SunTran

TITLE VI PROGRAM

2023–2026

Updated July 2023

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INTRODUCTION

Existing public transportation services in Marion County include both fixed-route and paratransit services. SunTran, the fixed-route bus system, is governed by the City of Ocala. Marion Transit Services, the Transportation-Disadvantaged (TD) service provider in Marion County, contracted through RATP Dev to provide ADA paratransit service for SunTran. The City of Ocala is the administrative agency for SunTran and has contracted with RATP Dev to perform day-to-day operations and management for the system. SunTran has been operating since 1998 and currently operates a fixed-route system six days per week.

The City of Ocala is submitting this report/program to the Federal Transit Administration (FTA) to satisfy the following objectives:

- Ensure that federally assisted benefits and related benefits are made available and are equitably distributed.
- Ensure that the level and quality of public transportation service is provided in a nondiscriminatory manner.
- Promote full and fair participation in public transportation decision-making without regard to race, color, or national origin.
- Ensure that placement of transit services and facilities are equitable.
- Provide procedures for investigating Title IV complaints
- Ensure meaningful access to transit-related programs and activities by persons with limited English proficiency.
- Ensure the public of their rights under Title VI.

This program update for 2023-2026 has been prepared pursuant to Title VI of the Civil Rights Act of 1964 and FTA Circular 4702.1B, "Title VI Requirements and Guidelines for Federal Transit Administration Recipients," published October 1, 2012. This update also summarizes the City of Ocala's transit service provisions since the last program was approved in January 2020 and provides compliance with all parameters of the Title VI Compliance Checklist for transit providers operating fixed-route transit service.

Title VI Program Checklist

Table 1 identifies the Title VI Program reporting requirements as described in FTA Circular 4702.1B and notes the associated page numbers in this report. The checklist follows the outline found in the circular and includes general requirements for all recipients of Federal funding assistance and all fixed-route transit and paratransit providers.

Table 1 Federal Title VI Program Checklist

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REQUIREMENT TO PROVIDE TITLE VI ASSURANCES

In accordance with Title 49 of the Code of Federal Regulations (CFR) Section 21.7(a), Federal Transit Administration (FTA) grantees must provide assurance that the grantee will comply with U.S. Department of Transportation (USDOT) Title VI regulations.

City of Ocala fulfilled this requirement when it submitted its annual Certifications & Assurances to FTA in 2021, the text of which is available on the City of Ocala website at https://www.ocalafl.org/home/showpublisheddocument/2334/637546107082200000.

TITLE VI PROGRAM POLICY STATEMENT

The City of Ocala values diversity and welcomes input from all interested parties, regardless of cultural identity, background, or income level. Moreover, the city does not tolerate discrimination in any of its employment practices, programs, services, or activities. The City of Ocala will not exclude participation in, deny the benefits of, or subject to discrimination anyone on the grounds of race, color, national origin, sex, age, disability, religion, or familial status.

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).Implementation of the Title VI Program is accorded the same priority as compliance with all other legal obligations incurred by City of Ocala and SunTran in its financial assistance agreements with USDOT.

To request a copy of City of Ocala's & SunTran 's Title VI Program, contact SunTran at (352) 401-6999 or the City of Ocala at (352) 401-3986. Any persons who believe they have been discriminated against under Title VI have the right to file a formal complaint no later than 60 calendar days of the alleged discrimination. Individuals and organizations may file a complaint with the FTA Office of Civil Rights at https://www.transit.dot.gov/title6 or by completing the City of Ocala and SunTran Title VI complaint form on the City's website and/or SunTran's website. The complaint form should be completed, signed, and sent to:

Devan Kikendall
Human Resources & Risk Management Director
City Hall
110 SE Watula Avenue
Ocala FL 34471
Phone: (352) 401-3986
Fax: (352) 401-6942
E-mail: dkikendall@ocalafl.gov

MAJOR ACCOMPLISHMENTS SINCE THE 2020 TITLE VI SUBMITTAL

The City of Ocala has made the following improvements to the system in accordance with FTA regulations since the submission of last Title VI:

- **New Bus Vehicle Purchase** – Thanks to the Coronavirus Aid, Relief, and Economic Security Act (CARES Act), the City of Ocala could take this opportunity to bring in seven new 35-foot diesel bus vehicles in 2020 and two cutaway vehicles in 2019 to replace the bus vehicles beyond their life span. The new bus vehicles were critical to enhance the system safety and customer riding experience.

- **SunTran Route Redesign Study** – A major Suntran Route Redesign Study was performed in June 2021 to address the operational and service issues such as continuously declining ridership, downgraded service performance, reduced customer satisfaction levels, among other things. The study resulted in an overhaul of the system network. In October 2021, the redesigned transit network was initiated that represented a "figure eight" core transit network, including Green, Orange, Blue, and Purple routes, with supporting routes that include Silver, Red, and Yellow Routes. Since the implementation of this major route changes, the ridership decline trend reversed in the first half of FY 2023 and ridership continues to grow. The system also saw the improvement in customer service levels. It is expected that the FY 2023 will have higher ridership than FY 2021.

- **SunTran FY 2023 – FY 2032 Transit Development Plan (TDP) Major Update** – The TDP is a strategic document to guide transit agencies in the system improvement for the 10-year planning horizon. It is also required by Florida Department of Transportation (FDOT) to receive its state block funding. The SunTran TDP will provide a roadmap for how to improve and build upon Marion County's transit system over the next 10 years, providing a plan for transit and mobility needs, cost and revenue projections, and community transit goals, objectives, and policies. The major outcome of this TDP is to electrify the entire transit fleet and introduce "on-demand" microtransit as a supplementary transit mode to SunTran fixed-route services within the next 10 years.

- **SunTran Bus Stop Shelter Improvements** – The FY2017 – FY2022 Transit Development Plan Major Update identified continuous improvement of infrastructure at bus stops, including benches, shelters, bicycle storage facilities, and other infrastructure needed to improve the rider experience at bus stops and the potential for attracting new riders and allocated $50,000 in average annually to support this capital improvement. SunTran is currently working on an FTA Supergrant (FY2019 – FY2021 FTA 5307 Consolidated Grant) to secure funding to make bus shelter improvements to select stops. In the meantime, a site plan of each select bus stop for bus shelter improvement was being developed and submitted to FDOT for approval. The City of Ocala expects the construction phase of this project will start in 2024.

- **SunTran Administrative & Maintenance Facility Renovation** – The administrative & maintenance facility of SunTran is located on the City of Ocala Annex property at 1805 NE 30th Ave, Building

900, Ocala, Florida. This building was built in 2005 and is divided into administrative (main) and maintenance (side) buildings. The latest SunTran Transit Asset Management Plan (TAMP) identified the deteriorated or defective condition on Finishes, materials used on walls, floors, and ceilings, HVAC, and parking lots. To protect this asset and improve the use experience of this facility, the City of Ocala began to innovate this facility starting on June 19, 2023. The whole project is expected to be finished within 75-day period according to the contract.

GENERAL REQUIREMENTS

The following information addresses Title VI general reporting requirements, as described in FTA Circular 4702.1B.

Title VI Notice to the Public

A Title VI Notice to the Public must be displayed to inform a recipient's customers of their rights under Title VI. At a minimum, recipients must post the notice on the agency's website and in public areas of the agency's office(s). The City of Ocala and SunTran has a Notice to the Public displayed on its website and on buses. The City of Ocala and SunTran's Notice to the Public can be found in **Appendix A**.

The City of Ocala and SunTran provides a Title VI page on its website, as well as this Title VI plan to inform individuals regarding the Title VI policies, and procedures. The City of Ocala provides the following notice of nondiscrimination on all its plans, documents, studies, and websites.

TITLE VI STATEMENT

The City of Ocala / SunTran complies with the Americans with Disabilities Act of 1990, Section 504 of the Rehabilitation Act of 1973, Title VI of the Civil Rights Act of 1964 and other federal equal opportunity laws and therefore does not discriminate on the basis of race, sex, color, age, national origin, religion or disability, in admission or access to and treatment in City programs and activities, as well as the City's hiring or employment practices. Title VI complaints related to City programs may be directed to Devan Kikendall, Human Resources & Risk Management Director, City of Ocala, City Hall, 110 SE Watula Avenue, Ocala FL 34471, Phone: (352) 401-3986, Fax: (352) 401-6942, E-mail: dkikendall@ocalafl.gov.

Free language assistance for Limited English Proficiency individuals is available upon request by contacting the City of Ocala at (352) 629-8205

In addition, Title VI information (posters, flyers, etc.) will be displayed in the SunTran administration facilities, as the City of Ocala administers SunTran services.

Title VI Complaint Procedures

The following Title VI complaint procedures are posted on the City of Ocala and SunTran website.

1. Verbal & Non-Written Complaints

   Any person who believes that he or she, or any specific class of persons, has been subjected to discrimination or retaliation by SunTran staff may file a verbal or written complaint no more than 180 days after the alleged incident, as such actions are prohibited by Title VI of the Civil Rights Act of 1964.

   Verbal and non-written complaints received by the City of Ocala shall be resolved by the Transit Manager. The Transit Manager will acknowledge receipt of the complaint(s) and within ten (10) calendar days inform the Complainant in writing of any action taken or proposed action to address the complaint(s). If actions that have been taken or are proposed to be taken to resolve the situation are not satisfactory to the Complainant, the Transit Manager will advise the Complainant to file a written complaint in the manner outlined in the Written Complaint Section.

   The City of Ocala will maintain a log of all verbal and non-written complaints received by the agency. The log will include all of the following information:

   - Name and mailing address of Complainant.
   - Name of Respondent.
   - Basis of complaint (i.e., race, color, national origin, sex, age, disability, religion, familial status, or retaliation).
   - Date verbal or non-written complaint(s) was/were received.
   - Explanation of the complaint and the actions that have been taken or are proposed to resolve the issue raised in the complaint.

2. Written Complaints

   If the Complainant does not feel that verbal or non-written procedures have satisfactorily resolved the complaint, or if at any time the Complainant files a written complaint no more than 180 days after the alleged incident, the Transit Manager shall refer the Complainant to the FDOT District Five Title VI Coordinator for processing in accordance with approved State procedures. Additionally, the Transit Manager shall advise the Complainant of other avenues of redress that are available, such as the Florida Department of Transportation's Equal Opportunity Office (EOO). Additionally, if the Transit Manager has previously investigated the complaint, the Transit Manager will provide a copy of the reported finding and proposed disposition to the FDOT District Five Title VI Coordinator.

   All written complaints received by the City of Ocala shall be immediately referred by the Transit Manager to the FDOT District Five Title VI Coordinator. The Transit Manager will advise the FDOT District Five Title VI Coordinator within five (5) calendar days of the receipt of the complaint. The following information will be included in every notification to the FDOT District Five Title VI Coordinator:

- Name, address, and phone number of the Complainant.
- Name(s) and address(es) of the Respondent.
- Basis of complaint (i.e., race, color, national origin).
- Date of alleged discriminatory act(s).
- Date of complaint received by the City of Ocala.
- A statement of the complaint.
- Other agencies (state, local, or federal) where the complaint has been filed.
- An explanation of the actions the Transit Manager has taken to or proposed to resolve the complaint(s).

Title VI Complaint Form

The City of Ocala and & SunTran 's Title VI complaint form is available in English and Spanish, on the City of Ocala and & SunTran 's webpage at https://www.ocalafl.gov/government/city-departments-i-z/suntran/about-us/title-vi-policy. The English and Spanish versions of the form can be found in **Appendix B**.

List of Active Title VI Investigations, Complaints, and Lawsuits

Members of the public who feel they have been discriminated against based on race, color, national origin, age, gender, or disability are afforded the opportunity to have their concern documented through the City of Ocala and & SunTran and are encouraged to convey their concern via written communication; however, they may use direct telephone communication with the City of Ocala and & SunTran Civil Rights Liaison. Complaints are documented and tracked for investigation. Once the investigation is completed, the customer is notified of the outcome of the investigation. The staff of the City of Ocala will maintain a log of all verbal and non-written complaints received by the agency. The log will include all the following information:

- Name of Complainant.
- Name of Respondent.
- Basis of complaint (i.e., race, color, national origin, sex, age, disability, religion, familial status, or retaliation).
- Date complaint received.
- Explanation of the complaint and the actions that have been taken or are proposed to resolve the issue raised in the complaint.

In addition, you can find a complaint log in **APPENDIX D.** However, to date there have been no complaints, investigations, or lawsuits regarding Title VI discrimination. RATP Dev, the contractor hired by the City of Ocala to be responsible for the day-to-day operations of the fixed routes, was also actively monitoring the Title VI complaints.

Had there been any complaints received they would have been given the highest priority and thoroughly investigated to ensure that any substantiated complaint is addressed in an appropriate manner. Follow-up actions are taken to correct discriminatory actions and prevent future discriminatory policies, practices, and environments

Civil Rights Compliance Review Activities

In 2021, FDOT conducted a Triennial Review of the City of Ocala and SunTran for compliance with the FDOT regulations for providing public transportation services and for receiving State Public Transportation Grant funds. Results of the review were transmitted to the City of Ocala by FDOT with corrective actions on specific review areas. There is no Civil Rights Compliance issue identified in this Triennial Review, which is closed on June 9, 2021. Currently, the FY 2022 FTA Triennial Review is undergoing with the City of Ocala and SunTran. This review started at the end of 2022 and is expected to be closed by the end of 2023.

Demographics for the Ocala/Marion Service Area

The SunTran system operates in the City of Ocala and surrounding areas in Marion County. Marion County has a population of 396,415 as of July 1, 2022, based on the U.S. Census latest estimated number.

Marion County has experienced a higher percentage increase in its total population and a lower percentage increase in its elderly population than the State of Florida. The County has experienced an increase in total population of 12.4%, and an increase of 13.8% for its aging population from 2015 to 2021. Whereas, the State of Florida has had a total population increase of 7.4%, and an increase of 16.3% for its aging population from 2015 to 2021. The following table highlights the population percentage increases mentioned above:

Table 2:Population and Elderly for Marion County and Florida (2015 – 2021)

	2015		2021		Percent Change (2015–2021)	
	Marion County	Florida	Marion County	Florida	Marion County	Florida
Total Population	343,254	20,271,272	385,915	21,781,128	12.4%	7.4%
65 & Older	97,141	3,952,898	110,581	4,598,996	13.8%	16.3%

Source: 2015 & 2021 American Community Survey 1-year Estimate.

The County has experienced a higher percentage of growth with total population since the year 2015, compared to the State of Florida as mentioned earlier. Table 3 shows the racial change details for Marion County and Florida from 2015 to 2021. Important to note is that the Hispanic or Latino origin (of any race) for Marion County increased about 22 percent, compared with 10.5% for Florida, from 2015 to 2021. This indicates that these traditionally underserved communities are in a faster growth pace compared with the State of Florida, which required the increasing needs and effort to interact with these communities.

Table 3: Racial Distribution Changes for Marion County and Florida (2015 - 2021)

	2015		2021		Percent Change (2015–2021)	
	Marion County	Florida	Marion County	Florida	Marion County	Florida
One Race	97.8%	97.6%	93.9%	90.6%	-4.0%	-7.2%
White	81.7%	76.0%	77.6%	67.7%	-5.0%	-10.9%
Black	12.9%	16.1%	12.6%	15.7%	-2.3%	-2.5%
American Indian and Alaska Native	0.3%	0.3%	0.3%	0.3%	0.0%	0.0%
Asian	1.5%	2.6%	1.5%	2.8%	0.0%	7.7%
Native Hawaiian and Other Pacific Islander	0.0%	0.1%	0.0%	0.1%	0.0%	0.0%
Some other races	1.3%	2.5%	1.8%	4.1%	38.5%	64.0%
Two or more races	2.2%	2.4%	6.1%	9.4%	177.3%	291.7%
Hispanic or Latino origin (of any race)	11.7%	23.7%	14.3%	26.2%	22.2%	10.5%
White alone, not Hispanic or Latino	72.4%	56.1%	68.9%	52.6%	-4.8%	-6.2%
Total Population	**336,811**	**19,645,772**	**370,372**	**21,339,762**	**10.0%**	**8.6%**

Source: 2011-2015 & 2017-2021 American Community Survey 5-Year Estimates.

Public Participation Plan

Based on the FTA requirements, recipients must promote inclusive public participation by integrating content from Title VI, the Executive order on LEP, and the USDOT LEP Guidance into a public participation plan or process. The document must explicitly describe the proactive strategies, procedures, and desired outcomes that underpin the recipient's public participation activities. The City of Ocala and SunTran follows the Marion-Ocala County Transportation Planning Organization's (TPO) Public Participation Plan (PPP) and completes additional public involvement activities to ensure that a wider range of opportunities is available for all persons to provide feedback on public transportation service. The City of Ocala and SunTran process has been designed to obtain a wide range of input from the community of both users and non-users. The PPP, last updated in December 28,2020, with a resolution signed, is provided on the of the Ocala-Marion County TPO website at https://ocalamariontpo.org/plans-and-programs/public-participation-plan-ppp/.

The City of Ocala and SunTran recognizes that, in compliance with Title VI, public involvement activities must focus on low- income and minority populations, thereby ensuring access to the transportation planning process for these populations through its public involvement process. As part of the City of Ocala and SunTran's public outreach process, all meeting notices, press releases, and public service

announcements are translated into other languages, as requested, or needed, based on documentation of previous requests. The City of Ocala works toward incorporating a vast and diverse array of public participation throughout the planning process. This includes engaging our minority and Limited English Proficiency (LEP) populations to receive input and working diligently to increase awareness of the planning process for all our residents throughout the planning area.

The Public Involvement Plan (PIP) includes various goals, and objectives to increase public involvement with the transportation planning process. This includes various outreach strategies such as, public forums, community meetings, project specific websites, and updating the City's website. The strategies include holding these outreach events, activities, and meetings in locations that are accessible to all individuals.

Public Outreach Techniques

In accordance with the FTA guidance on Public Participation, the following techniques are used to solicit feedback and input from the public, including minority, low-income, and LEP populations.

Formal Public Review and Comment Period

A formal public review and comment period is required prior to adoption of plans and programs or prior to fare changes and major service changes by the City of Ocala. During this time, the public is encouraged to review the document and provide comments about the information presented. Public comments received that are specific to a planning activity are included in the record of the plan or program that they reference. However, members of the public may submit general comments to the City of Ocala at any time. During the comment period, draft documents are available on Ocala-Marion County's website and in hard copy by contacting Marion County directly. Unless required otherwise, City of Ocala and SunTran uses a 30-day public comment period.

Comment Forms, Surveys, and Questionnaires

The City of Ocala and SunTran uses public comment forms, surveys, and questionnaires to allow citizens to provide their opinions and suggestions concerning specific transportation planning activities. Throughout development of the Transit Development Plan (TDP), for example, the public is encouraged to be involved in the various plan development phases and comment forms, surveys, and questionnaires are used throughout the process.

Public Hearing

A public hearing is held to close out the public comment period for a plan, program, or proposed fare or service changes that has undergone a review and comment period. The public hearing is held during the City Council meetings, at which members of the public are able to make formal comments. All comments received during the public comment period and at the public hearing are included in the project record and considered prior to adoption by the City of Ocala.

City of Ocala Website

Information regarding events such as public meetings is provided on the City of Ocala's website at https://www.ocalafl.gov/ . The City of Ocala and SunTran staff provide the material for the city website to keep all interested citizens informed on activities of the City of Ocala and SunTran, including meeting schedules and links to agendas, newsletters, and a calendar of meetings. The SunTran website allows translation of the site to over 100 languages to significantly remove language as a barrier to access, and to help accommodate the navigation, and awareness of SunTran-related events, activities, and meetings.

Social Media Network

The City of Ocala connects with the community through the use of social media channels such as Facebook (https://www.facebook.com/cityofocalafl). This platform is used to regularly inform City of Ocala and SunTran users, the community, and those interested in learning more about activities, plans, and programs. In addition, SunTran riders can plan a trip or track the schedule of the buses by route by accessing the following website: https://realtimesuntran.availtec.com/InfoPoint.

Flyers, Fact Sheets, or Other Informational Items

Collateral materials such as brochures, flyers, or fact sheets are used to inform the public of major milestones during transportation planning activities and to assist the members of the public in making informed decisions.

Public Workshops

Public workshops are useful in providing to interested parties that are not knowledgeable about the transportation planning process an opportunity to learn firsthand the background, expected outcomes, and additional information about specific projects or plans. Materials provided at the workshops may include maps, fact sheets, project documents, newsletters, questionnaires or surveys, and other related project materials. Locations are identified that target specific citizen input based on geographical locations within the county, minority and income statistics, or other attributes that may improve the results of the public outreach effort.

City Hall Meetings

The City of Ocala partners with different governmental agencies to hold city hall meetings, informal public meetings that give the members of a community an opportunity to discuss emerging issues and voice concerns and preferences for their community. These meetings include citizens and officials and provide an opportunity to talk personally in a relaxed environment about issues that are of importance in their community.

Media Relations

The city uses regionally distributed and local newspapers, special mailings through utility bills, and other methods to inform the public about various transportation projects. This has is proven to be an efficient way to engage the community and provide a simple background on the transportation planning process and project recommendations, emphasize the significance to the average resident, and provide information on how the public can provide their comments and how to get involved.

The City of Ocala places advertisements and coordinates with media contacts through newspapers such as the Ocala Star Banner, Ocala Evening Star, Ocala Post, Peddler's Paper, Voice of South Marion, etc.

Project-Level Public Participation and Outreach Activities

Since the submittal of the last Title VI report, the City of Ocala has conducted extensive public outreach efforts on two major projects, including 2021 SunTran Route Redesign Study and FY 2023 – FY 2032 TDP Major Update. Below is a list of major public involvement activities used in these two projects:

- Public Meetings (Open House, Town Hall, TPO Technical/Citizen Advisory Committee meetings, city council meeting)
- Surveys (On-board surveys, bus operator survey, non-user surveys, stakeholder interview surveys)
- Local Media Announcement (Newspaper release, local news broadcast)
- Social Media Outreach (SunTran webpage, Facebook, twitter)
- Printed Material Outreach (On-bus signs, yard signs, postcards)

LEP populations were provided sufficient opportunities to get involved during the planning process. For example, surveys were made available in English and Spanish versions online for users and non-users to provide their feedback. Public meetings were held at the locations where the high concentrations of LEP populations exhibited. The extensive outreach efforts conducted in these two projects resulted in a complete overhaul of the SunTran transit network, which was implemented in October 2021, and a 10-year TDP implementation plan that guides SunTran's pathway to better serve the local communities within Marion County. More details can be found in Section "MAJOR ACCOMPLISHMENTS SINCE THE 2020 TITLE VI SUBMITTAL"

Program of Projects

City of Ocala and SunTran's List of Priority Projects (LOPP) is completed on an annual cycle as part of the Transportation Improvement Program (TIP) adopted by the Ocala/Marion County TPO. The first step creates a multimodal list of priority projects to be completed in the next five years and begins in March/April. The LOPP is presented to the TPO Committees and ultimately is adopted by the Board each June, with a transmittal deadline of June 30th to the Florida Department of Transportation (FDOT). The LOPP is used as input for development of FDOT's Tentative Five-Year Work Program (and, ultimately, the

State's Transportation Improvement Program or STIP) for consideration as part of the statewide funding allocation process. The FDOT Work Program also has a public review and comment period in October, which leads to a public hearing and approval of a Final FDOT Work Program and a final TPO TIP and LOPP, which moves forward into the TPO's TIP for next year. The LOPP is adopted in June of the following year and is used to develop the next draft of the final TIP document. This cycle recurs in March/April for the next cycle of development of the LOPP. It should be noted that the public participation process for the TIP document also satisfies the City of Ocala's public participation requirements for the FTA Section 5307 Program of Projects (POP).

Meaningful Access to LEP Persons

Executive Order 13166, *Improving Access to Services for persons with Limited English Proficiency (LEP)*, was signed by President Clinton in August 2000, which directs each federal agency to examine the services it provides and develop and implement a system by which LEP persons can meaningfully access those services. Failure to ensure opportunities for LEP persons to effectively participate in or benefit federally assisted programs may constitute national origin discrimination.

As a public transportation provider receiving Federal funding from FTA, the City of Ocala and SunTran has a responsibility under Title VI of the Civil Rights Act of 1964 to take reasonable steps to ensure that LEP persons have meaningful access to benefits, services, information, and other important programs and activities provided by the City of Ocala and SunTran. LEP persons include individuals who have a limited ability to read, write, speak, or understand English. This includes conducting a "four-factor analysis" to determine the specific language services that are appropriate to provide as part of the recipient's Language Assistance Plan.

Four-Factor Analysis

The four-factor analysis includes four steps that assist transit agencies in developing a cost-effective mix of language assistance measures. The factors that should be considered during the LEP needs assessment include:

1. Number or proportion of LEP persons eligible to be served or likely to be encountered by the program or recipient.
2. Frequency with which LEP persons come into contact with the service.
3. Nature and importance of the program, activity, or service provided to people's lives.
4. Resources available to recipient for LEP outreach, as well as costs associated with the outreach.

Factor 1 – Number or proportion of LEP persons eligible to be served or likely to be encountered by program or recipient.

The number and proportion of LEP persons within the Marion County was assessed using the 2017–2021

American Community Survey (ACS) Five-Year Estimates to determine the number of people who speak English less than "very well" for Marion County as a whole and for each Census Tract within the City of Ocala and SunTran service area.

Table 2 provides a breakdown of the race and languages spoken in Marion County. As shown in this table, multiple languages are now tabulated under unique ACS categories. For example, Other Indo-European languages may include Frisian, German, Dutch, Scots, Danish, Swedish, and etc. and this grouping of languages makes it difficult to determine which foreign languages to target for translation and thereby provide enhanced LEP access. The Title VI Safe Harbor provision stipulates that agencies provide 5% or 1,000 persons of the total population of persons eligible to be served. As a result, the City of Ocala and SunTran target Spanish speakers as the predominant LEP population for assistance and is obligated to provide written translations of vital documents under the Safe Harbor Stipulation. Overtime, the city will continue to monitor customer service requests for language assistance for languages other than Spanish and provide additional language services to passengers. Obligations under the Safe Harbor Stipulation are further discussed in the Language Assistance Plan.

Table 4: LEP Persons in City of Ocala by Language Spoken

RACE AND HISPANIC OR LATINO ORIGIN		
Race Category	**Counts**	**Percentage**
Total Population	***375,908***	-
One race	***338,609***	**90.0%**
White	*268,563*	71.4%
Black or African American	*44,411*	11.8%
American Indian and Alaska Native	*1,527*	0.4%
Asian	*6,072*	1.6%
Native Hawaiian and Other Pacific Islander	*171*	0.0%
Some other race	*17,865*	4.8%
Two or more races	***37,299***	**9.9%**
Hispanic or Latino origin (of any race)	*55,910*	14.9%
White alone, not Hispanic or Latino	*253,837*	67.5%
LANGUAGE SPOKEN AT HOME AND ABILITY TO SPEAK ENGLISH		
Population 5 years and over	*352,199*	-
Speak language other than English	*48,186*	13.7%
Speak Spanish	*37,871*	10.7%
Speak Other Indo-European languages	*7,132*	2.0%
Speak Asian and Pacific Island Languages	*2,472*	0.7%
Speak other languages	*711*	0.2%
Speak English only or speak English "very well"	***336,503***	**95.5%**
Speak English less than "very well" (LEP)	***15,696***	**4.5%**

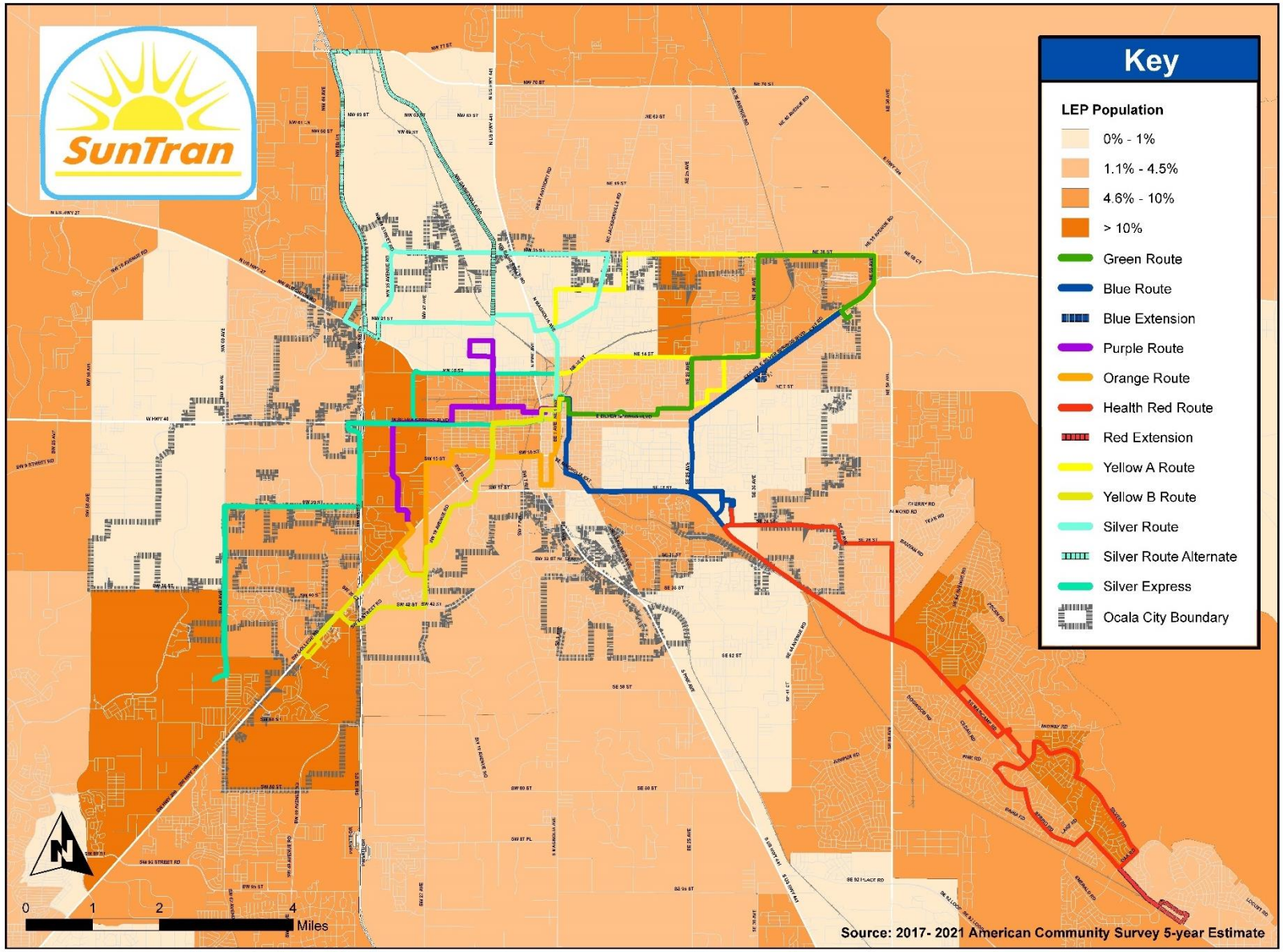
Source: ACS 2017-2021 Five-Year Estimates

Map1 shows the existing SunTran fixed routes, overlayed with the LEP population layer by census tract. The percentage of LEP population was divided into four categories, with orange and deep orange representing areas with higher than 4.5 percent LEP population (countywide number). As can be seen from the Map 1, the majority of SunTran fixed routes serve areas with higher than 4.5 percent LEP population,

including SunTran core routes Purple, Orange, and Green Routes, as well as Red, Yellow, and Silver Express routes.

A geospatial analysis was further conducted to determine the number of LEP population served by SunTran fixed routes. To do this, a 0.75-mile buffer of SunTran fixed routes is defined as SunTran service area, which was overlayed with LEP population census tracts. Based on the geospatial overlay, the total population and LEP population within SunTran service area add up to 78,795 and 4,495, respectively. This means that LEP populations served by SunTran represent 5.4% of the total population within SunTran service area, compared with the countywide number 4.5%.

Map 1: LEP Population



Factor 2 – Frequency with which LEP persons come into contact with programs, activities, and services. The City of Ocala conducts regular board meetings and public hearings throughout the year. Community outreach and the city website are the main sources of potential contact between the City of Ocala and SunTran and LEP persons. As a result, the frequency of contact is difficult to anticipate. Current contact with LEP individuals is relatively infrequent, but the commitment to serve the LEP group is a priority. In areas with more concentrated LEP populations, LEP individuals often ride SunTran buses with English-speaking family members. This is especially apparent along west Ocala. Considering the small amounts of individuals that live in the service area who have Limited English Proficiency, the probability of interaction with LEP individuals is very low. However, the SunTran transit service, overseen by the city, does have the Title VI Statements translated into Spanish on the revenue vehicles. Also, the Title VI Complaint procedures/forms are translated into Spanish and published on SunTran's website. In addition, both the City and SunTran website's have the information available in all languages. The City of Ocala Personnel Department is compiling an extensive list of employees who speak languages other than English who can be available for translation services if needed at public meetings. At workshops or other events, a bilingual staff member attends and translates as needed. Over the past three years, two major projects, including 2021 SunTran Route Redesign Study and FY 2023 – FY 2032 TDP Major Update, have included extensive effort to reach the LEP populations. For example, survey instruments were made available in English and Spanish versions online for non-English speaking users and non-users to fill out. When possible, public meetings during the public involvement process were held at locations with higher concentrations of LEP populations and city or consultant employees who speak languages other than English are available for translation services.

Factor 3 – Nature and importance of program, activity, or service provided by program to people's lives. The City of Ocala and SunTran realizes that Transportation is a vital part of people's everyday lives. It affects the roads they drive on, congestion, development, and their safety on the roadways. Therefore, increasing awareness with all individuals regarding the transportation planning process is an objective of the City of Ocala. Public transportation services can be very important to LEP individuals who may need these critical services to travel to jobs, go shopping for basic items such as food and clothing, or for getting to medical appointments. To assist LEP persons in accessing public transportation services, the City of Ocala and SunTran provide brochures, flyers, and schedules for the Spanish-speaking populations of Marion County, which are available upon request throughout the entire county. Flyers announcing workshops, route or schedule changes, closings, and other significant events are also provided in Spanish. These are posted on buses for the most widespread notice to riders. Additionally, when a transportation planning activity calls for an on-board survey, it is distributed in English and Spanish. The Title VI Policy Statement, Title VI Complaint Procedures, and the Title VI Complaint Form are also provided in Spanish and are available on the City of Ocala and SunTran website. These documents also can be provided in large print formats if required. The city also employs bilingual staff (i.e., staff that are fluent in both English and Spanish), including Spanish speaking operators, supervisors, and customer service representatives. They can assist LEP bus riders whenever necessary on a daily basis.

The City of Ocala and SunTran ensures that all segments of the population, including LEP persons, have been or have had the opportunity to be involved in the public transportation planning process. The impact of proposed transportation investments on underserved and under-represented population groups is part of the evaluation process for use of Federal funds in several major areas: 1) TDP, 2) Transportation Improvement Program, 3) Comprehensive Operational Analysis (COA), and 4) Long Range Transportation Plan (LRTP). Inclusive public participation is a priority in these plans, studies, and programs as well as the impacts of public transportation enhancements resulting from these planning activities impact all residents. Understanding and involvement are encouraged throughout the process, and every effort is made to make the planning process as inclusive as possible.

Factor 4 – Resources available to recipient for LEP outreach and costs associated with outreach.
Given the significant size of the LEP population in Marion County as well as financial constraints, full translation of all transportation documents is not reasonable at this time. However, bus schedules, information brochures, and flyers announcing public involvement activities, route or schedule changes, closings, and other significant events as well as Title VI information are provided in Spanish. Items are printed in-house or by external print agencies.

Continued growth of Marion County and its Spanish speaking populations make offering Spanish translations in many areas a good community investment; therefore, the city continues to make efforts to partner with State and local agencies to provide language translation and interpretation services when practical within the scope of funding available. The City of Ocala and SunTran suggests that the public make requests seven business days in advance of public meetings to accommodate LEP assistance.

One of the major resources for assisting LEP population is the SunTran staff as they were hired with the consideration of bilingual capability (English and Spanish). Currently, one transit supervisor, one maintenance mechanic, and eight bus operators (out of eighteen) are bilingual, who can help the bus passengers on their day-to-day bus trip needs and other needs as necessary.

The City of Ocala and SunTran continues to monitor the need for additional language assistance, including the need for greater dissemination of information in the current languages provided and/or translation to new languages. If additional services are needed, the City of Ocala together with SunTran will determine which additional language assistance measures are cost-effective and feasible for implementation based on the current and projected financial resources.

Safe Harbor Stipulation

Federal law provides a “safe harbor” stipulation so recipients of Federal funding can ensure compliance with their obligation to provide written translations in languages other than English with greater certainty. A “safe harbor” means that if a recipient has created a plan for the provision of written translations under a specific set of circumstances, such action will be considered strong evidence of compliance with written translation obligations under Title VI.

However, failure to provide written translations under these circumstances does not mean non-compliance, but rather provides recipients with a guide for greater certainty of compliance in accordance with the Four-Factor Analysis. Evidence of compliance with the recipient’s written translation obligations

under “safe harbor” includes providing written translations of vital documents for each eligible LEP language group that constitutes 5 percent of the population or 1,000 persons, whichever is less, of eligible persons served or likely to be affected. Translations also can be provided orally. Under this law, the City of Ocala and SunTran provides translations of vital documents in Spanish as needed.

The “safe harbor” provision applies to the translation of written documents only. It does not affect the requirement to provide meaningful access to LEP individuals through competent oral interpreters where oral language services are needed and reasonable to provide.

Language Assistance Plan

Building on the results of the Four-Factor Analysis, the Language Assistance Plan includes four components, described as follows.

Component 1 – Describe how recipient provides language assistance services by language.

As noted in the Four-Factor Analysis, approximately 4.5 percent of Marion County’s population speak English less than “very well.” The City of Ocala and SunTran currently undertakes the following to ensure that LEP persons have access to important information prepared by the transit agency:

- *Document translations* – The City of Ocala and SunTran provides the Title VI Notice to the Public, Title VI Complaint Procedure, and Title VI complaint form in Spanish.
- *Translation of informational items* – The City of Ocala and SunTran offers Spanish versions of bus schedules, information brochures, flyers announcing workshops, route or schedule changes, closings, and other significant events. When and if an interpreter is needed, first a determination of what language is needed. Then, depending on the language needed the city will utilize all available resources, including an interpreter to ensure that the needs of that individual or individuals are met. However, as there are no translation services within the Ocala area, further assistance would be sought out from the Ocala Police Department, and the University of Florida language department.
- *Website translation feature* – The City of Ocala and SunTran website includes a Google Translate feature that allows text to be translated into Spanish, Vietnamese, German, French, Chinese, and roughly 100 other languages.
- *Interpreter requests for public events* – Interpreter services are available free of charge upon request at least seven business days prior to public meetings or workshops.
- *Training*– All City of Ocala and SunTran staff will be provided with the LEP plan as part of the Title VI Plan in the Employee Orientation. Employees will be educated on procedures and services available under Title VI. Training topics include:
    - Understanding the Title VI LEP program responsibilities.
    - What language assistance is available.
    - Documentation of language assistance requests.
    - How to handle a complaint

Component 2 – Describe how recipient provides notice to LEP persons about availability of language assistance.

USDOT LEP guidance indicates that once an agency has decided to provide language services, it is important that the recipient notify LEP persons of services available free of charge in languages LEP persons would understand. Examples of methods for notification include:

- Stating in outreach documents that language services are available.
- Signage when free language assistance is available with advance notice.
- Working with community-based organizations and other stakeholders to inform LEP individuals of the public transportation services and the availability of language assistance.
- Providing information as to the availability of translation services (free of charge) when advertising for public hearings or public transportation-related workshops.
- Providing trip specific help to passengers from bilingual SunTran bus operators and supervisor.

The City of Ocala and SunTran takes reasonable steps to make available interpreter services, free of charge, and to include, at the minimum, Spanish translators upon request at least seven business days prior to transportation disadvantaged meetings, workshops, public hearings, or events. The City of Ocala and SunTran defines an interpreter as a person who translates spoken language orally, as opposed to a translator, who translates written language and transfers the meaning of written text from one language into another.

Component 3 – Describe how recipient monitors, evaluates, and updates language assistance plan.

The City of Ocala and SunTran provides an ongoing needs assessment to determine how best to continue reaching LEP persons in Marion County and improving ongoing efforts. To ensure that the intent of the LEP plan remains current, the City of Ocala and SunTran staff continues to monitor and update the plan and report progress every three years as part of the Title VI Program update. These efforts include the following actions:

- Keep an updated monitoring system of any requests for translations. Those include for plans, documents, and public meetings.
- Continual updates throughout the SunTran administration facilities, including SunTran buses to keep all individuals informed on the policies for Title VI, and ways to submit a complaint. All surveys and postings on the vehicles will be translated into Spanish utilizing Google Translate.
- Monitor the change of the demographic structure in Marion County based on the latest ACS or Census data and define emerging populations.
- Assess the availability of resources, including technological advance (e.g., ITS projects, AI Technology), and the requirements for non-English language translation.
- Conduct outreach presentations and notices to schools, underserved communities, business owners, and other interest parties.
- Review external agency LEP information, such as FTA, FDOT, and the Marion County MPO, for assistance in developing internal LEP training and processes.

Component 4 – Describe how recipient trains employees to provide timely and reasonable language assistance to LEP populations.

All City of Ocala and SunTran staff are provided with training opportunities with focus on methods and procedures to assist LEP populations with timely and reasonable language assistance. Example of training activities include:

- Provide information on LEP "best practice" as part of regular staff meetings and staff refresher training courses.
- Inform staff how LEP services can be obtained.
- Inform staff what resources and language assistance are available to the public.
- Emphasize the importance of responding to LEP persons through: Telephone communication, written communication, and in-person contact
- Resources/language assistance services available

This information is also part of the City of Ocala and SunTran staff orientation process for new hires. Such training ensures that staff are fully aware of LEP policies and procedures and are effectively able to work in person and/or by telephone with LEP individuals.

Minority Representation on Non-Elected Committees and Councils

Recipients that have transit-related, non-elected planning boards, advisory councils, or committees must provide a table depicting the membership of those committees broken down by race and a description of efforts made to encourage the participation of minorities on such committees.

The Ocala/Marion County TPO has four advisory committees comprising non-elected volunteers that provide direction and advice to the TPO board on a wide range of planning topics; members of these committees are appointed by the TPO, with City of Ocala and SunTran having no appointment authority:

- **Citizens' Advisory Committee (CAC)** – provides a citizen's perspective on plans and programs relating to overall community needs and values to planning goals for transportation decisions; includes local community residents representing a broad spectrum of social and economic backgrounds and interests in transportation.
- **Transportation Disadvantaged Local Coordinating Board (TDLCB)** – serves as an advisory board and aid in planning and approving the Transportation Disadvantaged Service Plan; includes one County Commissioner/TPO Board member as chair and three citizens acting on behalf of the Transportation Disadvantaged community.
- **Technical Advisory Committee (TAC)** – meets to review technical matters and make recommendations concerning transportation plans and programs to the MPO Board; includes professional and technical representatives, planners, engineers, and other disciplines.

Table 3 summarizes the racial composition of the TPO's four non-elected advisory committees, as requested by FTA Circulator 4702.1B.

Table 5 Racial Composition of TPO's Non-Elected Advisory Committees

Racial Composition	CAC	TAC	TDLCB
Caucasian	78%	73%	55%
Latino	0%	0%	13%
African American	22%	18%	13%
Asian American	0%	9%	0%
Native American	0%	0%	0%
Other	0%	0%	19%

Sub-Recipient Compliance with Title VI

Title 49 CFR Section 21.9(b) states that "if a primary recipient extends Federal financial assistance to any other recipient, such other recipient shall also submit such compliance reports to the primary recipient as may be necessary to enable the primary recipient to carry out its obligations under this part." The primary recipient has a responsibility to aid and monitor sub-recipients for compliance with USDOT's Title VI regulations. If the sub-recipient is not in compliance, then the primary recipient (The City of Ocala and SunTran) is also not in compliance.

The City of Ocala and SunTran currently has no sub-recipient, so this case does not apply. However, if/when this changes, the City of Ocala will monitor any subrecipient to ensure it meets all applicable Federal and State regulations.

Equity Analysis for New Facilities

The location of projects requiring land acquisition and the displacement of persons from their residences and businesses may not be determined on the basis of race, color, or national origin. The recipient must complete a Title VI equity analysis before the selection of a preferred site. Facilities under the purview of this requirement include storage facilities, maintenance facilities, operations centers, etc.

SunTran has initiated a project to construct a downtown restroom facility and ticketing kiosk. The project is under the phase of construction plan design. However, since this project does not involve land acquisition and displacement of persons from their residences and businesses, there is no need to perform an equity analysis for this new facility construction project.

Approval of Title VI Documentation

The Title VI Program Update has been approved by the City of Ocala, who are responsible for ensuring that the City of Ocala and SunTran's policies are developed and followed, as shown in Appendix C.

REQUIREMENTS OF TRANSIT PROVIDERS

Chapter IV of FTA Circular 4702.1B provides program-specific guidance for all transit providers that operate fixed-route services. FTA requires all fixed route transit providers to develop quantative standards for all fixed route modes of operation for the indicators listed below. Providers of public transportation may set additional standards as appropriate or applicable to the type of service they provide.

System-Wide Service Standards

Service standards have been set for each mode of service operated by the City of Ocala and SunTran, including local fixed-route bus and paratransit demand-response service. Quantitative standards for vehicle load, vehicle headway, on-time performance, and service availability are described below.

Vehicle Load

Vehicle load, or load factor, is a ratio of passengers carried versus passenger capacity on a vehicle during periods of either peak or off-peak travel. Load factors are used by transit systems to determine the extent of probable overcrowding or the need for additional vehicles. If overcrowding is reported, staff conduct follow-up checks to ensure that the vehicles assigned to these trips can accommodate peak passenger loads. The City of Ocala and SunTran 's goal is to operate vehicle loads at a threshold that meets safety and performance standards. In early 2023, SunTran tested and made all Automatic Passenger Counters (APC) installed on the entire fleet fully operational. The APC system enables staff to monitor all bus trips on maximum load factor on a regular basis. SunTran uses the following standard:

The monthly average weekday maximum load factor should not exceed the vehicles' achievable capacities, as shown in Table 4. During off-peak hours, the City of Ocala and SunTran's policy is to have no standing passengers.

Table 6: SunTran Vehicle Load

Vehicle Type	Seated Capacity	Standing Capacity– Off-Peak	Standing Capacity– Peak	Max. Vehicle Load– Off-Peak	Max. Vehicle Load–Peak	Max. Load Factor– Peak
Gillig 35'	32	0	10	32	42	1.2
Turtle Top	14	0	4	14	18	1.0

Paratransit vehicles hold 12–26 seated passengers. Paratransit vehicle load will not exceed available seating capacity at any time.

Vehicle Headways

Vehicle headway is the amount of time between two vehicles traveling in the same direction on a given bus route or combination of bus routes. A shorter headway corresponds to more frequent service. Vehicle headways are measured in minutes (e.g., every 15 minutes); service frequency is measured in vehicles per hour (e.g., 4 buses per hour). Headways and frequency of service are general indications of

the level of service provided along a route. Vehicle headway is one component of the amount of travel time expended by a passenger to reach his/her destination. The current the City of Ocala and SunTran service span is shown in Table 5.

Table 7: SunTran Span of Service and Service Headway (2023)

		Headway (min)					
Route	**Hours of Operation**	**Early**	**AM Peak**	**Midday**	**PM Peak**	**Evening**	**Late**
Green	Monday – Saturday 5:00 a.m. – 10:00 p.m.	60	70	70	70	70	60
Blue		60	70	70	70	70	60
Purple		60	70	70	70	70	60
Orange		60	70	70	70	70	60
Red	Monday – Saturday 5:45 a.m. – 8:15 p.m.	70	70	60	70	70	-
Yellow	Monday – Saturday 5:00 a.m. – 7:45 p.m.	60	70	70	70	70	60
Silver	Monday – Saturday 6:00 a.m. – 7:00 p.m.	-	70	120+	70	-	-

On-Time Performance

On-time performance is a measure of runs completed as scheduled. This criterion first must define what is considered “on time.” An acceptable level of performance must be defined (expressed as a percentage).

The City of Ocala and SunTran strives to continually provide transit service in accordance with published route schedules. It defines on-time performance as departures at a stop no earlier than the scheduled time and no more than five minutes past the scheduled time. The goal for the City of Ocala and SunTran is to achieve 95 percent on-time performance for all fixed-route service. The APC system installed on the buses enables staff to monitor on-time performance on a continuous basis. With APC monitoring in place, routes performing with an on-time performance lower than 70 percent that is not the direct impact of weather, traffic incidents, detours, and/or events over a consistent period of two or more weeks are reviewed to determine if schedule modifications are necessary to meet the on-time performance standard.

The paratransit on-time performance goal is 95 percent. Paratransit customers should be delivered no earlier than 30 minutes before their scheduled appointment time. Table 6 provides the quantitative on-time performance standards.

Table 8: On-Time Performance Standards

Mode	On-Time Performance Measure Goal (%)	On-Time Performance Measure (Time)
Fixed-route Service	95%	Departure no earlier than scheduled time, no more than 5 mins past scheduled time
Paratransit	95%	Dropped off no earlier than 30 mins before scheduled appointment time

Service Availability

The basis of providing public transportation is to ensure access to those who need the service and to attract choice riders. To reach the maximum number of users within the available resources, the City of Ocala and SunTran provides fixed-route service from approximately 5:00 a.m. to 10:00 p.m. Monday through Saturday for the core routes, with the remaining routes' service span ranging from 5:00 a.m. to 8:00 p.m. The City of Ocala determines service availability based on financial resources, public input, performance of existing routes, transit-dependent populations (low income, minority, zero-car households, LEP population, and disabled), safety guidelines, and development patterns. Table 7 shows the select transit-dependent populations served by each route and system, compared with countywide numbers. As can be seen Table 7, SunTran outweighed the county average for each disadvantaged population category served.

Table 9 Transit-Dependent Populations Served by SunTran Fixed Routes

Route	Low Income*	Minority	Zero-vehicle household	LEP Population	Disability
Green	32%	37%	10%	3%	18%
Blue	25%	32%	8%	2%	15%
Purple	47%	69%	20%	7%	17%
Orange	37%	59%	17%	6%	15%
Red	29%	44%	6%	7%	13%
Yellow	35%	47%	12%	4%	18%
Silver	42%	56%	13%	5%	17%
SunTran System-wide	**32%**	**45%**	**9%**	**5.4%**	**15%**
County-wide	**25.8%**	**40%**	**4.8%**	**4.5%**	**10.2%**

* Low-income population refers to percent of people living within 150% of the poverty threshold.

Based on the urbanized area characteristics, SunTran fixed-route service could be extended to major commercial, medical, and employment centers if certain criteria were met, which include the following thresholds:

- Individual business of 200 or more employees
- Shopping centers of more than 100,000 square feet of lease retail space
- Medical facilities with more than 100 beds

- Academic institutions with an enrollment of 1,000 full time students
- Government agencies that attract substantial daily visitors.

The bus stop spacing standards for the network is based on the development patterns, population density, and route characteristics along the route:

- In the urbanized area and on local routes, an average of 4 bus stops per mile is standard.
- In the suburban area and on local routes, an average of 2-4 bus stops per mile is standard.
- In the rural area or on express bus route, an average of 2 bus stops per mile is standard.

Paratransit service for Americans with Disabilities Act (ADA) customers is provided consistent with ADA requirements. The current ADA service area is shown on Map 2. The service area for certified ADA paratransit eligible passengers includes corridors centered on the SunTran's fixed route system and extending ¾ of a mile to either side of the routes.

System-Wide Service Policies

Qualitative policies were developed for two indicators: distribution of transit amenities and vehicle assignments. These policies are described in more detail below.

Distribution of Transit Amenities for Each Mode

Bus stops and shelters are provided throughout the City of Ocala and SunTran service area to give the greatest level of access to the majority of system users. The City of Ocala and SunTran currently has 345 bus stops throughout its service area. Fixed- route bus stops are provided based on the number of passengers boarding and alighting at stops, availability of right-of-way, and provision of ADA access. In addition, stops are placed in consistence with the bus stop spacing standards as described above. Bus shelters placement and improvement is largely based on the following major considerations:

- Average weekday boardings meeting certain criterion
- Right-of-way availability
- Proximity to disadvantaged communities
- Existing supporting infrastructure (e.g., sidewalk, trail)

A new SunTran Downtown Restroom Facility & Ticketing Kiosk project was initiated in 2023 and it is under plan design currently. This project was selected as downtown transfer station provides transfer opportunities to six of the seven routes of SunTran and has the highest ridership of the system. However, there is no restroom facility available to SunTran passengers, bus operators, and roadway supervisors at this place. The completion of this project will provide high-quality passenger amenities to SunTran passengers and create a better working environment for SunTran staff.

Vehicle Assignment for Each Mode

The City of Ocala and SunTran vehicles are assigned to specific runs based on load factors and the need for wheelchair securements. The process by which transit vehicles are assigned to routes throughout the

system involves:

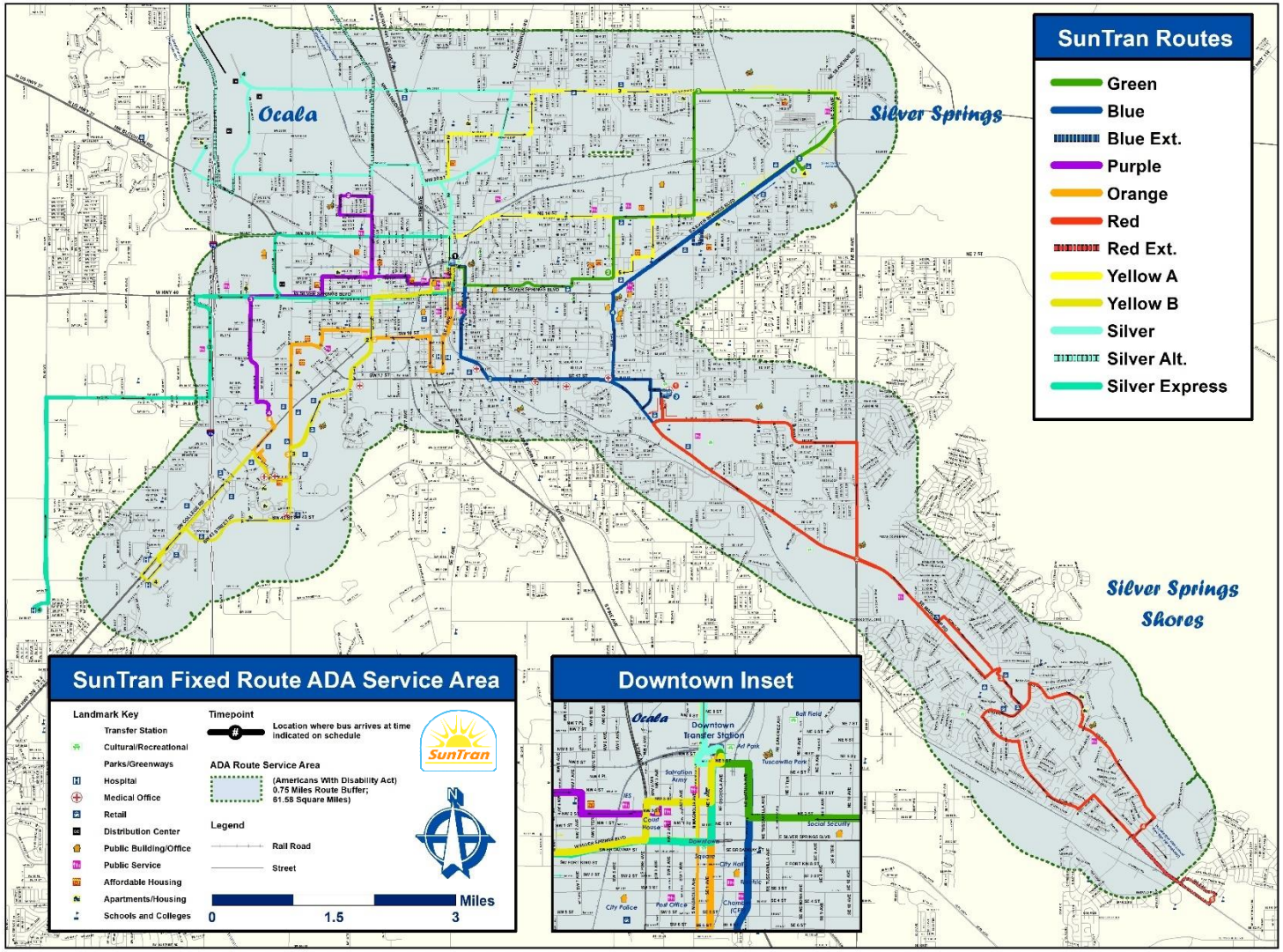
- Variation among vehicles (e.g., load factor)
- Types of service offered (e.g., demand, long- or short-haul, etc.)
- Timing of vehicle maintenance assignment (e.g., time of day, day of week, holiday/non-holiday)
- Other factors (e.g., origin points of vehicles, etc.)

CONCLUSION

The City of Ocala and SunTran Title VI Program Update was prepared pursuant to Title VI of the Civil Rights Act of 1964, FTA Circular 4702.1B, "Title VI and Title VI Dependent Guidelines for Federal Transit Administration Recipients (October 1, 2012)."

The objectives of this Title VI program include ensuring that the level and quality of public transportation service are provided in a nondiscriminatory manner; promoting full and fair participation in public transportation decision-making without regard to race, color, or national origin; and ensuring meaningful access to transit-related programs and activities by persons with limited English proficiency. According to the criteria described in this document, the City of Ocala and SunTran is in compliance with Title VI requirements.

Map 2 SunTran ADA Service Area



APPENDIX A: TITLE VI NOTICE TO THE PUBLIC

The City of Ocala/SunTran operates its programs and services without regard to race, color, and national origin in accordance with Title VI of the Civil Rights Act. Any person who believes she or he has been aggrieved by any unlawful discriminatory practice under Title VI may file a complaint with the City of Ocala no more than 180 days after the alleged incident.

For more information on the City of Ocala's civil rights program, and the procedures to file a complaint, contact (352) 401-3986; email dkikendall@ocalafl.gov; or visit our administrative office at 110 SE Watula Avenue, Ocala, FL 34471. For more information, visit https://www.ocalafl.gov/government/title-vi-ada-compliance-and-accessibility**.**

A complainant may file a complaint directly with the Federal Transit Administration no more than 180 days after the alleged incident by filing a complaint with the Office of Civil Rights, Attention: Title VI Program Coordinator, East Building, 5th Floor-TCR, 1200 New Jersey Ave., SE, Washington, DC 20590.

If information is needed in another language, or for more information on the City of Ocala and SunTran's Title VI obligations, please contact the City of Ocala at (352) 401-3986 or SunTran at (352) 401-6999 or visit the City of Ocala website at https://www.ocalafl.gov/government/title-vi-ada-compliance-and-accessibility **or the SunTran website at** https://www.ocalafl.gov/government/city-departments-i-z/suntran/about-us/title-vi-policy**.**

APPENDIX B: TITLE VI COMPLAINT FORMS

CITY OF OCALA AND SUNTRAN
TITLE VI COMPLAINT FORM

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."

The Environmental Justice component of Title VI guarantees fair treatment for all people and provides for City of Ocala and SunTran, to identify and address, as appropriate, disproportionately high and adverse effects of its programs, policies, and activities on minority and low-income populations, such as undertaking reasonable steps to ensure that Limited English Proficiency (LEP) persons have meaningful access to the programs, services, and information City of Ocala& SunTran provides.

The City of Ocala and SunTran works to ensure nondiscriminatory transportation in support of our mission to provide effective and efficient management and delivery of public, specialized, and coordinated transportation services in Marion County. City of Ocala and SunTran's Human Resources Department acts as a Civil Rights Liaison and is responsible for civil rights compliance and monitoring to ensure non-discriminatory provision of transit services and programs.

Complaint No.: _____

Home Number:

_____

Email

_____

Work Number: _____

Address:

_____

City:_____ Zip Code_____

List type of discrimination (please check all that apply):

Race ( ) National Origin ( ) Color ( )

Other

_____

Please indicate your race/color if it is a basis of your complaint:

_____

Please describe your national origin if it is a basis of your complaint:

_____

Location where incident occurred:

_____

Time and date of incident:

_____

Name/Position title of the person who allegedly subjected you to Title VI discrimination: _____

_____

Briefly describe the incident (use a separate sheet, if necessary):

_____

_____

_____

_____

_____

Did anyone else witness the incident? Yes ( ) No ( ) List witnesses (Use a separate sheet, if necessary):

Name: _____

Address: _____

Telephone No.: _____

Name: _____

Address: _____

Telephone No.: _____

Have you filed a complaint about the incident with the Federal Transit Administration?

Yes ( ) No ( ) If yes, when? _____

_____
Signature

_____
Date

FORMULARIO DE RECLAMO PARA EL TITULO VI

El título VI del Acta de Derechos Civiles de 1964 prohíbe la discriminación en base a raza, color o nacionalidad en los programas y actividades que reciben asistencia financiera Federal. Específicamente, el Título VI sostiene que "Ninguna persona en los Estados Unidos debe, en base a raza, color o nacionalidad, ser excluido de participar en, negarle los beneficios de o ser sujeto a discriminación bajo cualquier programa o actividad que reciba asistencia financiera Federal."

El componente de Justicia Ambiental del Título VI garantiza un trato justo para todas las personas y provee para CITY OF OCLA & SUNTRAN , el identificar y tomar acción, según sea apropiado, los efectos desproporcionadamente altos y adversos de sus programas, políticas y actividades en las minorías y en las poblaciones de bajos ingresos, tales como el tomar los pasos razonables para asegurar que las personas con Dominio de Inglés Limitado (LEP) tengan un acceso significativo a los programas, servicios e información que CITY OF OCLA & SUNTRAN provee.

CITY OF OCLA & SUNTRAN trabaja para asegurar transporte sin discriminación, apoyando de esta manera nuestra misión de proporcionar una eficaz y eficiente gestión, prestación y entrega de servicios, especializado y coordinado servicio de transporte en el Condado de Pasco. La oficina del Jefe Administrativo de CITY OF OCLA & SUNTRAN es responsable de cumplimiento y monitoreo de los Derechos Civiles para asegurar que no haya ninguna discriminación en los servicios de tránsito y sus programas.

Nombre y Apellido_____

Número de teléfono (casa)_____Correo electrónico (e mail)_ _____

Número de teléfono (trabajo) _____

Dirección

_____

Ciudad_____Código Postal _____

Indique el tipo de discriminación (favor de marcar todas las que apliquen):

Raza ( ) Nacionalidad ( ) Color ( )

Otro _____

Favor de indicar su raza/color, si es la base de su queja _____

Favor describir su nacionalidad, si es la base de su queja _____

Lugar donde ocurrió el incidente:_____

Hora y fecha del incidente:_____

Nombre/Título de l a posición de la persona que alegadamente lo discriminó bajo el Título VI:

_____

Describa brevemente el incidente (Si es necesario, adjunte otra hoja de papel)_

_____

_____

_____

¿Hubo algún otro testigo en el incidente? Sí ( ) No ( )

Haga una lista de los testigos (Si es necesario, adjunte otra hoja de papel) Nombre _____

Dirección _____

Número de teléfono _____

Nombre _____

Dirección _____

Número de teléfono _____

Ud. ha presentado una queja sobre el incidente a la Administración de Tránsito Federal?

Sí ( ) No ( ) Si es afirmativo, ¿cuándo?

_____

_____ _____

Firma Fecha

APPENDIX C: APPROVAL OF TITLE VI PROGRAM

I hereby acknowledge the receipt of the City of Ocala (SunTran) Title VI Implementation Plan 2023-2026. I have reviewed and approved the Plan. I am committed to ensuring that no person is excluded from participation in or denied the benefits of City of Ocala (SunTran) transportation services on the basis of race, color, or national origin, as protected by Title VI according to FTA Circular 4702.1B, Title VI requirements and guidelines for Federal Transit Administration sub-recipients.

_____ _____

Signature of SunTran CEO Date

Tye Chighizola
City Projects Director
Growth Management Department
110 SE Watula Ave
Ocala FL 34471

APPENDIX D: TITLE VI COMPLAINT LOG

Date	Investigations	Summary	Status
Date	**Lawsuits**	**Summary**	**Status**
Date	**Complaints**	**Summary**	**Status**