Specifically, Title VI provides 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” (42 U.S.C. Section 2000d).

SouthWest Transit (SWT) is committed to ensuring that no person is excluded from participation in, or denied the benefits of transit services on the basis of race, color, or national origin, as protected by Title VI in Federal Transit Administration (FTA) Circular 4702.1.B. This plan was developed to guide SWT in administration and management of Title VI-related activities.

Title VI Manager Contact Information:

Erik Hansen
Chief Executive Officer
SouthWest Transit
14405 W 62nd
Eden Prairie, MN 55346

II – General Requirements: Title VI Information Dissemination

- Title VI information posters shall be prominently and publicly displayed in SWT facilities and on their revenue vehicles. The name of the Title VI Manager is available on the website, at www.swtransit.org/about/Commitment-to-Fairness. **Exhibit A** includes a list of locations where the SWT Title VI notice is posted.
- All employees shall be provided a copy of the Title VI Plan and are required to sign the Acknowledgement of Receipt (see **Exhibit B**)
- Title VI information shall be disseminated to SWT annually via Employee bulletin boards and in payroll envelopes. This process reminds employees of SWT’s policy statement, and of their Title VI responsibilities in their daily work and duties.

- During New Employee Orientation, new employees shall be informed of the provisions of Title VI and SWT's expectations to perform their duties accordingly and be provided a copy of the Title VI Plan and are required to sign the Acknowledgement of Receipt (see **Exhibit B**).

III - Subcontracts and Vendors

All subcontractors and vendors who receive payments from SouthWest Transit where funding originates from any federal assistance are subject to the provisions of Title VI or the Civil Rights Act of 1964 as amended.

Written contracts shall contain non-discrimination language, either directly or through the bid specification package which becomes a component of the contract.

IV - Record Keeping

The Title VI Manager or his/her designee will maintain permanent records, which include, but are not limited to, 1) signed acknowledgements of receipt from the employees indicated the receipt of the Title VI Plan, 2) copies of the Title VI complaints or lawsuits and related documentation, and 3) records of correspondence to and from complainants and Title VI investigations.

V - General Requirements: Title VI Complaint Procedures & Complaint Form

Any person who believes that s/he individually, as a member of any specific class, has been subjected to discrimination prohibited by Title VI of the Civil Rights Act of 1964, as amended, may file a written complaint with SWT. A complaint may also be filed by a representative on behalf of such a person. All complaints will be referred to Erik Hansen, SWT's CEO for review and action.

In order to have the complaint considered under this procedure, the complainant must file the complaint no later than 180 calendar days after:

- The date of the alleged act of discrimination; or
- The date when the person(s) became aware of the alleged discrimination.;
- Where there has been a continuing course of conduct, the date on which that conduct was discontinued.

SWT may extend the time for filing or waive the time limit in the interest of justice, specifying in writing the reason for doing so.

Complaints shall be in writing and shall be signed by the complainant and/or the complainant's representative. Complaints shall set forth as fully as possible the facts and circumstances surrounding the claimed discrimination. In the event that a person makes a verbal complaint of discrimination to a Board member or employee of SWT, the person shall be interviewed by the CEO or his/her designee. If necessary, the CEO or his/her designee will assist the person in reducing the complaint to writing and submit the written version of the complaint to the person for signature. The complaint shall be handled in the usual manner.

Within 10 business days, the CEO or his/her designee will acknowledge receipt of the allegation, inform the complainant of action taken or proposed action to process the allegation, and advise the complainant of other avenues of redress available, such as the Federal Transit Administration (FTA). Please note that in responding to any requests for additional information, a complainant's failure to provide the requested information may result in the administrative closure of the complaint.

The complaint should include the following information:

- Name, address, and phone number of the complainant.
- Names and address(es) (if known) of alleged discriminating official(s).
- Basis of complaint (i.e., race color, national origin, sex, age, disability).
- Date of alleged discriminatory act(s).
- Date of complaint received by SWT.
- A statement of the complaint.
- Other agencies (State, local or Federal) where the complaint has been filed.

The investigation will be conducted in a full, fair and impartial manner by the CEO or his/her designee. Results of the investigation will be presented to the SouthWest Transit Commission for a determination. Every effort will be made to respond to the Title VI complaints within 60 working days of receipt of such complaints. Complaints will be determined to be:

- Substantiated (confirmed)
- not substantiated (alleged) or
- inconclusive (no substantiated findings were found)

Following the investigation, SWT will send a final written response letter to the complainant identifying the final determination. In the letter notifying the complainant that the complaint is not substantiated, the complainant will be advised of his or her right to:

1. appeal within (5) business days or receipt of the final written decision and/or
2. File a complaint externally with the U.S. Department of Transportation and/or the FTA.

In addition to the complaint process described above, a complainant may file a Title VI complaint with the following offices:

Federal Transit Administration Office of Civil Rights
Attention: Title VI Program Coordinator

East Building, 5th Floor – TCR
1200 New Jersey Ave., SE
Washington, DC 20590

As noted above, within 60 working days, the CEO or his/her designee will conduct and complete an investigation of the allegation, and based on the information received, will render a recommendation for action in a “Report of Findings,” including an explanation of the actions SWT has taken or proposed to resolve the issue raised in the complaint. The complaint should be resolved by informal means whenever possible. Such informal attempts and their results will be summarized in the Report of Findings.

Should a formal process be required, the complainant has the right to be represented by an attorney or other representative of his/her own choosing. A date/ time will be scheduled to accommodate the right of the complainant to bring witnesses and present testimony and evidence. As with the informal process, within 60 days, the CEO will conduct and complete an investigation of the allegation and based on the information obtained, will render a recommendation for action in a “Report of Findings,” including an explanation of the actions SWT has taken or proposed to resolve the issue raised in the complaint.

Within 90 calendar days of receipt of the complaint, the Chief Executive Officer or his designee will notify the complainant in writing of the final decision reached, including the proposed disposition of the matter. The notification will advise the complainant of his/her appeal rights if they are dissatisfied with the final decision rendered by SWT.

The Title VI complaints are to be submitted in writing to:

Erik Hansen
CEO
SouthWest Transit
14405 W 62nd St
Eden Prairie, MN 55346

Or

Ehansen@swtransit.org

Complaints can be mailed directly to the address or emailed to the email address, above. For complaints submitted by facsimile or email, an original, signed copy of the complaint must be mailed to the CEO as soon as possible, but no later than 180 calendar days from the alleged date of discrimination.

All complaints alleging discrimination based on race, color, or national origin in a service or benefit provided will be directly addressed by SWT and shall also provide appropriate assistance to complainants, including those persons with disabilities, or who are limited in their ability to communicate in English. In addition, Executive Order 12898 (Environmental Justice)

prohibits discrimination based on income status. Additionally, SWT shall make every effort to address all complaints in an expeditious and thorough manner.

See **Exhibits C and D** for the SWT Complaint Form and a Log of Title VI Complaints. The expectation is the complainant will answer the question(s) that they are able at the time of the complaint.

VI – General Requirements: Title VI Investigations, Complaints, and Lawsuits

Southwest Transit is not aware of any Title VI investigations, complaints, and lawsuits filed since the previous Title VI plan was submitted. Exhibit D includes a log that would capture these investigations, complaints, and lawsuits.

VII – General Requirements: Public Participation Plan

SouthWest Transit has undertaken the following community outreach efforts to engage the public in planning and decision-making processes, as well as its marketing and outreach activities:

- Has established a website at www.swtransit.org to post information, policies, maps, schedules, news, rider alerts, and meeting notices. This brochure clearly states contact information for SouthWest Transit and lists the “Commitment to Fairness” policy. The SWT website uses Google Translate allowing those using the website access to several different languages.
- Uses other social media, such as Facebook, Instagram and Twitter, to communicate with riders on possible issues. SWT also has a system of “Commuter Alerts” to send out broadcast emails to bus riders and other interested individuals about information, policies, maps, schedules, news, rider alerts, and meeting notices.
- Rider Alert flyers are directly distributed to bus riders on the bus by the drivers and posted at the park-and-ride locations.
- Bus schedules and maps are distributed in public places like the SouthWest Transit Station and are included in the metropolitan area distribution of schedules managed by Metro Transit, a working division of the Metropolitan Council.
- Every year, a comprehensive user survey is undertaken and other subject-specific surveys are used as needed.
- SouthWest Transit Commission meeting notices and agendas are posted per the State of Minnesota open meeting statutes. Transit business items for the Commission meeting are included in the agenda. Agendas and minutes of each meeting are available online and/or upon request.
- All communication efforts include a Limited English Proficiency (LEP) component when requested. As cited in the LAP plan, if it is expected that meeting attendees of LEP

communities will consist of 33% or more, then meeting materials will be translated to the needed language. At the drafting of this document no requests have been made and no groups in an open setting had more than 33 percent of one language group other than English.

- At times when a typical meeting format would not be best suited to conduct the outreach, SWT will find other means to conduct the outreach. That may include but is not limited to direct mailings, phone conversations, or meeting individuals at their place of work or home if willing. In this SW believes that all riders including Title VI protected populations as well as those with ADA needs will receive the necessary information.
- Documentation of public outreach efforts can be seen in Exhibit M

The public will be invited to participate in the planning and decision process whether through public meetings or surveys whenever major service changes are contemplated. When a major change to an existing service is proposed, SouthWest Transit convenes a public hearing to discuss feasibility and welcome suggestions. The public is also invited to attend all SouthWest Transit Commission meetings that are open to the public.

Citizens and passengers may call SouthWest Transit at 952-949-2287 to lodge a complaint or comment between the hours of 6:00 am and 6:00 pm weekdays to speak to a person.

VIII - General Requirements: Limited English Proficiency (LEP) Plan

SouthWest Transit has developed this Limited English Proficiency Plan (LEP) to help identify reasonable steps to provide language assistance for LEP persons seeking meaningful access to SWT services including Local Fixed Route, Commuter Express, Guaranteed Ride Home and other transportation services as required by Executive Order 13166. A customer with Limited English Proficiency is one who does not speak English as their primary language and who has a limited ability to read, speak, write, or understand English.

The plan details procedures on how to identify a person who may need language assistance, the ways in which assistance may be provided, training staff, how to notify LEP persons that assistance is available, and information for future plan updates. In developing the plan, SWT undertook a U.S. Department of Transportation four factor LEP analysis which considered the following:

1. number or proportion of LEP persons eligible in the SWT service area who may be served or are likely to encounter a SWT program, activity, or service;
2. frequency with which LEP individuals come in contact with SWT services;
3. Nature and importance of the program, activity or service provided by SWT to the LEP population; and
4. Resources available to SWT and overall cost to provide LEP assistance. A brief description of these considerations is provided in the following section.

See **Appendix 1** for a copy of the LEP Plan. See **Exhibits E and F** for LEP surveys and a Log of Requests for Interpretation/Translation.

IX – General Requirements: Demographics of Non-Elected Committees & Councils

Southwest Transit utilizes a formalized seven-member Transit Commission outlined in its JPA by laws. Each of the three City Council's at a minimum appoints at least one elected City Council member and one appointed individual from their City. That second person could also be another elected Council member, from the three cities of Eden Prairie, Chanhassen and Chaska. For the seventh spot on the SWT Commission, there is an open process by the SWT Commission of appointing an individual who resides in one of the three communities SWT serves. As of the drafting of this plan, the seven member Commission is comprised of five elected officials two from Eden Prairie (both are City Council members), two from Chanhassen (one position is vacant and the other is a City Council member) and two from Chaska (both are City Council members). The final position on the Commission goes through an open application process of SWT and is selected by the SWT Commission. SouthWest Transit does not select the members of its commission, that is the responsibility of the 3 cities (Eden Prairie, Chaska, Chanhassen) of the Joint Powers Agreement under which SWT was formed.

X – General Requirements: Monitoring Sub-Recipients

Southwest Transit does not have sub recipients, and therefore does not keep a schedule of sub recipient Title VI program submissions.

XI – General Requirements: Facility Siting Equity Analysis

Southwest Transit has not constructed any facilities since the 2014 Title VI program submission.

XII – General Requirements: Approval of Title VI Program

Exhibit J provides documentation of the approval of Southwest Transit's Title VI program by its board

XIII – Transit Provider Requirements: Service Standards & Policies

In 2010, SWT worked with other service providers in the region to complete a Regional Service Improvement Plan, which focused on evaluating opportunities for system expansion. As part of this undertaking, SWT relied on an extensive public improvement process to help develop standards for both design (service type, span, frequency, stop spacing, and facilities) and performance. The standards developed by SWT were used internally to create a Service

Investment Strategy and externally to meet requirements of the regional 2030 Transportation Policy Plan and the Regional Service Improvement Plan. The System-Wide Standards described below use this work as a foundation.

As of 2022, SWT operates a total of 7 fixed routes using 31 morning and 27 afternoon trips. These routes serve the three SWT partner cities of Eden Prairie, Chanhassen, and Chaska as well as Carver, Downtown Minneapolis, Southdale Mall, Edina, and the University of Minnesota. The following sections describe the FTA required quantitative standards and policies used by SWT when planning and monitoring transit services.

Service Standards

To provide a brief background on service area, it consists of the cities of Eden Prairie, Chanhassen and Chaska. SWT also provides fixed route service and on-demand service to the City of Carver, and on-demand service to the City of Victoria, both under service contracts. As seen on Table 1 in the Four Factor analysis almost 86 percent of the population in the service area is Caucasian followed by Asian with almost seven percent. With that background SWT's service standards are:

- Vehicle Loads: The SWT standard is 100 percent seated loads. Trip ridership on SouthWest Transit (SWT) commuter/express trips are reviewed daily to look for patterns of standing loads. When an individual trip experiences standees, the trip is examined for possible solutions to reduce the number of standees in the context of available financial and vehicle resources.
- Vehicle Headways: For express routes serving downtown Minneapolis and the University of Minnesota, SWT has a goal of a minimum of 60 minutes off peak for headways. For peak express service, it ranges between five minutes and 15 minutes, again depending on the previous bullet's statement of vehicle loads and demand.
- On-Time Performance: The goal is that 99 percent of all trips depart their first time point, pending weather, road construction, reroutes, etc. causing atypical conditions, on time for all regular route service. Due to the nature of express bus service an "on-time trip" is defined as a trip that is zero minutes early and not more than five minutes late. However, note for those time points classified as "drop-off" time points in the schedule, buses can be early due to the nature of the express bus service. An analysis is done quarterly using the automated vehicle locator (AVL) system provided by the region's data visual monitoring to determine compliance with this goal.
- Service Availability: SWT is primarily a commuter express service. SWT had a goal of placing one park and ride facility in each city of the JPA. That objective has now been met. Size for the park and ride facilities is based on the following analysis – 1) amount of

routes based off existing service after time; and 2) demographic analysis does dictate size requirements. Currently, SWT matches its resources with service demand.

Service Policies

SWT is primarily express service. Where there are opportunities/areas where the fixed route travels locally, it operates as a “flag” service, meaning it will stop anywhere until it is on the highway, pending safe conditions. As a result, shelters and stations are not placed along the route with the exception of the large park-and-ride lots. This Title VI plan incorporates the following “Service Policies:”

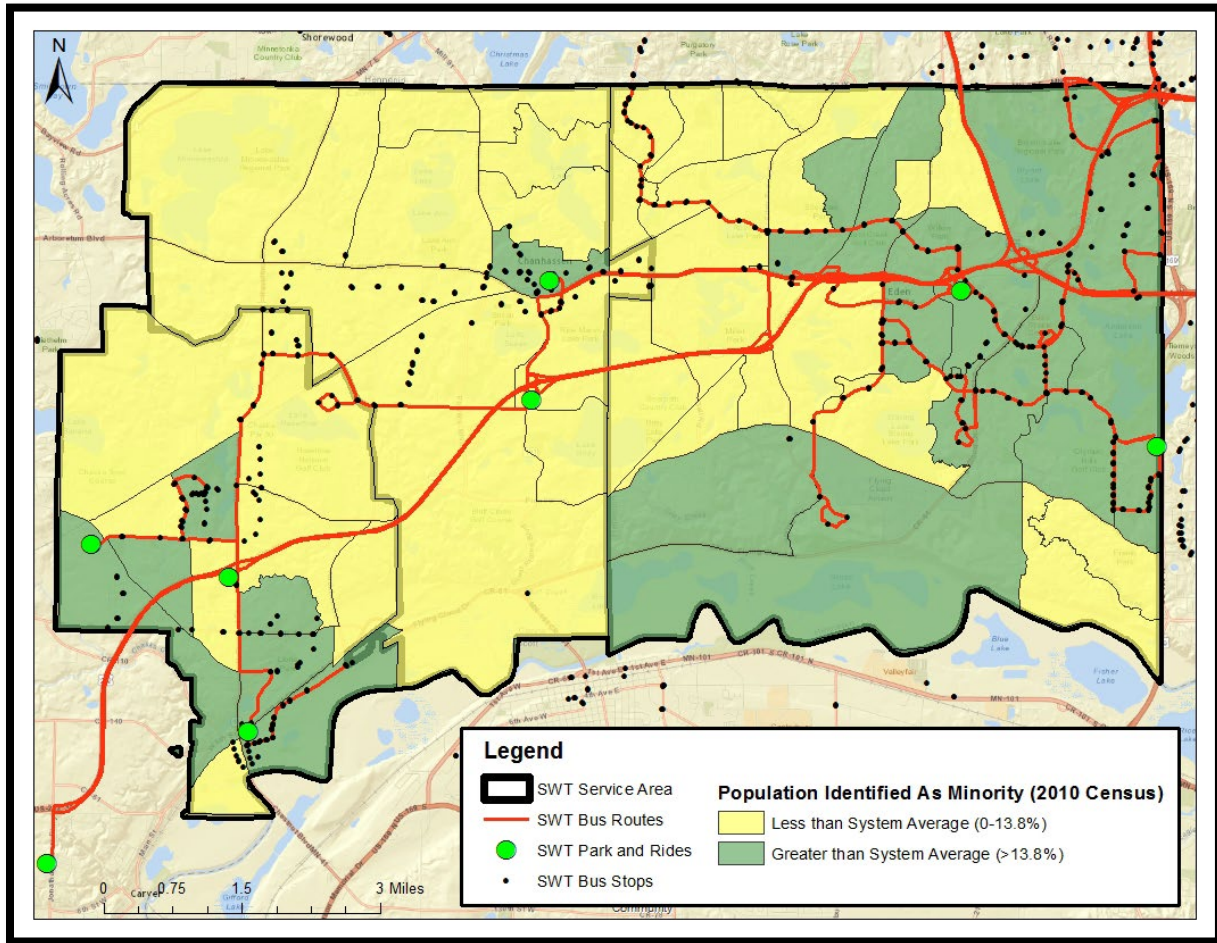
- Distribution of Transit Amenities: The local portion of SWTs express routes operate as a “flag” service, meaning we stop anywhere on a local street that it is safe to stop along the route enabling a customer to board and de-board. If a customer flags down the driver, the bus will pick them up. As a result, shelters are not typically placed along the route. With that being said, SWT does not place shelters at these locations because there is not enough demand to warrant the cost. That is why SWT, with the approval of this plan, the standard for constructing a shelter will be when a specific stop averages over 20 daily boardings.

A station is defined as a more substantial rider waiting facility that is ADA accessible with a full HVAC system, restrooms, security cameras, access to customer services, bus service information, lighting, and trash cans. SWT has four stations, one located in Eden Prairie, two located in Chanhassen, and one located in Chaska. Three of the stations take advantage of Highway 212 and the last one takes advantage of Highway 5.

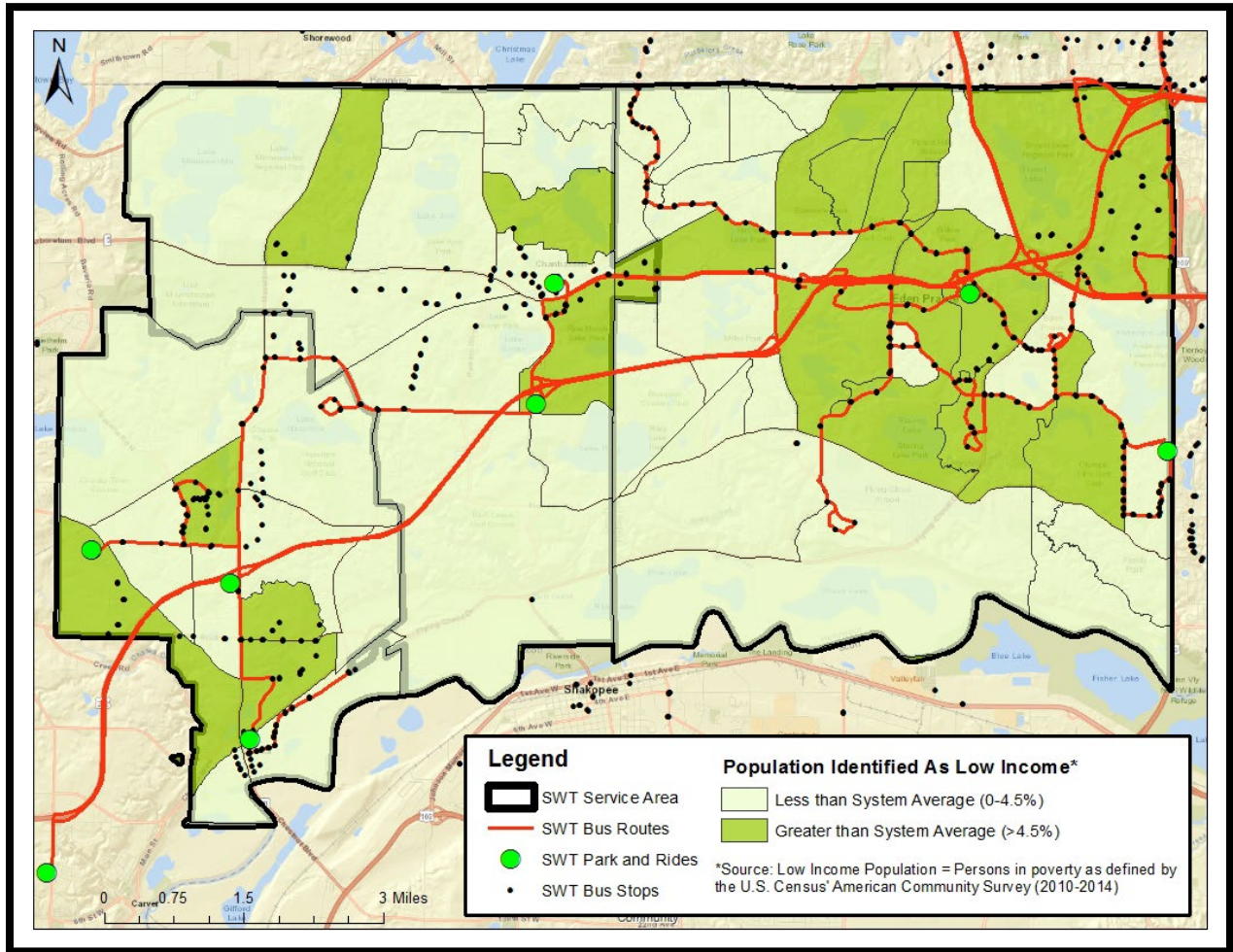
- Vehicle Assignment by Mode: SWT express service has three types of buses – fifty-seven 45 foot coaches, ten 40 foot low floor, and one 30 foot trolley style bus. Each bus style has a different passenger capacity. Buses are assigned to specific routes and trips based on the ridership levels to help prevent standing loads. The assignments are analyzed at a minimum quarterly. For seasonal local service, SWT uses the trolley. Ridership is the only measure to determine which vehicles are used for specific routes. This is also dependent on the interlining of the given run and the order that the vehicles are parked in SWT garage. After the size of the bus is dictated, Dispatch assigns the first bus in line that matches the capacity criteria for the given run as it is a first in/first out garage.

XIV – Transit Provider Requirements: Demographic & Service Profile Maps & Charts

Service Area and Facilities Map – Population Identified as Minority



Service Area and Facilities Map – Population Identified as Low Income



XV – Transit Provider Requirements: Demographic Ridership & Travel Patterns

Demographic Information

The following statistics were collected in the Fall of 2019 and 2021, as part of the annual rider survey that SWT conducts. A survey was not collected in the Fall of 2020 due to the ongoing Covid pandemic.

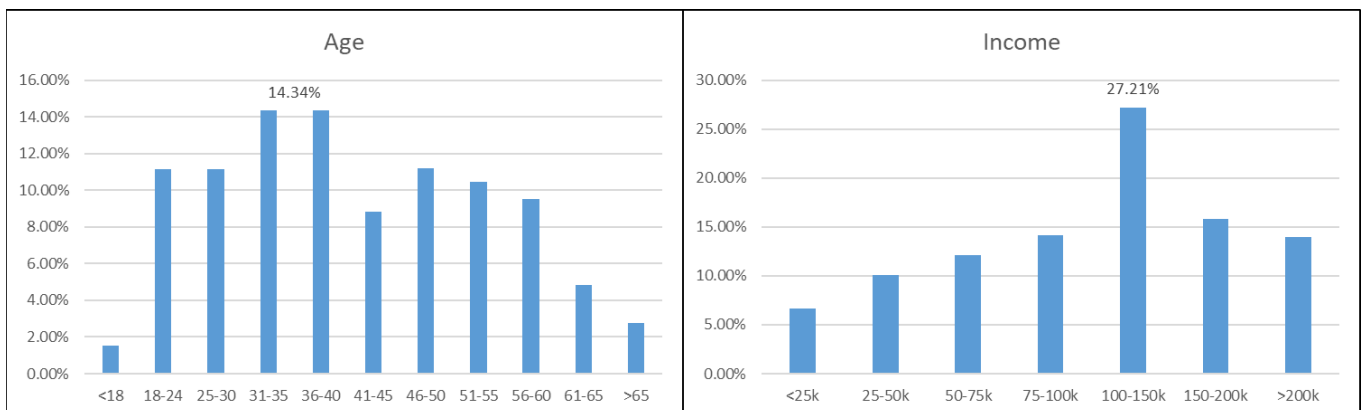
What is your gender?	
Male	Female
579	632
47.81%	52.19%

What is your age?					
<18	18-24	25-30	31-35	36-40	41-45
20	145	145	187	187	115
1.53%	11.12%	11.12%	14.34%	14.34%	8.82%

46-50	51-55	56-60	61-65	>65
146	136	124	63	36
11.20%	10.43%	9.51%	4.83%	2.76%

What is your approximate household income?						
<25k	25-50k	50-75k	75-100k	100-150k	150-200k	>200k
72	110	132	154	296	172	152
6.62%	10.11%	12.13%	14.15%	27.21%	15.81%	13.97%

What is your primary language?						
English	Hindi	Tamil	Spanish	Telugu	Somali	Other
1183	17	10	15	8	4	24
93.81%	1.35%	0.79%	1.19%	0.63%	0.32%	1.91%



Travel Patterns

Where do you normally BEGIN your trip on SWT?				
SW Station P&R	SW Village P&R	Chanhassen Transit Station (2019 only)	East Creek Station	Carver Station
746	216	70	315	34
51.14%	14.80%	4.80%	21.59%	2.33%

Minneapolis	Southdale Mall	Other
31	18	29
2.12%	1.23%	1.99%

What city do you live in?		
Eden Prairie	767	49.29%
Chaska	262	16.84%
Chanhassen	174	11.18%
Waconia	63	4.05%
Carver	62	3.98%
Victoria	60	3.86%
Minnetonka	33	2.12%
Minneapolis	26	1.67%
Shakopee	20	1.29%
Bloomington	15	0.96%
Jordan	12	0.77%
Cologne	11	0.71%
Excelsior	7	0.45%
Belle Plaine	8	0.51%
Edina	8	0.51%
Hopkins	6	0.39%
Norwood	6	0.39%
Mayer	5	0.32%
St Paul	5	0.32%
Glencoe	6	0.39%

XVI – Transit Provider Requirements: Monitoring Study Results

The Monitoring Study was planned to be completed in 2021. However, due to the reduction in service on March 23rd, 2020, SWT no longer operates 50+ vehicles during peak. Therefore, SWT is no longer required to complete the Monitoring Study. SWT continues to monitor the number of vehicles out in service to ensure compliance with FTA and Title VI requirements. The next study will be conducted in 2024, assuming SWT is operating 50+ vehicles in peak. The most recent Monitoring Study conducted in 2018 can be found at **Exhibit I**.

XVII – Transit Provider Requirements: Policy Development & Public Engagement Process

Effective October 1, 2012, FTA Circular 4702.1B requires transit providers located in urbanized areas of more than 200,000 who received federal funding and operate at least 50 peak vehicles, to develop two new policies:

- 1) A Major Service Change Policy, with thresholds that determine when a service equity analysis is required; and,
- 2) A Disparate Impact/Disproportionate Burden Policy, with thresholds that measure adverse impacts on minority and low-income populations.

SouthWest Transit partnered with Metropolitan Council/Metro Transit to develop the policies in **Appendix 2 and Appendix 3**.

The Major Service Change and Disparate Impact/Disproportionate Burden policies are based on existing practices used by Metropolitan Council and were reviewed by eight local advocacy groups. Additionally, policies used by transit agencies across the country were considered, including Los Angeles, CA; Washington, D.C.; Fort Worth, TX; Houston TX; Atlanta, GA; and Portland, OR.

Local public participation was available through five public hearings that were held across the region in February 2013. Comments were accepted by email, fax, mail, and/or phone, with the public comment period closing 10 days after the last public hearing. Details of the proposed policies and public hearings were also made available in the *State Register*, *Star Tribute*, *Pioneer Press*, *Finance & Commerce*, *Capitol Report*, *Anoka County Union*, *Waconia Patriot*, *Rosemount Town Pages*, *Shakopee Valley News*, *Lillie Suburban Newspaper*, *Asian American Press*, and the *MN Spokesman Recorder*. A total of five people attended the public hearings and comments were received from seven people; although, some comments did not specifically relate to the proposed Title VI policies.

The Major Service Change and Disparate Impact/Disproportionate Burden Policies will be added to SWT's planning process, with additional analyses conducted as described in the policies.

XVIII – Transit Provider Requirements: Service & Fare Equity Analysis since Previous Title VI Program

SouthWest Transit has not conducted any fare changes since the submission of the 2014 Title VI plan. SWT has conducted a service change on March 23, 2020, that does warrant a service equity analysis. The results of that Service Equity Analysis can be found under Exhibit L.

*Note – SWT did have subsequent service changes after March 23, 2020 that under the Major Service Change Policy, normally would warrant a Service Equity Analysis. However, since the reduction that took place on March 23, 2020, SWT currently operates 20 fixed route buses during peak and is no longer subject to the Title VI requirements to conduct an analysis. SWT will monitor services and is aware that once the 50 bus threshold is surpassed, this will once again be a requirement. Although SWT is no longer subject to conduct an SEA, we will still inform the public of major service changes as well as request feedback prior to the implementation of the service change.

IXX - System-Wide Standards

Transit System Monitoring

For purposes of the FTA Triennial transit monitoring review, SWT will evaluate Service Standards and Policies by selecting a *sample* of minority and non-minority routes. The following steps outline the general review process.

- The SWT ridership database and the Census will be used as primary data sources.
- Census data will be used to identify the total minority and non-minority populations within a ¼ mile of fixed-route and ½ mile of transit stations.
- Population totals and ridership levels will be compared to the Service Standards and Policies to determine whether discrepancies exist and whether a disparate impact exists.
- System-wide service standards/policies will be re-evaluated as needed to ensure equitable distribution.
- The Transit System Monitoring report will be approved by the SWT Commission every three years, at a minimum.

Appendix 1: Limited English Proficiency Plan

The Limited English Proficiency Plan has been prepared to address SouthWest Transit's responsibilities as a recipient of federal financial assistance as they relate to the needs of individuals with limited English language skills accessing the services offered by SWT. The plan has been prepared in accordance with Title VI of the Civil Rights Acts of 1964, 42 U.S.C. 2000d, et seq, and its implementing regulations, which state that no person shall be subjected to discrimination on the basis of race, color or national origin.

Executive Order 13166, titled "Improving Access to Services for Persons with Limited English Proficiency", indicates that differing treatment based upon a person's inability to speak, read, write or understand English is a type of national origin discrimination. It directs each federal agency to publish guidance for its respective recipients clarifying their obligation to ensure that such discrimination does not take place. This order applies to all state and local agencies which receive federal transit funds, including SWT where applicable relating to SWT services and facilities.

SWT has developed this Limited English Proficiency Plan to help identify reasonable steps for providing language assistance to persons with limited English proficiency (LEP) who wish to access services provided by SWT. As defined in Executive Order 13166, LEP persons are those who do not speak English as their primary language and have limited ability to read, speak, write or understand English.

This plan outlines how to identify a person who may need language assistance, the ways in which assistance may be provided, staff training that may be required, and how to notify LEP persons that assistance is available.

In order to prepare this plan, SWT undertook the U.S. DOT four-factor LEP analysis which considers the following:

1. The number or proportion of LEP persons in the service area who may be served or are likely to encounter a SWT program, activity or service.
2. The frequency with which LEP persons come in contact with SWT programs, activities or services.
3. The nature and importance of programs, activities or services provided by SWT to the LEP population.
4. The resources available to SWT and overall cost to provide LEP assistance.

Four-Factor Analysis:

1. The number or proportion of Limited English Proficiency (LEP) persons in the service area who may be served or are likely to encounter a SWT program, activity or service.

The SouthWest Transit staff reviewed the population estimates found in the 2016-2020 American Community Survey (ACS) 5 Year Estimates and determined, based on 2020 Census data that 109,902 persons live in the SWT service area (City of Eden Prairie – 60,537; City of Chanhassen – 24,409; City of Chaska – 24,956). The 2016-2020 American Community Survey (ACS) is used to determine the percentage of people who speak English less than “very well”, see chart below

Table 1. Population in SWT service area who speak English less than “very well”

	EDEN PRAIRIE	% OF TOTAL POPULATION	CHANHASSEN	% OF TOTAL POPULATION	CHASKA	% OF TOTAL POPULATION
Spanish	905	1.49%	61	0.25%	288	1.15%
Other Indo-European languages	820	1.35%	63	0.26%	45	0.18%
Asian and Pacific Island languages	1,112	1.84%	344	1.41%	269	1.08%
Other languages	917	1.51%	0	0.00%	0	0.00%

Source: U.S. Census Bureau, 2016-2020 American Community Survey 5-Year Estimates (2020)

A. How LEP persons interact with the agency

- LEP Customers interact with SWT drivers and staff most notably by talking to the drivers and staff and the drivers and staff determine what the questions are by taking time and being patient with the customer. In other cases family and friends also assist with the conversation. There are also community advocates that work with SWT assisting their community with communication and transportation. Finally, in extreme cases when the informal approach doesn't work, SWT will make arrangements to have an interpreter (depending on the language or hearing disability) to ensure we are able to communicate with one another and insure input and identify solutions to the questions.
- In addressing the ACS data no identified LEP population crosses the Safe Harbor threshold of an eligible LEP language group that constitutes five percent (5%) or 1,000 persons, whichever is less, of the total population of persons eligible to be served or likely to be affected or encountered. In Eden Prairie the total of LEP persons that speak Asian and Pacific languages is over 1,000. However since the ACS groups multiple languages under this category, it is SWT's determination that no one language in that group would cross the Safe Harbor threshold. Furthermore, the amount of SWT's service area population that utilizes SWT's services is 3.5%. When applying this percentage to each LEP communities, no one group totals more than 40 people.

- B. Identification of LEP communities, and assessing the number or proportion of LEP persons from each language group to determine the appropriate language services for each language group
 - As seen in Table 1, the level of LEP communities has been identified by SWT through analysis of ACS data. SWT's determination is that the level of language services provided currently is appropriate for the given LEP population in the service area.
 - C. The literacy skills of LEP populations in their native languages, in order to determine whether translation of documents will be an effective practice
 - Literacy skills of the LEP population appears to be high, based on the driver surveys conducted. In addition the average percentage of SWT's population that achieved a high school education or higher is 96.5%. With this percentage it can be assumed that literacy rates are at a high level whether English or in a native language. That being said, if SWT were to translate documents it would be an effective practice.
 - D. Whether LEP persons are underserved by the recipient due to language barriers
 - At this point in time, it does not appear that LEP persons are not underserved due to language barriers.
- 2. The frequency with which LEP persons come in contact with SWT programs, activities or services.**
- SWT assessed the frequency with which staff and drivers have, or could have, contact with LEP persons. This includes documenting phone inquiries and surveying vehicle operators. **Exhibit E** includes the driver and customer service representative surveys. **Exhibit F** contains the log to record inquiries for requests for interpreters and requests for translated SWT documents.
 - SWT surveyed its drivers/supervisors (receiving 43 responses) and customer service staff in 2016 with the following results: summary tables and surveys attached in **Exhibit E**. The survey was conducted in English. SW found this to be an acceptable method due to the fact that all staff is English proficient.
 - SWT conducts a rider survey annually to gauge customer satisfaction, route performance, opinions and idea, demographics, etc. From the demographics section, SW asks the question "What is your primary language?" 2019/2021 answers show that 93.81% chose English, 1.35% chose Hindi, 1.19% chose Spanish and all other responses were under 1% of ridership.
- 3. The nature and importance of programs, activities or services provided by SWT to the LEP population.**
- SWT offers several programs for the LEP population always trying to be inclusive of all individuals including:
 - o A new how to ride program that is in conjunction with the three cities police departments.
 - o Working with the three cities' outreach departments hold listening sessions to make communication and riding the bus easier.
 - o Holds rider focus groups.

- Hold customer experience meetings
- Hold listening sessions at the park and ride facilities attended by, at a minimum, the CEO and CAO of SWT.
- Meet with the Hispanic community sharing programs and listening for new ideas.
- Provides a Job Seekers pass to those who need it.
- All of these attempts tries to be inclusive of the various communities because SWT wants them to ride its service.

4. The resources available to SouthWest Transit and overall cost to provide LEP assistance.

- SWT has resources that will be used for providing LEP assistance with no limitation, and has determined that it could afford a professional interpreter and translation service. To this point in time, that service has not been required.
- The amount of staff and driver training that might be needed was also considered. Based on the four-factor analysis, SWT developed its LEP Plan as outlined in the following section.

Limited English Proficiency (LEP) Plan Outline

SWT will provide assistance to LEP persons who utilize SW transit services upon request. SWT is unable to tell if an individual needs assistance unless asked. However, if it helps the situation in the conversation, SWT will contact an interpreter to bridge the language gap. Currently, SWT has limited staff as well as the ability to contact a language interpreter in Spanish. For LEP populations that are not Spanish speakers, interpreter services such as Language Line are accessible. This service is available by request through the customer services desk. Other languages in the SWT geographical area appear to have a strong English as a Second Language (ESL) skills.

Language Assistance Measures

Although there is a very low percentage in the SWT Service Area of LEP individuals, that is, persons who speak English “not well” or “not at all”, SWT will ensure that the following measures are in place:

- SWT Title VI Policy and Limited English Proficiency Plan will be posted on the agency website at www.swtransit.org/about/Commitment-to-Fairness.
- When an interpreter is needed in person or on the telephone, staff will attempt to determine what language is required and then 1) see if there is a staffer internally who can assist in the interpretation; if that does not work, 2) access a language assistance person or program such as Language Line. That means a person or program that SWT, through its outreach efforts have identified, would be contacted/used in an effort to make the communication as easy as possible.

Staff Training

The following training will be provided to SWT staff that is directly involved with the transit services:

- Information on SWT’s Title VI Policy and LEP responsibilities.

- Description of language assistance services offered to the public.
- Documentation of language assistance (including Language Line use) and document translation requests via **Exhibit F**.
- How to handle a potential Title VI/LEP complaint.

Outreach Techniques

Due to the small local LEP population, the SouthWest Transit-initiated outreach activities are expected to be minimal, but the following procedure will be utilized as the need arises:

- When the staff prepares a document or schedules a meeting for which the target audience is expected to consist of at least 33 percent LEP individuals, then documents, meeting notices, flyers, and agendas will be printed in an alternative language based on the known LEP population.

Monitoring and Updating the LEP Plan

SWT will update the LEP as required by U.S. DOT. At a minimum, the plan will be reviewed and updated when data from the 2022 U.S. Census is available, or when it is clear that higher concentrations of LEP individuals are present in the SouthWest Transit service area. SWT will look for additional mid census data to ensure that if the Safe Harbor threshold is met, then the required steps will take place. If no thresholds are met within a three year times span then SWT will maintain the schedule of updating the plan every three years.

Dissemination of the SWT LEP Plan

A link to the SouthWest Transit LEP Plan and the Title VI Plan will be included on the SWT website, www.swtransit.org/about/Commitment-to-Fairness. Any person or agency with internet access will be able to access and download the plan from the SWT website. Alternatively, any person or agency may request a copy of the plan via telephone, fax, mail, email, or in person, and shall be provided a copy of the plan at no cost. LEP individuals may request a copy of the plan in translation which SWT will provide. Questions or comments regarding the LEP Plan may be submitted to SWT as follows:

Erik Hansen
Chief Executive Officer
SouthWest Transit
14405 W. 62nd St.
Eden Prairie, MN 55346

Appendix 2: Major Service Change Policy

SouthWest Transit (SWT) Major Service Change Policy Effective after SWT Commission Approval

The Federal Transit Administration's (FTA) updated Circular 4702.1B includes new requirements that all transit providers in an urbanized area of more than 200,000 who receive federal funding and operate at least 50 peak vehicles, establish a policy defining the threshold used to identify a major service change. The major service change threshold is used to determine when a more detailed service equity analysis is required. All increases or decreases in fixed route service that meet the major service change threshold require a Title VI Equity Analysis prior to implementation, which must be presented to SWT's Commission for consideration and recorded in SWT's Title VI Plan.

Further, the FTA requires public engagement in the decision-making process used to develop this policy. The major service change policy will be approved by SWT's Commission and incorporated into SWT's Title VI Plan.

Major Service Change Thresholds

In support of a regional approach to developing a major service change policy, SWT recommends adopting criteria in collaboration with the Metropolitan Council. Due to differences in system size and service types, the criteria below includes slight modifications that best reflect SWT's service area.

A major service change meets at least one of the following criteria:

- a) An existing route or set of routes with one or more net increases or decreases within a 12 month period of more than a 25% change in the daily platform hours.
- b) A new route in a new coverage area.
- c) Elimination of a transit route without alternate service or a fixed route replacement.

The following service changes are exempt:

- a) Seasonal service changes.
- b) Route number or branch letter designation.
- c) Any change or discontinuation of a demonstration route within the first 24 months of operation.
- d) Changes on special service routes such as State Fair, sporting events, and special events.
- e) Route changes caused by an emergency. Emergencies include, but are not limited to, major construction, labor strikes, inadequate fuel supplies, and public health crises.
- f) Any service change that does not meet the conditions of a major service change as defined above.

Appendix 3: Disparate Impact/Disproportionate Burden Policy

SouthWest Transit (SWT) Effective upon SWT Commission Approval

The Federal Transit Administration's (FTA) updated Circular 4702.1B includes new requirements that all transit providers, in an urbanized area of more than 200,000 who receive federal funding and operate at least 50 peak vehicles develop a policy for measuring disparate impacts and disproportionate burdens. The policy must include a threshold for determining when:

- 1) Adverse impacts are borne disproportionately by minority or low-income populations; and,
- 2) Benefits are not equitably shared by minority or low-income populations.

Further, the FTA requires public engagement in the decision-making process used to develop this policy, which will be approved by the SWT Commission and incorporated into SWT's Title VI Plan. The policy and threshold will be used to determine if a proposed fare change, major service change, or the triennial monitoring review of system-wide standards and policies shows evidence of potential disparate impacts and/or disproportionate burdens.

Four-Fifths Rule

In support of a regional approach to developing disparate impact and disproportionate burden policies, SWT will use the "four-fifths" rule. The "four-fifths" rule states that there could be evidence of a disparate impact or disproportionate burden if:

- Benefits are being provided to minority or low-income populations at a rate less than 80% (four-fifths) of the benefits being provided to non-minority or non-low-income populations.
- Adverse effects are being borne by non-minority or non-low-income populations at a rate less than 80% (four-fifths) of the adverse effects being borne by minority or low-income populations.

If a potential disparate impact for minority populations is found, the FTA requires agencies to analyze alternatives. A transit provider may modify the proposed change to avoid, minimize, or mitigate potential disparate impacts. A transit provider may proceed with the proposed change if there is substantial legitimate justification and no alternatives exist that would have a less disparate impact but still accomplish the provider's legitimate program goals.

If a potential disproportionate burden on low-income populations is found, the FTA requires recipients to take steps to avoid, minimize or mitigate impacts where feasible and describe alternatives to passengers affected by service or fare changes.

Exhibit A: List of Locations with Title VI Notice

Location	Date Posted	Date Updated
SouthWest Station	April 2012	November 2016
SouthWest Village	April 2012	November 2016
East Creek Station	April 2012	November 2016
Chanhassen Transit Station	April 2012	November 2016
Eden Prairie Garage	April 2012	November 2016
All Buses	April 2012	November 2016

Exhibit B: Acknowledgement of Receipt of Title VI Plan

All employees of SouthWest Transit are expected to consider, respect, and observe this Plan in their daily work and duties. If a citizen approaches you with a question or a complaint, direct him or her to the Title VI Manager who is the CEO.

I hereby acknowledge the receipt of the SouthWest Transit Title VI Plan. I have read the plan and am committed to ensuring that no person is excluded from participation in, or denied the benefits of its transit services on the basis of race, color, or national origin, as protected by Title VI in Federal Transit Administration (FTA) Circular 4702.1B.

Your signature

Print your name

Date



SouthWest Transit
 14405 W 62nd St • Eden Prairie, MN • 55346
 Phone: 952-949-2287 • Fax:952-974-7994 • Email: CustomerService@swtransit.org

Exhibit C: Title VI Discrimination Complaint Form

PART I—COMPLAINANT INFORMATION (Print all items legibly)

Name		Telephone
Mailing Address		
City	State	Zip Code

Are you filing this complaint on your own behalf (if yes, go to Part III)?

Yes No

PART II—THIRD PARTY INFORMATION

Name		Telephone
Mailing Address		
City	State	Zip Code

Please explain why you have filed for a third party (If additional space is needed, please attach extra sheets)

Have you obtained permission of the complainant to file this complaint on their behalf?

Yes No

PART III—COMPLAINT INFORMATION

The discrimination I experienced was based on (check all that apply)

Race
 Color
 National Origin
 Other, please specify _____

When did the alleged discrimination take place (MM/DD/YYYY): ____/____/____

Please explain as clearly as possible what happened and why you believe you were discriminated against. Describe all persons who were involved. Include the name and contact information of the person(s) who discriminated against you (if known) as well as names and contact information of any witnesses. (If additional space is needed, please attach extra sheets)

PART IV—RESOLUTION

How can this be resolved to your satisfaction?

PART V—COMPLAINT FILED WITH OTHER AGENCIES

Have you filed this complaint with any other federal, state, or local agency; or with any federal or state court?

Yes

No

If yes, check each that applies:

___ Federal Agency

___ Federal Court

___ State Agency

___ State Court

___ Local Agency

If you filed this complaint elsewhere, please provide information about a contact person at the agency/court where the complaint was filed.

Name: _____

Address: _____

City: _____ State: _____ Zip Code: _____

PART VI—SIGNATURE

Complainant's Signature _____ Date _____

Exhibit D: Log of SWT Title VI Complaints

Southwest Transit is not aware of any Title VI investigations, complaints, and lawsuits filed since the previous Title VI plan was submitted. Exhibit D includes a log that would capture these investigations, complaints, and lawsuits. This information is current as of June 14th, 2022.

Investigations	Date	Summary	Status	Action Taken

Lawsuits	Date			

Complaints	Date			

Exhibit E: Limited English Proficiency Plan Surveys

SouthWest Transit Limited English Proficiency (LEP) Plan Surveys

Title VI of the Civil Rights Act of 1964 prohibits discrimination on the basis of race, color, or national origin in programs and activities receiving Federal financial assistance. Executive Order 13166, titled “Improving Access to Services for Persons with Limited English Proficiency,” indicates that differing treatment based upon a person’s inability to speak, read, write, or understand English is a type of national origin discrimination.

As a result, to ensure compliance with the above federal regulations, SWT has developed a Limited English Proficiency Plan to help identify reasonable steps for providing language assistance to persons with **limited English proficiency (LEP)** who wish to access services provided by SWT. An LEP person is defined as a person who does not speak English as their primary language and has limited ability to read, speak, write, or understand English.

One component of SWT’s Limited English Proficiency Plan includes a driver survey to help assess the number and frequency that LEP persons use SWT. This survey will be conducted in the fall of 2023 and will include the following:

Driver Survey

Moving forward, this survey will be collected every three years to satisfy the requirements of Title VI.

Your Driver Badge ID and completion date must be filled in below. Your assistance is greatly appreciated. Thank you.

1. In the past 30 days, do you recall coming into contact with LEP bus riders while driving an SWT bus?
 - a. ____ Yes b. ____ No (*Check one response – If yes, continue to question 2. If no, your survey is complete*)
2. If yes to question 1, on average, how many times a week do you come into **contact** with LEP bus riders while driving an SWT bus? _____
3. If yes to question 1, on average, how many times a week do you **provide assistance** to LEP bus riders while driving an SWT bus? _____
4. If yes to question 1, if known, please list the non-English languages spoken by the LEP bus riders you encountered on the SWT buses and please identify the issues you assisted the LEP customers with such as fares, route information, final destination, etc. ?

**SouthWest Transit
Limited English Proficiency Plan
Survey of Customer Service Reps**

Title VI of the Civil Rights Act of 1964 prohibits discrimination on the basis of race, color, or national origin in programs and activities receiving Federal financial assistance. Executive Order 13166, titled “Improving Access to Services for Persons with Limited English Proficiency,” indicates that differing treatment based upon a person’s inability to speak, read, write, or understand English is a type of national origin discrimination.

As a result, to ensure compliance with the above federal regulations, SWT has developed a Limited English Proficiency Plan to help identify reasonable steps for providing language assistance to persons with **limited English proficiency (LEP)** who wish to access services provided by SWT. An LEP person is defined as a person who does not speak English as their primary language and has limited ability to read, speak, write, or understand English.

One component of SWT’s Limited English Proficiency Plan includes a survey to help assess the number and frequency that LEP persons use SWT. This survey will be conducted in the spring of 2023 and will include the following:

Customer Service Survey

Please complete and return to SWT Customer Service at SouthWest Station, Eden Prairie, MN

Your initials and completion date must be filled in below. Your assistance is greatly appreciated. Thank you.

1. In the past 30 days, do you recall coming into contact with LEP customers while on the phone as a Customer Service Rep or when talking to a passenger at a transit facility?
 - b. Yes b. No (*Check one response – If yes, continue to question 2. If no, your survey is complete*)
2. If yes to question 1, on average, how many times a week do you come into **contact** with LEP customers?

3. If yes to question 1, on average, how many times a week do you **provide assistance** to LEP customers?

4. If yes to question 1, if known, please list the non-English languages spoken by the LEP customers you encountered:

Initials _____

Date Completed _____

Summary of Exhibit E: Limited English Proficiency Plan Surveys:

1.) In the past 30 days, do you recall coming into contact with LEP bus riders while driving a SWT bus?	YES - 9	NO - 39
---	---------	---------

RESPONSE #	2.) If yes to question #1, on average, how many times a week do you come INTO CONTACT with LEP bus riders?	3.) If yes to question #1, on average, how many times a week do you PROVIDE ASSISTANCE to LEP bus riders?	4.) If yes to question #1, if known, please list the non-English languages spoken by LEP bus riders you encountered on the SWT buses and please identify the issues you assisted the LEP customers with such as fares, route information, final destination, etc.?
1	once in 12 months	once in 12 months	*not a clue
2	1	1	language unknown, help with route informaton
3	0-1	0-1	Spanish and other unknown
4	0-1	0-1	language: spanish and others, helped with route and local area information
5	5+	5+	Spanish, Hindi, Somali, German
6	6	3	Spanish, Hindi, Somali
7	0-1	0-1	Spanish
8	3	3	Spanish, various Indian dialects
9	2	2	Spanish, Somali

*Survey was conducted with 48 total responses (5 by customer service representatives, 43 (out of 70) by drivers)

**Exhibit F: Log to Record Inquiries for Requests for Interpreters and Requests
for Translated SouthWest Transit Documents**

Date of Inquiry or Request: _____

Request for Interpreter: _____ Yes _____ No

- Language: _____

Request for Translated Document: _____ Yes _____ No

- Language: _____
- Name of Document: _____

Contact Info for Person Making the Request: _____

Summary of Action and Conclusion: _____

Exhibit G: Log of SWT Commission Action

- Plan adopted (below 50 peak buses) 1-23-14
- Plan adopted (over 50 peak buses) 10-27-16
- Equity Analysis for route suspension acknowledged and service change approved 8-17-17
- Plan updated in response to triannual audit 3-20-19
- Plan updated in response to triannual audit 6-23-22
- Equity Analysis for March 23, 2020 Service Reductions acknowledged 6-23-22
- Major Service Change and Disparate Impact Policies approved 6-23-22

Exhibit H: History of SWT Title VI Plan Revisions

- Plan adopted (over 50 peak buses) 10-27-16
- Plan updated in response to triannual audit 3-20-19
- Plan updated in response to triannual audit 6-23-22

Exhibit I: Title VI Monitoring Study – 2018

Background

FTA requires transit providers that operate 50 or more fixed route vehicles in peak service and are located in urbanized areas (UZA) of 200,000 or more people, or that otherwise meet the threshold defined in Chapter IV, to monitor their service standards and policies. Service standards and policies provide the framework for monitoring and assessment of service to compare service provided in areas with a percentage of minority population that exceeds the percentage of minority population in the service area to service provided in areas with a percentage of minority populations that is below the percentage of minority population in the service area.

The following tables and maps are provided as examples of how to assess the performance of service on minority and non-minority routes for each of the transit provider's service standards and service policies. Providers of fixed route public transportation should follow these examples for submitting data in their Title VI Programs. Transit providers should assess transit service and compare actual/observed service to the established service policies and standards. The standards and policies that must be monitored are:

Standards

- Vehicle Load for each mode
- Vehicle Headway for each mode
- On-Time Performance for each mode
- Service Accessibility for each mode

Policies

- Vehicle Assignment for each mode
- Distribution of Transit Amenities (Policy and Standards) for each mode

Methodology

For each individual bus and/or rail line, calculate the percentages of all persons residing in areas served by the line who are minority persons. Define a unique geographic area of coverage for each line by including all Census Block Groups within one-quarter mile walking distance of bus stops and/or within one-half mile walking distance of rail stations served by that line. For each line, calculate the number of minority persons residing in all Block Groups served, and determine the percentage of minority persons among all persons served by the line. For this analysis, SouthWest Transit calculated the percentage of all persons residing in areas who are minority persons (for all routes) and for each route that served a higher percentage than the system average was deemed a minority route.

Monitoring of Service Standards

Vehicle Load Monitoring

Table 1 below shows passenger capacities for buses and light rail cars as the average maximum number of persons seated and standing during the peak one-hour in the peak direction. Maximum load factors represent the maximum achievable capacity, and are calculated by dividing the total seated and standing capacity by the seated capacity of the vehicle.

Table 1. Passenger Capacities

Assessment: Average weekday loads on each line were determined for the following time periods and directions of travel:

- AM in peak direction (7-9 a.m.)
- PM in peak direction (4-6 p.m.)
- Midday in both directions (9 a.m. – 4 p.m.)

VEHICLE TYPE	SEATED	STANDING	TOTAL	LOAD STANDARD	MAXIMUM LOAD FACTOR
40' LOW-FLOOR BUS	42	3	45	1	1.07
45' COACH BUS	57	3	60	1	1.1

Note: SouthWest Transit monitors service daily to ensure that no standing loads are taking place. In the event that a trip shows a pattern of standing loads (2 consecutive days) immediate action is taken. For the purposes of Table 1, the standing column does not represent a typical day but what the standing loads are when they do occur.

Table 2 below shows the average vehicle loads by time period for lines in each quartile, for minority lines, for non-minority lines, and for all lines in the system.

Table 2. Vehicle Loads for Minority and Non-Minority Lines

	AM PEAK		MIDDAY		PM PEAK	
	Load/Seats	Avg. Load	Load/Seats	Avg. Load	Load/Seats	Avg. Load
Minority	0.30	17.17	0.26	15.00	0.28	16.08
Non-Minority	0.51	29.09	0.45	25.50	0.52	29.68
System	0.41	23.13	0.36	20.25	0.40	22.88

The average load factors in the AM peak were 0.30 for minority lines and 0.51 for non-minority lines. The average load factors in the PM peak were 0.28 for minority lines and 0.52 for nonminority lines. No lines exceeded the vehicle load standard during the peak periods.

Figure 1 below depicts the average loads for minority and non-minority lines for PM peak, midday, and AM peak as shown in Table 2 above, in comparison to the maximum capacity of 57 passengers for a 45-foot coach bus.

Figure 1. Vehicle Loads for Minority and Non-Minority Lines by Peak Period

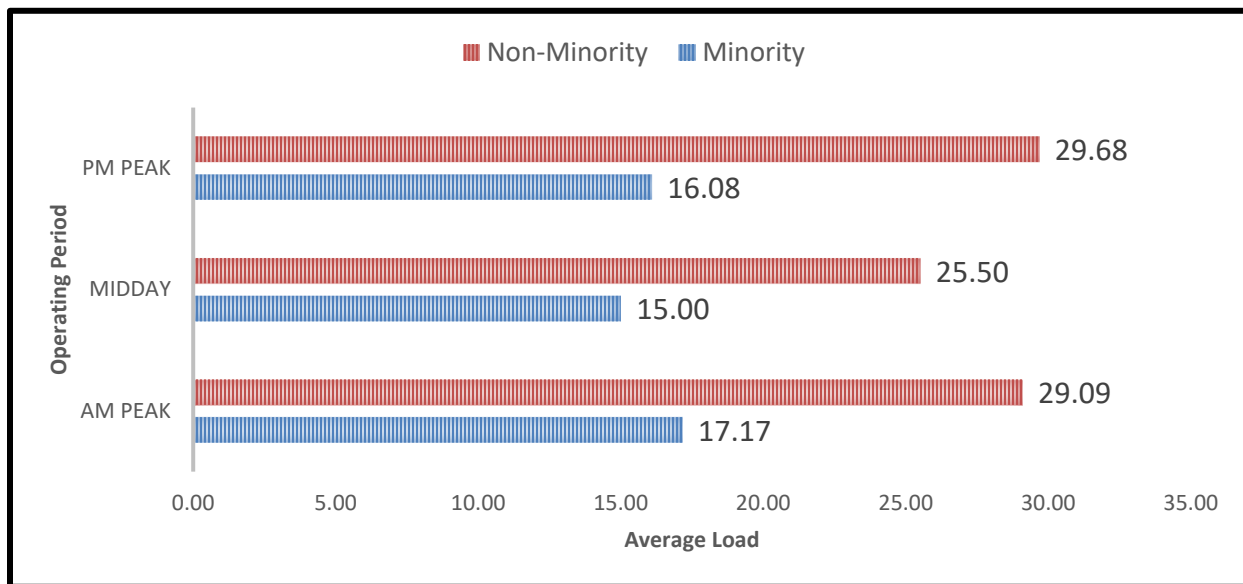


Table 3 below shows the average headway in minutes for minority and non-minority lines for AM peak, midday, PM peak, evening, and night periods, for weekday service. The average span of service in hours and tenths of hours is shown for minority and non-minority lines for weekday service.

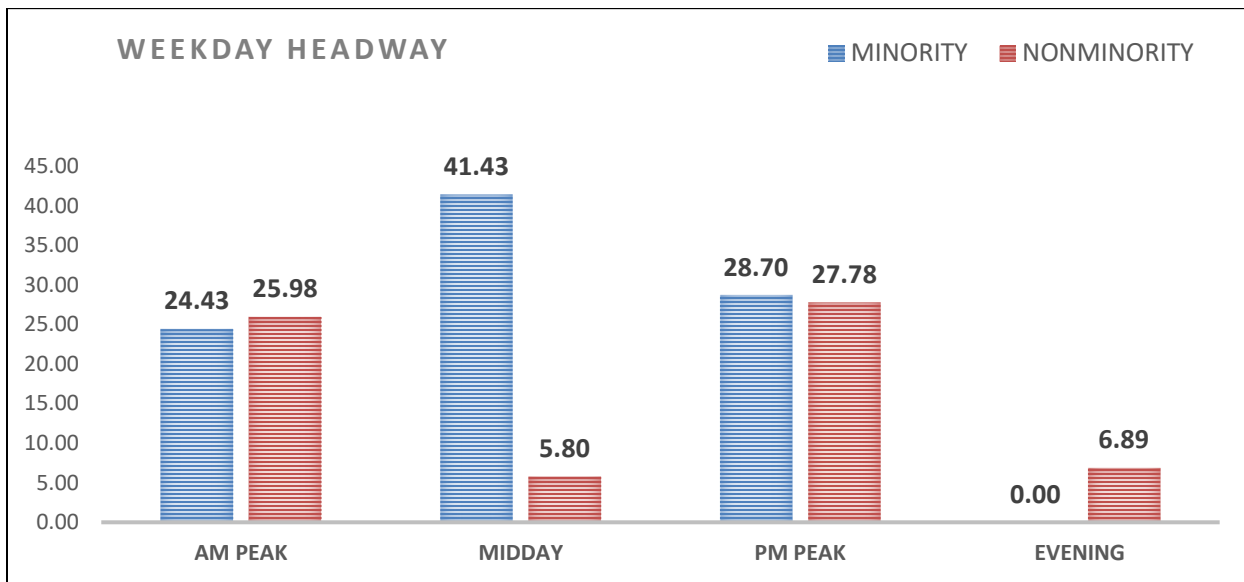
Table 3. Weekday Headways and Span of Service for Minority and Non-Minority Lines

	LINES OPERATING	% OPERATING	FREQ LINES	SERVICE START	AM PEAK HEADWAY	MIDDAY HEADWAY	PM PEAK HEADWAY	EVENING HEADWAY	SERVICE ENDS	SPAN (HOURS)
MINORITY LINES	3	100.00%	2	5:41 AM	24.43	41.43	28.70	0.00	7:16 PM	13.58
NON MINORITY LINES	7	100.00%	5	5:11 AM	25.98	5.80	27.78	6.89	10:37 PM	17.43

On weekdays, two (2) minority lines and five (5) non-minority lines were designated as Frequent Service lines (i.e., Freq Lines). On weekdays, the average AM and PM peak headway on minority lines was 26.57 minutes, versus 26.88 minutes on non-minority lines. Average headways on minority lines during weekday midday, evening, and night periods were higher (i.e., provided less frequent service) than on non-minority lines. The average Midday and Evening headway on minority lines was 20.72 minutes, versus 6.34 minutes on non-minority lines. Minority lines had an average weekday span of service of 13.58 hours, as compared with a 17.43 span of service on nonminority lines.

Figure 2 below depicts weekday headways for minority and non-minority lines for AM peak, midday, PM peak, and evening. In the AM Peak and evenings, the average frequency of service on minority lines exceeded frequency of service on non-minority lines (i.e., the average headway in minutes was lower on minority lines). The reverse is true in the Midday and PM peak with non-minority lines having a lower average headway in minutes.

Figure 2. Headways for Minority and Non-Minority Lines on Weekdays by Time Period



On-Time Performance Monitoring

Figure 3. Weekday On-Time Performance

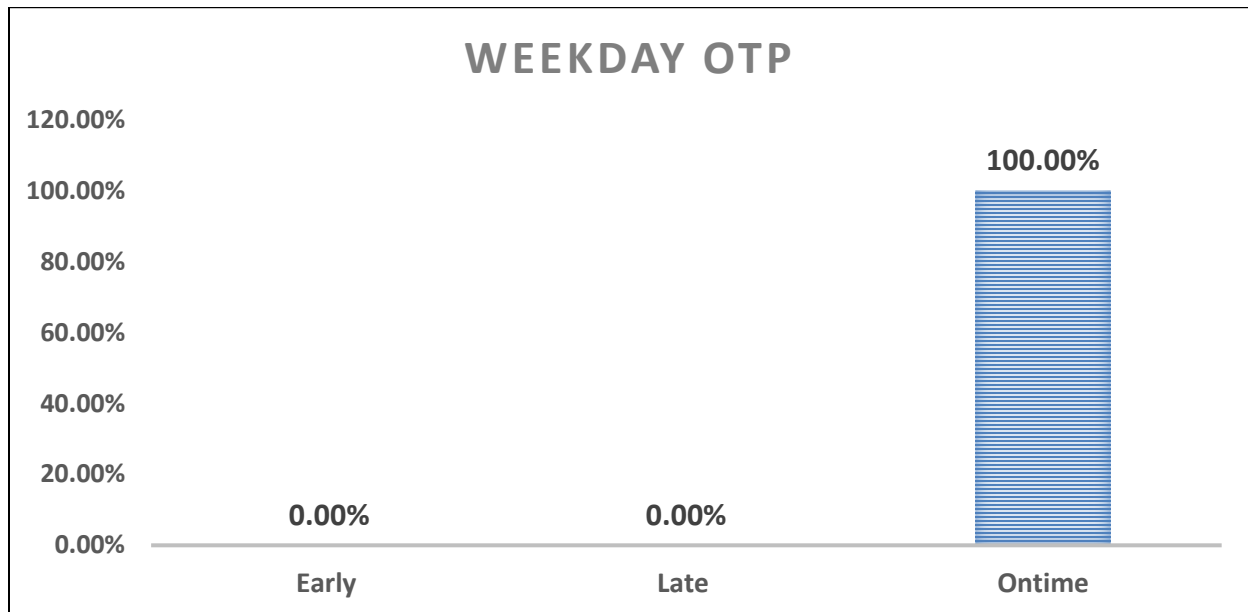


Figure 3 below shows that 100.00% of transit vehicles passed time points on time, 0.0% passed time points early, and 0.0% passed time points late. This information would be compared with the On-Time Performance Standard and analyzed to determine potential disparate impacts.

SouthWest Transit initiated a random spot check program to assess a variety of performance measures, including on-time performance in a route audit program named 'Secret Riders'. This audit program completed a total 13 observations between September 23rd, 2017 and November 15th 2017.

Of the 13 bus trips observed, 0 trips (0.0%) were found departing a schedule time point late (i.e., more than 5 minutes after the departure time in the printed schedule). These routes on which late departures were observed were:

Of all routes sampled, none have a greater-than-average proportion of route miles in minority Census blocks. These findings suggest that additional monitoring of on-time performance to assess potential disparate impacts is not warranted. SouthWest Transit will continue to operate the 'Secret Rider' program to ensure that time points are being departed on time and will continue to analyze the results to ensure that no disparate impact is taking place in the SouthWest Transit system.

Service Availability Monitoring

Table 4 below shows the percentages of minority and non-minority households served. The percentage of minority households within a ½ mile walk of stops and/or stations was 41.67%. The percentage of non-minority households within a ½ mile walk of stops and/or stations was 34.54%. While these percentages seem low, it is important to remember the service area in which SouthWest Transit serves: with a low density suburban setting, the difficulty of providing service that would cover 70% or more of residents within a ½ mile of stops and/or stations would not be operationally sound.

Table 4. Service Availability for Minority and Non-Minority Residents

Households	Within 1/2 mile	More than 1/2 Mile
Minority	41.67%	58.33%
Non-Minority	34.54%	65.46%
System	36.68%	63.32%

All residents of Census Block Groups where geographic center of the Block Group is within ½- mile walk of a bus stop and/or rail station are considered within ½-mile of service.

Monitoring of Service Policies

Vehicle Assignment Monitoring

The following language is inserted from SouthWest Transit’s 2016 Title VI Plan. The following language describes the process in which vehicles are assigned to routes.

Vehicle Assignment by Mode: SWT express service has three types of buses – fifty-seven 45 foot coaches, ten 40 foot low floor, and one 30 foot trolley style buses. Each bus style has a different passenger capacity. Buses are assigned to specific routes and trips based on the ridership levels to help prevent standing loads. The assignments are analyzed at a minimum quarterly. For seasonal local service, SWT uses the trolley. Ridership is not the only measure to determine which vehicles are used for specific routes. This is also dependent on the interlining of the given run and the order that the vehicles are parked in SWT garage. After the size of the bus is dictated, Dispatch assigns the first bus in line that matches the capacity criteria for the given run as it is a first in/first out garage.

Table 5 (Vehicle Assignment) cannot be completed in this monitoring study as the FTA Circular 4702.1B App. J-7 outlines since SouthWest Transit does not assign specific vehicles to specific routes. That being said, SouthWest Transit will continue to use the procedure and standards stated about to ensure that equitable service is being provided to all riders within the system.

Transit Amenities Monitoring

The overlay map below shows the locations of many of the transit agency’s amenities, including park and ride facilities, transit centers, pedestrian improvements, and bus shelters, relative to the locations of bus and rail routes and the locations of minority and non-minority populations. Such a map is one way to demonstrate how amenities are distributed across the transit system.

Figure 4. Transit Amenities Overlay Map

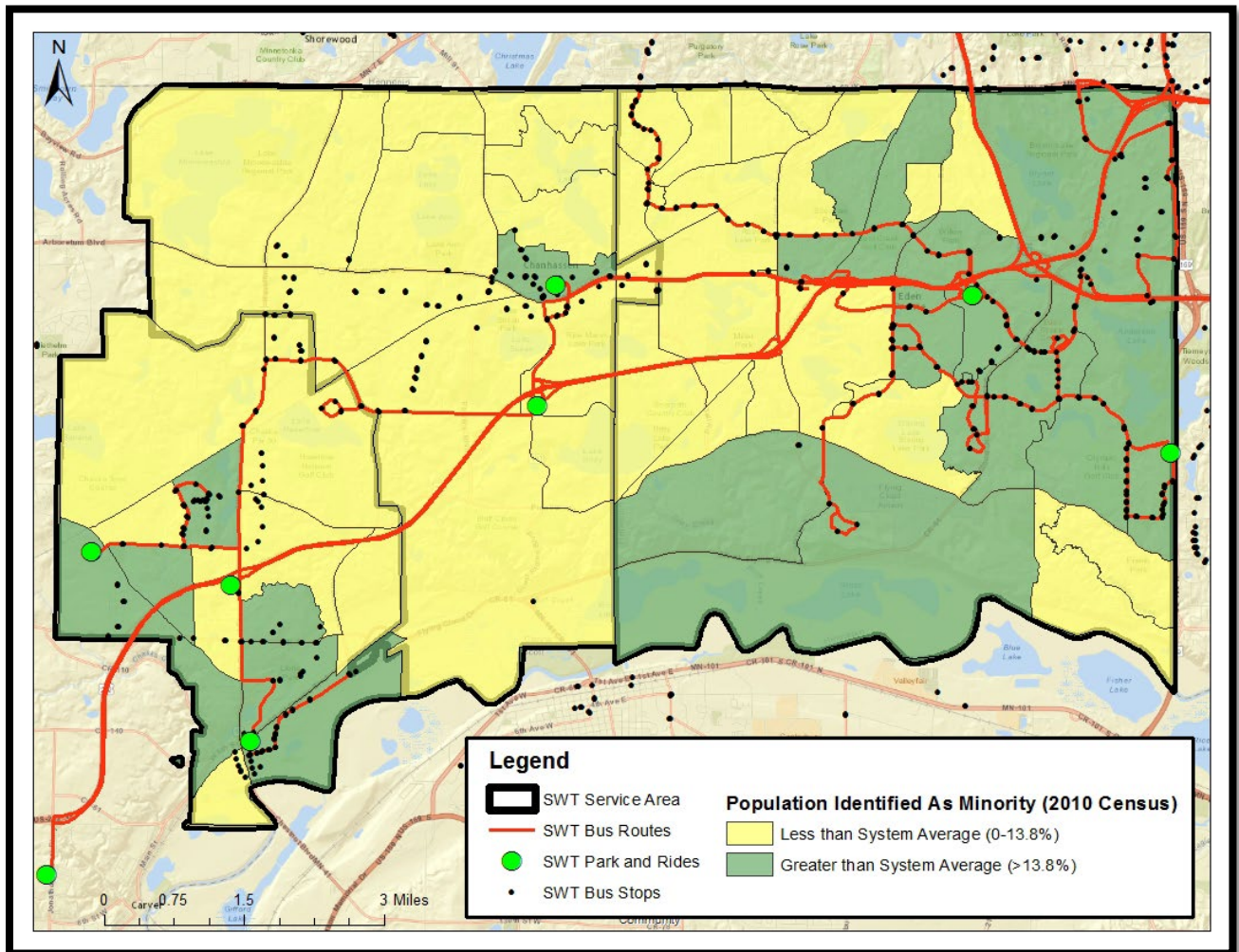


Exhibit J – SWS Commission Approval of Title VI Plan Update



**SOUTHWEST TRANSIT COMMISSION
RESOLUTION #22-15
Title VI Plan Update**

WHEREAS, SouthWest Transit (SWT) operates as a Joint Powers entity established by the Cities of Eden Prairie, Chaska and Chanhassen to provide transit services under the laws of the State of Minnesota including Minnesota Statute Sections 473.384, 473.388 and Statute 471.59; and

WHEREAS, the Federal Transit Administration (FTA) requires SouthWest Transit to update the Title VI plan every 3 years;

WHEREAS, the Title VI plan ensures equitable delivery of service, specifically to minority and low-income populations.

WHEREAS, the Metropolitan Council reviewed the draft plan update and recommended updating the following: update website with Title VI complaint procedures, update the Title VI complaint form, and updating public meeting notices to include verbiage regarding reasonable accommodations;

WHEREAS, the proposed updates to the Title VI plan will keep us compliant with both the Metropolitan Council and the FTA;

NOW THEREFORE, BE IT RESOLVED that the SWT Commission adopts resolution 22-15 approving of the Title VI Plan Update.

ADOPTED by the Commission of SouthWest Transit on June 23, 2022.


Mike Huang, Chairperson

ATTEST:


Matt Fyten, Interim Chief Executive Officer

Exhibit K – SWT Commission Approval of Title VI Equity Analysis



**SOUTHWEST TRANSIT COMMISSION
RESOLUTION #22-17
Title VI Equity Analysis – March 23 2020 Service Change**

WHEREAS, SouthWest Transit (SWT) operates as a Joint Powers entity established by the Cities of Eden Prairie, Chaska and Chanhassen to provide transit services under the laws of the State of Minnesota including Minnesota Statute Sections 473.384, 473.388 and Statute 471.59; and

WHEREAS, SouthWest Transit has a responsibility to operate effective and efficient services and be good stewards of taxpayer dollars;

WHEREAS, in response to the pandemic and decrease in ridership, service was reduced on March 23 2020;

WHEREAS, a Title VI Equity Analysis was completed and a disparate impact was found, change borne by minority populations had a delta value of 21.9%, which is over the 20% limit defined in the Disparate Impact Policy;

WHEREAS, SouthWest Transit had to respond to the pandemic in an expedited fashion and therefore alternative service plans could not be analyzed;

NOW THEREFORE, BE IT RESOLVED that the SWT Commission adopts resolution 22-17 approving of the results of the Title VI Equity Analysis for the March 23rd 2020 service change.

ADOPTED by the Commission of SouthWest Transit on June 23, 2022.


Mike Huang, Chairperson

ATTEST:


Matt Fyten, Interim Chief Executive Officer

Exhibit L – Title VI Equity Analysis for March 23rd 2020

Introduction

Title VI of the Civil Rights Act of 1964 prohibits discrimination on the basis of race, color, or national origin in programs and activities receiving Federal financial assistance. This analysis was conducted in compliance with Federal Transit Administration (FTA) Circular 4702.1B, which requires any FTA recipient serving a population of 200,000 or greater to evaluate any fare change and any major service change at the planning and programming stages to determine whether those changes have a discriminatory impact. This document is an analysis of the reduction in fixed route services on March 23rd 2020, in response to the COVID-19 pandemic.

Background

SouthWest Transit reduced fixed route service, from 127 daily trips to 34 daily trips.

SouthWest Transit's Major Service Change Policy require a Title VI analysis and a public hearing to be undertaken when a route is changed by twenty five percent or more. This reduction of fixed route services constitutes a major service change. The drastic drop in ridership (over 95%) coupled with the unknowns of the COVID-19 pandemic, a public hearing was not conducted regarding the service reductions. The reduction in service was necessary in order for SouthWest Transit to continue to provide services through the pandemic.

SouthWest Transit has had subsequent service changes since the March 23rd, 2020 reduction in service, two of which (9/8/2020 and 9/7/2021) normally would be subject to a Title VI analysis due to surpassing the thresholds laid out in the SWT Major Service Change Policy. However, since the March 23rd, 2020 reduction, SWT now operates fewer than 50 vehicles during peak service. As a result, SWT is no longer subject to conduct such analyses until a time where we are once again operating more than 50 vehicles during peak. SWT will continue to involve the public as much as possible when it comes to service changes (major or minor).

Service Characteristics

Pre-COVID Fixed Route Services had the following characteristics:

- 127 trips per day
- 66 total AM trips (52 AM Peak trips) and 61 total PM trips (48 PM Peak trips)
- Average daily ridership of 3400+ passengers

March 23, 2020 Fixed Route Services had the following characteristics:

- 34 trips per day
- 17 total AM trips (11 AM Peak trips) and 17 total PM trips (13 PM Peak trips)
- Average daily ridership of 125+ passengers

Outreach and Decision-making

The reduction in service is considered a major service change under SouthWest Transit's Major Service Change Policy and requires a Title VI Service Equity Analysis and public outreach. However, due to the Covid-19 Pandemic, SWT did not hold a public outreach meeting as a precaution to staff and public safety. Rider Notices were posted in lobbies, SWT website, Facebook, and Twitter.

Title VI Policies and Definitions

SouthWest Transit's Board of Commissioners adopted three policies in February 2016 related to Title VI that guide this analysis: Major Service Change Policy; Disparate Impact Policy; and Disproportionate Burden Policy. The requirement for these policies comes from Federal Transit Administration (FTA) Circular 4702.1B, "Title VI Requirements and Guidelines for Federal Transit Administration Recipients" which became effective October 1, 2012. The Circular requires any FTA recipient that operates 50 or more fixed route vehicles in peak service and serving a population of 200,000 persons or greater to evaluate any fare change and any major service change at the planning and programming stages to determine whether those changes have a discriminatory impact.

SOUTHWEST TRANSIT MAJOR SERVICE CHANGE POLICY

The purpose of this policy is to establish a threshold that defines a major service change and to define an adverse effect caused by a major service change.

A major service change is defined as any change in service on any individual route that would add or eliminate more than twenty five percent of the route revenue miles or twenty five percent of the route revenue hours. All major service changes will be subject to an equity analysis which includes an analysis of adverse effects on minority and low-income populations.

An adverse effect is defined as a geographical or time-based reduction in service which includes but is not limited to: span of service changes, frequency changes, route segment elimination, re-routing, or route elimination.

SOUTHWEST TRANSIT DISPARATE IMPACT POLICY

The purpose of this policy is to establish a threshold which identifies when adverse effects of a major service change or any fare change are borne disproportionately by minority populations.

A disparate impact occurs when the minority population adversely affected by a fare or service change is twenty percent more than the average minority population of SouthWest Transit's service area.

Disparate impacts on routes with either span of service changes and/or frequency changes will be determined by analyzing all routes with such changes together. Disparate impacts on routes with segment elimination, re-routing, or route elimination will be determined on a route by route basis.

If SouthWest Transit finds a potential disparate impact, the agency will take steps to avoid, minimize or mitigate impacts and then reanalyze the modified service plan to determine whether the impacts were removed. If SouthWest Transit chooses not to alter the proposed changes, the agency may implement the service or fare change if there is substantial legitimate justification for the change AND the agency can show that there are no alternatives that would have less of an impact on the minority population and would still accomplish the agency's legitimate program goals.

SOUTHWEST TRANSIT DISPROPORTIONATE BURDEN POLICY

The purpose of this policy is to establish a threshold which identifies when the adverse effects of a major service change or any fare change are borne disproportionately by low-income populations.

A disproportionate burden occurs when the low-income population adversely affected by a fare or service change is twenty percent more than the average low income population of SouthWest Transit's service area.

Disproportionate burden on routes with either span of service changes and/or frequency changes will be determined by analyzing all routes with such changes together. Disproportionate burden on routes with segment elimination, re-routing, or route elimination will be determined on a route by route basis.

If SouthWest Transit finds a potential disproportionate burden, the agency will take steps to avoid, minimize or mitigate impacts and then reanalyze the modified service plan to determine whether the impacts were removed. If SouthWest Transit chooses not to alter the proposed changes, the agency may implement the service or fare change if there is substantial legitimate justification for the change AND the agency can show that there are no alternatives that would have less of an impact on low-income population and would still accomplish the agency's legitimate program goals.

1. *Minority Population – Persons identifying themselves as a race other than white or of Hispanic origin, self-reported in the U.S. Census.*
2. *Low-Income Population – Persons reporting as being under the federal household poverty limit as defined by the U.S. Department of Health and Human Services. In 2015 the poverty level for a family of four was \$24,250.*

Methodology

The reduction of service due to the COVID-19 Pandemic in March of 2020 qualifies as a Major Service Change and thus is subject to a Title VI Service Equity Analysis.

SouthWest Transit staff used Remix (www.remix.com) to undertake the Title VI analysis for this project. Remix allows you to automatically generate a Title VI report (based on Census data) by comparing existing service to a set of proposed changes. The methodology used by Remix to achieve this includes the following steps:

Data sources

- Demographic data comes from the US Census Bureau, 2015-2019 American Community Survey (ACS) 5-Year Estimates.
- Population is coded by table B03002, field B03002001.
- Low-income status is set at 100%, 150% or 200% the US federal poverty level, depending on your individual agency. This is coded by the appropriate fields in table C17002.
- Minority status is coded by table B03002, by subtracting the white, non-Hispanic population (B03002003) from the total population (B03002001).
- Service area is a set of block groups determined by a shapefile your agency provides.
- Map and routing data are provided OpenStreetMap, Mapbox, and Valhalla.

Methodology

1. Get the population near a route, including its low-income and minority percentage.
 - For each route, build a shape that represents the area within quarter-mile of any of its stops.
 - Intersect the catchment area with 2015-2019 ACS 5-year estimates. Get a list of block groups and the percentage overlap with each.
 - For each block group, take the percentage of overlap and multiply it by the block group's statistics.
 - Get the population, minority population, and low-income population for each group and sum them together. This is the total population a route could serve.
2. Compare the number of people-trips, before and after.
 - Multiply the population near a route by the number of trips it makes (per year) to get "people-trips".
 - Repeat for low-income and minority populations to get "low-income people-trips" and "minority people trips".
 - Compare these numbers between the before and after versions of the route, to get a set of people-trip differences. We match before and after using routes that have the same name.
3. Get the total difference in people-trips across the transit system.
 - Repeat the process above for every route in the transit system.
 - Sum together the difference in people trips. This will return three numbers: total difference in people-trips, total difference in low-income people-trips, and total difference in minority people trips.
4. Calculate the change borne by low-income and minority populations.
 - Divide the total difference in low-income people trips by the total difference in people-trips to get the percentage of change borne by those with low incomes.
 - Repeat for minority people-trips.
5. Compare the percentage change to the average in the service area.
 - Calculate the average percentage of low-income and minority populations across the entire service area.
 - Subtract from the change borne by those populations.
 - Get two final numbers: the delta between the impact this set of transit changes had on low-income and minority populations compared to any average change.

Additional Raw Data

In addition to the methodology outlined above, Remix also produces a set of raw data you can use in your own methodology. Specifically, we provide:

- A list of Census block groups in the service area with population, low-income, minority information for each.
- A before and after count of trips in each block group.

- A service-area-wide average of minority and low-income populations
We've found that most US transit agencies can use the above data to run their existing Title VI methodology.

Effects of propose service change on minority and low-income populations

Impact of Service Change on Minority and Low-Income Populations

Tables 5.1 - 5.4 show the low-income and minority data for the existing and proposed service.

Table 5.1 Low-Income and Minority Populations within 1/4 Mile of Existing Service

Route	Before (Inbound)			Before (Outbound)				
	Population (within 1/4 mi)	Low Income	Minority	Trips (Annually)	Population (within 1/4 mi)	Low Income	Minority	Trips (Annually)
600 SW Transit - Flex Route	2,387	20.0%	35.2%	255	2,811	20.8%	37.6%	255
602 SW Transit - Flex Route	1,511	19.1%	39.6%	255	1,511	19.1%	39.6%	255
690 SW Transit - Express - Eden Prairie - Mpls (A)	1,423	32.3%	63.0%	4,080	1,038	29.8%	56.6%	4,080
690 SW Transit - Express - Eden Prairie - Mpls (B)	2,167	23.4%	45.9%	1,530	1,781	20.0%	38.6%	765
690 SW Transit - Express - Eden Prairie - Mpls (C)	10,404	25.7%	48.4%	510	10,160	25.5%	47.3%	510
690 SW Transit - Express - Eden Prairie - Mpls (D)	7,223	16.9%	31.6%	510	6,844	15.8%	29.0%	255
695 SW Transit - Express - Chaska - Chanhassen - Mpls	2,167	23.4%	45.9%	1,785	2,678	17.6%	37.9%	1,275
697 SW Transit - Express - Carver - Chaska - Mpls (A)	1,157	21.6%	43.0%	1,275	727	11.9%	22.0%	1,275
697 SW Transit - Express - Carver - Chaska - Mpls (B)	1,133	22.0%	43.7%	510	703	12.0%	22.3%	765
698 SW Transit - Express - Chaska - Chanhassen - Mpls (A)	2,167	23.4%	45.9%	2,040	2,829	19.6%	36.8%	1,530
698 SW Transit - Express - Chaska - Chanhassen - Mpls (B)	2,626	23.7%	39.9%	765	2,371	18.5%	41.6%	1,275
698 SW Transit - Express - Chaska - Chanhassen - Mpls (C)	0			0	2,853	19.4%	36.6%	765
698 SW Transit - Express - Chaska - Chanhassen - Mpls (D)	0			0	2,396	22.4%	40.6%	255
698 SW Transit - Express - Chaska - Chanhassen - Mpls (E)	1,423	32.3%	63.0%	255	0			0
699 SW Transit - Express - Chanhassen - Mpls (A)	1,469	25.8%	34.9%	1,530	1,039	20.7%	16.8%	1,275
699 SW Transit - Express - Chanhassen - Mpls (B)	1,010	26.0%	45.3%	510	1,346	18.5%	15.2%	765
699 SW Transit - Express - Chanhassen - Mpls (C)	1,443	19.4%	36.5%	255	0			0
699 SW Transit - Express - Chanhassen - Mpls (D)	769	19.2%	11.2%	255	0			0

Table 5.2 Low-Income and Minority Populations within 1/4 Mile of Proposed Service

Route	After (Inbound)			After (Outbound)				
	Population (within 1/4 mi)	Low Income	Minority	Trips (Annually)	Population (within 1/4 mi)	Low Income	Minority	Trips (Annually)
600	2,387	20.0%	35.2%	255	2,365	20.0%	35.5%	255
690 (A)	1,511	19.1%	39.6%	2,550	0			0
690 (B)	0			0	1,511	19.1%	39.6%	2,295
698	1,511	19.1%	39.6%	1,530	2,101	17.6%	42.7%	1,785

Table 5.3 Differences between Proposed and Existing Services

Route	Difference			Change Borne By Low Income	Change Borne by Minorities
	People-Trips (Population * Trips)	Low Income People-Trips	Minority People-Trips		
600	1,211,760	242,455	428,145	20.0%	35.3%
600 SW Transit - Flex Route	-1,325,490	-270,911	-483,735	20.4%	36.5%
602 SW Transit - Flex Route	-770,610	-147,542	-304,980	19.1%	39.6%
690 (A)	3,853,050	737,709	1,524,900	19.1%	39.6%
690 (B)	3,467,745	663,938	1,372,410	19.1%	39.6%
690 SW Transit - Express - Eden Prairie - Mpls (A)	-10,040,880	-3,139,347	-6,054,720	31.3%	60.3%
690 SW Transit - Express - Eden Prairie - Mpls (B)	-4,677,975	-1,048,124	-2,047,905	22.4%	43.8%
690 SW Transit - Express - Eden Prairie - Mpls (C)	-10,487,640	-2,685,497	-5,018,910	25.6%	47.9%
690 SW Transit - Express - Eden Prairie - Mpls (D)	-5,428,950	-897,510	-1,668,975	16.5%	30.7%
695 SW Transit - Express - Chaska - Chanhassen - Mpls	-7,282,545	-1,506,970	-3,071,475	20.7%	42.2%
697 SW Transit - Express - Carver - Chaska - Mpls (A)	-2,402,100	-429,345	-837,675	17.9%	34.9%
697 SW Transit - Express - Carver - Chaska - Mpls (B)	-1,115,625	-191,750	-372,555	17.2%	33.4%
698	6,062,115	1,102,115	2,516,085	18.2%	41.5%
698 SW Transit - Express - Chaska - Chanhassen - Mpls (A)	-8,749,050	-1,880,522	-3,622,530	21.5%	41.4%
698 SW Transit - Express - Chaska - Chanhassen - Mpls (B)	-5,031,915	-1,034,322	-2,060,910	20.6%	41.0%
698 SW Transit - Express - Chaska - Chanhassen - Mpls (C)	-2,182,545	-424,020	-797,895	19.4%	36.6%
698 SW Transit - Express - Chaska - Chanhassen - Mpls (D)	-610,980	-136,660	-248,115	22.4%	40.6%
698 SW Transit - Express - Chaska - Chanhassen - Mpls (E)	-362,865	-117,321	-228,480	32.3%	63.0%
699 SW Transit - Express - Chanhassen - Mpls (A)	-3,572,295	-854,415	-1,008,015	23.9%	28.2%
699 SW Transit - Express - Chanhassen - Mpls (B)	-1,544,790	-324,801	-390,405	21.0%	25.3%
699 SW Transit - Express - Chanhassen - Mpls (C)	-367,965	-71,327	-134,130	19.4%	36.5%
699 SW Transit - Express - Chanhassen - Mpls (D)	-196,095	-37,632	-21,930	19.2%	11.2%
All Changes (both directions)	-51,555,645	-12,451,799	-22,531,800	24.2%	43.7%

Table 5.4 Delta Values for Proposed Service Change

	Low Income	Minority
Change Borne By	24.2%	43.7%
Area Average	11.4%	21.8%
Delta	12.8%	21.9%

Overall, the March 23, 2020 service reductions serve an overall lower percentage of both low-income and minority populations than the Pre-Covid service. Furthermore the changes borne by low-income populations was 12.8%, which is well within the parameters set in SouthWest Transit’s Disproportionate Burden policy. The changes borne by minority populations was 21.9%, which does represent a disparate impact as it falls outside of the 20% limit set forth in the SouthWest Transit Disparate Impact policy.

Disparate Impact Analysis

SouthWest Transit’s policy states that a disparate impact occurs when the minority population adversely affected by a fare or service change is 20% more than the average minority population of SouthWest Transit’s service area. An adverse effect is defined in the Major Service Change Policy as a geographical or time-based reduction in service which includes but is not limited to: span of service changes,

frequency changes, route segment elimination, re-routing, or route elimination. SouthWest Transit's policy states that a disparate impact occurs when the minority population adversely affected by a fare or service change is 20% more than the average minority population of SouthWest Transit's service area. In this case, there were adverse effects identified due to the service reductions on March 23, 2020. Change borne by minority populations due to the service change is 43.7% while the area average is 21.8%, giving the overall delta a value of 21.9%. Normally, SWT would re-evaluate such a service change, however, based on the rapid decline in ridership in March 2020, the plan to reduce service on March 23, 2020, was developed and determined to be the only option to be good stewards of tax payer dollars and to provide both safe and cost-effective service. SWT had to respond to the pandemic in an extremely expedited fashion and therefore alternates could not be analyzed.

Disproportionate Burden Analysis

SouthWest Transit's policy states that a disproportionate burden occurs when the low-income population adversely affected by a fare or service change is 20% more than the average low-income population of SouthWest Transit's service area. An adverse effect is defined in the Major Service Change Policy as a geographical or time-based reduction in service which includes but is not limited to: span of service changes, frequency changes, route segment elimination, re-routing, or route elimination. In this case, there was no adverse effect identified due to the reduction in service on March 23, 2020. Changes borne by low-income populations due to the reduction in service is 24.2% while the area average is 11.4%. Overall delta value for the service change is 12.8%.

Exhibit M – Documentation of Public Outreach Efforts

March 23, 2020 Service Reductions

Effective March 23, 2020, service reductions were put in place in response to the COVID-19 pandemic. Riders were notified via rider notices posted in park and ride lobbies, driver announcements, the SWT website, and on SWT's Facebook and Twitter.

Rider Notice

Issued: 3/19/2020

Reduced Service Schedule

Effective Monday, March 23rd

This service will be in effect until further notice.

Service Changes Include (See reverse for detailed schedule):

- Service from Carver Station and Chanhassen Transit Station will be suspended until further notice.
- Routes after 6:22pm will be suspended until further notice.
- Route 690V will provide service to/from SouthWest Station, SouthWest Village, East Creek Station, and Downtown Minneapolis.
- Route 698A will provide service to/from SouthWest Station, SouthWest Village, East Creek Station, Downtown Minneapolis, and the University of Minnesota.
- Reverse commute trips will be provided with route 600 in the morning and route 600L in the afternoon.
 - o Route 600L provides limited service to East Creek Station, SouthWest Village, SouthWest Station, Optum Campus, and Downtown Minneapolis.

Please see other side of notice for schedule information.

www.swtransit.org - 952-949-2BUS (2287) - customerservice@swtransit.org

Eastbound	East Creek		SW Village		SW Station		Dodge Ave & 15th St		Dodge Ave & Washington		Anderson Hall (West End)		Dodge Ave & Chanhassen	
	AM	AM	AM	AM	AM	AM	AM	AM	AM	AM	AM	AM	AM	AM
690V	6:25 AM	6:36 AM	6:45 AM	6:54 AM	7:03 AM	7:12 AM	7:21 AM	7:30 AM	7:39 AM	7:48 AM	7:57 AM	8:06 AM		
690V	6:45 AM	6:56 AM	7:05 AM	7:14 AM	7:23 AM	7:32 AM	7:41 AM	7:50 AM	7:59 AM	8:08 AM	8:17 AM	8:26 AM		
690V	6:50 AM	7:01 AM	7:10 AM	7:19 AM	7:28 AM	7:37 AM	7:46 AM	7:55 AM	8:04 AM	8:13 AM	8:22 AM	8:31 AM		
690V	6:15 AM	6:26 AM	6:35 AM	6:44 AM	6:53 AM	7:02 AM	7:11 AM	7:20 AM	7:29 AM	7:38 AM	7:47 AM	7:56 AM	8:05 AM	8:14 AM
698A	6:25 AM	6:35 AM	6:45 AM	6:55 AM	7:05 AM	7:15 AM	7:25 AM	7:35 AM	7:45 AM	7:55 AM	8:05 AM	8:15 AM	8:25 AM	8:35 AM
690V	6:35 AM	6:45 AM	6:55 AM	7:05 AM	7:15 AM	7:25 AM	7:35 AM	7:45 AM	7:55 AM	8:05 AM	8:15 AM	8:25 AM	8:35 AM	8:45 AM
690V	6:45 AM	6:55 AM	7:05 AM	7:15 AM	7:25 AM	7:35 AM	7:45 AM	7:55 AM	8:05 AM	8:15 AM	8:25 AM	8:35 AM	8:45 AM	8:55 AM
698A	7:00 AM	7:10 AM	7:20 AM	7:30 AM	7:40 AM	7:50 AM	8:00 AM	8:10 AM	8:20 AM	8:30 AM	8:40 AM	8:50 AM	9:00 AM	9:10 AM
690V	7:15 AM	7:25 AM	7:35 AM	7:45 AM	7:55 AM	8:05 AM	8:15 AM	8:25 AM	8:35 AM	8:45 AM	8:55 AM	9:05 AM	9:15 AM	9:25 AM
698A	7:30 AM	7:40 AM	7:50 AM	8:00 AM	8:10 AM	8:20 AM	8:30 AM	8:40 AM	8:50 AM	9:00 AM	9:10 AM	9:20 AM	9:30 AM	9:40 AM
698A	7:45 AM	7:55 AM	8:05 AM	8:15 AM	8:25 AM	8:35 AM	8:45 AM	8:55 AM	9:05 AM	9:15 AM	9:25 AM	9:35 AM	9:45 AM	9:55 AM
690V	8:00 AM	8:10 AM	8:20 AM	8:30 AM	8:40 AM	8:50 AM	9:00 AM	9:10 AM	9:20 AM	9:30 AM	9:40 AM	9:50 AM	10:00 AM	10:10 AM
698A	8:15 AM	8:25 AM	8:35 AM	8:45 AM	8:55 AM	9:05 AM	9:15 AM	9:25 AM	9:35 AM	9:45 AM	9:55 AM	10:05 AM	10:15 AM	10:25 AM
698A	8:30 AM	8:40 AM	8:50 AM	9:00 AM	9:10 AM	9:20 AM	9:30 AM	9:40 AM	9:50 AM	10:00 AM	10:10 AM	10:20 AM	10:30 AM	10:40 AM
690V	8:45 AM	8:55 AM	9:05 AM	9:15 AM	9:25 AM	9:35 AM	9:45 AM	9:55 AM	10:05 AM	10:15 AM	10:25 AM	10:35 AM	10:45 AM	10:55 AM
690V	10:15 AM	10:25 AM	10:35 AM	10:45 AM	10:55 AM	11:05 AM	11:15 AM	11:25 AM	11:35 AM	11:45 AM	11:55 AM	12:05 PM	12:15 PM	12:25 PM
698A	11:15 AM	11:25 AM	11:35 AM	11:45 AM	11:55 AM	12:05 PM	12:15 PM	12:25 PM	12:35 PM	12:45 PM	12:55 PM	1:05 PM	1:15 PM	1:25 PM

Westbound	Chanhassen & Chanhassen		Anderson Hall (West End)		Dodge Ave & 15th St		Dodge Ave & Washington		SW Station		SW Village		East Creek	
	PM	PM	PM	PM	PM	PM	PM	PM	PM	PM	PM	PM	PM	PM
698A	12:20 PM	12:25 PM			12:32 PM	12:37 PM	12:47 PM	1:07 PM	1:17 PM					
690V					1:28 PM	1:33 PM	1:37 PM	2:07 PM	2:17 PM					
698A	2:20 PM	2:25 PM			2:32 PM	2:37 PM	2:47 PM	3:07 PM	3:17 PM					
690V					3:28 PM	3:32 PM	3:37 PM	4:07 PM	4:17 PM					
690V					3:41 PM	3:45 PM	3:50 PM	4:20 PM	4:30 PM					
698A	3:45 PM	3:50 PM			3:57 PM	4:02 PM	4:12 PM	4:32 PM	4:42 PM					
690V					4:01 PM	4:05 PM	4:10 PM	4:40 PM	4:50 PM					
690V					4:08 PM	4:12 PM	4:17 PM	4:47 PM	4:57 PM					
698A	4:15 PM	4:20 PM			4:27 PM	4:32 PM	4:42 PM	5:02 PM	5:12 PM					
690V					4:42 PM	4:47 PM	4:57 PM	5:17 PM	5:27 PM					
698A	4:45 PM	4:50 PM			4:57 PM	5:02 PM	5:12 PM	5:32 PM	5:42 PM					
690V					5:08 PM	5:12 PM	5:17 PM	5:47 PM	5:57 PM					
698A	5:15 PM	5:20 PM			5:27 PM	5:32 PM	5:42 PM	6:02 PM	6:12 PM					
690V					5:38 PM	5:42 PM	5:47 PM	6:17 PM	6:27 PM					
690V					5:53 PM	5:57 PM	6:02 PM	6:32 PM	6:42 PM					
698V	6:22 PM	6:27 PM			6:34 PM	6:39 PM	6:49 PM	7:09 PM	7:19 PM					

Reverse Commute														
Westbound	University Drive		Dodge Ave & 15th St		Dodge Ave & Washington		SW Station		SW Village		East Creek		East Creek	
	AM	AM	AM	AM	AM	AM	AM	AM	AM	AM	AM	AM	AM	AM
600	6:55 AM	6:50 AM	6:57 AM	7:11 AM	7:15 AM	7:22 AM								

Eastbound	East Creek		SW Village		SW Station		Dodge Ave & 15th St		Dodge Ave & Washington	
	PM	PM	PM	PM	PM	PM	PM	PM	PM	PM
600L	3:50 PM	4:00 PM	4:10 PM	4:17 PM	4:25 PM	4:35 PM	4:40 PM			

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Exhibit N – SWT Commission Approval of Major Service Change and Disparate Impact/Disproportionate Policies



**SOUTHWEST TRANSIT COMMISSION
RESOLUTION #22-16
Major Service Change and Disparate Impact/Disproportionate Burden Policies**

WHEREAS, SouthWest Transit (SWT) operates as a Joint Powers entity established by the Cities of Eden Prairie, Chaska and Chanhassen to provide transit services under the laws of the State of Minnesota including Minnesota Statute Sections 473.384, 473.388 and Statute 471.59; and

WHEREAS, the Major Service Change policy establishes the threshold that defines a major service change;

WHEREAS, the Disparate Impact/Disproportionate Burden policy establishes the threshold which identifies when adverse effects of a major service change or any fare change are borne disproportionately by minority and low-income populations;

WHEREAS, the proposed changes to the Major Service Change policy adds service changes caused by Public Health Crises to be exempt from being defined as a major service change;

NOW THEREFORE, BE IT RESOLVED that the SWT Commission adopts resolution 22-16 approving of the updates to the Major Service Change and Disparate Impact/Disproportionate Burden Policies.

ADOPTED by the Commission of SouthWest Transit on June 23, 2022.


Mike Huang, Chairperson

ATTEST:


Matt Fyten, Interim Chief Executive Officer