



GOVERNMENT OF PUERTO RICO
INTEGRATED TRANSPORTATION AUTHORITY

TITLE VI/NONDISCRIMINATION PLAN

Revised on:	05/15/2022
Adopted by:	Puerto Rico Integrated Transportation Authority (PRITA)
Original Title VI Plan	05/20/2022
Adopted on:	

This plan is hereby adopted and signed by:

Puerto Rico Integrated Transportation Authority – PRITA

Executive Name/Title: Josué L. Menéndez Agosto, Executive Director

Executive Signature: 

Approval:

Department of Transportation and Public Works - DTOP

Secretary of Transportation Name: Eileen M. Vélez Vega, PE

Secretary of Transportation Signature: 

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I. Legal Background

As part of the Puerto Rico Department of Transportation and Public Works (PRDOT), The Puerto Rico Integrated Transportation Authority (PRITA) is a public corporation and government instrumentality, with legal standing and judicial personality, separate and independent from all other agencies under the PRDOT umbrella. As such, it is a standalone agency with its own budget, appropriations, and external revenue streams. On August 3rd, 2014, the Puerto Rico Transportation Authority Act was created by Act 123 with the sole purpose of assigning ownership and operation capacity to PRITA of all means of public mass transportation systems that exist or that will exist in Puerto Rico. PRITA operates under a governing board of directors, presided over by the PRDOT Secretary.

Transportation Systems within PRITA's judicial spectrum include but are not limited to the Metropolitan Bus Authority (AMA), Maritime Transportation Authority (ATM), Intermodal and the Tren Urbano (TU) rail systems. On 2015 PRITA concluded a financial transition process with the government of Puerto Rico, thus giving PRITA budgetary control over all financial activities of the Metropolitan Bus Authority and the Puerto Rico Maritime Transportation Authority. On May 2020, PRITA began communications with the FTA to be considered an FTA subgrantee, and on July 16, 2021, the FTA awarded grant PR-2021-022 CARES ACT-Sec. 5307-Operating Assistance for the Puerto Rico Integrated Transportation Authority (PRITA). For financial purposes, since July 1, 2021, ATM and AMA integrated themselves as transportation programs under PRITA, thus, requiring that all financial transactions be reviewed and approved by the PRITA Executive Director. These reviews include the presentation of one global fiscal budget that includes ATM and AMA projected expenses. In compliance with Act 123-2014 the Authority's purpose is to manage and integrate all modes of transportation under one responsible entity. At this moment the Authority has begun the transition of the ferry and bus systems. Rail and intermodal services will transition in a subsequent phase.

As a sub-recipient of USDOT Federal Transit Administration (FTA) funding, per [FTA Circular 4702.1B](#) PRITA is required to prepare a Title VI Nondiscrimination Plan including the following elements:

- Evidence of Policy Approval
- Policy Statement, Log of Policy Updates, Contact Information/Program Administration
- Notice of Nondiscrimination (**Appendix 1**)
- Complaint Procedure (**Appendix 2**)
- Complaint Form (**Appendix 3**)
- Recording and Reporting Civil Rights Investigations, Complaints and, and Lawsuits (**Appendix 4**)
- Public Involvement Plan (**Appendix 5**)

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- Limited English Proficiency (LEP) Plan (**Appendix 6**)
- Additional information, as required.

II. Policy Statement

It is the policy of the Puerto Rico Integrated Transportation Authority that every program under its jurisdiction shall perform all official actions affirmatively and in full accord with the spirit and letter of the Constitutions of the United States of America and of the Commonwealth of Puerto Rico. The **Puerto Rico Integrated Transportation Authority - PRITA** is committed to ensuring that no person is excluded from, participation in, denied the benefits of, or otherwise subjected to discrimination on the basis of race, color, national origin, disability, sex, age, religion, income status or limited English proficiency (LEP) in any and all programs, activities or services administered by PRITA, in accordance with Title VI of the Civil Rights Act of 1964¹ and related nondiscrimination authorities.

PRITA receives federal financial assistance to provide transportation services to the greater San Juan metropolitan area (Rail, Fixed Route & Bus Rapid Transit), for maritime transportation services including the municipalities of Vieques and Culebra, as well as to purchase vehicles to provide rides to elderly and disabled individuals.

III. Standard Assurances - Policy Updates – Activity Log

Statistical data on race, color, national origin, sex age, disability and LEP of participants and beneficiaries of the PRITA programs is gathered, analyzed, and maintained by the agency to determine the transportation benefits and burdens to the population, including minority and low-income populations. Each program under PRITA maintains data relative to their operations and activities.

As a condition to receive federal funds, sub-recipients and programs under PRITA must sign an assurance of non-discrimination and agree to carry out the requirements of the Title VI program. This signed assurance must establish full and affirmative compliance with Title VI, as well as all other nondiscrimination authorities. Subrecipients and programs under PRITA may adopt the present program, adapting the same to their operations and services, while complying with the following minimum elements: 1) Policy Statement; 2) Title VI Liaison; 3) Complaint Procedures. The subrecipient must maintain a log of all non-employment discrimination complaints and provide this information to PRITA upon request.

In compliance with regulations, PRITA will review its non-discrimination policy on an annual basis to determine if modifications are necessary. As applicable, PRITA will discuss its Title VI Nondiscrimination Plan requirements with its third-party transit providers and division programs on an annual basis to ensure compliance with Title VI Nondiscrimination provisions. In such case, and if adjustments are deemed

¹ **Title VI of the Civil Rights Act of 1964** states “No person in the United States shall, on the grounds of race, color or national origin, be excluded from, participation in, denied the benefits of, or be subjected to discrimination under any program or activity receiving Federal financial assistance.”
– [Title 42 USC Section 2000d](#)

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necessary, PRITA will use the following log to record reviews/revisions.

Date	Activity (Review/Update/Addendum/ Adoption/Distribution)	Person Responsible	Notes

V. Organizational Structure- Program Administration

The Civil Rights Office (CRO) has the primary role of ensuring equity and nondiscrimination within all PRITA programs, services, and activities. A civil right is the common name given to the constitutional rights guaranteed to all people to ensure equal treatment. Such treatment is protected without distinction as to race, color, creed, national origin, sex, age, disability, or economic/social status. The composition of PRITA’s civil rights Office is as follows:

Chief Executive Director

PRITA’s Chief Executive will ensure compliance with [Title VI of the Civil Rights Act of 1964 \(42 U.S.C. 2000d\)](#) and the U.S. Department of Transportation implementing regulations.

Name:	Josue L. Menendez Agosto
Email:	jmenendez@dtop.pr.gov
Phone:	787-721-8787 X- 53001

Civil Rights Coordinator

PRITA’s Civil Rights Coordinator ensures Title VI/Nondiscrimination and LEP compliance in accordance with its federally funded transportation activities. The Civil Rights Coordinator has other duties and responsibilities in addition to Title VI/Nondiscrimination and LEP compliance. This position has a direct reporting relationship and access to the PRITA’s Chief Executive Director.

Name:	Jose L. Rodriguez Macias, Esq.
Email:	jrodriguez@ati.pr.gov
Phone:	787-721-8787 X-53002

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The Civil Rights Coordinator is responsible for initiating, monitoring, and ensuring compliance of the PRITA's nondiscrimination requirements, including the following activities:

A. Program Administration

- Ensure compliance with federal Title VI/Nondiscrimination and LEP requirements
- Develop and implement Title VI/Nondiscrimination and LEP Plan
- Update and maintain Title VI/Nondiscrimination and LEP program policies and procedures

B. Complaints

- Review, track, investigate and close Title VI/Nondiscrimination and LEP complaints

C. Employee Training

- Educate staff on Title VI/Nondiscrimination and LEP requirements and procedures

D. Reporting

- Prepare and submit Title VI/Nondiscrimination reports per state and federal regulations

E. Public Dissemination

- Notify the public of PRITA's Nondiscrimination requirements via public area, on its website, in vehicles and any other public platform included within its infrastructure's programs.

F. Oversight

- Ensure contractors and lessees adhere to Title VI/Nondiscrimination and LEP requirements

VI. Notice of Nondiscrimination

As a recipient of federal financial assistance, PRITA has the legal duty to notify the public of its obligations under U.S. DOT Title VI regulations and the protections against discrimination afforded to them by law. Regulations further require PRITA to inform the public of their rights under Title VI by posting a *Notice of Nondiscrimination*, which will be allocated in the following locations: agency website, public areas of the agency office, and as applicable, inside the fleet, and transit shelters/facilities.

This public notice must include PRITA's statement of nondiscrimination, information on how to request additional information about the agency's Title VI obligations, information on how to file a complaint, the location of the complaint form, etc., and information on how to request Title VI information in another language. In compliance with the above, PRITA's *Notice of Nondiscrimination* is provided in the following locations:

✓ Websites:

- Maritime Transportation
- <https://www.puertoricoferry.com/en/accessibility/>
- Metropolitan Bus Authority

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- ✓ Public area of the agency office:
 - Maritime Transportations
 - 24 Road 21, Guaynabo, PR 00966
 - Metropolitan Bus Authority
 - 24 Road 21, Guaynabo, PR 00966
 - #37, Ave. De Diego Final Barrio Monacillos, Rio Piedras, PR 00927
- ✓ Inside Fleet
 - Maritime Transportation
 - Included in all vessels
 - Metropolitan Bus Authority
 - Included in all buses
- ✓ Terminal and Transit Shelters
 - Maritime Transportation
 - Included in all vessels
 - Metropolitan Bus Authority
 - Included in all buses

On Spanish versions of the *Notice of Nondiscrimination*, a sentence is included in English to contact PRITA at 787-721-8787 X-53002 if additional information is needed in another language. To view a copy of the *Notice of Nondiscrimination*, please see Appendix 1.

VII. Complaint Procedure and Complaint Form

PRITA has adopted a public grievance procedure for prompt and equitable resolution of complaints alleging an action prohibited by federal regulations. As a recipient of federal financial assistance PRITA must also develop a procedure for investigating, tracking, and resolving Title VI/Nondiscrimination and LEP complaints and make the procedures available to the public upon request. Any person, group or firm that believes they've been discriminated against based on race, color, national origin, disability, sex, age, religion, income status or limited English proficiency (LEP) by PRITA has the right to file a civil rights complaint.

The purpose of the public grievance procedure is to delineate the steps used by PRITA for processing complaints under Title VI of the Civil Rights Act of 1964, Title II of the Americans with Disabilities Act and Section 504 of the Rehabilitation Act of 1973.

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Intimidation or retaliation because of a complaint is prohibited by law.

I. Scope of Civil Rights Complaints

The scope of civil rights complaints covers all internal and external PRITA activities. Adverse impacts resulting in civil rights complaints can arise from many sources including the delivery of programs and services, or advertising, bidding, and contracts. These can also originate as a result of project and program impacts on individuals or groups. Examples include social and economic impacts such as access to programs, activities and services, failure to maintain facilities and vehicles, traffic, noise, air quality, and accidents, as well as from individuals or firms alleging inability to bid upon or obtain a contract with **PRITA** for the furnishing of goods and services. Further Instances include advertising for bid proposals; prequalification or qualification requirements; bid awards; selection of contractors, subcontractors, material and equipment suppliers, lessors, vendors, consultants, etc.

Procedure:

1. Any person who believes he or she have been excluded from participation in, denied the benefits of, or otherwise subjected to discrimination under a PRITA program or activity because of their race, color, creed, national origin, age, sex, or disability may file a formal complaint with PRITA's Civil Rights Office (CRO). The complaint must be filed within one hundred and eighty (1800 days) of the alleged discrimination.
2. The complaint must be written and signed by the complainant and shall include:
 - The Complainant's name, address, and phone number
 - Basis of complaint (race, color, national origin, sex, age, disability)
 - Date (s) of alleged discriminatory act (s)
 - A statement of the complaint, including specific details, relevant facts, and related documents
3. The complaint must be filed by completing and signing the Complaint Form and delivering it personally, email or by mail to:

Puerto Rico Integrated Transportation Authority
Civil Rights Office
24 Road 21, Guaynabo P.R. 00966
jrodriguez@ati.pr.gov
Mail: P.O. Box 41267
San Juan, P.R. 00940

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4. Upon receipt of a complaint, the CRO will determine jurisdiction, acceptability or need for additional information. CRO will also provide a copy of the complaint to the applicable U.S. Department of Transportation Modal agency.
5. The CRO will conduct its investigation, which should be concluded in approximated sixty (60) days after receiving the complete grievance.
6. Once the investigation is concluded, the CRO will notify the complainant of the result.
7. If the complainant does not agree with the result, he or she may file a reconsideration at the PRITA's Legal Advisor's Office at 24 Road 21, Guaynabo, P.R. 00966, within thirty (30) days of the notification of such result.
8. If the complaint cannot be resolved by PRITA, the matter will be forwarded to the U.S. DOT within ten (10) days for further processing.

PRITA's complaint procedure is shown in **Appendix 2** and made available in the following locations:

- ✓ Via Website (<https://www.puertoricoferry.com/en/accessibility/>) either as a reference in the *Notice of Nondiscrimination* or in its entirety
- ✓ Agency office at 24 Road 21, Guaynabo, PR 00966
- ✓ Via Email request at: jlrodriguez@ati.pr.gov

A copy of PRITA's Complaint *Form* is shown in **Appendix 3**.

II. Civil Rights Investigations

Recipients of federal financial assistance are required to maintain a list of any complaints alleging discrimination. The list shall include the date the civil rights complaint, investigation, or lawsuit was filed, a summary of the allegation(s), the status of the complaint, investigation, or lawsuit, actions taken by the recipient in response, and final findings related to the complaint, investigation, or lawsuit. PRITA's procedure and tracking mechanism to investigate, track and resolve complaints is included as **Appendix 4**

Since the last update of this Title VI Nondiscrimination Plan, there has been no transportation related civil rights investigations, complaints, or lawsuits filed with PRITA.

VIII. Training

The CRO has the responsibility to provide internal and external training related to Title VI and other nondiscrimination provisions, its application to program operations, identification of Title VI issues and resolution of complaints, The CRO encourages and participates in Civil Rights related training as much as possible.

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IX. Annual Goals and Accomplishments Report

On an annual basis, PRITA and its programs are required to meet the following requirements:

- Website review to ensure that CRO information is accurate, consistent, and easily located
- Should a project that involves public impact arise, ensure public participation in the planning and development of transportation projects.
- Provide Title VI Program training: Staff-Transportation Programs-Internal and External partners
- Develop and establish adequate procedures and action plans to identify Title VI issues and ensure compliance

X. Public Involvement Plan

By law, PRITA is required to develop a public involvement plan that includes outreach strategies and participation techniques to engage the public including, minority, low-income, and limited English proficient (LEP) populations, as well as a summary of outreach efforts made since the last Title VI Nondiscrimination Plan. Any outreach efforts encourage and help to eliminate barriers to participation and are designed to reach broad representation of the public, thus representing diverse points of views on proposed issues. While traditional means of seeking public involvement may not reach all individuals, or might not allow for meaningful avenues of input, the intent of this effort is to take reasonable actions to provide opportunities for historically under-served populations to participate in transportation decision making efforts.

Efforts to encourage public involvement during the planning and development of PRITA processes are evaluated and monitored to ensure compliance with Title VI requirements. Specifically, the CRO monitors the community involvement process to ensure that extra efforts are taken to achieve a level of public participation that is representative of all interested/impacted communities.

PRITA will periodically evaluate public involvement efforts to determine their effectiveness in reaching populations to assure full and open access to planning and decision-making processes.

A copy of the PRITA's *Public Involvement Plan* is shown in **Appendix 5**.

XI. Limited English Proficiency (LEP) Plan

[Title VI of the Civil Rights Act of 1964](#) and The LEP [Executive Order 13166](#), among their legal provisions, prohibit discrimination based on national origin. Consistent with Title VI, Order 13166 ensures that persons with Limited English proficiency (LEP) have meaningful access to federally conducted programs and activities. A such PRITA guarantees accessibility to its programs and services for persons who are not proficient in the English Language. A copy of PRITA's *Limited English Proficiency (LEP) Plan* is shown in **Appendix 6**, which outlines the policies and procedures PRITA will use to address the needs of persons with limited English proficiency (LEP) that wish to participate in any of its programs and services.

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XII. Demographic Representation Information

PRITA understands that diverse representation on boards, councils, and committees help results in sound policy reflective of the needs of the entire population. [FTA Title VI Circular 4702.1B](#) requires any recipients which have transportation-related, non-elected boards, advisory council or committees, or similar bodies, membership of these committees must be broken down by race and accompanied by a description of efforts made to encourage the participation of minorities on these committees. The 2011-2015 American Community Survey (ACS) 5-year Summary File Data from the U.S. Census Bureau determined that in Puerto Rico, 99.0% of its population is of Hispanic Origin and that 94.7% of its residents speaks a language other than English at home. The U.S. Census 2011-2015 also indicates that out of the population of 5 years and over 78.9% speak English "less than very well", 94.7% speak a language other than English and 5.3% speak English only.

Spanish is the main language spoken in Puerto Rico. The Agency serves almost exclusively Spanish speaking individuals since 99.0% of its population is Hispanic. Contact with non-English speaking population is present at all times. All of the services provided by PRITA are directed to Spanish mainly speaking populations. Public employees, transit vehicle operators, transit station managers, customer service calls and visitors speak mostly Spanish and in some cases English.

To encourage participation on its boards, committees and councils, PRITA will continue to reach out to community organizations to connect with all population groups in its service area and will use creative ways to make participating realistic and reasonable, such as scheduling meetings at times best suited to its members.

XIII. Transportation Specific Facility Site Equity Analysis

On May 2020, PRITA began communications with the FTA to be considered an FTA subgrantee, and on July 16, 2021, the FTA awarded grant PR-2021-022 CARES ACT- Sec. 5307-Operating Assistance for the Puerto Rico Integrated Transportation Authority (PRITA). For financial purposes, since July 1, 2021, ATM and AMA integrated themselves as transportation programs under PRITA, thus, requiring that all financial transactions be reviewed and approved by the PRITA Executive Director. These reviews include the presentation of one global fiscal budget that includes ATM and AMA projected expenses. In compliance with Act 123-2014 the Authority's purpose is to manage and integrate all modes of transportation under one responsible entity. At this moment the Authority has begun the transition of the ferry and bus systems. Rail and intermodal services will transition in a subsequent phase. In compliance with regulations, we include a breakdown of each transportation program under PRITA's guidance, which we incorporate as sub-sections A and B of this part.

A. Metropolitan Bus Authority (MBA)

Currently, and until March 29, 2022, no construction of facilities required land acquisition and the displacement of persons from their residences and businesses. The Metropolitan Bus Authority's Facilities were built in the late 1970's in local government lands that didn't require such action. In the immediate future and within the next three years, there is no plan to build new facilities that will acquire a site equity analysis.

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I. SERVICE STANDARDS

The present MBA fixed route active revenue fleet consists of 108 buses. The scheduled service requires a maximum number of Eighty-Five (85) vehicles and the 23 routes cover over 557.9 miles. Vehicles are operated as single units and the fleet comprises of two vehicle sizes: 35-foot and 40-foot buses. The Forty feet units have 43 seats with a maximum design capacity of 78 persons, while the Thirty-Five feet buses offer 30 seats with a total capacity for 57 commuters.

- **Description of the Fixed Route Service Fleet**

Year	Quantity	Manufacturer	Length	Seats / Rider capacity
2005	1	Orion	35 feet	33 / 63
2007	21	Orion	35 feet	33 / 63
2010	39	Orion (H)	40 feet	36 / 60
2013	16	Nova Bus	40 feet	36 / 60
2019	6	Nova Bus	40 feet	36 / 60
2020	1	Nova Bus	40 feet	36 / 60
2021	17	Nova Bus	40 feet	36 / 60
Total Fleet	101			

The span of service is approximately from 5:00 a.m. until 9:00 p.m. during weekdays, and from 6:00 a.m. to 8:00 p.m. on Saturdays and Holidays. There are nine (9) bus terminals in the service area to facilitate passenger transfers and resource distribution. The details of the service are provided in Table 2, and the map of MBA service is provided in the figure presenting the route designation, description, weekday frequency, number of buses assigned to the route and the service hours.

AMA Service Standards and Design Parameters are as follows:

- **Service Standard on Frequency of Service**

Service Standard	Design Parameters
Service Span	Minimum 12-hour operation for regular routes Routes Connecting to TU: same span as TU
Coverage	¼ mile radius covering all principal roads ½ mile radius covering all secondary roads

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Frequency of Service	Trunk routes: peak hour service of 20-to-30-minute intervals Regular routes: peak hour service of 30-to-90-minute intervals
On-time Performance	0 minutes early – 5 minutes late
Reliability	2,500 miles between service interruption road calls

- **System- Wide Title VI Policies**

The following Title VI policies listed are specific guidelines when implementing major service and all fare changes

<i>Policy</i>	<i>MBA Definition</i>
System-Wide Title VI Policies	MBA will not “utilize criteria or methods of administration which have the effect of subjecting persons to discrimination because of their race, color, or national origin, or have the effect of defeating or substantially impairing accomplishment of the objectives of the program with respect to individuals of a particular race, color, or national origin.” AMA will “take affirmative action to assure that no person is excluded from participation in, or denied the benefits of, the program or activity on the grounds of race, color, or national origin.” MBA assures that “no person or group of persons shall be discriminated against regarding routing, scheduling, or quality of service transportation on the basis of race, color, or national origin. Frequency of service, age and quality of vehicles assigned to routes, quality of stations serving different routes, and location of routes may not be determined on the basis of race, color, or national origin.”
Major Service Change Policies	MBA will assess whether changes meet the Major Service Change threshold. Any fare increase/decrease; and/or a major service change, defined as: service reduction which directly affects twenty-five percent (25%) or more of the number of transit miles or operating hours of a route computed on a daily basis for the day(s) of the week for which the change is made; the elimination of a transit route; or the establishment of a new transit route
Service Change Disparate Impact Policy (minority)	If the impact of a major service change proposal or any fare change proposal requires a minority population to receive benefits 20% less or to bear adverse effects 20% more than those benefits or adverse effects received or borne by the non-minority population that impact will be consider a disparate impact.
Service Change Disproportionate Burden Policy	If the impact of a major service change proposal or any fare change proposal requires a low-income population to receive benefits 20% less or to bear adverse effects of 20% more than those benefits or adverse

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	effects received or borne by the non-low-income population, that impact will be considered a disparate impact.
System-wide Transit Amenities Service Policy	Installation of transit amenities along bus routes is based on the number of passengers boarding at stops and stations along those routes to support connectivity of routes and riders with limited mobility.
Vehicle Assignment Service Policy	Vehicles operate as single units. Forty feet units have 43 seats with a maximum design capacity of 78 persons, while the Thirty-Five feet buses offer 30 seats with a total capacity for 57 commuters. Most of our units are low-floor buses, equipped with air conditioning system, ADA accessible, and destination signage. Standard floor buses are equipped with ADA compliant wheelchair lifts.
Fare Change Policy	Fare changes will be evaluated to ensure fare increases do not disproportionately negatively affect a class protected groups as defined by Title VI.
On-Time Performance Standard	On-time performance objective is 90% or greater

- **Bus System Fare Structure**

Passenger Type	Fare	
	<i>TU Conexión , Metrobús, AMA Regular Fixed Route</i>	<i>Metro Urbano</i>
Regular Fare	\$0.75	\$2.00
Seniors (60 to 74 years old)	\$0.35	\$1.00
Super Seniors (above 74 years)	Free	Free
Disabled	\$0.35	\$1.00
Students	\$0.60	\$1.00
Children (6 years and under)	Free	Free
Transfers within two hours	Free	Free (1)

The current service plan of 23 bus fixed routes requires a peak vehicle requirement (PVR) of 85 vehicles. A map with the MBA fixed route service is shown in Figure 1. The details of the bus fixed route service are provided in Table IV.

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• **Description of MBA Fixed Bus Routes**

Route No.	Route Description	Weekday Bus Headway (minutes)
T2	TU Bayamón Station, Santa Rosa, San Patricio, Las Américas, TU Roosevelt Station, Hato Rey, TU Sagrado Corazón Station	20
T4	Cataño Terminal, ave. Las Nereidas, San Patricio, Plaza las Americas, c/ Calaf, ave. Chardon, arterial B, ave. Ponce de Leon, ave. Gandara,ave. Barbosa, ave. Piñero, Estacion Piñero	30
T5	Iturregui Terminal, Laguna Gardens, Los Ángeles, LMM International Airport, Isla Verde, calleLoiza, Minilla, Miramar, Old San Juan, Covadonga Terminal	20
D6	Iturregui Terminal, ave. El Comandante,Ave., Sánchez Vilella, Ave.Sanchez Osorio, Plaza Carolina Mall,ave. Roberto Clemente, ave. Severo quiñones, Carolina Terminal	35
T7	Carolina Terminal, 65th Infantería Ave./PR-3, University of Puerto Rico at Carolina, Plaza Escorial Mall, TU Cupey Station	30
D8	TU Martínez Nadal Station, Central Ave./PR-17, University of Puerto Rico at Rio Piedras, TU Piñero Station	33
T9	TU Cupey Station, Río Piedras, Barbosa Ave., Borinquén Ave., TU Sagrado Corazón Station, Santurce, Miramar, Old San Juan, Covadonga Terminal	20
T21	TU Sagrado Corazón Station, Santurce, Minilla, Condado, Old San Juan, Covadonga Terminal,	30
T41	TU Piñero Station, Barbosa Ave., University of Puerto Rico at Rio Piedras,De Diego, julio andino, aristides chavier, Ramal 8,c/ vinyater, calle eider, ave. Campo rico Iturregui Terminal	30
C1	TU Sagrado Corazón Station, Ponce de León Ave, Muñoz Rivera Ave., Hato Rey, Rio Piedra, Capetillo Terminal	25
C43	Iturregui Terminal, Ext. Vista Mar, Jardines de Country Club, Universidad del Este,. Ave. El Comandante	45
C44	Iturregui Terminal, Sánchez Castaño, Villa Carolina, Campo Rico Ave., Calderón Ave.	55
D17	Cupey Terminal, centro médico, san Patricio, ave. Piñero, ave.Andalucia, ave. Domenech, exclusivo Ponce de Leon, Piñero Terminal	70

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D19	TU Martínez Nadal Station, ave. Piñero, ave. San Patricio, Ave. Roosevelt, ave. De Diego,americo Miranda, est. centro medico	60
D15	TU Sagrado Corazón Station, Hato Rey, Embalse San José, Residencial Manuela A. Pérez, Highway PR-181, Río Piedras, TU Cupey Station	60
D18	TU Cupey Station, calle Paraná, Señorial Plaza, Winston Churchill Ave., Las Cumbres Ave., pr- 199,calle ceciliana	45
D26	TU Piñero Station, Ponce de León Ave., University of Puerto Rico at Rio Piedras, Highway PR-181, Park Garden, Venus Garden	40
D27	TU Martínez Nadal Station, Paz Granela Ave, Camino Alejandro, Esmeralda Ave., Guaynabo City	45
D37	Cataño Terminal, Las Nereidas,Antiguo Terminal,Boulevard las Palmas,ave.Lago.ave. Sabana Seca Ave., Comerio, BayamonTerminal	50
D45	TU Sagrado Corazón Station, Barrio Obrero, Isla Verde, Piñones, Highway PR-187, Loíza,	45
D53	Covadonga Terminal, Old San Juan, Conventions Center, Condado, Isla Verde, LMM International Airport	67
D91	TU Bayamón Station, Bobby Capo Ave., Santa Rosa, University of Puerto Rico at Bayamón, Laurel Ave., Santa Juanita	30
D92	TU Bayamón Station, ave. Santa Juanita,ave. Lomas Verde , carr. 174 Ave., Magnolia Gardens	35

Note: TU = Tren Urbano Station, T = Trunk route service, D = Distribution route service, C = Circulation route service.

- **Terminals**

As previously stated, MBA operates nine (9) bus terminals in its service area to facilitate passenger transfers and resource management. These terminals serve as transfers points for passengers, reporting sites for relief operators, service truck road call facilities and live dispatching of buses to meet fixed route standards. Five of the bus terminals are contiguous to a Tren Urbano Station and two other terminals are adjacent or nearby to a ferryboat terminal. Buses connecting to each bus terminal are shown in the *Description of MBA Fixed Routes* table, supra, and terminals and bus routes served by each of them can be found below:

<i>Terminal</i>	<i>Routes Served</i>	<i>Intermodal Connection with other Transit Service</i>
TU Bayamón	2-91-92-37	Tren Urbano, Porteadores Publicos
Carolina	6-7-44	Municipality of Carolina SITRAC

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		bus service
Cataño	4, 37	Ferryboat
Cupey, Río Piedras	7-9-15-18-17	Porteadores Publicos, Tren Urbano
Covadonga, Old San Juan	5-9-21-53	Ferryboat, Portadores Publicos, Municipality of San Juan bus service
Iturregui, Carolina	6-7-44	SITRAC Bus Service

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TU Martínez Nadal, San Juan	8-27	Tren Urbano, Municipality of San Juan Bus service, Municipality of Guaynabo bus service
TU Piñero, San Juan	8-26-41-17	Tren Urbano
TU Sagrado Corazón	C1-2-15-21-45	Tren Urbano

- **Service Availability Standards**

The MBA will distribute transit service so that 90% of all residents in the service area are inside a ¼ mile walk of bus service or within a ½ mile walk of Tren Urbano terminals. Local bus stops will be not more than 3 blocks apart. Exclusive line bus stops will be one-half to three-quarters of a mile apart.

- **Vehicle Assignment Policy**

MBA operates Fixed Route and Paratransit Services within only the San Juan Metropolitan area, covering approximately eight municipalities under the San Juan Urbanized Area (UZA). Vehicles are operated as single units. Forty feet units have 43 seats with a maximum design capacity of 78 persons, while the Thirty-Five feet buses offer 30 seats with a total capacity for 57 commuters. Most of our units are low-floor buses, equipped with air conditioning system, ADA accessible, and destination signage. Standard floor buses are equipped with ADA compliant wheelchair lifts and some of them have bike racks.

Unlike most other mass transit bus operators, the MBA does not provide peak service during the morning and afternoon rush hours, instead, the service is flat during the day. The MBA operates several fixed route bus services and provides a demand-responsive ADA complementary paratransit service. The active fleet consists of 108 units for the fixed route and 45 units for the Demand Respond service. For the fixed route service, the Peak Vehicle Requirement is 85, with 23 buses as spare. Vehicles are operated as single a unit that fluctuates between 35 and 40 feet long with a capacity between 78 to 57 users per units, depending on their size.

- **Transit Amenities Policy**

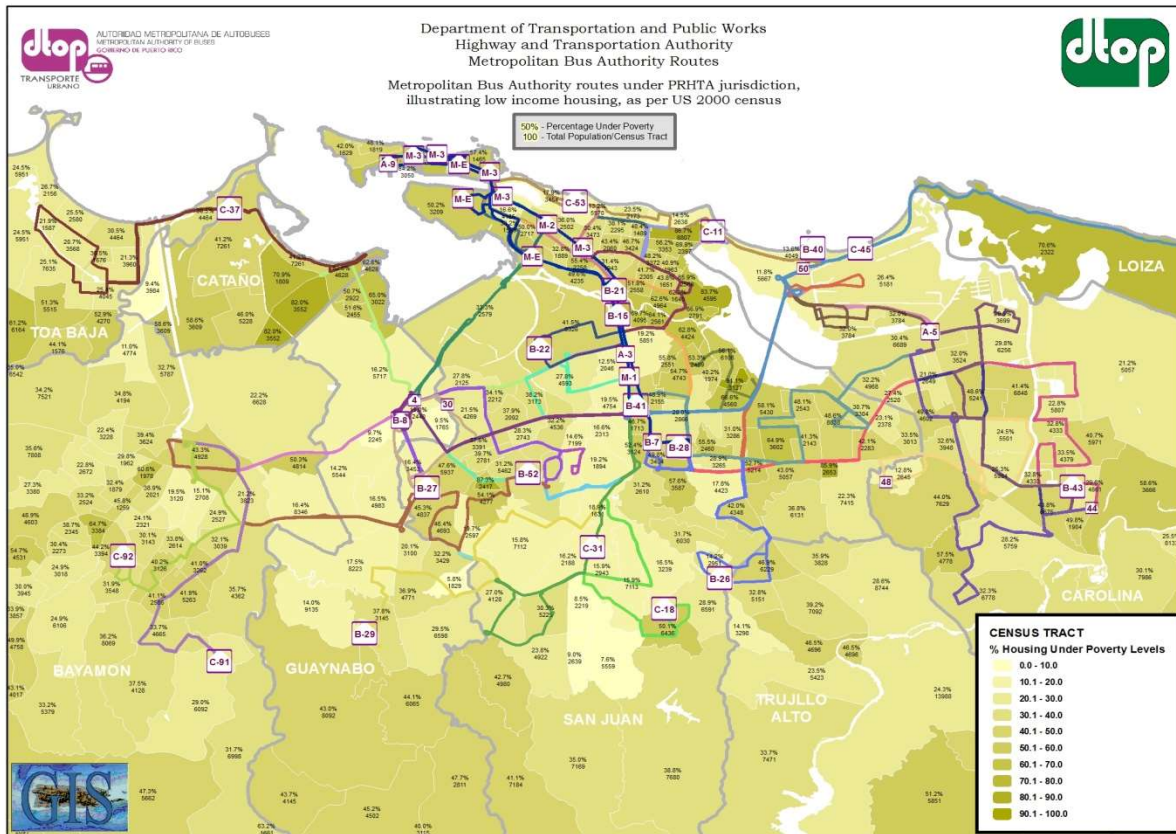
Installation of Bus shelters and transit amenities along fixed service are based on the number of passengers boarding at stops and stations along those routes.

- **Demographic Data Collection**

The Metropolitan Bus Authority of Puerto Rico (MBA) operates 23 fixed routes services in the San Juan Metropolitan Area, providing services in the municipalities of San Juan, Guaynabo, Bayamón, and Carolina in the urbanized core of the metro area and more limited services in the outlying municipalities of Cataño, Toa Baja, Trujillo Alto and Loíza. The following figure shows MBA fixed routes overlapped with the San Juan Metropolitan Area population under poverty level as per the 2010 census:

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Low Income Housing in the San Juan Metropolitan Area



Puerto Rico is a primarily Hispanic jurisdiction. Because of this, no major procedures have been implemented in order to analyze impact on minority populations given the fact that service affects an almost entirely minority population, as 99% is Hispanic, as shown in Population and Housing narrative profile. As shown in the following table, 45% of the population falls within the poverty guideline threshold:

	Percentage	Margin of Error
All people	45.1%	+/-0.3
Under 18 years	55.9%	+/-0.5
Related children under 18 years	55.6%	+/-0.5
Related children under 5 years	57.2%	+/-0.8
Related children 5 to 17 years	55.1%	+/-0.5
18 years and over	41.5%	+/-0.3
18 to 64 years	41.2%	+/-0.3
65 years and over	42.8%	+/-0.5
People in families	43.4%	+/-0.3
Unrelated individuals 15 years and over	58.1%	+/-0.5

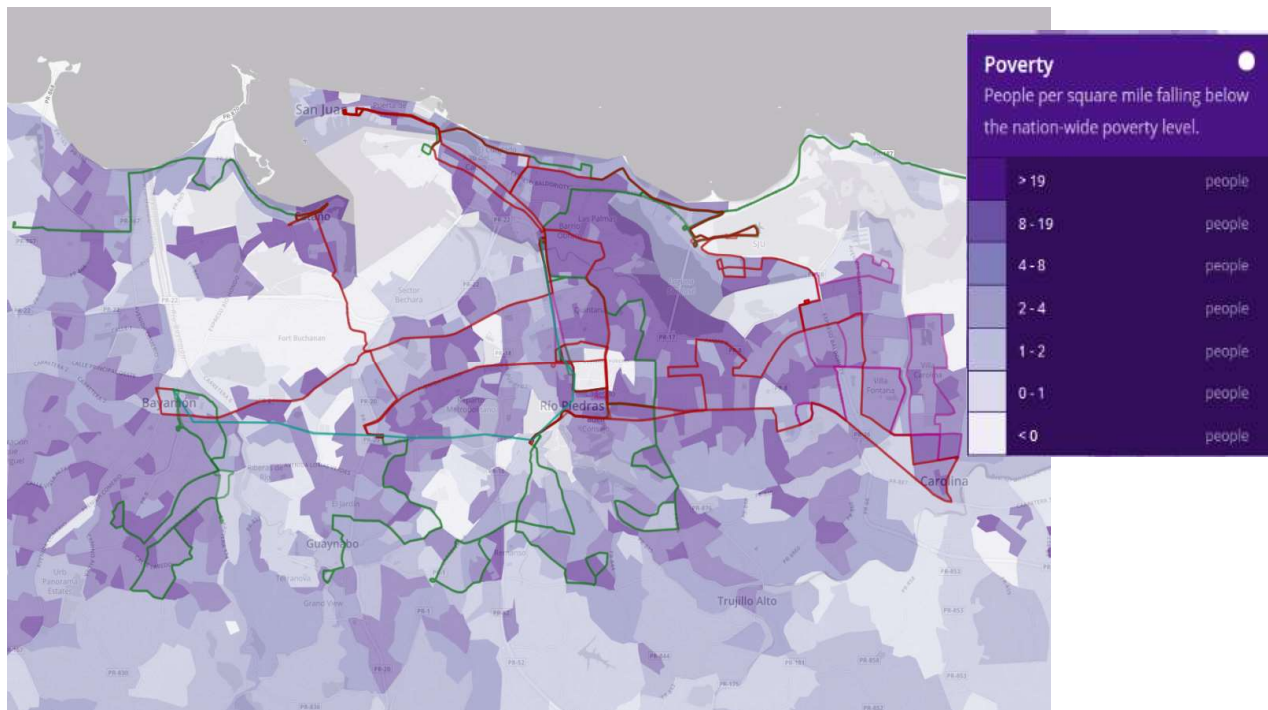
Source: U.S. Census Bureau, 2005-2009 American Community Survey CENSUS 2010

**data Source 2014-2018 American Survey 5-years Estimates*

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Since its inception, the MBA bus routes serve predominantly low-income communities. Low income is defined as a person whose household income is at or below the U.S. Department of Health and Human Services poverty guidelines. As shown in the enclosed map, almost all MBA bus routes serve predominantly low-income communities by having at least 1/3 of its total route mileage in a census tracts or traffic analysis zones with a percentage of low income population greater than the percentage of low income population in the transit service area. These areas show a similar distribution in terms of minority groups. In terms of poverty, these municipalities have 38, 30.09 and 24.2% of its population, respectively, who live under poverty level (see tables of economic data for these municipalities) The most recent survey done by the MBA has limited data on poverty levels, since the questions were done based on household. Not having a description of the components makes it difficult to establish poverty level. However, some information can be derived from their findings: 36% of the persons surveyed stated annual household incomes below \$25,000. Of these, 13% of the service users stated having incomes no greater than \$10,000 per year, while 6% indicated having annual incomes between \$10,000 and \$14,999. Another 17% stated \$15,000 to \$24,999. In the higher income brackets, 16% indicated having annual per household incomes between \$25,000 and \$34,999, while 12% pertained to those with household incomes between \$35,000 and \$49,999. Only 8% indicated having an annual household income of \$50,000. Twenty-seven percentage of the persons surveyed decided not to state an opinion with regards to this question.” Undoubtedly, households with incomes under \$25,000 will fall under poverty level and 36% seems consistent with percentages of people below poverty level in the municipalities mentioned.

Minority Group Density Levels in the San Juan Metropolitan Area



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- **Requirement to Monitor Transit Service**

In June 2014 an external firm completed a study of the MBA transit service monitoring which includes demographic analysis of the transit service area, current demographic charts, demographic information and service profiles and surveys on customer demographics and travel patterns and service monitoring. Service Monitoring Process and Procedures is provided on MBA existing routes with Bus Monitors to screen any new or modifications to existing service.

- **Fare Increases and Service Changes – Service and Equity Analysis**

The Puerto Rico Metropolitan Bus Authority, in its efforts to ensure Title VI Compliance, adopted requirements as part of their administrative procedure's local guidelines for service changes and fare increases, which are included in this document. Major Service changes require a public hearing announcement.

Determination as to whether or not a modification constitutes a major change is determined on a case-by-case basis, with the exception of total elimination of service, which is automatically considered a major service reduction as noted below:

- 1) Any fare increase/decrease; and/or
- 2) A major service change, defined as:
 - service reduction which directly affects twenty-five percent (25%) or more of the number of transit miles or operating hours of a route computed on a daily basis for the day(s) of the week for which the change is made;
 - the elimination of a transit route; or
 - the establishment of a new transit route

Prior to implementing a major service change or a fare change in service, citizens are notified by means of public announcements in newspapers, radio and on the PRITA's web page. As of today, the regular fare is \$0.75 for the fixed route and \$1.50 for the complementary paratransit service. Should a major service change will occur, fares will be set by regulation; public hearings will be conducted in the impacted areas to comply with federal regulations. Our policy will always be to adhere to the Federal Guidelines as it ensures that no discriminatory impacts will result during any major change service. Prior to implementing a major change, MBA will strictly consider:

- 1. Adverse Effects**

The MBA will consider any adverse effects related to major service changes, paying particular emphasis to the fact that elimination of a route will likely have a greater adverse effect that a reduced frequency (headway change) in service. The MBA will also consider the degree of the adverse effects when planning service changes.

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2. Disparity Impact

The MBA will determine when a disparate impact may occur as a consequence of a major service change which could affect disproportionately the minority populations. A Disparate impact on minority populations is present if the impact of a major service change proposal or any fare change proposal requires a minority population to receive benefits [twenty percent (20%)] less or to bear adverse effects [twenty percent (20%)] more than those benefits or adverse effects received or borne by the non-minority population, that impact will be considered a disparate impact.

3. Disproportionate Burden

The MBA will determine when a disproportionate burden may occur as a consequence of a major service change which could affect disproportionately low-income population. A Disproportionate burden on low-income populations results if the impact of a major service change proposal or any fare change proposal requires a low-income population to receive benefits [twenty percent (20%)] less or to bear adverse effects [twenty percent (20%)] more than those benefits or adverse effects received or borne by the non-low-income population, that impact will be considered a disparate impact.

B. Puerto Rico Maritime Transportation Authority (PRMTA)

• **Service Standards**

Currently, and until March 29, 2022, no construction of facilities required land acquisition and the displacement of persons from their residences and businesses. The Maritime Transportation Authority's facilities were built in local government lands, some of which were part of the Puerto Rico Ports Authority, which didn't require such action. Furthermore, the facilities which serve the island municipalities of Vieques and Culebra, located in the Town of Ceiba, Puerto Rico, were formerly part of the Roosevelt Waterfront operations of the United States Navy. In the immediate future and within the next three years, there is no plan to build new facilities that will acquire a site equity analysis. The PRMTA, also known as Autoridad de Transporte Marítimo e Islas Municipio was created on January 1, 200 through the Puerto Rico and Island Municipalities Maritime Transport Authority Act. PRMTA's three routes carry passengers and cargo between the main island and the island municipalities.

• **Description of Ferry Service (Rates and Frequency of Service)**

The Metro service ferries travels between the historic Old San Juan to the ferry terminal in Cataño, which is located just besides the Cataño Convention Center. This route is scheduled to run every 30 minutes in both directions from 5:45am to 9:45 pm on weekdays and 8:00 am to 10:00 pm on weekends. Tickets cost \$0.50 each and the travel time is approximately 10 minutes.

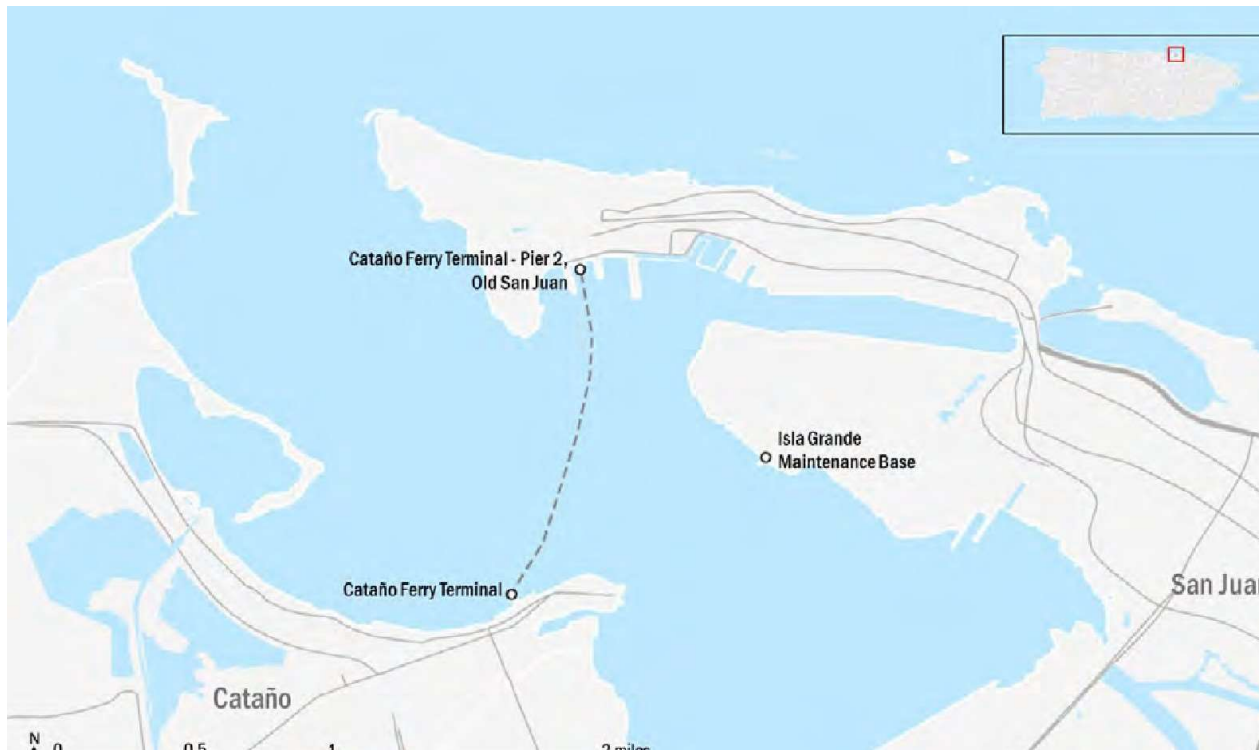
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The Island Service transports passengers and cargo between the main island municipalities of Vieques and Culebra. Originally, the Fajardo Terminal was used for this service, but due to severe damage during hurricanes Irma and María in 2017, the Island Service had to be rerouted to the Ceiba Ferry Terminal, which PRMTA leases from the Local Redevelopment Authority for Roosevelt Roads (LRA).

This route is scheduled to run sixteen (16) times a day (eight from either end) between 4:00 am to 10:00 pm for Ceiba to Vieques and from 4:45 am to 7:30 pm for Ceiba to Culebra. The travel time from Ceiba to Vieques is approximately Ninety (90) minutes and from Ceiba to Culebra it's about Sixty (60) minutes.

Below, route maps for the Metro and Island Services:

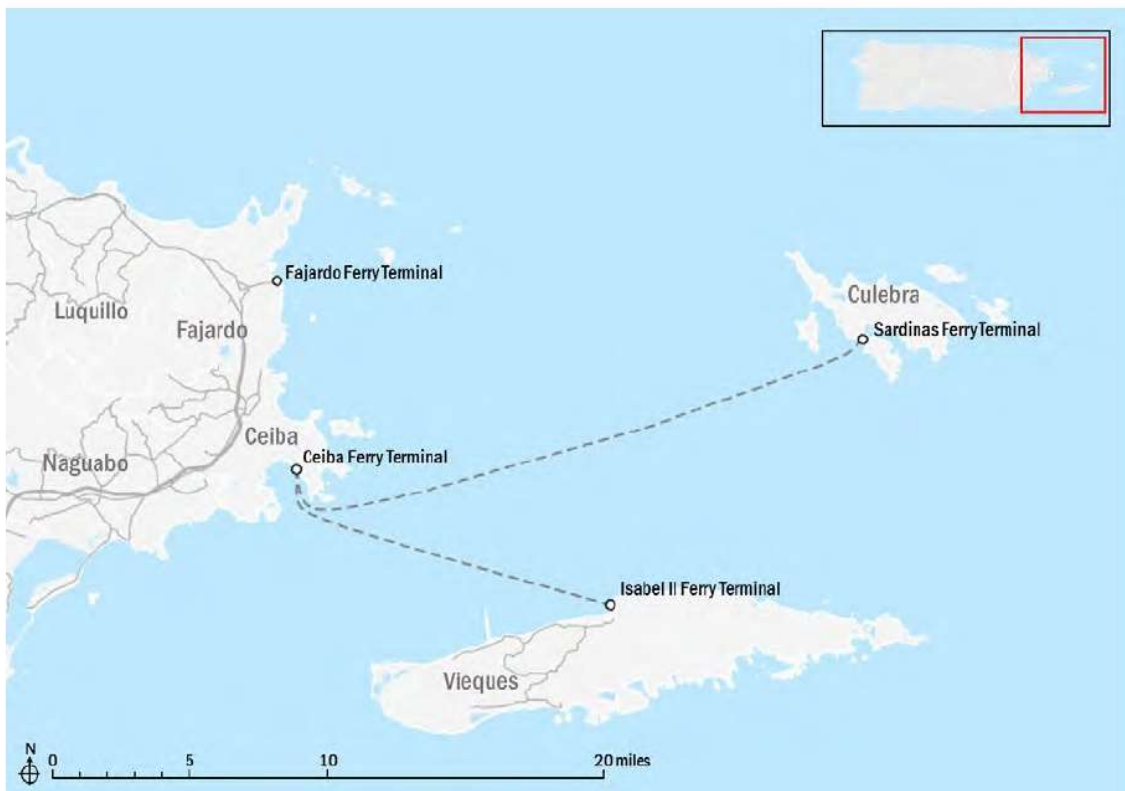
Metro Service Route
Cataño to Old San Juan



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Island Ferry Route

Ceiba to Vieques & Ceiba to Culebra



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Passenger Fares for the Island Route

Fare Type	Vieques	Culebra
Infants (0-2 years old)	Free	Free
Kids (3-11 years old)	\$ 1.00	\$ 1.00
Adults (12-59 years old)	\$ 2.00	\$ 2.25
Adults (60-74 years old)	\$ 1.00	\$ 1.00
Seniors (75 + years old)	Free	Free

- **System- Wide Title VI Policies**

The following Title VI policies listed are specific guidelines when implementing major service and all fare changes.

<i>Policy</i>	<i>PRMTA Definition</i>
System-Wide Title VI Policies	PRMTA will not “utilize criteria or methods of administration which have the effect of subjecting persons to discrimination because of their race, color, or national origin, or have the effect of defeating or substantially impairing accomplishment of the objectives of the program with respect to individuals of a particular race, color, or national origin.” PRMTA will “take affirmative action to assure that no person is excluded from participation in, or denied the benefits of, the program or activity on the grounds of race, color, or national origin.” PRMTA assures that “no person or group of persons shall be discriminated against regarding routing, scheduling, or quality of service transportation on the basis of race, color, or national origin. Frequency of service, age and quality of vehicles assigned to routes, quality of stations serving different routes, and location of routes may not be determined on the basis of race, color, or national origin.”
Major Service Change Policies	PRMTA will assess whether changes meet the Major Service Change threshold. Any fare increase/decrease; and/or a major service change, defined as: service reduction which directly affects twenty-five percent (25%) or more of the number of

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	transit miles or operating hours of a route computed on a daily basis for the day(s) of the week for which the change is made; the elimination of route; or the establishment of a new route
Service Change Disparate Impact Policy (minority)	If the impact of a major service change proposal or any fare change proposal requires a minority population to receive benefits 20% less or to bear adverse effects 20% more than those benefits or adverse effects received or borne by the non-minority population that impact will be considered a disparate impact.
Service Change Disproportionate Burden Policy	If the impact of a major service change proposal or any fare change proposal requires a low-income population to receive benefits 20% less or to bear adverse effects of 20% more than those benefits or adverse effects received or borne by the non-low-income population, that impact will be considered a disparate impact.
System-wide Transit Amenities Service Policy	Installation of amenities is based on the number of passengers boarding at ferry terminals to support connectivity of routes and riders with limited mobility.
Vessel Assignment Service Policy	PRMTA owns Fourteen (14) ferryboats of varying sizes and type. Four (4) of PRMTA;s vessels are capable of transporting both passengers and cargo, including private vehicles, construction equipment, materials, fuel, commercial goods, among other commodities.
Fare Change Policy	Fare changes will be evaluated to ensure fare increases do not disproportionately negatively affect a class protected groups as defined by Title VI.
On-Time Performance Standard	On-time performance objective is 90% or greater

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- Terminals and Maritime Assets

PRMTA owns Fourteen (14) ferryboats of varying sizes and type. Four (4) of PRMTA's vessels are capable of transporting both passengers and cargo, including private vehicles, construction equipment, materials, fuel, commercial goods, among other commodities. Below, a table describing the details of PRMTA's fleet:

Vessel Name	Vessel Type	Gross Tonnage	Dimensions (Length x Breadth)	In Service Date	Status	Service / Location	Replacement Cost
Cayo Blanco	Passenger	735	160 x 34 ft	4/7/2008	Operational	Island Service	\$10,632,409
Cayo Largo	Passenger/ Cargo	652	165 x 46 ft	2/15/2007	Operational	Island Service	\$6,601,640
Isleño	Passenger	528	154.2 x 41.4 ft	8/11/2003	Operational	Island Service	\$3,966,258
Santa María	Passenger/ Cargo	326	134.5 x 36.1 ft	12/1/1989	Out of Order	St. Thomas Subbase	\$1,860,647
Isla Bonita	Passenger/ Cargo	768	158.4 x 46.6 ft	3/1/2012	Out of Order	Ceiba Ferry Terminal	\$2,905,132
Amelia	Passenger	87	72.2 x 26.2 ft	4/15/1989	Operational	Metro Service	\$1,710,921
Covadonga	Passenger	87	72.2 x 26.3 ft	8/14/1989	Out of Order	Isla Grande Dry Dock	\$1,306,826
La Décima	Passenger	45	45 x 17 ft	11/1/2008	Out of Order	Isla Grande Dry Dock	\$1,306,826
Culebra II	Passenger	493	120.3 x 29.5 ft	1/1/1996	To Be Disposed	St. Thomas Subbase	\$3,771,849
Caribeña	Passenger	191	89.5 x 24 ft	6/1/2003	To Be Disposed	Fajardo Ferry Terminal	\$2,415,682
Fajardo II	Passenger	186	95 x 24 ft	1996	To Be Disposed	Lost during Hurricane	\$1,917,600
Vieques II	Passenger	493	120.3 x 29.5 ft	6/30/1995	To Be Disposed	Isla Grande Dry Dock	\$2,292,530
Cayo Norte	Passenger/ Cargo	497	155 x 41.5 ft	4/1/2008	To Be Disposed	Pier 15, San Juan	
La Princesa	Passenger	74	68.9 x 19.7 ft	8/25/1995	Out of Order	Isla Grande Dry Dock	\$2,937,315

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To support their ferry facilities, PRMTA owns and maintains several terminals, parking, administrative and maintenance facilities. Below, a breakdown of the amenities:

No	Facility	Type	Address
1	Cataño Ferry Terminal	Terminal	Frente Marítimo Avenida Las Nereidas, Cataño 00962
2	Isla Grande Maintenance Base	Maintenance	Calle Lindbergh final Isla Grande, San Juan 00907
2a	Isla Grande Maintenance Base – Maintenance Building	Maintenance	Calle Lindbergh final Isla Grande, San Juan 00907
2b	Isla Grande Maintenance Base – Administrative & Warehouse Building	Administrative	Calle Lindbergh final Isla Grande, San Juan 00907
2c	Isla Grande Maintenance Base – Personnel Building	Administrative	Calle Lindbergh final Isla Grande, San Juan 00907
2d	Isla Grande Maintenance Base – Synchrolift Control & Generator Building	Maintenance	Calle Lindbergh final Isla Grande, San Juan 00907
2e	Isla Grande Maintenance Base – Dock & Fueling Station	Maintenance	Calle Lindbergh final Isla Grande, San Juan 00907
2f	Isla Grande Maintenance Base – Dry Dock Boat Elevator & Transfer Equipment	Maintenance	Calle Lindbergh final Isla Grande, San Juan 00907
3	Cataño Ferry Terminal – Pier 2	Terminal	Muelle 2 calle Marina Paseo Gilberto Concepción de Gracia, San Juan 00901
4	Fajardo Ferry Terminal	Maintenance*	Calle Union Final Playa Puerto Real, Fajardo 00738

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No	Facility	Type	Address
4a	Fajardo Ferry Terminal - Terminal	Terminal	Calle Union Final Playa Puerto Real, Fajardo 00738
4b	Fajardo Ferry Terminal - Administrative Building	Administrative	Calle Union Final Playa Puerto Real, Fajardo 00738
4c	Fajardo Ferry Terminal - Mechanical Workshop	Maintenance	Calle Union Final Playa Puerto Real, Fajardo 00738
4d	Fajardo Ferry Terminal - Fueling Station	Maintenance	Calle Union Final Playa Puerto Real, Fajardo 00738
4e	Fajardo Ferry Terminal - Parking Facilities	Parking	Calle Union Final Playa Puerto Real, Fajardo 00738
4f	Fajardo Ferry Terminal - Welding Shop	Maintenance	Calle Union Final Playa Puerto Real, Fajardo 00738
4g	Fajardo Ferry Terminal Warehouse	Maintenance	Calle Union Final Playa Puerto Real, Fajardo 00738
4h	Fajardo Ferry Terminal - Plumbing, Electrical and Carpentry Workshops	Maintenance	Calle Union Final Playa Puerto Real, Fajardo 00738
5	Sardinas Ferry Terminal	Terminal	Bo. Sardinas Carr. PR-250, Culebra 00775
6	Isabel II Ferry Terminal	Terminal	Calle Germán Rieckehoff #581, Vieques 00765
7	Ceiba Ferry Terminal**	Terminal	Marina DR, Roosevelt Roads, Ceiba 00735

Hurricanes Irma and Maria in 2017 significantly damaged vessels and the PRMTA infrastructure. As a result, the Fajardo ferry terminal is categorized under maintenance as its only being used for storage. As previously stated, the PRMTA leases the Ceiba Ferry Terminal from the LRA as a replacement facility for the Fajardo Ferry Terminal.

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- **Demographic Data Collection**

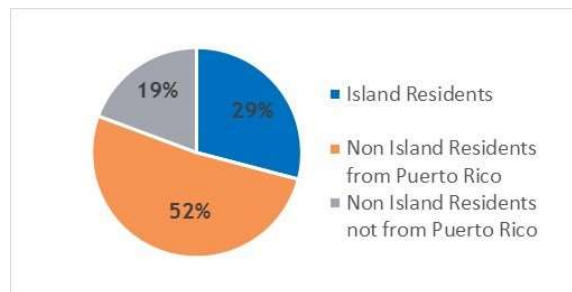
The residents of the Island Municipalities have no other options provided by the government to reach the Main Island. To facilitate both island's economic and social potential, a reliable ferry service must be provided to link residents, businesses and tourists to the offshore islands, connect island residents to the essential services (i.e., health, education and commercial services) that are provided on the main island, as well as safely transporting island residents during storms or emergency events.

Currently, the MTA operates three scheduled ferry services with 13 vessels in 5 terminals, running 7 days per week. The services are split into two main categories: Metro Services and Island Services.

- **Passenger Demographics**

The Metro Service is primarily used by commuters to Old San Juan and by visitors to Old San Juan for leisure purposes. The Island Service serves two distinct markets: the first is island residents, for whom the ferries provide the only affordable travel option (\$2.00 and \$2.25 for Vieques and Culebra each way, respectively) to the main island of Puerto Rico. The other market served is visitors, primarily, but not exclusively, from the main island of Puerto Rico.

An extensive survey was conducted to better understand the passenger market using the Vieques and Culebra ("Municipal Islands") services. Surveys were carried out between August 3, 2015 and August 10, 2015, yielding 1,200 completed surveys. The survey results suggest that Municipal Island residents account for less than one-third of passengers.

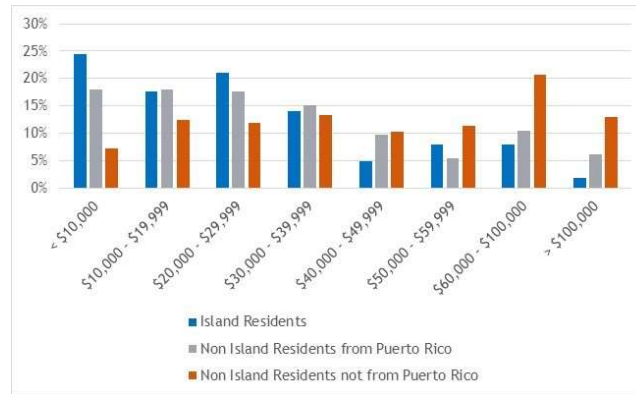


The survey results also suggested that 77% of non-residents traveling to the Municipal Islands are primarily doing so for vacation. Residents of the Municipal Islands traveling to the Puerto Rico mainland have varied reasons for doing so, including work, visiting relatives or friends, shopping, or personal business. Overall, 77% of respondents identified themselves as Puerto Ricans, while 44% of the respondents were visitors living in the continental United States.

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Household Income of Island Service Passengers

The Household income for respondents who are visitors from outside Puerto Rico is significantly higher than for residents of the Municipal Islands. For such visitors, 45% have a household income over \$50,000, while only 18% of residents do. In comparison, 63% of residents have household incomes below \$30,000, while only 31% of visitors from outside Puerto Rico have incomes in this range. The Island Service passengers who are residents of Puerto Rico, but not of the Municipal Islands, have income levels between those of these two groups, as shown in the chart below.



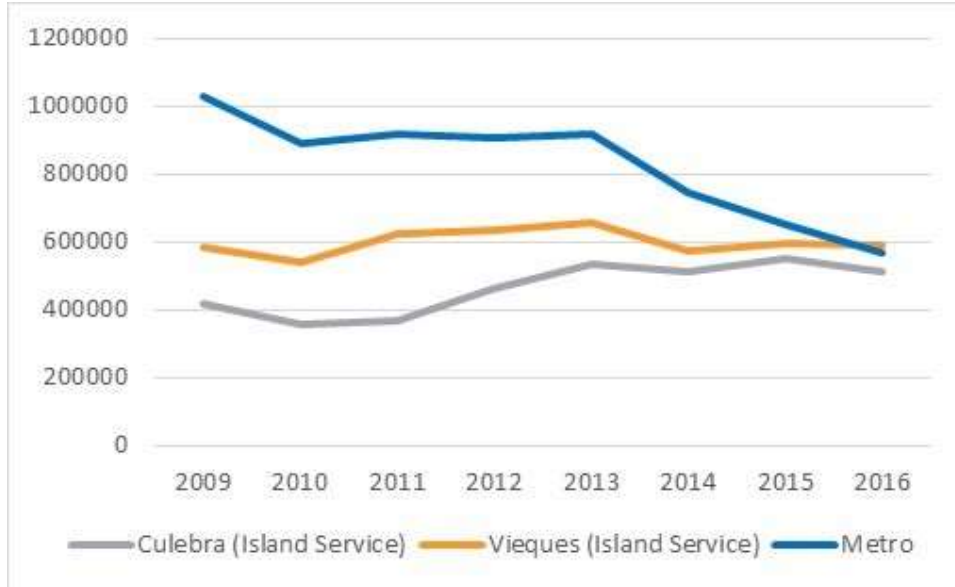
Travelers flying between the Municipal Islands and the main island of Puerto Rico were also surveyed for comparison. The air travel market was found to be quite distinct from ferry users. They generally have higher income levels than those using the ferries, with perhaps the most striking difference being where these users reside. Results of the sample of non-ferry users were overwhelming indicating that users are from outside of Puerto Rico. Based on the results of the survey, the following can be concluded regarding the current operations of Metro and Island Services:

- Most travelers are Puerto Rico residents traveling for leisure purposes with slightly higher income than residents of the Municipal Islands
- Municipal Island residents have lower income than other users of the service and cannot afford other means of transportation
- Ridership may increase if service attracts non-residents on vacation or leisure

The charts below show annual and monthly ridership for the Island and Metro Services. For the Island Service, ridership displays a strong seasonal pattern related to tourism activity, with large peaks in July. From 2009 to 2016, ridership on the Vieques and Culebra service has been fairly constant. Metro ridership peaks in January of each year. However, overall ridership has decreased following a reduction of service in early 2014 and subsequent intermittent service.

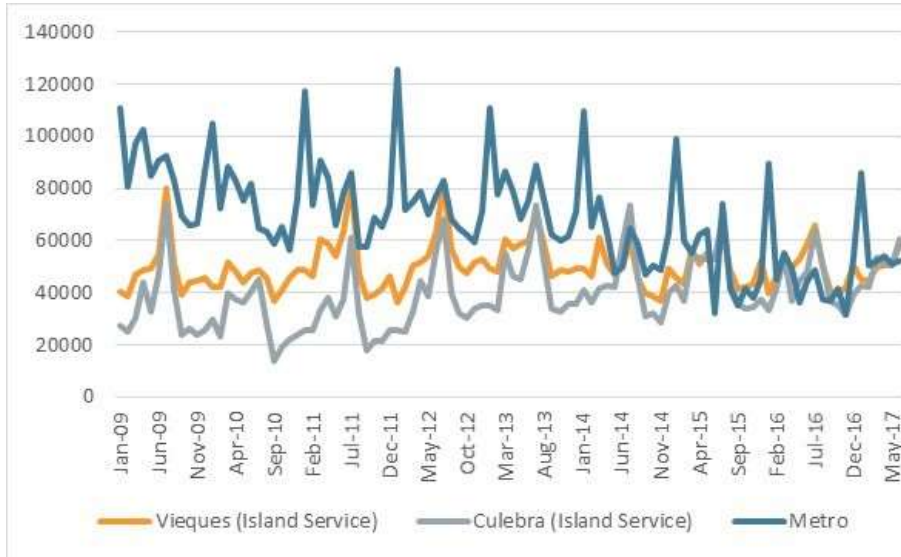
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MTA Annual Historical Ridership



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MTA Monthly Historical Ridership



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Metro Service Vessels:

The current Metro Service fleet consists of the following vessels:

Name	Year Built	# Passengers
Amelia	1989	146
Covandonga	1990	146
La Decima	2009	46
La Princesa	2009	146

Of these vessels, the Covandonga and Amelia are past their expected service life and should be replaced with new vessels having similar passenger capacity. La Decima is a viable backup vessel but does not have the passenger capacity to serve as a primary vessel on this route. La Princesa has adequate passenger capacity but does not have the speed necessary to provide the level of service that may be required during peak demand periods.

Island Service Vessels:

The Islands Service fleet currently consists of the following vessels:

Name	Year Built	# of Passengers
Passenger-Only Vessels		
Caribeña ¹	2004	236
Cayo Blanco ²	2009	600
Fajardo II ²	1996	272
Vieques II ²	1996	523
Passenger + Cargo Vessels		
Cayo Largo ¹	2008	300
Cayo Norte ²	1995	198
Isla Bonita ¹	2012	355
Isleño ¹	2004	204
Santa Maria ¹	1990	137

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- **Fare Increases and Service Changes – Service and Equity Analysis**

The PRMTA, in its efforts to ensure Title VI Compliance, adopted requirements as part of their administrative procedure's local guidelines for service changes and fare increases, which are included in this document. Major Service changes require a public hearing announcement.

Determination as to whether or not a modification constitutes a major change is determined on a case-by-case basis, with the exception of total elimination of service, which is automatically considered a major service reduction as noted below:

- 1) Any fare increase/decrease; and/or
- 2) A major service change, defined as:

- service reduction which directly affects twenty-five percent (25%) or more of the number of transit miles or operating hours of a route computed on a daily basis for the day(s) of the week for which the change is made.
- the elimination of a transit route; or
- the establishment of a new transit route

Prior to implementing a major service change or a fare change in service, citizens are notified by means of public announcements in newspapers, radio and on the PRITA's web page. As of today, the regular fare is \$0.75 for the fixed route and \$1.50 for the complementary paratransit service. Should a major service change will occur, fares will be set by regulation; public hearings will be conducted in the impacted areas to comply with federal regulations. Our policy will always be to adhere to the Federal Guidelines as it ensures that no discriminatory impacts will result during any major change service. Prior to implementing a major change, PRMTA will strictly consider:

4. Adverse Effects

The PRMTA will consider any adverse effects related to major service changes, paying particular emphasis to the fact that elimination of a route will likely have a greater adverse effect than a reduced frequency (headway change) in service. The PRMTA will also consider the degree of the adverse effects when planning service changes.

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5. *Disparity Impact*

The PRMTA will determine when a disparate impact may occur as a consequence of a major service change which could affect disproportionately the minority populations. A Disparate impact on minority populations is present if the impact of a major service change proposal or any fare change proposal requires a minority population to receive benefits [twenty percent (20%)] less or to bear adverse effects [twenty percent (20%)] more than those benefits or adverse effects received or borne by the non-minority population, that impact will be considered a disparate impact.

6. *Disproportionate Burden*

The PRMTA will determine when a disproportionate burden may occur as a consequence of a major service change which could affect disproportionately low-income population. A Disproportionate burden on low-income populations results if the impact of a major service change proposal or any fare change proposal requires a low-income population to receive benefits [twenty percent (20%)] less or to bear adverse effects [twenty percent (20%)] more than those benefits or adverse effects received or borne by the non-low-income population, that impact will be considered a disparate impact.

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Appendix 1
Title VI - Notice of Nondiscrimination to the Public

PRITA's *Notice of Nondiscrimination* is as follows:

Notice of Nondiscrimination

Puerto Rico Integrated Transportation Authority - PRITA

It is the Policy of the Puerto Rico Integrated Transportation Authority (PRITA) and its transportation programs to establish compliance with the Title VI of the Civil Rights Act of 1964 and related statutes, regulations, and directives, as amended. PRITA and its transportation programs assure that no person shall, on the grounds of race, color, sex, age, creed, national origin, those who are disabled, or because of social status or condition, be excluded from participation in, be denied the benefits of, or be otherwise subjected to discrimination under any PRITA service, program or activity which is managed by PRITA, regardless of the funding source. PRITA and its transportation programs also assure that every effort will be made to prevent discrimination through the impacts of its programs, policies and activities on minority and low-income populations. In addition, PRITA and its transportation programs will take reasonable steps to provide meaningful access to services for those in the population confronted with language barriers.

The officials and directors of PRITA and its Transportation Programs are responsible to oversee strict adherence to this policy. Non-compliance, non-cooperation, or obstruction of said policy will convey penalties.

Visitors, applicants and employees may write, call or visit the Civil Rights Office and request information with the appropriate official, pertaining to their rights to file a complaint under Title VI regulation. For Further information concerning this policy of to file a complaint, contact the PRITA Civil Rights Office, 24 Road 21, Puerto Rico 00966, 787-721-8787, jlrodriguez@ati.pr.gov.

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Appendix 2
Complaint Procedure

PRITA's Complaint Procedure is made available in the following locations:

- ✓ By email request at jrodriguez@ati.pr.gov, either as a reference in the *Notice of Nondiscrimination* or in its entirety
 - ✓ Agency office at: 24 Road 21, Guaynabo, Puerto Rico 00966
-

Any person who believes they've been discriminated against on the basis of race, color, national origin, disability, sex, age, religion, income status or limited English proficient (LEP) by PRITA of any of its Transportation Programs may file a complaint by completing and submitting the **PRITA's** Complaint Form. The Complaint Form may also be used to submit general complaints to the **PRITA**. PRITA investigates complaints received no more than 180 calendar days after the alleged incident and will process complaints that are complete.

Once the complaint is received, PRITA will review the same, determine the need for additional information if necessary and work to resolve the complaint informally, if possible. If the complaint warrants a formal civil rights complaint process, PRITA will follow the steps listed in this complaint procedure. PRITA may also use this formal procedure to address general complaints. If PRITA determines it has jurisdiction, the complainant will receive an acknowledgement letter stating the complaint will be investigated by PRITA as a civil rights complaint.

PRITA's CRO has **Sixty (60)** business days to investigate the civil rights complaint. If more information is needed to resolve the case, PRITA may contact the complainant. The complainant has **Thirty (30)** business days from the date of the letter to send requested information to the investigator assigned to the case.

If the investigator is not contacted by the complainant or does not receive the additional information within **Sixty (60)** business days, PRITA can administratively close the case. A case can also be administratively closed also if the complainant no longer wishes to pursue their case. After the investigator reviews the complaint, one of two (2) letters will be issued to the complainant: a closure letter or a letter of finding (LOF).

- A closure letter summarizes the allegations and states that there was not a Title VI violation and that the case will be closed.
- A letter of finding (LOF) summarizes the allegations and the interviews regarding the alleged incident, and explains whether any disciplinary action, additional training of the staff member, or other action will occur.

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If the complainant wishes to appeal the decision, the complainant has **Thirty (30)** business days after the date of the letter or the LOF to do so.

A person may also file a complaint directly with the Federal Transit Administration, at FTA Office of Civil Rights, 1200 New Jersey Avenue SE, Washington, DC 20590.

If information is needed in another language, then contact 787-721-8787 X-53002.

Si se necesita información en otro idioma favor de contactar el siguiente número 787-721-8787 X-53002.

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Apéndice 3
Appendix 3

Formulario de Querella por Discrimen-Título VI/ADA
Title VI/ADA Non-Discrimination Complaint Form

La Autoridad de Transporte Integrado y sus programas de transportación están comprometidos en proveer sus servicios sin discriminar con el fin de asegurarse que ninguna persona sea excluida de participar en, ni se le negarán los beneficios de, o será objeto de discriminación, según exigen las leyes federales.

The Puerto Rico Integrated Transportation Authority and its transportation programs are committed to providing non-discriminatory services to ensure that no person is excluded from participation is, or denied the benefits of, or subjected to discrimination in the receipt of its services, as required by federal law.

Si usted entiende que ha sido discriminado, favor de proveer la siguiente información para facilitar la tramitación de su queja. Si necesita asistencia para completar el formulario o de tener alguna pregunta, no dude en comunicarse al 787-721-8787 X-53002. Una vez completado, envíelo a:

If you feel that you have been discriminated against, please provide the following necessary information in order to facilitate the processing of your complaint. If assistance is required to complete the form, or if you have any questions, please do not hesitate to contact us at (787)-721-8787. Once completed, send to:

Puerto Rico Integrated Transportation Authority – Autoridad de Transporte Integrado
P.O. Box 41267 San Juan, Puerto Rico 00940

También puede llamarnos al (787)721-8787. Favor de proveernos su información de contacto para facilitar su respuesta.

Sección A (Section A): Formatos Accesibles (Accessible Format Requirements)

Favor de suministrar el formato preferido para el presente documento (Please check the preferred format for this document)

<input type="checkbox"/> Letra Grande (Large Print)	<input type="checkbox"/> TDD o Relay (TDD or Relay)	<input type="checkbox"/> Grabación (Audio Recording)	<input type="checkbox"/> Otro <i>Other (if selected please state what type of format you need in the box below)</i>
---	---	--	---

Click or tap here to enter text.

You may also call us at (787)721-8787. Please make sure to provide your contact information in order to receive a response.

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Sección B (Section B): Información de Contacto (Contact Information)

Nombre/Name <input type="text" value="Click or tap here to enter text."/>	Teléfono/Telephone Number (including area code) <input type="text" value="Click or tap here to enter text."/>
Dirección/Address <input type="text" value="Click or tap here to enter text."/>	Ciudad/City <input type="text" value="Click or tap here to enter text."/>
Estado/State <input type="text" value="Click or tap here to enter text."/>	Código Postal/Zip Code <input type="text" value="Click or tap here to enter text."/>

Email:

¿Esta querrela se presenta por su propia experiencia? Are you filing this complaint on your own behalf?	<input type="checkbox"/> Si/Yes	<input type="checkbox"/> No
--	---------------------------------	-----------------------------

De la contestación anterior ser No, favor de proveer información de parentesco con la persona interesada en presentar la presente y las razones por las cuales llena el formulario a su nombre.
(If no, please provide the name and relationship of the person for whom you are complaining and why you are completing the form on their behalf in the box below.)

Favor de confirmar si obtuvo el consentimiento o permiso de la parte querellante si está llenando el presente formulario a su nombre (Please confirm that you have obtained the permission of the aggrieved party if you are filing on behalf of a third party.)	<input type="checkbox"/> Si/Yes	<input type="checkbox"/> No
---	---------------------------------	-----------------------------

Sección C (Section C): Naturaleza de la Información (Type of Comment)

Favor de seleccionar la naturaleza de su comentario

What type of comment are you providing? Please check which category best applies.

<input type="checkbox"/> Querrela (Complaint)	<input type="checkbox"/> Sugerencia (Suggestion)	<input type="checkbox"/> Cumplido (Compliment)	<input type="checkbox"/> Otro (Other)
--	---	---	--

Cuál de las siguientes mejor describe la naturaleza de sus comentarios?

(Which of the following describes the nature of the comment? Please check one or more of the check boxes.)

<input type="checkbox"/> Raza Race	<input type="checkbox"/> Color	<input type="checkbox"/> Origen National Origin	<input type="checkbox"/> Religión Religion
<input type="checkbox"/> Edad Age	<input type="checkbox"/> Sexo Sex	<input type="checkbox"/> Servicio Service	<input type="checkbox"/> Estatus Social Income Status
<input type="checkbox"/> Proficiencia Limitada en Inglés		<input type="checkbox"/> Ley ADA	

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Limited English Proficient (L.E.P)	Americans with Disability Act (A.D.A)
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Sección D (Section D) : Detalles (Comment Details)

Favor de proveer los datos que mejor se relacionen con su queja

Please answer the questions below regarding your comment

<p>Con qué tipo de servicio se relaciona su queja? <i>Did the incident occur on the following type of service? Please check any box that may apply.</i></p>	<input type="checkbox"/> Transporte <i>Marítimo</i> <i>Ferry transport</i>	<input type="checkbox"/> Tren <i>Rail Service</i>	<input type="checkbox"/> AutoBus <i>Bus</i> <input type="checkbox"/> Paratransitio <i>Paratransit</i>
<p>Fecha del evento <i>What was the date of the occurrence?</i></p>	<input type="text" value="Click to add date in the following format: Day, month, year"/>		
<p>Hora del evento <i>What was the time of the occurrence?</i></p>	<input type="text" value="Click to add the time"/>		
<p>Nombre o identificación del empleado(s) involucrado <i>What is the name or identification of the employee or employees involved?</i></p>	<input type="text" value="Click or tap here to enter text."/>		
<p>De ser aplicable, nombre de otras personas involucradas <i>What is the name or identification of others involved, if applicable?</i></p>	<input type="text" value="Click or tap here to enter text."/>		
<p>Nombre o ruta en la cual ocurre el evento, si aplica <i>What was the number or name of the route you were on, if applicable?</i></p>	<input type="text" value="Click or tap here to enter text."/>		
<p>Destino o lugar al que viajaba al momento del incidente, si aplica <i>What was the direction or destination you were headed to when the incident occurred, if applicable?</i></p>	<input type="text" value="Click or tap here to enter text."/>		
<p>En dónde ocurrió el evento? <i>Where was the location of the occurrence?</i></p>	<input type="text" value="Click or tap here to enter text."/>		
<p>Algún equipo de movilidad (ej. silla de ruedas) estuvo involucrado en el evento? <i>Was the use of a mobility aid involved in the incident?</i></p>	<input type="checkbox"/> Si/Yes	<input type="checkbox"/> No	
<p>Favor de añadir cualquier otro detalles relevante a su querrela <i>Please add any additional descriptive details about the incident.</i></p>	<input type="text" value="Click or tap here to enter text."/>		

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En el encasillado que sigue, favor de explicar y describir el incidente con el mayor detalle posible:
In the box below, please explain as clearly as possible what happened and why you believe you were discriminated against.

Click or tap here to enter text.

Sección E (Section E): Seguimiento (Follow-up)

Podemos contactarle si necesitamos más información?
May we contact you if we need more details or information?

Si/Yes

No

Si su contestación es en la afirmativa (si), favor de proveer el mejor método de contacto
If yes, how would you best liked to be reached? Please select your preferred form of contact below

Teléfono/Phone

Email

Correo/Mail

Si prefiere ser contactado mediante teléfono, favor de proveer el número, día y horas preferidas
If you would prefer to be contacted by phone, please list the best day and time to reach you.

Click here to add your preferred time

Click here to add your preferred day

Sección F (Section F): Resolución Deseada (Desired Outcome)

Favor de enumerar los pasos que usted desea como resolución del problema o conflicto
Please list below, what steps you would like taken to address the conflict or problem.

Click or tap here to enter text.

Si aplica, favor de proveer una lista de las agencias en las cuales usted presente una querrela relacionada a los hechos que incluye en la presente (Federal, local, judicial) Favor de incluir la información de contacto de la agencia(s)

If applicable, please list below all additional agencies you have filed this complaint with such as Federal, State, Local agencies, or with any Federal or State Court. Please include the contact information to where the complaint was sent.

Click or tap here to enter text.

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Sección G (Section G): Firma/Signature

Favor de incluir cualquier documento en apoyo de su alegación. Una vez completada y revisada, favor de proceder a la firma y remitir a PRITA

Please attach any documents you have which support the allegation. Then date and sign this form and send it to PRITA.

Nombre/Name: Click or tap here to enter text.

Fecha/Date: Click to add date in the following format:
Day, month, year

Firma/Signature: Click or tap here to enter text.

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Appendix 4

List of Complaints, Investigations and Lawsuits²

The Puerto Rico Integrated Transportation Authority (PRITA) maintains a log to track and resolve transit related complaints, investigations, and lawsuits.

Check One:

Since the last update of this Title VI Nondiscrimination Plan, there has been no transportation related civil rights investigations, complaints, or lawsuits filed with PRITA or any of its transportation programs.

There have been investigations, complaints and/or lawsuits filed against us. *See list below. Attach additional information as needed.*

Type Complaint Investigation Lawsuit	Date (Month, Day, Year)	Complainant's Name/Address	Basis of Complaint ³	Summary Complaint Description	Status	Action Taken/ Final Outcome if Resolved

² **Lawsuit:** The protected class under Title II is disability. The protected classes under Title VI are Race, Color and Nation Origin.

³ **Basis of Complaint:** Specify Race, Color, National Origin, Disability, Religion, Sex, Age, Service, Income Status, Limited English Proficient (LEP), Safety, Other

Appendix 5

Public Involvement Plan

The purpose of the **Public Involvement Plan** is to establish procedures that allow for, encourage, and monitor participation of all citizens within service area including but not limited to low income and minority individuals, and those with limited English proficiency (LEP).

While traditional means of soliciting public involvement may not reach such individuals, or might not allow for meaningful avenues of input, the intent of this effort is to take reasonable actions to provide opportunities for historically under-served populations to participate in transportation decision making efforts.

Goal

The goal of public involvement is to offer real opportunities for the engagement of all citizens within PRITA's service area to participate in the development of plans, programs, and services.

Strategies

In order to promote inclusive public participation, PRITA uses the following strategies, as appropriate.

I. Coordination and Consultation

- Coordinate and consult with partners, stakeholders, program participants and their caregivers, and the public affected by the distribution of state and federal transit grant programs.
- Seek guidance and input from WisDOT on public involvement mechanisms and strategies.
- Maintain an electronic distribution list of all potential program participants, partners, stakeholders, etc.

II. Accessibility and Information

- Meetings
 - Adhere to state and federal public hearing requirements
 - Provide a general notification of meetings, particularly forums for public input, in a manner that is understandable to all populations in the area.
 - Hold meetings in locations which are accessible and reasonably welcoming to all area residents including, but not limited to, low-income and minority members of the public.
 - Employ different meeting sizes and formats
 - Provide avenues for two-way flow of information and input from populations which are not likely to attend meetings.
- Make public information available in electronically accessible formats
- Use social media in addition to other resources to gain public involvement
- Use radio, television or newspaper ads on stations and in publications that serve LEP

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populations. Outreach to LEP populations may also include audio programming available on podcasts.

- Expand traditional outreach methods by visiting ethnic stores/markets and restaurants, community centers, libraries, faith-based institutions, local festivals, etc.

III. Timeliness

- Provide timely information about state and federal grant programs to affected program participants, the public, partner agencies, and other interested parties.
- Provide adequate notice of public involvement activities and time for public review and comment.

IV. Public Comment

- Work openly and diligently to incorporate public comments received and to notify respondents of final plans, reports, programs, etc.
- Provide for early, frequent, and continuous engagement by the public

V. Social/Environmental Justice

- Seek and consider the needs of those traditionally underserved by participating in outreach efforts that address the needs of minority persons, the elderly, persons with disabilities, limited English Proficient individuals, and low-income households.
- Determine what non-English languages and other cultural barriers exist to public participation within PRITA's service area.

VI. Training

- Participate in training to continuously improve the knowledge and understanding of civil rights and environmental justice principles.

VII. Evaluation

- Document and maintain records of public outreach efforts.
- Review the effectiveness of public participation activities.
- Seek news ways to providing public input opportunities.

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Participation Techniques

PRITA will use the following participation techniques as deemed appropriate. Participation techniques will be reviewed and modified each year, as necessary. If new techniques are tried and found to be successful, this list will be updated to include the new techniques.

- Booth at Community events (craft fair, festival, farmers market, parades, etc.)
- Advisory meetings and committees
- Direct mailings (letters, fliers, etc.)
- Website and social media
- Project-specific newsletter articles
- Public information meetings
- Legal advertisements
- Presentations to community partners, citizens/residents, etc.
- Press releases, meetings with local media representatives
- Surveys (telephone, internet, and public information meetings)
- Work with partner organizations

Public Outreach Activities

PRITA maintains a log/record of the various types of outreach activities it uses to promote inclusive public participation. On an annual basis, PRITA reviews its log of outreach activities to determine if additional or different strategies are needed to promote inclusive public participation.

The direct public outreach and involvement activities conducted by PRITA are summarized below. Efforts include *meetings, surveys, focus groups, attendance at community events, etc.* Information collected on the size, location, meeting format, number of attendees, etc. as well as the scope of the distribution method (i.e. information posted to social media, fliers in grocery stores and community centers, etc.) will be used for future planning efforts.

Summary of Outreach Activities					
Event Date	Name of Event/Activity	Date Publicized and Communication Method (Public Notice, Posters, Social Media, etc.)	Outreach Method (Meeting, Focus Group, Survey, etc.).	Staff Members Responsible	Notes

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Summary of Outreach Activities					
Event Date	Name of Event/Activity	Date Publicized and Communication Method (Public Notice, Posters, Social Media, etc.)	Outreach Method (Meeting, Focus Group, Survey, etc.).	Staff Members Responsible	Notes

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Appendix 6
Limited English Proficiency (LEP) Plan

Overview

As a recipient of federal financial assistance, PRITA is required to prepare a Limited English Proficiency (LEP) Plan to address its responsibilities relating to the needs of individuals with limited English language skills. This plan has been prepared in accordance with [Title VI of the Civil Rights Act 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 “Improving Access to Services for Persons with Limited English Proficiency”](#), issued in 2000 clarified Title VI of the Civil Rights Act of 1964. It stated that individuals who do not speak English well and who have a limited ability to read, write, speak, or understand English are entitled to language assistance under Title VI in order to access public services or benefits for which they are eligible. While most individuals in Wisconsin read, write, speak, and understand English, for some individuals English is not their primary language. If these individuals have a limited ability to read, write, speak or understand English, they are considered Limited English Proficient (LEP).

The US DOT [“Policy Guidance Concerning Recipients’ Responsibilities to LEP Persons”](#) discusses the concept of “safe harbor” with respect to the requirements for translation of written materials. The *Safe Harbor Threshold* is calculated by dividing the population estimate for a language group that “Speaks English less than very well” by the total population of the county. The *LEP Safe Harbor Threshold* provision stipulates that for each LEP group that meets the LEP language threshold (5% or 1,000 individuals, whichever is less, of the population to be served) PRITA must provide translation of vital documents (e.g., Notice of Nondiscrimination, Complaint Procedure and Complaint Form) in written format for non-English speaking persons.

Recipients of federal financial assistance are also required to implement LEP plans in accordance with guidelines of the federal agency from which the funds are provided. [FTA Circular 4702.1B – Title VI Requirements and Guidance for FTA Recipients](#) provides guidance and instructions for LEP Plan development.

Plan Summary

PRITA has developed this *Limited English Proficiency Plan* to identify reasonable steps for providing language assistance to persons with limited English proficiency (LEP) who wish to access services provided by PRITA and its transportation programs. This plan outlines how to identify a person who may need language assistance, how to inform LEP persons language assistance is available, the ways in which assistance may be provided, and staff training.

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Plan Components

PRITA is required to take reasonable steps to ensure meaningful access to programs and activities by LEP persons.

This plan includes the following elements:

1. The results of the *Four Factor Analysis*, including a description of the LEP population(s), served.
2. A description of the following:
 - How language assistance services are provided.
 - How LEP persons are informed of the availability of language assistance services.
 - How the language assistance plan is monitored and updated.
 - How employees are trained to provide language assistance to LEP persons.

Meaningful Access - Four Factor Analysis

To prepare this plan, PRITA conducted a four-factor analysis which considers the following:

Factor 1 - Demography

Number and proportion of LEP persons who may be served or are likely to encounter a City of USA program or service.

The 2011-2015 American Community Survey (ACS) 5-year Summary File Data from the U.S. Census Bureau determined that in Puerto Rico, 99.0% of its population is of Hispanic Origin and that 94.7% of its residents speaks a language other than English at home. The U.S. Census 2011-2015 also indicates that out of the population of 5 years and over 78.9% speak English “less than very well”, 94.7% speak a language other than English and 5.3% speak English only.

Factor 2 – Frequency

Frequency of contact with LEP persons.

Spanish is the main language spoken in Puerto Rico. The Agency serves almost exclusively Spanish speaking individuals since 99.0% of its population is Hispanic. Contact with non-English speaking population is present at all times. All of the services provided by PRITA are directed to Spanish mainly speaking populations. Public employees, transit vehicle operators, transit station managers, customer service calls and visitors speak mostly Spanish and in some cases English.

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Log of LEP Encounters

Date	Time	Language Spoken by Individual <i>(if available)</i>	Name and Phone Number of Individual <i>(if available)</i>	Service Requested	Follow Up Required	Staff Member Providing Assistance	Notes

If a language barrier were to exist, **PRITA** would work to provide a reasonable accommodation. The “*I Speak*” *Language Identification Card* listed shown below is a document that can be used by **PRITA** staff to assist LEP individuals. Additional languages can be added, **as needed**, to match the demographic changes of **PRITA’s** service area. The languages included in the “*I Speak*” *Language Identification Card* below represent many of the languages spoken within the **PRITA** service areas.

“I Speak” Language Identification Card

Mark this box if you speak...	Language Identification Chart	Language
	I speak English	English
	Yo hablo español	Spanish
	Kug has lug Moob	Hmong
	我說中文	Chinese
	E nói tiếng Việt	Vietnamese
	나는한국어를	Korean
	Marunong akong mag-Tagalog	Tagalog
	Ich spreche Deutsch	German
	Я говорю по-русски	Russian
	Ja говорим српски	Serbian
	मैं हिंदी बोलते हैं	Hindi
	میں نے اردو بولتے ہیں	Urdu

Note: For additional languages visit the US Census Bureau website
<http://www.lep.gov/ISpeakCards2004.pdf>

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Factor 3 – Importance (Nature and importance of program to LEPs)

The Puerto Rico Integrated Transportation Authority (PRITA) is a public corporation and government instrumentality, with legal standing and judicial personality, separate and independent from all other agencies under the PRDOT umbrella, in charge of the planning, development and coordination of public transportation activities within the Commonwealth of Puerto Rico. It was created to provide people with the best means of transportation.

Currently PRITA has the responsibility of undertaking the rail, maritime, BRT, fixed route, and paratransit services on the island. PRITA's transit vehicle operators, transit station managers, employees and customers are mainly of Hispanic origin, which are mostly Spanish speaking. Normal, day-to-day, interactions are conducted in Spanish language.

Factor 4 – Resources and Costs (Resources available and overall cost to provide LEP assistance)

Given the small size of LEP encounters and small LEP populations, full multi-language translations of our programs and services related to transportation services is not warranted at this time. However, this information can be made upon request.

The implementation of LEP Access Program will cause no additional cost to PRITA, since Spanish is the primary language spoken on the island. All public employees within PRITA and its transportation programs speak Spanish and, in some cases, English.

Policies, publications regarding public hearings, bid advertisements, Title VI related surveys, complaint forms, signs, communications, printed materials, special fare applications, maps, brochures and general information, danger signs, alarms, exits, etc. are all provided in Spanish and English.

Overview - Language Assistance Services Implementation Plan

The Puerto Rico Integrated Transportation Authority (PRITA) will comply with the federal requirements by providing assistance as described below:

- **Identifying LEP Individuals who need Language Assistance:** Spanish is the primary language spoken in Puerto Rico; normal interactions with people helps identify the language spoken by an individual. Spanish is the norm, not the exception.
- **Language Assistance Measures:** PRITA employees are Spanish speaking, and, in some cases, they also speak English. All documents are provided in Spanish including Policies, publications regarding public hearings, bid advertisements, Title VI related surveys, complaint forms, employee applications, transportation facility signs and communications, printed materials, special fare applications, maps, brochures, and general information, etc. Agency staff, vehicle operators, station managers and employees speak Spanish and, in some cases, English.
- **Training Staff:** All our staff is Spanish Speaking and, in some cases, English.

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- **Providing Notice to LEP Persons:** All communications (newspapers, radio, television advertisements, signs, announcements in vehicles and in stations, handouts that are available at transportation facilities, agency website and customer service lines are provided in Spanish.
- **Monitoring and Updating:** PRITA will annually evaluate and update the LEP Program.